	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
1	**Argentina**	**Andean Pact Model**	**Exemption Method**: Income, profits or benefits of any kind are only taxable in the State of source of such income, profits of benefits. **Capital in the form of shares or participation rights in a company is only taxable in the Contracting State where the owner is domiciled. Other elements of capital are only taxable in the State where such elements are situated.**	(i) Income from Immovable Property**: Is only taxable in the Contracting State where such property is situated.** (ii) Income from the Exploitation of Natural Resources**: Is only taxable by the Contracting State that authorizes the exploitation.** (iii) Business Profits**: Only taxable in the Contracting State where the business activities are carried out.** (iv) Income from Transport**: Only taxable in the Contracting State where the Transport enterprise is situated.** (v) Royalties**: Only taxable in the Contracting State of source.** (vi) Interest**: Only taxable in the Contracting State where the credit has been used.** (vii) Dividends and Participations**: Only taxable in the Contracting State where the company is domiciled.** (viii) Capital Gains**: Only taxable in the Contracting State where the transferred assets are situated, except:** **a) Ships, airplanes, buses and other transportation vehicles, which are only taxable by the Contracting State where such vehicles are registered upon transference; and** **b) Credits, titles, shares and other financial instruments which are only taxable by the Contracting State where the debtor or the issuer is domiciled.** (ix) Personal Services: **Only taxable in the Contracting State where such services were rendered, with some exemptions.** (x) Professional Services and Technical Assistance**: only taxable in the Contracting State where such services and assistance were rendered.** (xi) Pensions**: Only taxable in the Contracting State of source.** (xii) Artistic Activities**: Only taxable in the Contracting State where such activities were performed.**	**Published in the Official Gazette of March 7, 1986.**	**In force since December 19, 1985. Applicable to income, profits, benefits or gains obtained and capital held since January 1st, 1986.**

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
2	**Brazil**	OECD Model	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits**: The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a Permanent Establishment (PE) situated therein. In such case, only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. **(iii) Interest:** Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 15% of the gross amount of the interest. **(iv) Royalties:** Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 15% of the gross amount of the royalties. (v) Capital Gains: **As a general rule, taxable in both Contracting States. Capital gains realized upon the transfer of transport vehicles, ships or aircrafts used for international transport services, or from movable assets associated to the exploitation of those vehicles are only taxable in the Contracting State where the person that carries out such transport enterprise is a resident.** (vi) Income from Independent Personal Services: **Taxable only in the Contracting State where the services provider is a resident, unless:** **a) Such resident or his/her representatives are present or the activities are performed in the other State for a period or periods amounting or exceeding 183 days in any 12 month period; or** **b) Services are rendered in the other State and the beneficiary has a fixed base regularly available to perform his/her activities. (*)** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless the employment is performed in the other State, with some exemptions.** (viii) Pensions: **Pensions are taxable only in the State where they arise. Alimony paid to a resident in a Contracting State is only taxable in such state if allowable as a relief to the payer. Otherwise, it is only taxable in the State of residence of the payer.** **(*) Most-favoured Nation clause.**	**Published in the Official Gazette of October 24, 2003.**	In force since July 24, 2003. Applicable to taxes assessed on income obtained and amounts paid, credited to the account, left to the disposition of the taxpayer or registered as an expense from January 1º, 2004, onwards.

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforceability
3	**Canada**	OECD Model	**A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State, unless it principally performs transport services within the other State. (iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 10% of the gross amount of the interest if it is paid out of a) credits from Banks or Insurance companies, b) bonds and securities regularly traded, or c) credit sales of machinery and equipment.** 15% of the gross amount of the interest in all other cases. (*) (iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 10% of the gross amount of the Royalty, and 5% in certain cases. (*)** (v) Capital Gains: **As a general rule, taxable in both Contracting States, but those arising from the sale of ships or aircraft operated in international traffic or from movable property pertaining to the operation of such ships or aircraft shall be taxable only in the Contracting State of which the seller is a resident.** (vi) Income from Independent Personal Services: **Taxable only in the State where the render of services is a resident, unless he/she has a fixed base regularly available in the State where the services are rendered. (*)** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Pensions shall be taxable only in the Contracting State where they arise. Annuities may be taxed in both states, but the tax so charged in the State where it arises shall not exceed 15%.** **(*) Most-favoured Nation clause (OECD).**	**Published in the Official Gazette of February 8, 2000.**	In force since October 28, 1999. Applicable to taxes assessed on income obtained and amounts paid, credited in the accounting records, left to the disposition of the taxpayer or registered as an expense from January 1º, 2000, onwards.

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
4	**South Korea**	OECD Model	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. **(iii) Interest:** Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 10% of the gross amount of the interest if it is paid out of a) credits from Banks or Insurance companies, b) bonds and securities regularly traded or c) sales on credit of machinery and equipment. 15% of the gross amount of the interest in all other cases. (*) **(iv) Royalties:** Taxable in both States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of such royalties which are paid for the use of industrial, commercial or scientific equipment or 10% of the gross amount of such royalties in all other cases. (*) (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident. Gains from the sale of a) immovable property situated in a Contracting State, b) movable property forming part of the business property of a PE which an enterprise of a Contracting State has in the other State, or c) movable property pertaining to a fixed base available to a resident of a Contracting State in the other State for the purpose of performing independent personal services, may be taxed in that other State. Gains from the sale of shares or rights of a company resident of the other State, may be taxed in that other State, with a limit of 20%, unless its assets consists of immovable property situated in that other State or the recipient of the gain during the 12-month period preceding such sale directly or indirectly owned 20% or more of the capital of the company, in which case there is no limit.** (vi) Income from Independent Personal Services: **Taxable only in the State where the individual is a resident, unless he/she has a fixed base regularly available in the other State or he/she is present in the other State for periods amounting to or exceeding 183 days in any 12 month period.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Taxable only in the State where they arise.** **(*) Most-favoured Nation clause (OECD).**	**Published in the Official Gazette of October 20, 2003.**	In force since July 7, 2003. Applicable to taxes assessed on income obtained and amounts paid, credited to the account, left to the disposition of the taxpayer or registered as an expense from January 1º, 2004, onwards.

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
5	**Croatia**	**OECD Model**	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. (iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed: 10% of the gross amount of the interest if it is paid out of credits from Banks or Insurance companies. 15% of the gross amount of the interest in all other cases.** (iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed: 5% of the gross amount of such royalties which are paid for the use of industrial, commercial or scientific equipment. 10% of the gross amount of such royalties in all other cases.** (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident. Gains from the sale of a) immovable property situated in a Contracting State, b) movable property forming part of the business property of a PE which an enterprise of a Contracting State has in the other State, or c) movable property pertaining to a fixed base available to a resident of a Contracting State in the other State for the purpose of performing independent personal services, may be taxed in that other State. Gains from the sale of shares or rights of a company resident of the other State, may be taxed in that other State, with a limit of 20%, unless its assets consists of a 50% or more of immovable property situated in such State, or the recipient of the gain during the 12-month period preceding such sale directly or indirectly owned 20% or more of the capital of the company, in which case there is no limit.** (vi) Income from Independent Personal Services: **Taxable only in the State where the individual is a resident, unless he/she has a fixed base regularly available in the other State or he/she is present in the other State FOR periods amounting to or exceeding 183 days in any 12 month period.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions** (viii) Pensions: **Pensions paid to a resident in a Contracting State shall be taxable only in that State. Alimony paid to a resident in a Contracting State is only taxable in such state if allowable as a relief to the payer. Otherwise, only taxable in the State of residence of the payer.**	Signed on June 24, 2003. Pending for the approval of the Chilean Congress.	

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
6	**Denmark**	OECD Model	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respe ct of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from international transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. (iii) Interest:**Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 15% of the gross amount of the interest. (*)** **(iv) Royalties:** Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed: 5% of the gross amount of such royalties which are paid for the use of industrial, commercial or scientific equipment. 15% of the gross amount of such royalties in all other cases. (*) (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident, unless the gains are realized upon the sale of a) immovable property situated in the other Contracting State, b) movable property forming part of the business property of a PE which an enterprise of a Contracting State has in the other State, c) movable property pertaining to a fixed base available to a resident of a Contracting State in the other State for the purpose of performing independent personal services, or d) gains from the sale of shares or rights of a company resident of the other State, which may be taxed in that other State.** (vi) Income from Independent Personal Services: **Taxable only in the State where the individual is a resident, unless he/she has a fixed base regularly available in the other State or he/she is present in the other State for periods amounting to or exceeding 183 days in any 12 month period.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Pensions shall be taxable only in the State where they arise. Alimony and other maintenance payments paid to a resident of a Contracting State shall be taxable only in that State. However, if not allowable as a relief to the payer, will be taxable only in the State of residence of the payer.** **(*) Most-favoured Nation clause (OECD).**	Signed on September 21, 2003. Pending for the approval of the Chilean Congress.	

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
7	**Ecuador**	OECD Model	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of the interest if it is paid out of a) credits from Banks or Insurance companies, b) bonds and securities regularly traded, or c) sales on credit of machinery and equipment.** 15% of the gross amount of the interest in all other cases. (*) (iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 10% of the gross amount of the royalty. (*)** (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident. Gains from the sale of immovable property shall be taxable only in the State where situated. Gains from the sale of a) movable property forming part of the business property of a PE which an enterprise of a Contracting State has in the other State, b) movable property pertaining to a fixed base available to a resident of a Contracting State in the other State for the purpose of performing independent personal services, or c) from the sale of shares or rights of a company resident of the other State, may be taxed in that other State.** (vi) Income from Independent Personal Services: **Taxable only in the State where the individual is a resident, unless he/she has a fixed base regularly available in the other State or he/she is present in the other State of periods amounting to or exceeding 183 days in any 12 month period.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Pensions paid to a resident in a Contracting State shall be taxable only in that State.** **(*) Most-favoured Nation clause.**	**Published in the Official Gazette of January 5, 2004.**	**In force since October 24, 2003. Applicable to taxes assessed on income obtained and amounts paid, credited to the account, left to the disposition of the taxpayer or registered as an expense from January 1º, 2004, onwards.**

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforceability
8	**Spain**	OECD Model	**A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. (iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of the interest if it is paid out of a) credits from Banks or Insurance companies, b) bonds and securities regularly traded, or c) credit sales of machinery and equipment. 15% on the gross amounts of such interest in all other cases. (*)** (iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed: 5% of the gross amount of such royalties which are paid for the use of industrial, commercial or scientific equipment. 10% of the gross amount of such royalties in all other cases. (*)** (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident. Gains from the sale of a) immovable property situated in a Contracting State, b) movable property forming part of the business property of a PE which an enterprise of a Contracting State has in the other State, or c) movable property pertaining to a fixed base available to a resident of a Contracting State in the other State for the purpose of performing independent personal services, may be taxed in that other State. Gains from the sale of shares or rights of a company resident of the other State, may be taxed in that other State, with a limit of 16%, unless its assets consists of 50% or more of immovable property situated in that other State, or the recipient of the gain during the 12-month period preceding such sale directly or indirectly owned 20% or more of the capital of the company, in which case there is no limit.** (vi) Income from Independent Personal Services: **Are assimilated to business profits, with the same tax treatment.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Pensions paid to a resident in a Contracting State shall be taxable only in that State, except alimony and other maintenance payments not allowable as a relief to the payer, in which case are only taxable in the State in which the payer is a resident.** **(*) Most-favoured Nation clause (OECD).**	**Published in the Official Gazette of January 24, 2004.**	In force since December 22, 2003. Applicable to taxes assessed on income obtained and amounts paid, credited to the account, left to the disposition of the taxpayer or registered as an expense from January 1º, 2004, onwards.

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
9	**Mexico**	OECD Model	**A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits**: The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. **iii) Interest:** Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of the interest if it is paid out of credits from Banks. In the case of credits from a) Insurance companies, b) bonds and securities regularly traded and c) sales on credit of machinery and equipment, the limit is 10%. The limit is 15% of the gross amount of the interest in all other cases. (*) (iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 10% of the gross amount of such royalties. (*)** (v) Capital Gains: **As a general rule, are taxable in both Contracting States, but those realized upon the sale of ships or aircrafts used for international transport services, or from movable assets associated to the exploitation of those vehicles are only taxable in the Contracting State where seller is a resident.** (vi) Income from Independent Personal Services: **Taxable only in the State where the individual is a resident, unless he/she has a fixed base regularly available in the other State or he/she is present in the other State for periods amounting to or exceeding 183 days in any 12 month period. (*)** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Pensions shall be taxable only in the State where they arise.** **(*) Most-favoured Nation clause.**	**Published in the Official Gazette of February 8, 2000.**	In force since November 5, 1999. Applicable to taxes assessed on income obtained and amounts paid, credited to the account, left to the disposition of the taxpayer or registered as an expense from January 1º, 2000, onwards.

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
10	**Norway**	OECD Model	**A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from international transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 10% of the gross amount of the interest if it is paid out of credits from Banks or Insurance companies, b) bonds and securities regularly traded, or c) sales on credit of machinery and equipment. 15% of the gross amount of the interest in all other cases. (*)** (iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed: 5% of the gross amount of the royalties which are paid for the use of industrial, commercial or scientific equipment. 10% of the gross amount of the royalties in other cases. (*)** (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident. Gains from the sale of immovable property shall be taxable only in the State where situated. Gains from the sale of a) movable property forming part of the business property of a PE which an enterprise of a Contracting State has in the other State, b) movable property pertaining to a fixed base available to a resident of a Contracting State in the other State for the purpose of performing independent personal services, or c) from the sale of shares or rights of a company resident of the other State or any other type of financial instruments situated in the other State, may be taxed in that other State.** (vi) Income from Independent Personal Services: **Taxable only in the State where the individual is a resident, unless he/she has a fixed base regularly available in the other State or he/she is present in the other State for periods amounting to or exceeding 183 days in any 12 month period.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Pensions shall be taxable only in the State where they arise. Alimony paid to a resident of a Contracting State shall be taxable only in that State. However, if not allowable as a relief to the payer, will be taxable only in the State of residence of the payer.** **(*) Most-favoured Nation clause (OECD).**	**Published in the Official Gazette of October 20, 2003.**	In force since July 22, 2003. Applicable to taxes assessed on income obtained and amounts paid, credited to the account, left to the disposition of the taxpayer or registered as an expense from January 1º, 2004, onwards.

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
11	New Zealand	OECD Model	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 10% of the gross amount of the interest if it is paid out of credits from Banks or Insurance companies.15% of the gross amount of the interest in all other cases. (*)** (iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 10% of the gross amount of the royalty. (*)** (v) Capital Gains: **As a general rule, taxable in both Contracting States, but those realized upon the sale of ships or aircrafts used for international transport services, or from movable assets associated to the exploitation of those vehicles are only taxable in the Contracting State where seller is a resident.** (vi) Income from Independent Personal Services: **Are assimilated to business profits, with the same tax treatment.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Pensions paid to a resident in a Contracting State shall be taxable only in that State. Alimony paid to a resident of a Contracting State shall be taxable only in that State. However, if not allowable as a relief to the payer, will be taxable only in the State of residence of the payer.** **(*) Most-favoured Nation clause.**	**Signed on September 10, 2003. Pending for the approval of the Chilean Congress.**	

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
12	**Peru**	OECD Model	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits**: The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. (iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 15% of the gross amount of the interest.** **(iv) Royalties**: Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed15% of the gross amount of such royalties. (*) (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident. Gains from the sale of immovable property shall be taxable only in the State wheresituated. Gains from the sale of a) movable property forming part of the business property of a PE, which an enterprise of a Contracting State has in the other State, b) movable property pertaining to a fixed base available to a resident of a Contracting State in the other State for the purpose of performing independent personal services, or c) from the sale of shares or rights of a company resident of the other State or any other type of financial instruments situated in the other State, may be taxed in that other State.** (vi) Income from Independent Personal Services: **Taxable in the State where rendered with a limit of 10% of the gross amount received. It can also be taxed in the other State if the individual has a fixed base regularly available in the other State or he/she is present in the other State for periods amounting to or exceeding 183 days in any 12-month period.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Taxable in the State where they arise, with a limit of 15%. Alimony and other maintenance payments paid to a resident in a Contracting State shall be taxable only in that State, unless not allowable as a relief to the payer, in which case are only taxable in the State where they arise.** **(*) Most-favoured Nation clause**	**Published in the Official Gazette of January 5, 2004.**	In force since November 13, 2003. Applicable to taxes assessed on income obtained and amounts paid, credited to the account, left to the disposition of the taxpayer or registered as an expense from January 1º, 2004, onwards.

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
13	**Poland**	OECD Model	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits**: The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case, only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. (iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 15% of the gross amount of the interest. (*)** iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of such royalties which are paid for the use of industrial, commercial or scientific equipment. 15% of the gross amount of such royalties in all other cases. (*)** (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident, unless the gains come from the sale of a) immovable property situated in the other Contracting State, b) movable property forming part of the business property of a PE which an enterprise of a Contracting State has in the other State, c) movable property pertaining to a fixed base available to a resident of a Contracting State in the other State for the purpose of performing independent personal services, or d) gains from the sale of shares or rights of a company resident of the other State, which may be taxed in that other State.** (vi) Income from Independent Personal Services: **Taxable only in the State where the individual is a resident, unless he/she has a fixed base regularly available in the other State or he/she is present in the other State for periods amounting to or exceeding 183 days in any 12 month period.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Pensions paid to a resident in a Contracting State shall be taxable only in that State. Alimony and other maintenance payments not allowable as a relief to the payer will be exempted in both Contracting States.** **(*) Most-favoured Nation clause (OECD).**	**Published in the Official Gazette of March 27, 2004.**	In force since December 30, 2003. Applicable to taxes assessed on income obtained and amounts paid, credited to the account, left to the disposition of the taxpayer or registered as an expense from January 1º, 2004, onwards.

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
14	United Kingdom	OECD Model	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e. carried out by a resident of such State, shall be taxable only in the same State. (iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of the interest if it is paid out of a) credits from Banks or Insurance companies, b) bonds and securities regularly traded or c) sales on credit of machinery and equipment. 15% of the gross amount of such interest in all other cases. (*)** (iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of such royalties which are paid for the use of industrial, commercial or scientific equipment. 10% of the gross amount of such royalties in all other cases. (*)** (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident. Gains from the sale of a) immovable property situated in a Contracting State, or b) movable property forming part of the business property of a PE, which an enterprise of a Contracting State has in the other State, may be taxed in that other State. Gains from the sale of shares or rights of a company resident of the other State, or interests in a trust of a partnership incorporated in accordance to its laws may be taxed in that other State, with a limit of 16%, unless its assets consists of 50% or more of immovable property situated in that other State, or the recipient of the gain during the 12-month period preceding such sale directly or indirectly owned 20% or more of the capital of the company, in which case there is no limit.** (vi) Income from Independent Personal Services: **Same tax treatment as business profits.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Pensions are only taxable in the State where they arise. Alimony and other maintenance payments are exempted in both States. Nevertheless, if the payer is entitled to a relief in his/her State of residence, such payments can only be taxed in the other State.** **(*) Most-favoured Nation clause (OECD).**	Signed on July 12, 2003. Pending for the approval of the Chilean Congress.	

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea-bility
15	Sweden	OECD Model	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case, only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. (iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of the interest if it is paid out of credits from Banks or Insurance companies.15% of the gross amount of the interest in all other cases. (*)** iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of such royalties which are paid for the use of industrial, commercial or scientific equipment. 10% of the gross amount of such royalties in all other cases. (*)** (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident, unless the gains come from the sale of a) immovable property situated in the other Contracting State, b) movable property forming part of the business property of a PE which an enterprise of a Contracting State has in the other State, c) movable property pertaining to a fixed base available to a resident of a Contracting State in the other State for the purpose of performing independent personal services, d) ships or aircrafts used for international transport services, or from movable assets associated to the exploitation of those vehicles, or e) gains from the sale of shares or rights of a company resident of the other State, which may be taxed in that other State.** (vi) Income from Independent Personal Services: **Taxable only in the State where the individual is a resident, unless he/she has a fixed base regularly available in the other State or he/she is present in the other State for periods amounting to or exceeding 183 days in any 12 month period.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Taxable in both Contracting States. Alimony paid to a resident of a Contracting State shall be taxable only in that State. However, if not allowable as a relief to the payer, will be taxable only in the State of residence of the payer.** **(*) Most-favoured Nation clause.**	**Executed on June 4, 2004. Not ratified by Chilean legislative branch, yet.**	

16	**France**	OECD Model	**Credit Method:** **A Chilean resident obtaining income, which may be taxed in the foreign country, may credit the tax so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.** **As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to the equivalent to the Chilean corporate tax rate (17%). Exceptionally, in the case of income from countries that are party to a Tax Treaty with Chile, such credit may be increased up to 30%.** **A foreign resident obtaining income, which may be taxed in Chile, may credit the tax so paid against its domestic taxes payable in respect of the same income, subject to the applicable provisions of its domestic law.**	**(i) Business Profits** : The profits of an enterprise of a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable only in that State, unless the enterprise carries out business in the other State through a PE situated therein. In such case, only the profits attributable to the PE are taxable in the source State. **(ii) Income from International Transport:** Income from an international transport enterprise of a Contrac ting State, i.e., carried out by a resident of such State, shall be taxable only in the same State. (iii) Interest: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of the interest if it is paid out of a) credits from Banks or Insurance companies, b) bonds and securities regularly traded, or c) credit sales of machinery and equipment. 15% of the gross amount of the interest in all other cases. (*)** iv) Royalties: **Taxable in both Contracting States, but if the beneficial owner is a resident of the other State, the tax so charged shall not exceed 5% of the gross amount of such royalties which are paid for the use of industrial, commercial or scientific equipment. 10% of the gross amount of such royalties in all other cases. (*)** (v) Capital Gains: **As a general rule, only taxable in the State of which the seller is a resident, unless the gains come from the sale of a) immovable property situated in the other Contracting State, b) movable property forming part of the business property of a PE which an enterprise of a Contracting State has in the other State, or c) gains from the sale of shares or rights of a company resident of the other State, which may be taxed in that other State provided the resident company has directly or indirectly owned 20% or more of the referred shares or rights, and more than 50% of the value of the capital gain proceeds from immovable assets located in such other State.** (vi) Income from Independent Personal Services: **Taxable only in the State where the individual is a resident, unless he/she has a fixed base regularly available in the other State or he/she is present in the other State for periods amounting to or exceeding 183 days in any 12 month period.** (vii) Income from Dependent Personal Services: **Taxable only in the Contracting State where the employee is a resident, unless he/she works in the other State, with certain exceptions.** (viii) Pensions: **Taxable in both Contracting States.** **(*) Most-favoured Nation clause (OECD).**	**Executed on June 7, 2004. Not ratified by Chilean legislative branch, yet.**	