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Convention (MLI) Tax  
~~Treaties, Part 1~~ Model  
Tax Convention On  
Income

1. This Convention shall  
apply to taxes on  
income imposed on  
behalf of a Contracting  
State irrespective of the  
manner in which they

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are levied. 2. There shall be regarded as taxes on income all taxes imposed on total income, or on elements of income, including taxes on gains from the alienation of property.

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Convention: Payment  
received after  
termination of the  
employment: Salary is  
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where the employment

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activity was exercised.

Payment received for  
unused holidays

accrued. Salary is

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Income from

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international treaty  
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significant common  
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United Nations Model  
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- 4 - Article 2 TAXES

COVERED 1. This

Convention shall apply

to taxes on income

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imposed on behalf of a Contracting State, irrespective of the manner in which they are levied. 2. There shall be regarded as taxes on income all taxes imposed on total income, or on

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Interest is commonly known as the income earned on the movable capital. Unlike dividends, interest does not suffer the economic double taxation and is not taxed both at the hands of the debtor and the creditor. The payer of the interest gets the

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deduction, whereas the recipient has to discharge taxes. Article 11 of the OECD Model Tax Convention covers the taxation of interest income.

Income from Interest |

Article 11 | OECD

Model Tax Convention

The Model Tax

Convention, and the

worldwide network of

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treaties based on it,  
provide clear consensual  
rules for taxing income  
and capital across  
countries, while  
avoiding having income  
or capital taxed twice by  
two different countries.

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On 7 June 2017, 76  
countries and  
jurisdictions signed or  
formally expressed their  
intention to sign an  
innovative multilateral  
convention that will  
swiftly implement a  
series of tax treaty

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measures to update the existing network of bilateral tax treaties and reduce opportunities for tax avoidance by MNEs.

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governments could



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adopt to curb ...

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(The 1996 United

States Model Income

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MC) was released in

September 1996. It

offers insights into the

US Treasury's views on

treaty interpretations,

and its negotiating

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particularly its right to  
tax its citizens and  
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