	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 where the Transport enterprise is situated. (vi) Interest: 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 were rendered. (xii) Artistic Activities: Only taxable in the Contracting State where such activities were performed. 		In force since December 19, 1985. Applicable to income, profits, benefits or gains obtained and capital held since January 1 st , 1986.

	Contracting Mo State	lodel	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea- bility
2	Brazil OEC Mode	del	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 and the beneficiary has a fixed base regularly available to perform his/her activities. (*) (wii) 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. (wiii) Pensions: Pensions are taxable only in the State where the employ as a resident oresid	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	Enforcea- bility
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 if not contracting States, but if 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 employee is a resident personal Services: (viii) Income from Independent Personal Services: Taxable only in the Contracting State where the employee is a resident quies he/she whas a fixed base regularly available in the State where the employee is a resident quies he/she where the employee is a resident quies he/she where the employee is a residen	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.

ModelA Chilean resident obtaining income, which may be taxed in the foreign country, may credit the taxof 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 profitsthe Official Gazette of 2003.since Ju 2003.ModelA Chilean resident obtaining income, which may be taxed in the foreign country, may credit the taxof a Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable out business in the other State through a PE situated therein. In such case only the profitsthe Official Gazette of 2003.since Ju 2003.		Contracting Model State	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea- bility
so paid against its Chilean taxes payable in respect of the same income, subject to the applicable provisions of the laws of Chile.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.Income obtained 	4		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	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 receipient of the gain during the 12-month period preceding such sa	the Official Gazette of October 20,	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 1°,

Contracting State Model Method to Avoid Double Taxation Particular Items of Income Status I	Enforcea- bility
5 Creatia OECD Credit Method: (I) Business Profits: The profits of an enterprise Signed on the forming time converting State, i.e. carried out by a large 24, esident of a Contracting State, shall be taxable in the State, or and against its Chienar structure of the therein in sup and against its Chienar time of the State through a PE insert of the same income, subject to the same income, subject to the same income, subject to the same income subject to gravitants of the chienar state. (ii) Income from international transport enterprise of a Contracting State, i.e., carried out by a regeneral rule, Chilean the same income subject to gravitant to the Chienar corporate tax rate (17%). Tax Law grants a credit for init three states in sub taxes paid advand up to the present of subject to subject to the same income structure tax rate (17%). Exceptionally, in the case of the increase of the same state. 10° of origin resident obtaining income, while the same base or harrace on spatial structure tax rate (17%). Exceptionally, in the case of the increase of the oater structure tax rate (17%). 10° origin resident obtaining income, while base obtaining income, while base of the same structure tax rate (17%). Exceptionally, in the case of the increase of the same increase. 10° origin resident obtaining income, while base obtained in the order structure tax rate (17%). Exceptionally, in the case of the information informati	

Contracting StateModelMethod to Avoid Double Taxation	Particular Items of Income	Status	Enforcea- bility
Denmark OECD Model Credit Method: A Chilean resident obtaining income, which may be taxed in the foreig country, may credit the tasso paid against its Chilean taxes payable in respect of the same income, subject t the applicable provisions of the laws of Chile. As a general rule, Chilean Tax Law grants a credit for taxes paid abroad up to th 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 ma be increased up to 30%. A foreign resident obtaining income, which may be taxed in Chile, ma credit the tax so paid against its domestic taxes payable in respect of the same income, subject to th applicable provisions of it domestic law.	 attributed 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. (*) f(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 interest. (*) f(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 	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, shall be taxable only in the same State. (iii) Income from International transport enterprise of a Contracting 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 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 has in the other State, b) movable property pertaining to a fixed base available to a resident of a Contracting State has in the other State, b) movable property form 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 of he/she is present in the other State of	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 disposition of the taxpayer or registered as an expense from January 1°, 2004, onwards.

	Contracting State	Model	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea- bility
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 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 performing the other State, or c) movable property performing independent personal services, 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 capital of the capital of the company, in which case there is no limit. (vi) Income from Independent Personal Services: Taxable only in the Cantracting State where	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 aresident. (vi) Income from Independent Personal Services: Taxable only in the Contracting State where seller is a resident. (vii) Income from Independent Personal Services: Taxable only in the Contracting State where the employee is a resident, unless he/she has a fixed base regularly available in the other State on he/she is present in the other State or he/she is present in the other State or he/she is present in the other State or he/she where the employee is a resident, unless he/she has a fixed base regularly available in the other State or he/she is pres	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.

Contractin State	g 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.	 (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 	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 Mo State	odel	Method to Avoid Double Taxation	Particular Items of Income	Status	Enforcea- bility
11	New Zealand OEC Mode	lel	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. Alimony paid to a resident of the payer. 	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) 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 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 Ortracting 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 tha 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 ava	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, m ay 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) 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 such royalties which are paid for the use of industrial, commercial or scientific equipment. 15% 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, 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, which may be taxed in that other State. (vii) Income from Dep	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 StateModelMethod to Avoid Double TaxationParticular Items of IncomeStatusEr	Enforcea- bility
14 United Kingdom Credit Method: (i) Business Profits: The profits of an enterprise Contracting State, i.e. carried out by a resident of a Contracting State, shall be taxable on business in the other State through a PE state in the foreign country, may credit the tax sup paid against is Chilesan taxes payabel in respect the applicable provisions of the applicable provisions of the same income, which may state and in the rest state through a PE state business in the other State through a PE state business of this the same income, which may state in the rest of state. (i) Chilesan taxes payabel in respect to a Contracting State, i.e. carried out by a resident of such State, shall be taxable only in the same State. (ii) Chilesan taxes payabel in respect on a intermational transport enterprise of a Contracting State, i.e. carried out by a rest to a Tax Tax grants a credit for taxes paid abrough to the equivalent to the Chilesan corporate tax rate (17%). Exceptionally, in the case of increased up to 30%. (ii) Rest the state, the tax so charged shall not exceed S% of the gross annout of the interest fit is paid or click of the state, the taxs ocharged shall not exceed S% of the gross annout of state hystick with the state, the taxs ocharged shall not exceed S% of the gross annout of state, optimise which are payabe in respect to the state of which the selfer is a resident of the other State, or the sease of influence is a resident of the other State, or the sease of a influence is a resident of the state of which the selfer is a resident of the state of which the selfer is a resident of the other State, which are set of a influence is a resident of the state state of the sease property of a PE, which an enterprise of a Contracting State has in the State of	

15SwedenOECD ModelCredit Method:(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.Executed on June 4, 2004. Not ratified by Chilean legislative branch, yet.15SwedenOECD ModelCredit Method: 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 laws of Chile.(i) Business Profits : The profits of an enterprise of a Contracting State, i.e., carried out by a resident of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State.Executed on June 4, 2004. Not ratified by Chilean legislative branch, yet.15SwedenOECD ModelCredit Method: of a Contracting State, i.e., carried out by a resident of such State, shall be taxable only in the same State.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.10Income 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.11Interest: 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	7
 b) Drate tat rate (175). c) Exceptionally, in the case of income from countries that are party to a Tax Treaty. w) 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 party to a Tax Treaty. A foreign resident obtaining income, which is a resident of the same income, subject to the applicable provisions of its domestic taxe. (*) Capital Gains: As a general rule, only taxable in the State of which the seller is a resident, unless the gains tis domestic taxe. (*) 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 forming part of the business property of 2F which an enterprise of a Contracting State, b) movable areas associated to the usiness property of 2F which an enterprise of a Contracting State has in the other State, c) movable property performing to a fixed in the other State, c) movable asset associated to the exploitation of those vehicles, or 0 igains from the sale of a base ravialbable to a resident of a company resident of the other State, or more from Independent Personal Services: Taxable only in the State for periods amounting to a resident of the other State, which may be taxed in that other State, which may be taxed in that other State. (wi) Income from Independent Personal Services: Taxabbe only in the State for periods amounting to o exceeding 183 days in any 12 month period. (wii) Income from Independent Personal Services: Taxabbe only in the State for periods amounting to a resident and state share beaver, if not allowable as a reside to the payer, will be taxable only in the State of residence of the payer. (*) Most-favoured Nation clause. 	

16	France	OECD Model	Credit Method:	(i) Business Profits : The profits of an enterprise of a Contracting State, i.e. carried out by a regident of a Contracting State, aball be two bla	June 7, 2004.	
			A Chilean resident	resident of a Contracting State, shall be taxable	Not ratified by	
			obtaining income, which	only in that State, unless the enterprise carries out business in the other State through a PE	Chilean	
			may be taxed in the foreign	situated therein. In such case, only the profits	legislative	
			country, may credit the tax	attributable to the PE are taxable in the source	branch, yet.	
			so paid against its Chilean	State.		
			taxes payable in respect of	(ii) Income from International Transport:		
			the same income, subject to	Income from an international transport enterprise		
			the applicable provisions of	of a Contracting State, i.e., carried out by a		
			the laws of Chile.	resident of such State, shall be taxable only in		
			As a general rule, Chilean	the same State. (iii) Interest: Taxable in both Contracting States ,		
			Tax Law grants a credit for	but if the beneficial owner is a resident of the		
			taxes paid abroad up to the	other State, the tax so charged shall not exceed		
			equivalent to the Chilean corporate tax rate (17%).	5% of the gross amount of the interest if it is paid		
			Exceptionally, in the case of	out of a) credits from Banks or Insurance		
			income from countries that	companies, b) bonds and securities regularly		
			are party to a Tax Treaty	traded, or c) credit sales of machinery and		
			with Chile, such credit may	equipment. 15% of the gross amount of the		
			be increased up to 30%.	interest in all other cases. (*)		
			_	iv) Royalties: Taxable in both Contracting States,		
			A foreign resident	but if the beneficial owner is a resident of the		
			obtaining income, which	other State, the tax so charged shall not exceed		
			may be taxed in Chile, may	5% of the gross amount of such royalties which		
			credit the tax so paid	are paid for the use of industrial, commercial or scientific equipment. 10% of the gross amount of		
			against its domestic taxes	such royalties in all other cases. (*)		
			payable in respect of the	(v) Capital Gains: As a general rule, only taxable in		
			same income, subject to the	the State of which the seller is a resident, unless		
			applicable provisions of its	the gains come from the sale of a) immovable		
			domestic law.	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).		
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