the Netherlands, being desirous of concluding an agreement for the reciprocal exemption from income tax in certain cases of profits accruing from the business of shipping, have agreed as follows:—

# Article 1.

His Britannic Majesty's Government agree to take the necessary steps under Section 18 of the Act of Parliament of the United Kingdom known as the Finance Act, 1923, for exempting from income tax (including supertax) chargeable in Great Britain and Northern Ireland for the year of assessment, 1923-24, commencing on the 6th day of April, 1923, and every subsequent year of assessment, any profits which accrue from the business of shipping carried on by an individual resident in the Netherlands or by a company managing and controlling such business in the Netherlands.

## Article 2.

The Government of Her Majesty the Queen of the Netherlands hereby declare that, under the laws of the Netherlands relating to income tax (Wet op de Inkomstenbelasting, 1914, Wet van 19 December, 1914, Staatsblad no. 563), tax is not chargeable on any profits which accrue from the business of shipping carried on by an individual resident in Great Britain and Northern Ireland or by a company managing and controlling such business in Great Britain and Northern Ireland.

## Article 3.

The Government of Her Majesty the Queen of the Netherlands hereby declare that, under the laws of the Netherlands relating to Dividend and Tantième Tax (Dividend- en Tantièmebelasting), tax is not chargeable on dividends or other sums on account of profits distributed by a company carrying on the business of shipping and managing and controlling such business in Great Britain or Northern Ireland.

#### Article 4.

The expression "the business of shipping" means the business carried on by an owner of ships, and for the purpose of this definition the expression "owner" includes any charterer.

## Article 5.

This agreement shall cease to have effect if and so soon as the relief to be granted under Article 1 hereof in respect of income tax in Great Britain and Northern Ireland ceases to have legal operation or the laws of the Netherlands cease to give the relief indicated in the declarations in the Articles 2 and 3.

In witness whereof the Undersigned, duly authorised to that effect, have signed this Agreement and have affixed thereto their seals.

Done in duplicate at London, the 20th May, 1926.

- (L.S.) Austen Chamberlain.
- (L.S.) R. de Marees van Swinderen.

## PRESENT,

# The KING's Most Excellent Majesty in Council.

WHEREAS there was this day read at the Board a Memorial from the Right Honourable the Lords Commissioners of the Admiralty, dated the 11th day of June, 1926 (N. 299/26), in the words following, viz.:—

"Whereas by Section 3 of the Naval and Marine Pay and Pensions Act, 1865, it is enacted, *inter alia*, that all pay, pensions, grants or other allowances in the nature thereof payable in respect of services in Your Majesty's Naval or Marine Force to a person being or having been a Seaman or Marine therein shall be paid in such manner, and subject to such restrictions, conditions, and provisions as are from time to time directed by Order in Council:

"And whereas we consider it desirable that a special rate of pay should be laid down for Pensioned Chief Petty Officers and Petty Officers of Your Majesty's Navy who are, or may be, employed as Instructors to Your Majesty's Naval Volunteer Reserve :

"We beg leave humbly to recommend that Your Majesty may be graciously pleased to direct, by Your Order in Council, that Pensioned Chief Petty Officers and Petty Officers of Your Majesty's Navy employed as Instructors to Your Majesty's Naval Volunteer Reserve may receive pay at the inclusive rate of 11s. 6d. per diem in addition to their pensions, either (1) as from the date of appointment as such, if appointed on or after the 27th day of February, 1926; or (2) as from the 1st day of April, 1926, or as from the date of completing time for pension, whichever is the later, if appointed as such prior to the 27th day of February, 1926:

"We beg leave further to recommend that where quarters are provided for such Instructors at the charge of Naval Funds, or where such Instructors are accommodated in any of Your Majesty's Ships or Naval Establishments, the above rate of pay may be subject to a reduction of 1s. 6d. per diem, and that where Instructors are victualled in any of Your Majesty's Naval Hospitals, the rate of pay may be subject to a deduction of the same amount as that laid down for Non-Commissioned Officers and men of the Royal Marine Police in Your Majesty's Order in Council bearing date the 21st day of March, 1924:

"We beg leave further to recommend that marriage allowance may be payable in respect of the wives and families of such Instructors at the rates, and under the conditions, applicable to other men of Your Majesty's Navy, but that no other pay, grant or allowance in the nature thereof may be payable to such Instructors.

"The Lords Commissioners of Your Majesty's Treasury have signified their concurrence in the foregoing proposals."

His Majesty, having taken the said Memorial into consideration, was pleased, by and with the advice of His Privy Council, to approve of what is therein proposed.