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**Cyprus
and
Finland**

Agreement between the Republic of Cyprus and the Republic of Finland for the avoidance of double taxation with respect to taxes on income (with protocol). Nicosia, 15 November 2012

Entry into force: *27 April 2013, in accordance with article 26*

Authentic text: *English*

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**Chypre
et
Finlande**

Accord entre la République de Chypre et la République de Finlande tendant à éviter la double imposition en matière d'impôts sur le revenu (avec protocole). Nicosie, 15 novembre 2012

Entrée en vigueur : *27 avril 2013, conformément à l'article 26*

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AGREEMENT
between the Republic of Cyprus and the Republic of Finland
for the avoidance of double taxation with respect to taxes on income

The Government of the Republic of Cyprus and the Government of the Republic of Finland

Desiring to conclude an Agreement for the avoidance of double taxation with respect to taxes on income,

Have agreed as follows:

Article 1

Persons covered

This Agreement shall apply to persons who are residents of one or both of the Contracting States.

Article 2
Taxes covered

1. This Agreement shall apply to taxes on income imposed on behalf of a Contracting State or of its political subdivisions or local authorities, 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 elements of income, including taxes on gains from the alienation of movable or immovable property.

3. The existing taxes to which the Agreement shall apply are:

a) in the case of Cyprus:

- (i) the income tax;
 - (ii) the corporate income tax;
 - (iii) the special contribution for the defence of the Republic; and
 - (iv) the capital gains tax;
- (hereinafter referred to as "Cyprus tax");

b) in the case of Finland:

- (i) the state income taxes (valtion tuloverot; de statliga inkomstskatterna);
- (ii) the corporate income tax (yhteisöjen tulovero; inkomstskatten för samfund);
- (iii) the communal tax (kunnallisvero; kommunalskatten);
- (iv) the church tax (kirkollisvero; kyrkoskatten);
- (v) the tax withheld at source from interest (korkotulon lähdevero; källskatten på ränteinkomst); and
- (vi) the tax withheld at source from non-residents' income (rajoitetusti verovelvollisen lähdevero; källskatten för begränsat skattskyldig);

(hereinafter referred to as "Finnish tax").

4. The Agreement shall apply also to any identical or substantially similar taxes which are imposed after the date of signature of the Agreement in addition to, or in place of, the existing taxes. The competent authorities of the Contracting States shall notify each other of any significant changes which have been made in their respective taxation laws.

Article 3
General definitions

1. For the purposes of this Agreement, unless the context otherwise requires:
 - a) the term "Cyprus" means the Republic of Cyprus and, when used in a geographical sense, includes the national territory, territorial sea thereof as well as any area outside the territorial sea, including the contiguous zone, the exclusive economic zone and the continental shelf, which has been or may hereafter be designated, under the laws of Cyprus and in accordance with international law, as an area within which Cyprus may exercise sovereign rights or jurisdiction;
 - b) the term "Finland" means the Republic of Finland and, when used in a geographical sense, means the territory of the Republic of Finland, and any area adjacent to the territorial waters of the Republic of Finland within which, under the laws of Finland and in accordance with international law, the rights of Finland with respect to the exploration for and exploitation of the natural resources of the sea bed and its sub-soil and of the superjacent waters may be exercised;
 - c) the term "person" includes an individual, a company and any other body of persons;
 - d) the term "company" means any body corporate or any entity that is treated as a body corporate for tax purposes;
 - e) the term "enterprise" applies to the carrying on of any business;
 - f) the terms "a Contracting State" and "the other Contracting State" mean the Republic of Cyprus and the Republic of Finland, as the context requires;
 - g) the terms "enterprise of a Contracting State" and "enterprise of the other Contracting State" mean respectively an enterprise carried on by a resident of a Contracting State and an enterprise carried on by a resident of the other Contracting State;
 - h) the term "national" in relation to a Contracting State, means:
 - (i) any individual possessing the nationality or citizenship of that Contracting State; and
 - (ii) any legal person, partnership or association deriving its status as such from the laws in force in that Contracting State.
 - i) the term "international traffic" means any transport by a ship or aircraft operated by an enterprise of a Contracting State, except when the ship or aircraft is operated solely between places in the other Contracting State;
 - j) the term "competent authority" means:
 - (i) in the case of Cyprus, the Minister of Finance or his authorised representatives;