

in the United Kingdom, unless the profits or gains either—

(i) arise from the sale of goods from a stock in the United Kingdom; or

(ii) accrue directly or indirectly through any branch or management in the United Kingdom or through an agency in the United Kingdom where the agent has and habitually exercises a general authority to negotiate and conclude contracts.

Article 2.

In Switzerland from the sixth day of April, nineteen hundred and thirty, and thereafter so long as the exemption specified in Article 1 hereof remains effective, the profits or gains to which this Article relates shall be exempted from all direct taxes on income, whether imposed by the Confederation, the Cantons or the Communes.

Further, from the sixth day of April, nineteen hundred and thirty, and thereafter so long as the exemption specified in Article 1 hereof remains effective, any property which is owned or possessed and employed in Switzerland by a person resident in the United Kingdom and not resident in Switzerland for the purpose of making profits or gains to which this Article relates shall be exempted from all direct taxes on property or capital, whether imposed by the Confederation, the Cantons or the Communes.

The profits or gains to which this Article relates are any profits or gains arising, whether directly or indirectly, through an agency in Switzerland to a person who is resident in the United Kingdom and is not resident in Switzerland, unless the profits or gains either—

(i) arise from the sale of goods from a stock in Switzerland; or

(ii) accrue directly or indirectly through any branch or management in Switzerland or through an agency in Switzerland where the agent has and habitually exercises a general authority to negotiate and conclude contracts.

The existing taxes in Switzerland to which this Article applies are those indicated in the Annex to this Agreement.

Article 3.

For the purposes of this Agreement the word "person" includes any body of persons, corporate or not corporate, and a body corporate shall be regarded as resident in the United Kingdom if its business is managed and controlled in the United Kingdom and shall be regarded as resident in Switzerland if its business is managed and controlled in Switzerland.

Article 4.

This Agreement may be denounced at any time upon six months' notice being given by one Contracting Party to the other.

Article 5.

This Agreement shall be ratified and the instruments of ratification shall be exchanged at London as soon as possible. This Agreement shall take effect on the exchange of the instruments of ratification.

In witness whereof the above-named plenipotentiaries have signed the present Agreement and have affixed thereto their seals.

Done at Berne in duplicate in the English and French languages, the seventeenth day of October, one thousand nine hundred and thirty-one (17th October, 1931).

(L.S.)
(L.S.)

H. W. KENNARD.
MOTTA.

At the Court at *Buckingham Palace*, the 10th day of *November*, 1932.

PRESENT,

The KING's Most Excellent Majesty in Council.

WHEREAS the Ecclesiastical Commissioners for England have, in pursuance of the Union of Benefices Measure, 1923, duly prepared, and laid before His Majesty in Council, a Scheme bearing date the 28th day of July, 1932, in the words and figures following, that is to say:—

"We, the Ecclesiastical Commissioners for England, acting in pursuance of the Union of Benefices Measure, 1923, have prepared, and now humbly lay before Your Majesty in Council, the following Scheme for effecting the union of the Benefice (being a Rectory) of Holton and the Benefice (being a Rectory) of Bratton Saint Maur, both of which Benefices are situate in the County of Somerset and in the Diocese of Bath and Wells:

"Whereas Commissioners appointed at our request by the Right Reverend St. John Basil Wynne, Bishop of Bath and Wells, pursuant to the provisions of the said Union of Benefices Measure, 1923, to inquire into and report upon the union of the said two Benefices of Holton and Bratton Saint Maur duly made their Report to the said Bishop of Bath and Wells and therein recommended the union of the said two Benefices and the terms for effecting the union (including an alteration of boundaries affecting the Parish of the said Benefice of Bratton Saint Maur and the Parish of the Benefice of Charlton Musgrove, in the said County and Diocese) and the said Bishop of Bath and Wells signified in writing his approval of the said Report:

"And whereas we, the said Ecclesiastical Commissioners for England, have prepared this Scheme for the said union of Benefices based upon the terms recommended in the said Report:

"And whereas both of the said Benefices of Holton and Bratton Saint Maur are now full, the Reverend Henry Beament Fone being the present Incumbent of the said Benefice of Holton and the Reverend George Herbert Griffiths being the present Incumbent of the said Benefice of Bratton Saint Maur:

"And whereas the Patronage of both of the said Benefices of Holton and Bratton Saint Maur is now vested in one and the same body of persons:

"Now, therefore, we, the said Ecclesiastical Commissioners for England, with the consent of the said St. John Basil Wynne, Bishop of Bath and Wells (in testimony whereof he has signed this Scheme), do humbly recommend and propose to Your Majesty as follows, that is to say:—

"1. That the said Benefice of Holton and the said Benefice of Bratton Saint Maur shall