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## EXPLANATORY NOTE

*(This note is not part of the Order)*

The Schedule to this Order contains an agreement and a protocol (“the Arrangements”) made between the Government of the United Kingdom of Great Britain and Northern Ireland and the Government of the Federal Democratic Republic of Ethiopia for the avoidance of double taxation and prevention of fiscal evasion. This Order brings the Arrangements into effect.

The Arrangements aim to eliminate the double taxation of income or gains arising in one country and paid to the residents of the other country. This is done by allocating the taxing rights that each country has under its domestic law over the same income and gains, and/or by providing relief from double taxation. There are also specific measures which combat discriminatory tax treatment and provide for assistance in international tax enforcement.

Article 1 provides for citation.

Article 2 makes a declaration as to the effect and content of the Arrangements.

The Arrangements will enter into force on the date of the later of the notifications by each country of the completion of its legislative procedures. They will take effect as follows:

- (a) in Ethiopia,
  - (i) in respect of taxes withheld at source, for amounts paid or credited on or after the first day of the month next following the date of entry into force; and
  - (ii) in respect of taxes on income, for any taxable year beginning on or after 8th July next following the date of entry into force;
- (b) in the United Kingdom,
  - (i) in respect of taxes withheld at source, for amounts paid or credited on or after the 1st day of the month next following the date of entry into force; and
  - (ii) in respect of income tax and capital gains tax (other than taxes withheld at source), for any year of assessment beginning on or after 6th April next following the date of entry into force; and
  - (iii) in respect of corporation tax, for any financial year beginning on or after 1st April next following the date of entry into force.

The date of entry into force will, in due course, be published in the *London, Edinburgh and Belfast Gazettes*.

A Tax Information and Impact Note has not been prepared for this Order as it gives effect to a previously announced policy to enact a double taxation agreement.