fyrir heimild til skattlagningar sé á þeim stað, þar sem raunveruleg framkvæmdastjórn fyrirtækisins hefur aðsetur. Þegar slíkt fyrirtæki er rekið af sameigendum með persónulegri ótakmarkaðri ábyrgð, telst það að jafnaði skattskyld stofnun í samræmi við íslenzk lög. Samkvæmt dönskum lögum er hins vegar hver sameigenda um sig skattlagður. Af þessum sökum hefur reynzt erfitt að komast að samkomulagi um ákvæði varðandi þetta atriði. Gert er því ráð fyrir, að einstök mál, er upp kunna að rísa um þetta efni, verði tekin til meðferðar af bærum stjórnvöldum í aðildarríkjunum samkvæmt ákvæðum 26. gr.

til hvilke kriteriet for beskatningsretten er det sted, hvor sædet for foretagendets virkelige ledelse er. I tilfælde, hvor et sådant foretagende drives af ansvarlige interessenter, vil foretagendet normalt blive anset for en skattepligtig enhed efter islandsk lovgivning. Derimod er hver enkelt interessent for sig skattepligtig efter dansk lovgivning. Af denne grund har det vist sig vanskeligt at opnå enighed om bestemmelser, der regulerer dette, og man er derfor indstillet på, at enkelttilfælde, af denne art, som måtte opstå i fremtiden, skal behandles af de kompetente myndigheder i de kontraherende stater i henhold til bestemmelserne i artikel 26.

Reykjavík, 21. maí 1970.

Fyrir hönd
lýðveldisins Íslands:
Emil Jónsson

Fyrir hönd
konungsríkisins Danmerkur:
Birger Kronmann

Reykjavik, den 21. mai 1970.

For Kongeriget Danmark:
Birger Kronmann

For Republikken Island:
Emil Jónsson

Nr. 14. 1. júní 1970.

AUGLÝSING

um viðskipta- og greiðslusamning milli Íslands og Ungverjalands.

Hinn 19. maí 1970 var undirritaður í Moskvu viðskipta- og greiðslusamningur milli Íslands og Ungverjalands. Gildistími samningsins er frá 1. júní 1970 til 31. maí 1975.

Við gildistöku samnings þessa féllu úr gildi viðskipta- og greiðslusamningar milli Íslands og Ungverjalands frá 5. febrúar 1963, sbr. Stjt. C 3/1963.

Viðskipta- og greiðslusamningurinn ásamt tveim viðaukum er birtur sem fylgiskjal með auglýsingu þessari.

Þetta er hér með gert almenningi kunnugt.

Utanríkisráðuneytið, Reykjavík, 1. júní 1970.

Emil Jónsson.

Pétur Thorsteinsson.

Fylgiskjal.

TRADE AND PAYMENT AGREEMENT

between the Republic of Iceland and the Hungarian People's Republic.

The Government of the Republic of Iceland and the Government of the Hungarian People's Republic being desirous of promoting the development of trade between the two countries, have agreed to conclude a long term trade and payment agreement for the period 1st June 1970 to 31st May 1975 as follows:

Article 1

The Government of the Republic of Iceland and the Government of the Hungarian People's Republic will work for a continued increase in the trade of the two countries.

The exchange of goods between the Republic of Iceland and the Hungarian People's Republic shall be carried out according to the laws and regulations in force in each country.

It is understood that the Contracting Parties will mutually grant to each other the most favoured nation treatment as set out in the Treaty of Commerce and Navigation signed on the 14th of March 1887. Exceptions from this principle are for the Icelandic side those provided for in Article 24 of the GATT and for the Hungarian side the preferences that Hungary grants only to the CMEA countries.

Article 2

Indicative lists of goods traditionally traded: Lists "A" — Icelandic export to the Hungarian People's Republic and "B" — Hungarian exports to the Republic of Iceland are attached to this Agreement.

Beside the goods mentioned in the lists "A" and "B" the exchange of goods may comprise commodities not specified therein.

Article 3

Mixed Commissions shall be appointed at the proposal of either Government to survey the trend of the trade and to ensure the implementation of this Agreement. The commissions may make any proposal aimed at the further development in the exchange of goods between the Republic of Iceland and the Hungarian People's Republic.

Article 4

As from 1st June 1970 all payments between the Republic of Iceland and the Hungarian People's Republic shall be effected in convertible US dollars.

The Sedlabanki Islands and the National Bank of Hungary shall agree separately upon the technical details.

The balance of the account opened with the Sedlabanki Islands in the name of the National Bank of Hungary in accordance with Article 1 of the Payment Agreement of 5th February 1963 between the Republic of Iceland and the Hungarian People's Republic should be settled by the debtor party in convertible pounds sterling within 30 days from the entering into force of this Agreement.

Transactions concluded but not yet executed at the time of entering into force of this Agreement should be settled at maturity in convertible pounds sterling.

Article 5

In case of any change in the import licensing regulations in force in either country which might adversely affect the exchange of goods, the problems arising therefrom shall be taken up for consideration within the framework of the Mixed Commissions foreseen in Article 3 in order to find a mutually satisfactory alternative arrangement.

Article 6

The Trade Agreement and Payment Agreement, both of 5th February 1963, between the Republic of Iceland and the Hungarian People's Republic cease to be valid on 31st May 1970.

This present Agreement shall come into force on 1st June 1970 and shall remain in force until 31st May 1975.

The validity of this Agreement will be automatically extended for a period of one year unless notice of termination has been given by either Government before 28th February 1975, and for further periods of one year unless notice of termination has been given three months before expiry of its validity.

DONE in Moscow on 19th May 1970 in two originals in the English language.

For the Government of the Republic of Iceland:	For the Government of the Hungarian People's Republic:
Oddur Guðjónsson.	**T. Antalpeter.**

LIST "A"

Icelandic exports to the Hungarian People's Republic.

1. Fish meal and herring meal.
2. Frozen fish fillets.
3. Canned fish products.
4. Fish oils including medicinal cod liver oil.
5. Wool.
6. Sheep casings.
7. Milk powder.
8. Casein.
9. Woven and knitted woollen products.
10. Tanned sheep skins and skin products.
11. Diatomite.
12. Refrigerating equipment.

LIST "B"

Hungarian exports to the Republic of Iceland.

1. Rolled steel products.
2. Textile goods.
3. Chemicals.
4. Leather manufactures.
5. Machinery, apparatus, etc.
6. Miscellaneous agricultural products.