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Income Taxes in the British  
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# INCOME TAXES

IN THE

## BRITISH DOMINIONS.

**A Digest of the Laws imposing Income Taxes  
and Cognate Taxes in the British Dominions,  
Colonies, Protectorates etc.**

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Compiled in the Inland Revenue Department, London.

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**PREFACE.**

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This supplement contains additions or amendments to "Income Taxes in the British Dominions" consequent on the receipt of information since the latter went to press. The supplement is divided into two parts. The first part is a series of additional pages of the book; this matter is not primarily intended to be taken out of this supplement and incorporated in the existing volume, but is so arranged that this can be done if it is desired. The second part contains a series of additions and corrections which are intended to be incorporated in the text of the book.

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INLAND REVENUE,  
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*January, 1924.*

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## SOUTH AFRICA—TRANSVAAL.

## POLL TAX.

The poll tax is payable by non-native adults domiciled in the Transvaal or resident therein for not less than ninety consecutive days during the twelve months preceding the 30th day of June of the year for which tax is payable.

Exemption is granted to (a) any female who is not a payer of Union income tax, and (b) any male adult who, as a student, has regularly attended a recognised educational institution during the three months immediately preceding the date when the tax becomes due, and is not in receipt of an income.

The tax is apparently payable in respect of each calendar year ended 31st December. (The financial year of the province ends on the 31st March.)

The rates of tax under the amending ordinance of 1922 are :—

- (1) Married individuals :—£1 10s., plus 15 per cent. of the Union normal tax and super-tax (if any) paid for the year ended the 30th June preceding the year for which the poll tax is payable.
- (2) Unmarried individuals :—
  - (i) Under 25 years of age and not income tax payers, £1 10s.
  - (ii) Others, £2 5s., plus 22½ per cent. of any Union income tax paid (as at (1)).

The tax is due on the 30th June in each year and must be paid on or before the 30th September. If tax is not paid by the 30th September (in 1922 the 31st October) a penalty is payable of 10 per cent. for each month or part of a month in which it remains unpaid. Tax unpaid by an employee may be recovered from the employer, who is empowered to deduct from wages etc. any tax paid.

## TABLE OF ORDINANCES.

Poll Tax Ordinance, 1921. (No. 7 of 1921.)

Poll Tax Amendment Ordinance, 1922. (No. 9 of 1922.)

Poll Tax (Penalty) Ordinance, 1923. (No. 2 of 1923.)

SOUTH AFRICA—TRANSVAAL—*continued.*

## COMPANIES TAX.

## I.—SCOPE OF THE TAX.

1. **Income Charged.**—The “taxable income” is the income assessable on any company under the Union Income Tax laws. “Company” includes any association incorporated or registered under any Transvaal law concerning companies, and any association incorporated or registered outside the province but carrying on business or with a place of business therein.

2. **Income Exempted.**—

- (i) Income or dividend derived directly from mining or mineral operations or rights ;
- (ii) income derived from a source outside the province ;
- (iii) income of any company not carrying on business for the profit of its members ;
- (iv) any dividend distributed by a financial company (*see* para. 20) out of dividends taxed under the ordinance.

## II.—COMPUTATION OF INCOME.

3. **Year and Basis of Assessment.**—The tax is apparently payable in respect of the calendar year on the basis of the income of the year ending 30th June preceding the year of assessment. The first assessment is on the income of the year ending 30th June, 1922. (The financial year of the province ends on the 31st March.)

## IV.—COMPUTATION OF TAX.

9. **Rates of Tax.**—Except in the cases mentioned in para. 20 (*q.v.*) the tax is 6*d.* for each £1 of taxable income, with a minimum of £5.

## V.—PAYMENT.

12. **Due Date, Taxation at the Source etc.**—Except in the cases mentioned in para. 20, tax is due on the 30th June and must be paid within two months of that date, or not later than two months after the date when the relative Union income tax assessment has been determined.

In all cases an additional 10 per cent. of tax is payable for every month or part of a month for which it is in arrear.

SOUTH AFRICA—TRANSVAAL—*continued.*

## VII.—SPECIAL TRADES ETC.

20.—(a) **Financial Companies.**—These (defined as companies “ the value of whose holdings, according to the latest balance sheet, represented by shares, debentures or debenture stock in other companies including foreign companies together with loans to other companies exceeds half the value of the total gross assets of such company according to such balance-sheet ”) pay 1s. for each £1 distributed after 31st May, 1923, as dividend (including any money or its equivalent paid to or destined for the company’s shareholders or members).

Where the business of a financial company not registered in the province extends outside it, the Commissioner apports any dividend distributed, in the ratio borne by the gross assets in the province to the total gross assets according to the latest balance sheet. Gross assets in the province include holdings in a Transvaal company or a company whose principal business is carried on in the Transvaal.

Tax is payable within 30 days after any dividend is declared.

(b) **Insurance Companies** pay for each £1 of premium received in the province after 31st March, 1923, relating to (i) life business, 3d. ; (ii) all other business, 2d.

⌈ Premiums are “ received in the province ” if paid in respect of an insured person ordinarily resident therein, or in respect of any article located within, or to be brought into, the province.

Tax is payable within 30 days of the end of each quarter.

## VIII.—TABLE OF ORDINANCES.

Companies Tax Ordinance, 1923. (No. 8 of 1923.)



## ANTIGUA.

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**Introductory.**—The note summarises the law in force for 1923. The law as revised is based on the Model Income Tax Ordinance prepared by an Inter-departmental Committee in 1922 (*see* its report, published in December, 1922—Cmd. 1788).

Antigua is one of the five Presidencies constituting the Colony of the Leeward Islands but has also a separate administration.

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—In general terms, residents are liable in respect of income from any source in or out of Antigua; non-residents are liable in respect of income from any source in Antigua. As regards income from sources out of Antigua, no tax is payable by recipients who are in Antigua temporarily and have not resided there for six months in all in the year preceding the year of assessment.

Income includes the annual value of land and improvements thereon owned and used, or used rent-free, for the purpose of residence or enjoyment, the annual value being deemed to be 3 per cent. of the capital value.

### 2. Income Exempted.—

- (i) The official emoluments of the officer administering the Government of the Leeward Islands.
- (ii) Incomes of local authorities not derived from trade or business.
- (iii) Incomes of building societies.
- (iv) The official emoluments of members of the permanent consular services of foreign countries.
- (v) The official emoluments of persons in the service of the Imperial Government in Antigua (including H.M. forces).
- (vi) Wound and disability pensions and war gratuities to members of H.M. forces.
- (vii) Incomes of ministers of religion derived from their occupation as such.
- (viii) Income from property charged with rates under the City Rate Ordinance 1907.
- (ix) Profits of estates or sugar factories which have paid export duty.

ANTIGUA—*continued.*

## II.—COMPUTATION OF INCOME.

**3. Year and Basis of Assessment.**—The income tax is levied for each calendar year upon the chargeable income (*i.e.*, net income after making all deductions, exemptions and allowances) for the year preceding the year of assessment. Where accounts are usually made up on a date other than the 31st December, the assessment may be made on the basis of the accounts for the business year ending in the calendar year preceding the year of assessment.

**4. Deductions.**—Among the expenses allowed are :—

- (i) interest payable on any borrowed capital employed in acquiring the income ;
- (ii) expenditure on replacement of obsolete plant or machinery equivalent to its written-down value less any sum realised by its sale ;
- (iii) expenditure on repairs of premises and plant, and for renewal repair or alteration of any articles employed in acquiring the income ;
- (iv) bad and (to the extent that they are estimated to be bad) doubtful debts, recoveries being treated as income when received ;
- (v) an allowance for wear and tear of property, including plant and machinery, arising from the employment of such property in a trade, business, profession or vocation.

**5. Set-off of Losses.**—Any loss incurred in the basis year in any trade, business, profession, or vocation of any person may be set off against his income from other sources for the same year. Any balance of loss not so set off may, until it is exhausted, be set off against the income for the next five years in succession ; but the tax for any of these years must not be so reduced to less than one-half the amount which would have been payable if the set-off had not been allowed.

## III.—PERSONAL ALLOWANCES ETC.

**6. Exemption Limit.**—Incomes less than £100, except in the case of companies, are exempt.

**7. Personal Allowances.**—A deduction (not to exceed £200 for any individual) is allowed of one-tenth of the earned income of any individual. In cases where the set-off mentioned

ANTIGUA—*continued.*

in para. 5 may be made, this deduction is allowed only in respect of the excess of the earned income over the loss so set off.

The following deductions are allowed to any individual whose income, apart from these deductions, does not exceed £500 :—

- (a) £25, in respect of wife living with or wholly maintained by the individual during the basis year ;
- (b) £15, in respect of every child (including stepchild but not illegitimate child) up to three, living and under 16 years of age at the commencement of the basis year, and  
£25 for every such child exceeding three.

None of the above deductions is granted to non-British non-residents.

**8. Life Insurance and Similar Allowances.**—Annual insurance premiums paid by the taxpayer on his life or on that of his wife, or annual contributions by him to the Widows' and Orphans' or other similar fund in Antigua, up to one-sixth of his income (estimated before making the deductions specified in para. 7 (a) and (b), or in this paragraph), are allowed as deductions, except to a non-British non-resident.

## IV.—COMPUTATION OF TAX.

**9. Rates of Tax.**—

On incomes of companies .. .. .	1s. in the £.
On incomes of persons other than companies—	
of £100 .. .. .	1d. in the £
	Per cent.
over £100 and not exceeding £150 .. .. .	1½
£150 .. .. .	3
£1,000 .. .. .	4
£2,000 .. .. .	5
Interest payable to a non-resident ( <i>see</i> para.	
17) .. .. .	6d. in the £
See paragraph 7 for earned income relief.	

**11. Provisions regarding Double Taxation.**—For the purposes of Antigua income tax, income is assessable without any deduction for United Kingdom income tax (including super-tax).

Any person who has paid or is liable to pay Antigua income tax and has paid or is liable to pay United Kingdom income

ANTIGUA—*continued.*

tax for the same year in respect of the same part of his income is entitled to relief from Antigua income tax of the amount paid as income tax in the United Kingdom.

A certificate issued on behalf of the Commissioners of Inland Revenue in the United Kingdom is *prima facie* evidence of the appropriate rate of United Kingdom tax in any particular case.

## V.—PAYMENT.

**12. Due Date, Taxation at the Source etc.**—The time for payment (prescribed by the rules) is in general the 31st August. If tax is not paid within the prescribed time an additional 5 per cent. of its amount is payable.

The rules provide for the payment of tax by deduction monthly in the cases of pensions paid out of the revenue of the presidency and of salaries of public officials.

Interest payable to non-residents (*see* paragraph 17) and dividends (*see* paragraph 13) are taxed at the source.

Claims for repayment of tax paid in excess must be made within two years from the end of the year of assessment.

## VI.—CORPORATE, JOINT ETC. INCOME.

**13. Companies and Income from Companies.**—Antiguan companies are entitled to deduct tax from dividends, and the tax so deductible is set off against the tax charged on the income (including such dividends) of the shareholder.

**14. Partnerships.**—A return of the partnership income is required, but each partner's share of the total income of the partnership is assessable in his hands.

**15. Married Women.**—The income of a married woman living with her husband is deemed to be his income and is charged in his name, but the wife's proportionate part of the tax may, if necessary, be collected from her.

## VII.—SPECIAL TRADES ETC.

**17. Non-resident Traders, Shipowners etc.**—Provisions have been made in the terms set forth in Clause 27 of the Model Ordinance (*cf.* Income Tax Act, 1918, of the United Kingdom, General Rules 5-8, 10-12) for assessing Antiguan agents of non-residents, for making assessments in cases where residents are controlled by non-residents, for charging non-residents on the basis of a percentage of turnover, for restricting

*ANTIGUA—continued.*

assessments on non-residents to the “merchanting” profit etc.

If any person pays mortgage or debenture interest to a non-resident and is entitled to a deduction for such interest under paragraph 4 (i), he must deduct and account for tax at the rate of 6d. in the £.

*See also* paragraph 20.

**20. Insurance Companies.**—In the case of insurance companies (other than life insurance companies) where the profits accrue partly outside Antigua, the profit is computed by taking the gross premiums, interest and other income received or receivable in Antigua, deducting premiums returned to the insured, premiums paid on re-insurances, actual losses (less losses covered by re-insurance), agency expenses, and a fair proportion of head office expenses, and making an adjustment for increase or decrease in the reserve for unexpired risks.

Life insurance companies are taxed on investment incomes, less management expenses and commission. If the company receives premiums outside Antigua the investment income is apportioned in the ratio of premiums received in Antigua to total premiums, and tax is payable on such apportioned sum less Antigua expenses and a fair proportion of head office expenses.

#### VIII.—TABLE OF ORDINANCES.

The Income Tax Ordinance, 1923. (No. 9 of 1923.)

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## CANADA—MANITOBA.

## INCOME TAX.

**Introductory.**—The note summarises the first Income Tax Act (that of 1923) under which tax is imposed on 1923 income.

Dominion of Canada income tax is in general payable in addition.

## I.—SCOPE OF THE TAX.

**1. Income Charged.**—Income tax is payable on the whole income from all sources of every individual residing or ordinarily resident in Manitoba or who remains in Manitoba during any calendar year for a period or periods equal to 183 days. There is no charge on companies (unless acting as trustees for individuals) or non-residents. Companies are however liable to special taxes (*see* pages 156-157).

In cases in which personal and living expenses form part of the profit, gain, or remuneration of the taxpayer, they are assessed as income.

There is no provision for taxing the annual value of immovable property used by the owner for residence or enjoyment.

**2. Income Exempted.**—The exemptions are :—

- (i) The incomes of consuls and consular agents who are citizens of the country they represent, and are not engaged in any other business or profession.
- (ii) Disability pensions in connection with service in H.M. forces, and pensions to dependent relatives of killed or disabled men.
- (iii) The income derived from any bonds or securities of the province, issued exempt from any income tax imposed by the province.

## II.—COMPUTATION OF INCOME.

**3. Year and Basis of Assessment.**—The tax is under the terms of the law payable on the income of the preceding calendar year. It is understood however that the assessment is regarded as being made for the income year, and not

CANADA—MANITOBA—*continued.*

for the year in which the tax is payable. This note should be read accordingly—where a year is referred to the income year is to be understood. (The financial year of the province is the year ending 31st December.)

Income from a business must be returned on the basis of the year of account ending within the calendar year.

4. **Deductions.**—The following deductions are provided for :—

- (i) A reasonable allowance for depreciation.
- (ii) An allowance for exhaustion of mines, wells and timber limits, when the income is derived from mining, oil and gas wells, and timber limits.
- (iii) Dominion of Canada income tax.
- (iv) Payments under Dominion of Canada Special War Revenue Act, 1915, (Part 1), as amended, for corresponding accounting periods.

5. **Set-off of Losses.**—Losses in transactions entered into for profit but not connected with the chief business, trade, profession or occupation of the taxpayer, may not be deducted from income derived from the chief business etc. The Minister has the sole power of determining what losses are connected with the chief business etc.

### III.—PERSONAL ALLOWANCES ETC.

6. **Exemption Limit.**—The exemption limit is \$1,000, but this is increased to \$2,000 if the taxpayer is married or has dependants (*see* paragraph 7).

7. **Personal Allowances.**—A deduction of \$300 is allowed for each child under 18 years of age who is dependent on the taxpayer for support.

An abatement of \$1,000 is allowed to unmarried persons, widows and widowers without dependent children, and persons who are not supporting dependent brothers or sisters under the age of 18 years, or a dependent parent or grandparent, and an abatement of \$2,000 to other persons.

“Dependent child” is defined as “a child under 21 years of age and dependent upon his parent for support or over 21 years of age and dependent on his parent for support on account of physical or mental incapacity.”

CANADA—MANITOBA—*continued.*

**8. Life Insurance and Similar Allowances.**—A deduction not exceeding 10 % of the first \$3,000, and 5 % of the balance, of the taxpayer's net income (after making all deductions, exemptions and allowances), is allowed in respect of premiums on any insurance policy on the life of the taxpayer or his dependants. A deduction is also allowed of amounts deducted from remuneration for superannuation or pension fund.

## IV.—COMPUTATION OF TAX.

**9. Rates of Tax.**—The rates of tax payable on 1923 income are :—

- (i) In the case of persons entitled to the abatement of \$2,000 (*see* paragraph 7), on the income after allowing that abatement :—
- |   | %  |
|---|----|
| On the 1st whole or part \$1,000 ..   | 1  |
| „ 2nd „ „ „ \$1,000 ..  | 1½ |
| and so on in steps of \$1,000 and ½ % to the 12th whole or part \$1,000 .. .. . | 6½ |
| All net taxable income in excess of \$12,000.. .. .                             | 7  |
- (ii) In the case of persons entitled to the abatement of \$1,000 on the income after allowing that abatement: the above rates increased throughout by 1 %.

**11. Provisions Regarding Double Taxation.**—Deduction from the tax is allowed of the amount paid to Great Britain or any of its self-governing colonies or dependencies for income tax in respect of income derived from sources therein, and the amount similarly paid to any foreign country if such foreign country treats income from Canada reciprocally, provided that such amount does not exceed the Manitoba tax which would otherwise have been payable on the income in question.

## V.—PAYMENT.

**12. Due Date, Taxation at the Source etc.**—The time within which the tax is payable is specified in the notice of assessment. On any delay in payment of the tax an additional 5 % becomes payable, and further, at the beginning of each month after the due date, 1 % of the tax.



CANADA—MANITOBA—*continued.*

Applications for the refund of overpaid tax or penalty must be made within 12 months of the date of payment.

## VI.—CORPORATE, JOINT ETC. INCOME.

13. **Companies and Income from Companies.**—Companies are not liable to income tax (but *see* the note on Taxes on Corporations, pages 156 and 157).

Dividends (including bonus shares) declared or shareholders' bonuses voted after the 31st December, 1922, are deemed to be taxable income of the taxpayer in the year in which they are paid or distributed.

The definition of "income" includes "interest, dividends or profits directly or indirectly received from . . . stocks, or from any other investment, and whether such gains or profits are divided or distributed or not . . ." The share of a taxpayer in the undistributed gains or profits of a corporation is not however deemed to be his taxable income unless the Minister is of opinion that the accumulation of such undistributed gains or profits is made for the purpose of evading the tax and is in excess of what is reasonably required for the purposes of the business.

14. **Partnerships.**—Persons carrying on business in partnership are liable for income tax only in their individual capacity. The income from the business must be returned on the basis of the business year of account.

Husband and wife carrying on business together are not deemed to be partners for any purpose under the Income Tax Act. The business income in such circumstances is treated as income of one of the spouses.

15. **Married Women.**—A married woman with a separate income is taxable as if she were unmarried. Husband and wife may receive only one abatement of \$2,000 (*see* paragraph 7), which may be taken by either or divided between them. (*See* also paragraph 14, second sub-paragraph.)

16. **Trusts.**—Income accumulating in trust for the benefit of unascertained persons or of persons with contingent interests is taxed in the hands of the trustees as if it were the income of an unmarried person.

## VIII.—TABLE OF ACTS.

The Income Tax Act. (13 Geo. V., 1923, cap. 19.)

## ST. CHRISTOPHER AND NEVIS.

---

**Introductory.**—The note summarises the law in force for 1923. The law as revised is based on the Model Income Tax Ordinance prepared by an Inter-departmental Committee in 1922 (*see* its report, published in December, 1922—Cmd. 1788).

St. Christopher and Nevis is one of the five Presidencies constituting the Colony of the Leeward Islands. The Presidency is also known as “St. Kitts and Nevis” ; it is referred to in this note as “St. Kitts.”

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—In general terms, residents are liable in respect of income from any source in or out of St. Kitts ; non-residents are liable in respect of income from any source in St. Kitts. As regards income from sources out of St. Kitts no tax is payable by recipients who are in St. Kitts temporarily and have not resided there for six months in all in the year preceding the year of assessment.

Income includes the annual value of land and improvements thereon owned and used, used rent-free, or occupied at a rent less than the rent which might reasonably be expected to be obtained, for the purpose of residence or enjoyment.

### 2. Income Exempted.—

- (i) The official emoluments of the governor of the colony and of the administrator of the presidency.
- (ii) Incomes of local authorities not derived from trade or business.
- (iii) Incomes of building or friendly societies.
- (iv) The official emoluments of members of the permanent consular services of foreign countries.
- (v) The official emoluments of persons in the service of the Imperial Government in St. Kitts (including H.M. forces).
- (vi) Wound and disability pensions and war gratuities to members of H.M. forces.
- (vii) The income of the Government Savings Bank and of any other Government institution or concern.

ST. CHRISTOPHER AND NEVIS—*continued.*

## II.—COMPUTATION OF INCOME.

**3. Year and Basis of Assessment.**—The income tax is levied for each calendar year upon the chargeable income (*i.e.*, net income after making all deductions, exemptions and allowances) for the year preceding the year of assessment. Where accounts are usually made up on a date other than the 31st December, the assessment may be made on the basis of the accounts for the business year ending in the calendar year preceding the year of assessment.

**4. Deductions.**—Among the expenses allowed are :—

- (i) interest payable on any borrowed capital employed in acquiring the income ;
- (ii) expenditure on replacement of obsolete plant or machinery equivalent to its written-down value less any sum realised by its sale ;
- (iii) expenditure on repairs of premises and plant, and for renewal repair or alteration of any articles employed in acquiring the income ;
- (iv) bad debts actually written off (recoveries being treated as income when received) ;
- (v) annuities and annual payments legally payable ;
- (vi) rates and taxes (not including income tax) on property used in acquiring the income ;
- (vii) fire insurance premiums on property used in acquiring the income ;
- (viii) expenditure on repairs of a dwelling-house let to a tenant ; (in the case of a house occupied by the owner, or rent-free, one-sixth of the annual value is allowed) ;
- (ix) an allowance for wear and tear of property, including plant and machinery, arising from the employment of such property in a trade, business, profession, or vocation.

**5. Set-off of Losses.**—Any loss incurred in the basis year in any trade, business, profession, or vocation of any person may be set off against his income from other sources for the same year. Any balance of loss not so set off may, until it is exhausted, be set off against the income for the next five years in succession—but the tax for any of those years must not be so reduced to less than one-half of the amount which would have been payable if the set-off had not been allowed.

ST. CHRISTOPHER AND NEVIS—*continued.*

## III.—PERSONAL ALLOWANCES ETC.

**6. Exemption Limit.**—The allowance mentioned in paragraph 7 establishes in effect an exemption limit of £100, except for non-British non-residents.

**7. Personal Allowances.**—Every individual resident in St. Kitts and every non-resident British subject is allowed an abatement of £100.

The following deductions are allowed to any individual resident in St. Kitts and to any non-resident British subject if his income apart from these deductions, but allowing the abatement of £100, does not exceed £500 :—

- (a) £25 in respect of wife living with or wholly maintained by the individual during the basis year.
- (b) £15 in respect of every child (including stepchild but not illegitimate child unless the parents have married each other) living and under the age of 16 years at the commencement of the basis year.

**8. Life Insurance and Similar Allowances.**—Annual insurance premiums paid by the taxpayer on his life or on that of his wife, or annual contributions to the Widows' and Orphans' Fund of St. Kitts or to any similar fund, up to one-sixth of his income (estimated before making the deductions specified in paragraph 7 (a) and (b), and this paragraph), are allowed as deductions, except to a non-British non-resident.

## IV.—COMPUTATION OF TAX.

**9. Rates of Tax.**—The rates of tax payable for the year 1923 are :—

For persons other than companies—

On each £ up to £100	..	..	2d.
.. .. from £101 to £200	..	..	4d.
.. .. " £201 .. £400	..	..	6d.
.. .. " £401 .. £600	..	..	7d.
.. .. " £601 .. £800	..	..	8d.
.. .. " £801 .. £1,000	..	..	9d.
.. .. " £1,001 .. £1,200	..	..	10d.
.. .. " £1,201 .. £1,400	..	..	11d.
.. .. " £1,401 .. £1,600	..	..	1s.
.. .. " £1,601 .. £2,000	..	1s.	2d.
.. .. " £2,001 .. £2,500	..	1s.	5d.
.. .. above £2,500	..	..	1s. 9d.

For companies :—

On each £	..	..	..	..	1s.
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ST. CHRISTOPHER AND NEVIS—*continued.*

**11. Provisions regarding Double Taxation.**—For the purposes of St. Kitts income tax, income is assessable without any deduction for United Kingdom income tax (including super-tax); or Empire income tax (*i.e.*, any income tax charged in any other British dominion, colony or protectorate which provides by law for relief in a similar manner in respect of tax charged on income there and in St. Kitts).

Any person who has paid or is liable to pay St. Kitts income tax and has paid or is liable to pay United Kingdom income tax for the same year in respect of the same part of his income is entitled to relief from St. Kitts income tax at a rate equal to the excess of the appropriate rate of St. Kitts tax over half the appropriate rate of United Kingdom tax, or, if the St. Kitts rate exceeds the United Kingdom rate, at half the United Kingdom rate.

A person liable to St. Kitts income tax and to Empire income tax for the same year in respect of the same part of his income is entitled to relief from St. Kitts tax :—

- (i) if resident in St. Kitts, at the Empire rate or half the St. Kitts rate, whichever is the less ; or
- (ii) if not resident in St. Kitts, at half the Empire rate, or the excess of the St. Kitts rate over half the Empire rate, whichever is the less.

A certificate issued on behalf of the Commissioners of Inland Revenue in the United Kingdom is *prima facie* evidence of the appropriate rate of United Kingdom tax in any particular case.

The appropriate rate of St. Kitts tax is determined by dividing the tax payable for the year (before deduction of the double income tax relief) by the amount of the income in respect of which the St. Kitts tax has been charged, except that where St. Kitts tax is charged on an amount other than the ascertained amount of the actual profits the rate of tax is determined by the (St. Kitts) Commissioners. The Empire rate of tax is computed in a similar manner.

Where a person is for any year of assessment resident both in St. Kitts and in a place where Empire income tax is charged he is deemed to be resident where during that year he resides for the longer period.

ST. CHRISTOPHER AND NEVIS—*continued.*

## V.—PAYMENT.

**12. Due Date, Taxation at the Source etc.**—The rules make the following provisions for payment of tax. If the tax for the year 1923 is less than £4 it is payable on or before 31st January, 1924; if it is £4 or over it is payable in two equal instalments in December, 1923, and March, 1924. For subsequent years of assessment the tax will under similar conditions be payable on or before 30th September, or in two instalments in September and the following March.

The rules further provide for the payment of tax by deduction monthly in the cases of pensions paid out of the revenue of the presidency and of salaries of public officials. Tax on other income of these individuals is payable in one sum on or before 31st December of the year of assessment.

Additional tax equal to  $1\frac{1}{4}$  % of the amount unpaid is charged if payment is not made within the prescribed time but within 15 days thereafter,  $2\frac{1}{2}$  % if payment is made within one month, and 5 % if payment is made within two months thereafter.

Income of non-residents (*see* paragraph 17) and dividends (*see* paragraph 13) are taxed at the source.

Claims for repayment of tax paid in excess must be made within two years from the end of the year of assessment.

## VI.—CORPORATE, JOINT ETC. INCOME.

**13. Companies and Income from Companies.**—St. Kitts companies are entitled to deduct tax from dividends, and the tax so deductible is set off against the tax charged on the income (including such dividends) of the shareholder.

**14. Partnerships.**—A return of the partnership income is required, but each partner's share of the total income of the partnership is assessable in his hands.

**15. Married Women.**—The income of a married woman living with her husband is deemed to be his income, and is charged in his name, but the wife's proportionate part of the tax may, if necessary, be collected from her.

## VII.—SPECIAL TRADES ETC.

**17. Non-resident Traders, Shipowners etc.**—Provisions have been made in the terms set forth in Clause 27 of

ST. CHRISTOPHER AND NEVIS—*continued.*

the Model Ordinance (*cf.* Income Tax Act, 1918, of the United Kingdom, General Rules 5-8, 10-12) for assessing St. Kitts agents of non-residents, for making assessments in cases where residents are controlled by non-residents, for charging non-residents on the basis of a percentage of turnover, for restricting assessments on non-residents to the "merchandising" profit, etc.

Any resident person who pays any interest, rent, annuity, or annual payment to a non-resident and is entitled to a deduction in that respect under paragraph 4 must deduct and account for tax at the rate of 6*d.* in the £.

*See also* paragraph 20.

**20. Insurance Companies.**—In the case of insurance companies (other than life insurance companies) where the profits accrue partly outside St. Kitts, the profit is computed by taking the gross premiums, interest, and other income received or receivable in St. Kitts, deducting premiums returned to the insured, premiums paid on reinsurances, actual losses (less losses covered by reinsurance), agency expenses, and a fair proportion of head office expenses, and making an adjustment for increase or decrease in the reserve for unexpired risks.

Life insurance companies are taxed on investment incomes, less management expenses and commission. If the company receives premiums outside St. Kitts the investment income is apportioned in the ratio of premiums received in St. Kitts to total premiums received, and tax is payable on such apportioned sum less St. Kitts expenses and a fair proportion of head office expenses.

## VIII.—TABLE OF ORDINANCES.

The Income Tax Ordinance, 1923. (No. 5 of 1923.)

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## TRINIDAD AND TOBAGO.

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**Introductory.**—The note summarises the law in force for 1923. The law as revised is based on the Model Income Tax Ordinance prepared by an Inter-departmental Committee in 1922 (*see* its report, published in December, 1922—Cmd. 1788).

“Trinidad” in the note should be read as meaning “Trinidad and Tobago.”

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—In general terms, residents are liable in respect of income from any source in or out of Trinidad; non-residents are liable in respect of income from any source in Trinidad. As regards income from sources out of Trinidad, no tax is payable by recipients who are in Trinidad temporarily and have not resided there for six months in all in the year preceding the year of assessment.

Income includes the annual value of land and improvements thereon owned and used or used rent-free, for the purpose of residence or enjoyment.

#### 2. Income Exempted.—

- (i) The official emoluments of the officer administering the Government.
- (ii) Incomes of local authorities not derived from trade or business.
- (iii) Incomes of building or friendly societies.
- (iv) The official emoluments of members of the permanent consular services of foreign countries.
- (v) The official emoluments of persons in the service of the Imperial Government in Trinidad (including H.M. forces).
- (vi) Wound and disability pensions and war gratuities to members of H.M. forces.

The return form directs the exclusion from the return of interest from debentures issued under the Local Loan Ordinance, 1915.

### II.—COMPUTATION OF INCOME.

**3. Year and Basis of Assessment.**—The income tax is levied for each calendar year upon the chargeable income (*i.e.*, net income after making all deductions, exemptions and



TRINIDAD AND TOBAGO—*continued.*

allowances) for the year preceding the year of assessment. Where accounts are usually made up on a date other than the 31st December the assessment may be made on the basis of the accounts for the business year ending in the calendar year preceding the year of assessment.

**4. Deductions.**—Among the expenses allowed are :—

- (i) interest payable on any borrowed capital employed in acquiring the income ;
- (ii) expenditure on replacement of obsolete plant or machinery equivalent to its written-down value less any sum realised by its sale ;
- (iii) expenditure on repairs of premises and plant, and for renewal repair or alteration of any articles employed in acquiring the income ;
- (iv) bad debts actually written off, recoveries being treated as income when received ;
- (v) annuities and annual payments legally payable ;
- (vi) rates and taxes on real estate (not including income tax) ;
- (vii) fire insurance premiums on property used in acquiring the income ;
- (viii) an allowance for wear and tear of property, including plant and machinery, arising from the employment of such property in a trade, business, profession or vocation.

**5. Set-off of Losses.**—Any loss incurred in the basis year in any trade, business, profession or vocation of any person may be set off against his income from other sources for the same year. Any balance of loss not so set off may, until it is exhausted, be set off against the income for the next five years in succession, but the tax for any of those years must not be so reduced to less than one-half the amount which would have been payable if the set-off had not been allowed.

### III.—PERSONAL ALLOWANCES ETC.

**6. Exemption Limit.**—The allowance mentioned in paragraph 7 establishes in effect an exemption limit of £500, except for non-British non-residents.

TRINIDAD AND TOBAGO—*continued*.

7. **Personal Allowances.**—Every individual resident in Trinidad and every non-resident British subject is allowed relief equal to the tax on £500 at the lowest rate.

## IV.—COMPUTATION OF TAX.

9. **Rates of Tax.**—The rates of tax payable for the year of assessment 1923 are :—

For persons other than companies :—

		s.	d.
On each £	up to £1,000	0	6
„ „ £	from £1,000 „ £2,000	1	0
„ „ £	„ £2,000 „ £5,000	2	0
„ „ £	„ £5,000 „ £8,000	4	0
„ „ £	„ £8,000 „ £12,000	5	0
„ „ £	above £12,000	6	8

For companies other than life insurance companies :—

	s.	d.
On each £	2	6

(For life insurance companies *see* paragraph 20.)

11. **Provisions regarding Double Taxation.**—For the purposes of Trinidad income tax, income is assessable without any deduction for United Kingdom income tax (including super-tax), or Empire income tax (*i.e.*, any income tax charged in any other British dominion, colony or protectorate which provides by law for relief in a similar manner in respect of tax charged on income there and in Trinidad).

Any person who has paid or is liable to pay Trinidad income tax and has paid or is liable to pay United Kingdom income tax for the same year in respect of the same part of his income is entitled to relief from Trinidad income tax at a rate equal to the excess of the appropriate rate of Trinidad tax over half the appropriate rate of United Kingdom tax, or, if the Trinidad rate exceeds the United Kingdom rate, at half the United Kingdom rate.

A person liable to Trinidad income tax and to Empire income tax for the same year in respect of the same part of his income is entitled to relief from Trinidad tax :—

- (i) if resident in Trinidad, at the Empire rate or half the Trinidad rate, whichever is the less ; or

TRINIDAD AND TOBAGO—*continued.*

- (ii) if not resident in Trinidad, at half the Empire rate, or the excess of the Trinidad rate over half the Empire rate, whichever is the less.

A certificate issued on behalf of the Commissioners of Inland Revenue in the United Kingdom is *prima facie* evidence of the appropriate rate of United Kingdom tax in any particular case.

The appropriate rate of Trinidad tax is determined by dividing the tax payable for the year (before deduction of the double income tax relief) by the amount of the income in respect of which the Trinidad tax has been charged, except that where Trinidad tax is charged on an amount other than the ascertained amount of the actual profits the rate of tax is determined by the (Trinidad) Commissioner. The Empire rate of tax is computed in a similar manner.

Where a person is for any year of assessment resident both in Trinidad and in a place where Empire income tax is charged he is deemed to be resident where during that year he resides for the longer period.

## V.—PAYMENT.

**12. Due Date, Taxation at the Source etc.**—The time for payment (prescribed by the regulations) is in general (for 1923) on or before 15th September. If tax is not paid within the prescribed time an additional 5% of its amount is payable.

The regulations provide for the payment of tax by deduction monthly in the cases of pensions paid out of revenue of the colony and of salaries of public officials.

Income of non-residents (*see* paragraph 17) and dividends (*see* paragraph 13) are taxed at the source.

Claims for repayment of tax paid in excess must be made within two years from the end of the year of assessment.

## VI.—CORPORATE, JOINT ETC. INCOME.

**13. Companies and Income from Companies.**—Trinidad companies are entitled to deduct tax from dividends, and the tax so deductible is set off against the tax charged on the income (including such dividends) of the shareholder.

**14. Partnerships.**—A return of the partnership income is required, but each partner's share of the total income of the partnership is assessable in his hands.

TRINIDAD AND TOBAGO—*continued.*

15. **Married Women.**—The income of a married woman living with her husband is deemed to be his income and is charged in his name, but the wife's proportionate part of the tax may, if necessary, be collected from her.

## VII.—SPECIAL TRADES ETC.

17. **Non-resident Traders, Shipowners etc.**—Provisions have been made in the terms set forth in Clause 27 of the Model Ordinance (*cf.* Income Tax Act, 1918, of the United Kingdom, General Rules 5-8, 10-12) for assessing Trinidad agents of non-residents, for making assessments in cases where residents are controlled by non-residents, for charging non-residents on the basis of a percentage of turnover, for restricting assessments on non-residents to the "merchandising" profit, etc.

Any resident person who pays "rent, interest or income" to a non-resident is assessable as the agent of the non-resident and must pay the tax and deduct it from the income.

*See also* paragraph 20.

20. **Insurance Companies.**—In the case of insurance companies (other than life insurance companies) where the profits accrue partly outside Trinidad, the profit is computed by taking the gross premiums, interest and other income received or receivable in Trinidad, deducting premiums returned to the insured, premiums paid on reinsurances, actual losses (less losses covered by reinsurance), agency expenses, and a fair proportion of head office expenses, and making an adjustment for increase or decrease in the reserve for un-expired risks.

Life insurance companies are taxed on investment incomes, less management expenses and commission. If the company receives premiums outside Trinidad the investment income is apportioned in the ratio of premiums received or annuities paid in Trinidad to total premiums received or annuities paid, and tax is payable on such apportioned sum less Trinidad expenses and a fair proportion of head office expenses. Life insurance companies are taxed at the "average of the rate applicable to an individual whose chargeable income" (*i.e.*, after making all deductions, exemptions and allowances) is £1,000.

## VIII.—TABLE OF ORDINANCES.

The Income Tax Ordinance, 1923. (No. 9—1923.)

## INDIA—MYSORE.

**Introductory.**—Mysore is an Indian native state, but being under the protection of His Majesty is a “dominion” within the meaning of Sec. 27 of the Finance Act, 1920.

The note summarises the law in force from 1st July, 1923.

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—The Mysore Income-tax Regulation, 1923, applies to all income from whatever source derived, arising or received in Mysore, or deemed to arise or be received in Mysore.

The following classes of chargeable income are specified :—

- (1) *Salaries.*—Salary, etc., paid to a Mysore subject or Mysore Government employee outside Mysore by Government or a Mysore local authority and the value of rent-free quarters are chargeable.
- (2) *Interest on Securities.*
- (3) *Property.*—The *bona fide* annual value of buildings or lands appurtenant thereto, unless occupied by the owner for the purposes of his business. The “annual value” of property occupied by the owner as his residence may not be put at a higher figure than 10 per cent. of his total income.
- (4) *Business.*—A resident in Mysore carrying on or controlling a business abroad is liable in respect only of income received in Mysore within three years of the end of the year in which the profits accrued or arose. (*See, however, paragraph 2 (xii).*)
- (5) *Professional Earnings.*—Professional fees paid outside Mysore to a person ordinarily resident in Mysore are chargeable.
- (6) *Other Sources.*

**2. Income Exempted.**—Among the exemptions granted by the Regulation are :—

- (i) Agricultural income. (The full definition is substantially the same as for British India. *See page 228, paragraph 19.*)

INDIA—MYSORE—*continued.*

- (ii) Income of local authorities.
- (iii) Interest on securities held by the provident funds referred to in paragraph 8.
- (iv) Any capital sum received in commutation of all or part of a pension or as consolidated compensation for death or injuries, or in payment of any insurance policy, or as the balance at the credit of the subscriber to any provident fund as in the preceding head.
- (v) Any receipts (not arising from business or the exercise of a profession or occupation) of a casual and non-recurring nature, and not an addition to the remuneration of an employee.
- (vi) Any special allowance, benefit or perquisite specifically granted to meet expenses wholly and necessarily incurred in performing the duties of an office or employment of profit. (*Cf.* paragraph 1. (1).)
- (vii) Interest on any security of the Government of India.
- (viii) Interest on deposits in the Mysore Government Savings Bank.
- (ix) Gratuities to non-pensionable subscribers to a Railway Provident Fund on retirement, or to their widows and children if they die while in service.
- (x) Interest on the following Mysore Government bonds :—
 

1920,	$6\frac{1}{4}$	per cent.	20 year.
1921,	7	„	10 year.
1921,	$6\frac{1}{2}$	„	20/30 year.
- (xi) Interest on Mysore District Boards and Municipality debentures issued to 30th June, 1925.
- (xii) The profits due to the transactions in British India of a business which has its headquarters in Mysore but has branches in British India, or which is carried on partly in Mysore and partly in British India.

Items (x) (xi) and (xii) are taken into account in computing total income of the recipient.

INDIA—MYSORE—*continued.*

## II.—COMPUTATION OF INCOME.

**3. Year and Basis of Assessment.**—The year of assessment is the year ending 30th June. Assessments are made on the basis of the income of the previous year, ending 30th June, or of a period of 12 months (ending in that year), for which accounts have been made up, if the taxpayer so elects. In special cases the Government may prescribe that the income of a specified period shall be adopted.

When a business, profession or vocation commenced after the 30th June, 1923, is discontinued, an assessment on the profits of the period between the end of the previous year and the date of discontinuance may be made within the year in which the business is discontinued in addition to the assessment on the previous year's profits.

In view of the fact that under the Mysore Income-tax Regulation, 1920, tax was charged on the actual income of the year of assessment it is provided that if any business, profession or vocation which was in existence on 1st July, 1923, and on which tax was at any time charged under the Regulation of 1920 is discontinued, no tax shall be payable in respect of the income or profits of the period between the end of the previous year (or period of account adopted) and the date of discontinuance, and the taxpayer may further claim a reduction of the assessment for the year in which the business, etc., was discontinued to the income, etc., of the said period.

If any change occurs in the constitution of a firm, or if any person has succeeded to any business, profession or vocation the assessment is made on the firm as constituted or on the person engaged in the business, etc., at the time of the making of the assessment.

**4. Deductions.**—These are classified under the same headings as the income chargeable (*see* paragraph 1).

(1) *Salaries.*—*See* paragraph 8.

(3) *Property.*—

(i) For repairs, one-sixth of the annual value, but limited if the tenant bears the cost of repairs to the difference between the annual value and the rent paid.

(ii) Premiums of insurance against damage or destruction.

INDIA—MYSORE—*continued.*

- (iii) Mortgage interest and ground rent.
- (iv) Land-revenue, local rates or municipal taxes.
- (v) Collection charges not exceeding 6 per cent.
- (vi) An allowance for voids.

(4) *Business.*—

- (i) Rent of premises, except that of any residential portion.
- (ii) Repairs of the business portion of such premises where the taxpayer is tenant only and has undertaken to bear the cost of repairs.
- (iii) Interest on capital borrowed where the payment of interest is not dependent on the earning of profits.

(Periodical subscriptions to prescribed mutual benefit societies are deemed to be capital borrowed.)

- (iv) Premiums of insurance against damage or destruction of business buildings, plant or stocks.
- (v) Current repairs to such buildings or plant.
- (vi) An allowance for depreciation of such buildings or plant owned by the taxpayer.  
(The rates of allowance are based on original cost and are fixed by the Government. When in any year full effect cannot be given to the allowance the balance may be carried forward.)
- (vii) In the case of machinery or plant sold or discarded as obsolete the difference between the original cost to the taxpayer as reduced by the aggregate allowances for depreciation and the selling price or scrap value.
- (viii) Land-revenue, local rates or municipal taxes paid in respect of the business portion of the premises.
- (ix) Any expenditure (not in the nature of capital expenditure) incurred solely to earn the profits.

(5) *Professional Earnings* and(6) *Other Sources.*—

Expenditure (not being capital or personal expenditure) incurred solely to produce the income.



INDIA—MYSORE—*continued.*

5. **Set-off of Losses.**—A loss sustained under any head (including a share in the loss of a registered firm) may be set off against income or profits under any other head in the same year, but losses may not be carried forward from year to year.

## III.—PERSONAL ALLOWANCES ETC.

6. **Exemption Limit.**—The income-tax exemption limit is Rs. 2,400 (total income) in all cases. The super-tax exemption limit is Rs. 50,000 in general, but Rs. 75,000 for Hindu undivided families.

7. **Personal Allowances.**—No abatements are allowed for income-tax if the total income is Rs. 2,400 or more, and there are no allowances for children or dependants. For super-tax there is an abatement as shown in the scale in paragraph 9.

8. **Life Insurance and Similar Allowances.**—These allowances are made for income-tax only and are not allowed in computing total income for the purpose of determining the rate of income-tax or the super-tax assessment. The total of the allowances described in this paragraph may not exceed one-sixth of the total income.

A deduction is allowed in computing the taxable income of any sum paid by the taxpayer to effect an insurance or in respect of a deferred annuity on his own life, or on the life of his wife, or as a contribution to any provident fund to which the Provident Funds Regulation, 1916, applies. To a Hindu undivided family a deduction is allowed of any sums paid for insurance of the life of any male member of the family or of his wife.

In assessing salaries a deduction is allowed of any sum deducted under the authority of Government from the salary of any individual for the purpose of securing to him a deferred annuity or to provide for his wife or children, subject to a limit of one-sixth of the salary.

## IV.—COMPUTATION OF TAX.

9. **Rates of Tax.**—The rates of tax for the year 1923-24 are as follows :—

(1) *Income-tax.*

A. Individuals, unregistered firms and Hindu undivided families :—

INDIA—MYSORE—*continued.*

Total income.		Rate per rupee on taxable income.	
Not less than	but less than	Annas*	Pies*
Rupees	Rupees		
—	2,400	..	Nil.
2,400	9,000	..	0 3
9,000	25,000	..	0 4½
25,000	40,000	..	0 6
40,000	50,000	..	0 9
50,000	—	..	1 0

The tax is limited to the aggregate of :—

- (a) The amount which would have been payable if the total income had been a sum less by one rupee than the limit of the scale next below ; and
- (b) The amount by which the total income exceeds that sum.

B. Companies and registered firms :—1 anna\* in the rupee on income not less than Rs. 2,400. (*Cf.* paragraphs 13 and 14.)

(2) *Super-tax.*

A. Individuals, unregistered firms and companies :—On the amount by which the total income exceeds Rs. 50,000, 1 anna\* in the rupee.

B. Hindu undivided families :—On the amount by which the total income exceeds Rs. 75,000, 1 anna\* per rupee.

In computing "total income" income from a Hindu undivided family is excluded, but income exempted as at (x) (xi) and (xii) of paragraph 2 is included, and none of the deductions indicated in paragraph 8 is allowed. For super-tax purposes only, income from an unregistered firm actually assessed to super-tax is excluded from the "total income" of the member of the firm.

The "taxable income" excludes income from a Hindu undivided family, dividends from a taxed company, and the taxpayer's share of the profits or gains of a taxed firm, the exemptions (x) (xi) and (xii) of paragraph 2 are of course allowed, and the deductions in paragraph 8 are granted.

11. **Provisions regarding Double Taxation.**—For the purposes of Mysore income-tax income is assessable without

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\*12 pies = 1 anna : 16 annas = 1 rupee.

INDIA—MYSORE—*continued.*

any deduction for United Kingdom income-tax (including super-tax).

Any person who has paid Mysore income-tax and United Kingdom income tax for the same year in respect of the same part of his income is entitled to relief at a rate equal to the excess of the Mysore rate of tax over the rate at which he has obtained relief from United Kingdom income-tax under Section 27 of the Finance Act, 1920. The rate of relief is, however, limited to half the Mysore rate.

The Mysore rate of tax is determined by dividing the income-tax and super-tax by the income on which it was charged.

## V.—PAYMENT.

12. **Due Date, Taxation at the Source etc.**—Tax is due in general in two equal instalments, the first 30 days and the second 60 days from the date of service of the notice of assessment. In case of default the Income-tax Officer may, in his discretion, direct the recovery of a sum not exceeding double the amount of the arrear.

“Salaries” and “Interest on Securities” (*see* paragraph 1), are charged with income-tax at the source, the person making payment being required to deduct income-tax and pay it over to the Government. Tax is deducted from salaries at the rate appropriate to the estimated income under this head, and from securities at the maximum rate (for 1923-24 1 anna in the rupee). Dividends from taxed companies and income from registered firms are also charged with income-tax at the source at the maximum rate (*see* paragraphs 13 and 14). In all of these cases, if the rate of income-tax appropriate to the taxpayer's total income is less than the maximum (or, in the case of salary, the rate actually deducted), a repayment of the excess may be claimed; or if the tax deducted is insufficient the balance may be directly charged.

Claims to repayment of tax paid in excess must be made within one year from the last day of the year in which the tax was recovered.

## VI.—CORPORATE, JOINT ETC. INCOME.

13. **Companies.**—Foreign associations, whether incorporated or not, carrying on business in Mysore, are declared to be companies for the purposes of income-tax.

Companies are assessable to income-tax at the maximum rate on their whole income if that is not less than Rs. 2,400,

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INDIA—MYSORE—*continued.*

and also to super-tax on any income in excess of Rs. 50,000 (see paragraph 9). The dividends are not charged with income-tax in the hands of the shareholders, and if the rate of tax appropriate to the shareholder's total income is less than the maximum he is entitled to an appropriate repayment. For this purpose dividends are deemed to have been taxed at the maximum rate of income-tax in force at the time when they were declared. In computing income-tax must be added to the net dividends. Super-tax is payable by the shareholders on dividends without regard to the super-tax paid by the company.

Companies are required to deduct income-tax at the maximum rate from their debenture interest (see paragraph 12).

Super-tax is payable by a company on the dividends of any non-resident shareholder if he is liable to super-tax on the dividends (the dividends being treated for this purpose as his total income), and such tax may be deducted from the dividends.

**14. Partnerships.**—If the instrument of partnership of a firm, specifying the shares of the partners, is registered with the Income-tax Officer, income-tax is payable on the whole income (if that is not less than Rs. 2,400) of the firm at the maximum rate, but the individual partners are entitled to an adjustment by refund if the rate of tax appropriate to their total income is less than the maximum. A partner's share of the firm's income must be included in his total income for the purposes of determining the rate of income-tax payable and of assessing super-tax.

If a taxpayer, resident out of Mysore, is a member of a registered firm and liable to super-tax on his share of the profits the partners resident in Mysore are liable on his behalf to the super-tax on his share (treating his share for this purpose as if it were his total income).

In the case of an unregistered firm the whole income of the firm is assessed to income-tax on the same scale as is applicable to individuals, no charge is made on the individual partner and no refund is allowed. The partner's share of the income must be included in his *total* income. (But if the income of the firm is less than Rs. 2,400 no income-tax is payable by the firm, and in that case the partners' shares must be assessed to income-tax in their hands.) If the firm's income exceeds Rs. 50,000 super-tax is payable by the firm.

INDIA—MYSORE—*continued.*

and the partners' shares are not included in their total incomes for super-tax purposes. If the firm's income is Rs. 50,000 or less no super-tax is payable by the firm and the partners' shares must be included in their total incomes for super-tax purposes.

15. **Married Women.**—Although there is no specific provision to such effect in the Regulation a married woman is apparently chargeable as if unmarried.

16. **Hindu Undivided Family.**—The income of a Hindu undivided family is assessed to income-tax and super-tax on the family, and income from the family is entirely excluded from consideration in assessing the individual members.

## VII.—SPECIAL TRADES ETC.

17. **Non-resident Traders, Shipowners etc.**—In the case of any person residing out of Mysore all profits arising to such person, either directly or indirectly through or from any business connection or property in Mysore, are deemed to be income arising within Mysore, and are chargeable to income-tax in the name of that person's agent.

Where a person not resident in Mysore and not a Mysore or British subject or a firm or company constituted within Mysore or His Majesty's Dominions or a branch thereof, carries on business with a person resident in Mysore, and it appears to the income-tax authority that owing to the close connection between the resident and the non-resident and to the substantial control exercised by the non-resident over the resident, the course of business between those persons is so arranged that the business done by the resident in pursuance of his connection with the non-resident produces to the resident either no profits or less than the ordinary profits which might be expected to arise in that business, the profits derived therefrom, or reasonably deemed to be derived therefrom, are chargeable to income-tax in the name of the resident person.

If the actual amount of income arising to a non-resident through or from any business connection in Mysore (including cases falling within the preceding sub-paragraph) cannot be ascertained, the amount of income may be computed as a reasonable percentage of the turnover, or as an amount which bears the same proportion to the total profits of the business

INDIA—MYSORE—*continued.*

of the non-resident as the receipts accruing from the business connection in Mysore bear to the total receipts.

As to the collection of super-tax from non-residents by companies and firms *see* paragraphs 13 and 14. *See also* paragraph 20 regarding the treatment of insurance companies not incorporated in Mysore.

20. **Insurance Companies.**—In the case of life assurance companies incorporated in Mysore whose profits are periodically ascertained by actuarial valuation the income of the life assurance business is the average annual net profits disclosed by the last preceding valuation, subject to the adding back of deductions inadmissible for income-tax and of Mysore income-tax deducted from investments. (The same method is applied to annuity and capital redemption business of life assurance companies.) If the Mysore income-tax deducted from investments exceeds the income-tax payable on the income so computed a refund of the difference is allowed.

In the case of other insurance business carried on by Mysore companies any amount charged against receipts as a reserve to meet outstanding liabilities or unexpired risk in respect of policies issued, and not used for any other purpose, may be treated as expenditure incurred solely to earn the profits. A deduction is similarly allowed for any amount written off to meet depreciation of or loss on securities or other assets, or carried to a reserve fund for that purpose; but any sums taken credit for on account of appreciation of or gains on the securities or other assets are deemed to be income chargeable with tax.

The income from dividing society or assessment business is deemed to be 15 per cent. of the premium income of the previous year.

In the absence of more reliable data the income of Mysore branches of non-resident insurance companies may be deemed to be the proportion of the income of the companies corresponding to the proportion which the Mysore premium income bears to the total premium income, or in the case of dividing society or assessment business, may be deemed to be 15 per cent. of the Mysore premium income.

## VIII.—TABLE OF REGULATIONS.

The Mysore Income-tax Regulation, 1923. (V. of 1923.)

## INDIA—TRAVANCORE.

**Introductory.**—Travancore is an Indian native state, but being under the protection of His Majesty is a “dominion” within the meaning of Sec. 27 of the Finance Act, 1920.

The note summarises the law in force from 1st Chingam 1097 (16th August, 1921).

## I.—SCOPE OF THE TAX.

**1. Income Charged.**—The Travancore Income-tax Regulation VIII of 1096\* applies to all income from whatever source derived, arising or received in Travancore, or deemed to arise or be received in Travancore.

The following classes of chargeable income are specified :—

- (1) *Salaries.*—Salary, etc., paid to a Travancore Government employee in any part of India by Government or a Travancore local authority and the value of rent-free quarters are chargeable.
- (2) *Interest on Securities.*
- (3) *House Property.*—The *bona fide* annual value of residential house property. The “annual value” of such property occupied by the owner may not be put at a higher figure than 10 per cent of his total income.
- (4) *Business.*
- (5) *Professional Earnings.*—Professional fees paid in any part of India to a person ordinarily resident in Travancore are chargeable.
- (6) *Other Sources.*

**2. Income Exempted.**—Among the exemptions granted by the Regulation are :—

- (i) Agricultural income. (The full definition is substantially the same as for British India. See page 228, paragraph 19.)
- (ii) Income of local authorities.
- (iii) Any capital sum received in commutation of all or part of a pension or as consolidated compensation for death or injuries, or in payment of any insurance policy, or as the balance at the credit of the subscriber to any provident fund.

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\* The year 1096 commenced on 16th August, 1920.

INDIA—TRAVANCORE—*continued*.

- (iv) Any receipts (not arising from business or the exercise of a profession or occupation) of a casual and non-recurring nature and not an addition to the remuneration of an employee.
- (v) Any special allowance, benefit or perquisite specifically granted to meet expenses wholly and necessarily incurred in performing the duties of an office or employment of profit. (*Cf.* paragraph 1 (1).)
- (vi) The profits due to the transactions outside Travancore of a business which has its headquarters in Travancore but has branches elsewhere, or which is carried on partly in Travancore and partly elsewhere.

## II.—COMPUTATION OF INCOME.

3. **Year and Basis of Assessment.**—The year of assessment is the year commencing on the first day of Chingam (i.e., 16th August in 1921, 1924 and 1925, 17th August in 1922 and 1923). Provisional assessments are made on the basis of the income of the previous year, or of a period of 12 months (ending in that year) for which accounts have been made up if the taxpayer so elects.

Adjustment after the close of the year of assessment is made to the amount of the total actual income of the taxpayer for such year when that has been ascertained. The difference between the tax on the actual total income and the tax provisionally paid is refunded to or paid by the taxpayer, as the case may be. An immediate similar adjustment, to date, for any particular year may, however, be claimed in the course of that year.

If any change occurs in the constitution of a partnership, or if any person has succeeded to any business, profession or vocation the assessment is made notwithstanding such change or succession on the profits derived during the previous year, but the assessment is subject to adjustment under the preceding sub-paragraph.

4. **Deductions.**—These are classified under the same headings as the income chargeable (*see* paragraph 1).

(1) *Salaries.*—*See* paragraph 8.

(3) *House Property.*—

- (i) For repairs, one-sixth of the annual value, but limited if the tenant bears the cost of repairs



INDIA—TRAVANCORE—*continued.*

to the difference between the annual value and the rent paid.

- (ii) Premiums of insurance against damage or destruction.
  - (iii) Mortgage interest and ground rent.
  - (iv) Land-revenue, local rates or municipal taxes.
  - (v) Collection charges not exceeding 6 per cent.
  - (vi) An allowance for voids.
- (4) *Business.*—

- (i) Rent of premises, except that of any residential portion.
- (ii) Repairs of the business portion of such premises where the taxpayer is tenant only and has undertaken to bear the cost of repairs.
- (iii) Interest on capital borrowed, where the payment of interest is not dependent on the earning of profits.
- (iv) Premiums of insurance against damage or destruction of business buildings or plant.
- (v) Current repairs to such buildings or plant.
- (vi) An allowance for depreciation of such buildings or plant owned by the taxpayer.  
(The rates of allowance are based on original cost and are fixed by the Government. When in any year full effect cannot be given to the allowance the balance may be carried forward.)
- (vii) In the case of machinery or plant sold or discarded as obsolete the difference between the original cost to the taxpayer as reduced by the aggregate allowances for depreciation and the selling price or scrap value.
- (viii) Land-revenue, local rates or municipal taxes paid in respect of the business portion of the premises.
- (ix) Any expenditure (not in the nature of capital expenditure) incurred solely to earn the profits.

(5) *Professional Earnings* and

(6) *Other Sources.*—

Expenditure (not being capital or personal expenditure) incurred solely to produce the income.

INDIA—TRAVANCORE—*continued.*

## III.—PERSONAL ALLOWANCES ETC.

6. **Exemption Limit.**—The exemption limit is Rs. 2,000 (taxable income) in all cases.

7. **Personal Allowances.**—No abatements are allowed if the taxable income is Rs. 2,000 or more, and there are no allowances for children or dependants.

8. **Life Insurance and Similar Allowances.**—These allowances are not made in computing total income for the purpose of determining the rate of tax. The total of the allowances described in this paragraph may not exceed one-sixth of the total income.

A deduction is allowed in computing the taxable income of any sum paid by the taxpayer to effect an insurance, or in respect of a deferred annuity, on his own life or on the life of his wife.

In assessing salaries a deduction is allowed of any sum deducted under the authority of Government from the salary of any individual for the purpose of securing to him a deferred annuity or to provide for his wife or children, subject to a limit of one-sixth of the salary.

## IV.—COMPUTATION OF TAX.

9. **Rates of Tax.**—The rates of tax for the year commencing 1st Chingam, 1097 (16th August, 1921), and each subsequent year are as follows :—

A. Assessee other than companies and registered firms :—

<i>Taxable income.</i>	Rate per rupee on	
	<i>taxable income.</i>	
	Chackram*	Cash*
Less than Rs. 2,000 ..	..	Nil.
<i>Taxable income not less than Rs. 2,000 and total income—</i>		
Less than Rs. 5,000 ..	..	0      10
"    "    Rs. 10,000 ..	..	0      12
"    "    Rs. 20,000 ..	..	1      0
"    "    Rs. 30,000 ..	..	1      8
"    "    Rs. 40,000 ..	..	1     12
Rs. 40,000 or above ..	..	2      0

B. Companies and registered firms :—

Two chackrams\* in the rupee on income not less than Rs. 2,000. (*Cf.* paragraphs 13 and 14.)

\* 16 cash = 1 chackram ; 28 chackrams = 1 rupee.

INDIA—TRAVANCORE.—*continued.*

The tax is limited to the aggregate of—

- (a) The amount which would have been payable if the total income had been a sum less by one rupee than the limit of the scale next below ; and
- (b) The amount by which the total income exceeds that sum.

The income-tax payable by any person is in no case to exceed the amount by which his *taxable* income is greater than Rs. 2,000.

In computing "total income" income received by any person as a member of a taxed undivided family (*see* paragraph 16), dividends from a taxed company, and the taxpayer's share of the profits of a taxed firm are included, and none of the deductions indicated in paragraph 8 is allowed.

The "taxable income" excludes income received by any person as a member of a taxed undivided family, dividends from a taxed company, and the taxpayer's share of the profits of a taxed firm, and the deductions in paragraph 8 are granted.

## V.—PAYMENT.

12. **Due Date, Taxation at the Source etc.**—Tax is due in general (under the rules) in two equal instalments, the first 60 days and the second 120 days from the date of service of the notice of the assessment. In case of default the Collector may, in his discretion, direct the recovery of a sum not exceeding double the amount of the arrear.

"Salaries" and "Interest on Securities" (*see* paragraph 1) are charged with income-tax at the source, the person making payment being required to deduct income-tax and pay it over to the Government. Tax is deducted from salaries at the rate appropriate to the estimated income under this head, and from securities at the maximum rate (*see* paragraph 9). Dividends from taxed companies and income from registered firms are also charged with income-tax at the source at the maximum rate (*see* paragraphs 13 and 14). In all of these cases, if the taxpayer's appropriate rate of income-tax under the scale (*see* paragraph 9) is less than the maximum (or, in the case of salary, the rate actually deducted), a repayment of the excess may be claimed ; or if the tax deducted is insufficient the balance may be directly charged. (*See also* paragraph 3 as to adjustment after the end of the year.)

INDIA—TRAVANCORE—*continued.*

Claims to repayment of tax paid in excess must be made within one year of the end of the year to which the claim relates.

## VI.—CORPORATE, JOINT ETC. INCOME.

13. **Companies.**—Foreign associations, whether incorporated or not, carrying on business in Travancore, are declared to be companies for the purposes of income-tax.

Companies are assessable at the maximum rate on their taxable income if that is not less than Rs. 2,000 (*see* paragraph 9). The dividends are not charged with income-tax in the hands of the shareholders, and the shareholder may claim the relief described in paragraph 12. In computing income, income-tax must be added to the net dividends.

Companies are required to deduct income-tax at the maximum rate from their debenture interest (*see* paragraph 12).

14. **Partnerships.**—If the instrument of partnership of a firm, specifying the shares of the partners, is registered with the Collector, income-tax is payable on the taxable income (if that is not less than Rs. 2,000) of the firm at the maximum rate, but the individual partners are entitled to an adjustment by refund in the circumstances described in paragraph 12. A partner's share of the firm's income must be included in his total income for the purposes of determining the rate of income-tax payable.

In the case of an unregistered firm, the taxable income of the firm is assessed to income-tax on the same scale as is applicable to individuals, no charge is made on the individual partner and no refund as described in paragraph 12 is allowed to the individual partner. The partner's share of the income must be included in his *total* income. (But if the income of the firm is less than Rs. 2,000 no income-tax is payable by the firm, and in that case the partners' shares must be assessed to income-tax in their hands.)

15. **Married Women.**—Although there is no specific provision to such effect in the Regulation, a married woman is apparently chargeable as if unmarried.

16. **Undivided Family.**—The income of a Hindu undivided family or undivided Marumakkathayam Tarwad (another form of undivided family) is assessed on the family or the Tarwad, and income from the family or the Tarwad is excluded in computing the taxable incomes of the individual members, though it is included in computing their total incomes.

INDIA—TRAVANCORE—*continued.*

## VII.—SPECIAL TRADES ETC.

17. **Non-resident Traders, Shipowners etc.**—In the case of any person residing out of Travancore, all profits arising to such person, either directly or indirectly, through or from any business connection or property in Travancore, are deemed to be income arising within Travancore, and are chargeable to income-tax in the name of that person's agent.

Where a person not resident in Travancore, and not a Travancore or British subject, or a firm or company constituted within Travancore or His Majesty's Dominions or a branch thereof, carries on business with a person resident in Travancore, and it appears to the income-tax authority that, owing to the close connection between the resident and the non-resident, and to the substantial control exercised by the non-resident over the resident, the course of business between those persons is so arranged that the business done by the resident in pursuance of his connection with the non-resident produces to the resident either no profits or less than the ordinary profits which might be expected to arise in that business, the profits derived therefrom, or reasonably deemed to be derived therefrom, are chargeable to income-tax in the name of the resident person.

If the actual amount of income arising to a non-resident through or from any business connection in Travancore (including cases falling within the preceding sub-paragraph) cannot be ascertained, the amount of income may be computed as a reasonable percentage of the turnover, or (where that method is inapplicable) as an amount which bears the same proportion to the total profits of the business of the non-resident as the receipts accruing from the business connection in Travancore bear to the total receipts.

(*See also* paragraph 20 regarding the treatment of insurance companies not incorporated in Travancore.)

20. **Insurance Companies.**—In the case of life assurance companies incorporated in Travancore whose profits are periodically ascertained by actuarial calculations, the income of the life assurance business is the average annual net profits disclosed by the last preceding valuation, subject to the adding back of deductions inadmissible for income-tax. (The same method is applied to annuity and capital redemption business of life assurance companies.) If the average Travancore income-tax deducted from investments during the valuation

INDIA—TRAVANCORE.—*continued.*

period exceeds the income-tax payable on the income so computed, a refund of the difference is allowed.

If there has been no periodical actuarial valuation, or if the last valuation was more than five years previous to the year in which the assessment falls to be made, the taxable income is computed on the basis of the interest, dividends and rents received by the companies in the previous year.

In the case of Travancore companies other than life assurance companies, any amount charged against receipts solely as a reserve to meet outstanding liabilities or unexpired risk in respect of policies issued may be treated as expenditure incurred solely to earn the profits.

A deduction is allowed to an assurance company of any kind, for any amount credited to meet depreciation in the value of its securities, and carried to a reserve fund for that purpose.

The income from dividing society or assessment business is deemed to be 15 per cent. of the premium income of the previous year.

In the absence of more reliable data, the profits of Travancore branches of non-resident insurance companies may be deemed to be the proportion of the total profits of the companies corresponding to the proportion which the Travancore receipts bear to the total receipts, or in the case of dividing society or assessment business, may be deemed to be 15 per cent. of the Travancore premium income.

## VIII.—TABLE OF REGULATIONS.

The Travancore Income-tax Regulation, VIII of 1096.\*

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\* The year 1096 commenced on 16th August, 1920. The Regulation became law on 7th August, 1921.

## IRISH FREE STATE (SAORSTAT EIREANN).

The Irish Free State was established on 6th December, 1922. Arrangements were made under which, for the year 1922-23 (beginning 6th April, 1922) and earlier years, the basis and amount of liability to income tax (including super-tax) remained unaffected by the establishment of the Free State. (In effect, there continues to be one income tax and one super-tax for Great Britain and the whole of Ireland for years prior to 1923-24.)

These arrangements do not apply in respect of the year 1923-24 (beginning 6th April, 1923) and subsequent years, for which the Free State levies its own income tax and super-tax separate and distinct from the income tax and super-tax of Great Britain and Northern Ireland. The Irish Free State adopted as its own income tax code the Acts relating to income tax that were in force in the Free State at the date of the coming into operation of the Free State Constitution, subject to certain adaptations and modifications. For 1923-24 the Irish Free State income tax and super-tax are thus governed by the Income Tax Act, 1918, and the Finance Acts, 1919, 1920, 1921 and 1922 (adapted in general by the substitution of "Irish Free State" for "United Kingdom" and "Ireland" where these expressions occur), and the Free State legislation of which short particulars are given below.

### Finance Act, 1923. (No. 21 of 1923.)

*Section 1.*—(1) For the year 1923-24 income tax is charged at the rate of 5s. in the £, and super-tax is charged at the same rates as for the year 1922-23.

(2) The income tax and super-tax provisions in force in the Free State during the year 1922-23 (as adapted) apply (subject to the Double Taxation (Relief) Act, 1923, and this Act) for the year 1923-24.

(3) The annual value for income tax under Schedules A and B of any property for the year 1922-23 is, subject to this Act, adopted for the same purpose for the year 1923-24.

*Section 2.*—(1) Notwithstanding Section 5 of the Income Tax Act, 1918, any person chargeable with super-tax for the year 1923-24 may, on application, obtain adjustment of the tax to the amount which would have been payable if this Act had been in force during the year 1922-23 and if the Adaptation

IRISH FREE STATE (SAORSTAT EIREANN)—*continued.*

of Enactments Act, 1922, had been in force with reference to income tax for that year. (*Cf.* British Finance Act, 1923, Section 20.)

*Section 3.*—The accumulated interest on Free State savings certificates is exempted from income tax.

*Section 4.*—From 1st October, 1923, interest on British Government securities issued subject to the condition that the interest thereon should be exempt from income tax is charged to Free State income tax.

*Section 5.*—(1) The land purchase annuity on which the Schedule B assessment may alternatively be based is the unaltered original annuity.

*Section 9.*—An exemption from Free State income tax for the year 1923-24 is granted to charities in Great Britain and Northern Ireland; the exemption is similar to that granted to Irish Free State charities from British income tax for the year 1923-24 under Section 21 of the British Finance Act, 1923.

*Section 12.*—(1) Section 27 of the Finance Act, 1920, and Section 28 of the Finance Act, 1921 (which relate to relief from United Kingdom income tax in respect of Dominion income tax), apply as if "Irish Free State" were substituted for the term "United Kingdom," and "Great Britain and Northern Ireland" for the term "Dominion," wherever those terms occur.

(2) Those sections, so adapted, apply, subject to any Order\* under the Double Taxation (Relief) Act, 1923, and in the event of any conflict between the provisions of the sections and the provisions of the Order the provisions of the Order are to prevail.

(3) In applying to the Free State any British statute relating to income tax, "foreign," "foreign State" and "abroad" respectively include all places outside the Free State.

(4) Profits arising to any person, although not resident in the Free State, from the sale of any articles wholly or partly manufactured by that person in the Free State, are chargeable to income tax under Schedule D.

(5) Great Britain and Northern Ireland are deemed to have been outside the Free State for all of the three years included in the average in the computations in respect of the income from stocks, shares or rents, or other possessions,

\* See below.



**IRISH FREE STATE (SAORSTAT EIREANN)—continued.**

outside of the Free State (Income Tax Act, 1918, Schedule D, Case V, Rules 1 and 2).

(6) The rules as to the computations in respect of the income of a "British subject" not ordinarily resident in the "United Kingdom," from securities or from stocks shares or rents outside of the "United Kingdom" (Income Tax Act, 1918, Schedule D, Case IV, Rule 2, and Case V, Rule 3), apply as if "citizen of the Irish Free State" were substituted for "British subject." ["Irish Free State" is substituted for "United Kingdom" by the Inland Revenue (Adaptation of Taxing Acts) Order, 1923, made under the Adaptation of Enactments Act, 1922.]

(7) The rule as to the liability to tax of a non-resident person (not being a "British subject" or a "British, Indian, Dominion or Colonial" firm or company) exercising business control over a resident, applies as if for the words in inverted commas "citizen of the Irish Free State" and "Irish Free State" were respectively substituted. (Income Tax Act, 1918, General Rules, Schedules A, B, C, D and E, Rule 7.)

*Section 21.*—Issue may be made of securities, the interest on which is exempt from tax so long as the securities are shown to be in the beneficial ownership of a person or persons who is or are not ordinarily resident in the Free State.

**Finance (No. 2) Act, 1923. (No. 32 of 1923.)**

This Act grants exemption from income tax for the year 1923-24 to the funds of National Health Insurance authorities in Great Britain or Northern Ireland. (*Cf.* British Finance Act, 1923, Section 22.)

**The Double Taxation (Relief) Order (No. 1), 1923** (No. O.S. 2 of 1923), made under the **Double Taxation (Relief) Act, 1923** (No. 8 of 1923), contains the following provisions :—

**INCOME TAX (INCLUDING SUPER-TAX).**

- (a) Relief shall be allowed from British income tax in accordance with and under the provisions of section twenty-seven of the Finance Act, 1920, subject to the proviso that for the purpose of determining the Dominion rate of tax, the first paragraph of sub-section (8) (d) of that section shall not apply, but the rates of Irish Free Stat

IRISH FREE STATE (SAORSTAT EIREANN)—*continued.*

income tax and super-tax respectively shall be ascertained in the same manner as the rates of British income tax and super-tax respectively are required to be ascertained by the second paragraph of sub-section (8) (d) of that section.

(b) The Irish Free State Government shall grant relief from Irish Free State income tax at the lower of the two rates following, viz. :—

(i) The rate of relief from British income tax allowable under section twenty-seven of the Finance Act, 1920, as modified by this arrangement ; and

(ii) the excess of the Irish Free State rate of income tax (or, where Irish Free State super-tax is payable, the excess of the sum of the rates of Irish Free State income tax and super-tax) over the rate of relief from British income tax allowable as aforesaid.

(c) This arrangement applies to income tax (including super-tax) for the year of assessment commencing on the sixth day of April, nineteen hundred and twenty-three and subsequent years.

(Cf. Part I of the Relief in respect of Double Taxation (Irish Free State) Declaration, 1923, Statutory Rules and Orders, 1923, No. 406.)

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## Additions and Amendments to the Text of "Income Taxes in the British Dominions."

### INDEX TO "DOMINIONS."

PAGE 5.—*Correct the entries and insert new entries as follows :—*

Antigua ... ..	153 & 379	14A & 15	37	41	364
India—					
Mysore ... ..	401	26A	38	43	369
Travancore ... ..	411	26B	38	43	—
Irish Free State ... ..	419	—	—	—	—
Manitoba ... ..	156 & 385	18A	38	42	—
Mysore ... ..	401	26A	38	43	369
Nevis—St. Christopher and	200 & 389	24 & 24A	38	42	367

PAGE 6.—*Correct the entries and insert new entries as follows :—*

St. Christopher and Nevis } St. Kitts and Nevis }	200 & 389	24 & 24A	38	42	367
Tobago—Trinidad and ...	212 & 395	25 & 24A	38	43	367
Transvaal ... ..	108 & 375	14A	—	—	364
Travancore ... ..	411	26A	38	43	—
Trinidad and Tobago ...	212 & 395	25 & 24A	38	43	367

**Additions and Amendments—continued.**

**TABLE OF INCOME TAX RATES.**

PAGE 10.—In both columns, after “1921-22” *insert* “and 1922-23.”

PAGE 12.—In the column for Rhodesia, after “1921-22” *insert* “and 1922-23.”

*Delete* all the references to super-tax.

In the column for Seychelles, after “1922” *insert* “and 1923.”

PAGES 13-14.—In the Union of South Africa columns, after “1921-22” *insert* “and 1922-23.”

*Insert* new page 14A as given below.

PAGE 15.—In the Swaziland column, after “1921-22” *insert* “and 1922-23.”

PAGE 16.—*Delete* the \* after “BARBADOS” and *insert* “1923”; *delete* the footnote.

PAGES 17-18.—In both columns, after “1922” *insert* “and 1923.”

*Insert* new page 18A given below.

PAGE 21.—In the Grenada column, after “1922” *insert* “and 1923.”

*Insert* new page 24A given below.

*Insert* new page 26A given below.

PAGE 27.—In the heading, for “1922-23,” *read* “1923-24.”

Rates of Tax for Companies.—*Delete* matter in second column and *substitute*—

Taxable income	... ..	... ..	... ..	}	1s. in the £.
Debenture or loan interest to absentees					

PAGES 31-32.—In the Tasmania columns, after “1922” *insert* “and 1923.”

PAGE 35.—In the New Zealand column, after “1922-23” *insert* “and 1923-24.”

Under “Rates of Tax for Individuals” *add*—

For 1923-24 only, the  
tax on “other income” is  
reduced by 20 per cent.

TABLE OF INCOME TAX RATES—*continued.*

	SOUTH AFRICA— TRANSVAAL.*	ANTIGUA. 1923.														
<b>RATES OF TAX FOR INDIVIDUALS.</b>	<p><i>Poll Tax—</i>  <i>Married—</i>£1 10s., plus 15% of the Union normal tax and super-tax paid for the previous year.  <i>Unmarried—</i>Under 25 years of age and not income tax payers—£1 10s.; others, £2 5s., plus 22½% of the Union normal tax and super-tax paid for the previous year.</p>	<p>In general—  Income Rate of tax on whole income</p> <table> <tr> <td>£100</td> <td>1d. in £</td> </tr> <tr> <td>not exceeding—</td> <td></td> </tr> <tr> <td>£150</td> <td>1½%</td> </tr> <tr> <td>£1,000</td> <td>3%</td> </tr> <tr> <td>£2,000</td> <td>4%</td> </tr> <tr> <td>exceeding</td> <td></td> </tr> <tr> <td>£2,000</td> <td>5%</td> </tr> </table> <p>On mortgage or debenture interest paid by a resident to a non-resident, 6d. in the £.  (A deduction of one-tenth of earned income, but not more than £200, is allowed to each individual. The scale is applied to the income so reduced.)</p>	£100	1d. in £	not exceeding—		£150	1½%	£1,000	3%	£2,000	4%	exceeding		£2,000	5%
£100	1d. in £															
not exceeding—																
£150	1½%															
£1,000	3%															
£2,000	4%															
exceeding																
£2,000	5%															
<b>RATES OF TAX FOR COMPANIES.</b>	<p><i>Companies Tax—</i>  <i>Financial Companies—</i>1s. in the £ on dividends.  <i>Insurance Companies—</i>3d. in the £ on life premiums, 2d. in the £ on other premiums.  <i>Other Companies—</i>6d. in the £ on profits, with a minimum of £5.</p>	<p>1s. in the £ in general.  6d. in the £ on mortgage or debenture interest paid by a resident to a non-resident.</p>														
<b>EXEMPTION LIMIT.</b>	<p><i>Individuals—</i>Unmarried, none. Married, <i>see</i> under Union of South Africa.  <i>Companies—</i>None.</p>	<p>£100.  Not allowed to companies. (The exemption limit is in effect increased to a married taxpayer by the deduction for a wife. <i>See</i> above for earned income relief.)</p>														
<b>ABATEMENT.</b>	<p><i>Individuals—</i><i>See</i> under Union of South Africa.  <i>Companies—</i>None.</p>	<p>None.  (If the income does not exceed £500 a deduction of £25 is made to a resident married taxpayer. <i>See</i> above for earned income relief.)</p>														

\* *See* also Union tax.

TABLE OF INCOME TAX RATES—*continued.*

CANADA—MANITOBA*, 1923 (Income Year).	
<b>RATES OF TAX FOR INDIVIDUALS.</b>	Unmarried persons, widows or widowers without dependent children, persons not supporting dependent brothers, sisters, parents or grandparents— Up to \$1,000 ... .. Nil \$1,000—\$2,000 ... .. 2% Next \$1,000 ... .. 2½% etc. \$12,000—\$13,000 ... .. 7½% Balance (over \$13,000) ... .. 8% Other individuals— Up to \$2,000 ... .. Nil \$2,000—\$3,000 ... .. 1% Next \$1,000 ... .. 1½% etc. \$13,000—\$14,000 ... .. 6½% Balance (over \$14,000) ... .. 7%
<b>RATES OF TAX FOR COMPANIES.</b>	Companies are not liable to income tax, but are liable to corporation taxes ( <i>see</i> pages 156-157).
<b>EXEMPTION LIMIT.</b>	Unmarried persons and persons without dependants ( <i>see</i> scale) ... .. \$1,000 Other individuals ... .. \$2,000
<b>ABATEMENT.</b>	Unmarried persons and persons without dependants ( <i>see</i> scale) ... .. \$1,000 Other individuals ... .. \$2,000

\* *See* also Dominion tax.

TABLE OF INCOME TAX RATES—*continued.*

	ST. CHRISTOPHER AND NEVIS. 1923.	TRINIDAD AND TOBAGO. 1923.																																								
<b>RATES OF TAX FOR INDIVIDUALS.</b>	<table> <thead> <tr> <th>Income—</th> <th>In the £ <i>s. d.</i></th> </tr> </thead> <tbody> <tr> <td>First £100</td> <td>... 0 2</td> </tr> <tr> <td>Next £100</td> <td>... 0 4</td> </tr> <tr> <td>„ £200</td> <td>... 0 6</td> </tr> <tr> <td>„ £200</td> <td>... 0 7</td> </tr> <tr> <td>„ £200</td> <td>... 0 8</td> </tr> <tr> <td>„ £200</td> <td>... 0 9</td> </tr> <tr> <td>„ £200</td> <td>... 0 10</td> </tr> <tr> <td>„ £200</td> <td>... 0 11</td> </tr> <tr> <td>„ £200</td> <td>... 1 0</td> </tr> <tr> <td>„ £400</td> <td>... 1 2</td> </tr> <tr> <td>„ £500</td> <td>... 1 5</td> </tr> <tr> <td>Balance (above £2,500)</td> <td>... 1 9</td> </tr> </tbody> </table>	Income—	In the £ <i>s. d.</i>	First £100	... 0 2	Next £100	... 0 4	„ £200	... 0 6	„ £200	... 0 7	„ £200	... 0 8	„ £200	... 0 9	„ £200	... 0 10	„ £200	... 0 11	„ £200	... 1 0	„ £400	... 1 2	„ £500	... 1 5	Balance (above £2,500)	... 1 9	<table> <thead> <tr> <th>Income—</th> <th>In the £ <i>s. d.</i></th> </tr> </thead> <tbody> <tr> <td>First £1,000</td> <td>... 0 6</td> </tr> <tr> <td>Next £1,000</td> <td>... 1 0</td> </tr> <tr> <td>„ £3,000</td> <td>... 2 0</td> </tr> <tr> <td>„ £3,000</td> <td>... 4 0</td> </tr> <tr> <td>„ £4,000</td> <td>... 5 0</td> </tr> <tr> <td>Balance (above £12,000)</td> <td>... 6 8</td> </tr> </tbody> </table>	Income—	In the £ <i>s. d.</i>	First £1,000	... 0 6	Next £1,000	... 1 0	„ £3,000	... 2 0	„ £3,000	... 4 0	„ £4,000	... 5 0	Balance (above £12,000)	... 6 8
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<b>RATES OF TAX FOR COMPANIES.</b>	1s. in the £.	Life Insurance Companies — <i>See</i> paragraph 20 of the text, p. 399. Other Companies—2s. 6d. in the £.																																								
<b>EXEMPTION LIMIT.</b>	£100. (In the case of a married man, in effect, £125.) Not allowed to companies. Not allowed to non-British non-residents.	£500. Not allowed to companies. Not allowed to non-British residents.																																								
<b>ABATEMENT.</b>	£100. (Deduction for wife, if income does not exceed £500, £25.) Not allowed to companies. Not allowed to non-British non-residents.	The amount chargeable on £500 at the lowest rate is deducted from the tax assessed. Not allowed to companies. Not allowed to non-British non-residents.																																								

TABLE OF INCOME TAX RATES—*continued.*

INDIA—MYSORE.* 1923-24.																			
<b>RATES OF TAX FOR INDIVIDUALS.</b>	<p><i>Income-tax—</i></p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Total income less than Rupees.</th> <th style="text-align: center;">Rate per Rupee on taxable income.</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">2,400</td> <td style="text-align: center;">Nil.</td> </tr> <tr> <td style="text-align: center;">9,000</td> <td style="text-align: center;">3 pies.</td> </tr> <tr> <td style="text-align: center;">25,000</td> <td style="text-align: center;">4½ "</td> </tr> <tr> <td style="text-align: center;">40,000</td> <td style="text-align: center;">6 "</td> </tr> <tr> <td style="text-align: center;">50,000</td> <td style="text-align: center;">9 "</td> </tr> <tr> <td style="text-align: center;">Rs. 50,000 or above</td> <td style="text-align: center;">1 anna.</td> </tr> </tbody> </table> <p><i>Super-tax—</i></p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">First Rs. 50,000</th> <th style="text-align: center;">Rate per Rupee.</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Balance.</td> <td style="text-align: center;">NIL 1 anna.</td> </tr> </tbody> </table>	Total income less than Rupees.	Rate per Rupee on taxable income.	2,400	Nil.	9,000	3 pies.	25,000	4½ "	40,000	6 "	50,000	9 "	Rs. 50,000 or above	1 anna.	First Rs. 50,000	Rate per Rupee.	Balance.	NIL 1 anna.
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<b>RATES OF TAX FOR COMPANIES.</b>	<p><i>Income-tax—</i> On all incomes not less than Rs. 2,400 : 1 anna per rupee.</p> <p><i>Super-tax—</i> On the excess over Rs. 50,000 : 1 anna per rupee.</p>																		
<b>EXEMPTION LIMIT.</b>	<p><i>Income-tax—</i> Rs. 2,400.</p> <p><i>Super-tax—</i> Rs. 50,000.</p>																		
<b>ABATEMENT.</b>	<p><i>Income-tax—</i> None.</p> <p><i>Super-tax—</i> Rs. 50,000.</p>																		

\* 12 pies = 1 anna ; 16 annas = 1 rupee.



TABLE OF INCOME TAX RATES—*continued.*

INDIA—TRAVANCORE. From 1921/22 inclusive.																															
<b>RATES OF TAX FOR INDIVIDUALS.</b>	<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 60%;"></th> <th colspan="2" style="text-align: center;">Rate per rupee on taxable income.</th> </tr> <tr> <th style="text-align: left;"></th> <th style="text-align: center;">Chackrams†</th> <th style="text-align: center;">Cash.†</th> </tr> </thead> <tbody> <tr> <td style="text-align: left;"><i>Taxable</i> income less than Ra. 2,000.</td> <td colspan="2" style="text-align: center;">NIL</td> </tr> <tr> <td style="text-align: left;"><i>Taxable</i> income not less than Ra. 2,000 and <i>total</i> income—</td> <td></td> <td></td> </tr> <tr> <td style="text-align: left;">less than Ra. 5,000</td> <td style="text-align: center;">0</td> <td style="text-align: center;">10</td> </tr> <tr> <td style="text-align: left;">" " Ra. 10,000</td> <td style="text-align: center;">0</td> <td style="text-align: center;">12</td> </tr> <tr> <td style="text-align: left;">" " Ra. 20,000</td> <td style="text-align: center;">1</td> <td style="text-align: center;">0</td> </tr> <tr> <td style="text-align: left;">" " Ra. 30,000</td> <td style="text-align: center;">1</td> <td style="text-align: center;">8</td> </tr> <tr> <td style="text-align: left;">" " Ra. 40,000</td> <td style="text-align: center;">1</td> <td style="text-align: center;">12</td> </tr> <tr> <td style="text-align: left;">Ra. 40,000 or above</td> <td style="text-align: center;">2</td> <td style="text-align: center;">0</td> </tr> </tbody> </table>		Rate per rupee on taxable income.			Chackrams†	Cash.†	<i>Taxable</i> income less than Ra. 2,000.	NIL		<i>Taxable</i> income not less than Ra. 2,000 and <i>total</i> income—			less than Ra. 5,000	0	10	" " Ra. 10,000	0	12	" " Ra. 20,000	1	0	" " Ra. 30,000	1	8	" " Ra. 40,000	1	12	Ra. 40,000 or above	2	0
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<b>RATES OF TAX FOR COMPANIES.</b>	On all taxable incomes not less than Ra. 2,000: 2 chackrams† per rupee.																														
<b>EXEMPTION LIMIT.</b>	Ra. 2,000 (taxable income). Allowed to companies.																														
<b>ABATEMENT.</b>	None.																														

† 16 cash = 1 chackram ; 28 chackrams = 1 rupee.

## LIFE INSURANCE AND SIMILAR ALLOWANCES.

PAGE 37.—Under Rhodesia *delete* “ Allowed for income tax only.”

Under Antigua *delete* “ or children ” and *add*—  
Not granted to non-British non-residents.

PAGE 38.—*Correct* the entries and *insert* new entries as follows :—

Manitoba	10 % of first \$3,000, 5% of balance of net income.	Premiums on life of taxpayer or his dependants; superannuation and pension fund deductions from salary.
St. Christopher and Nevis	One-sixth of total income less abatement of £100.	Annual premiums on life of taxpayer or his wife, and annual contribution to widows' and orphans' fund. Not allowed to non-British non-residents.
India—Mysore	One-sixth of total income.	As in British India.
India— Travancore	Ditto.	Ditto.

## ALLOWANCES FOR CHILDREN.

PAGE 41.—Under Rhodesia *delete* “ No allowance for super-tax.”

For the entry under Antigua *read* :—

Antigua	£15 each of first three, £25 others.	16 (at beginning of income year)	£500	Stepchild included. Not granted to non-British non-residents.
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PAGE 42.—*Correct entry and insert new entry as follows:—*

Canada— Manitoba ...	\$300 ...	18 ...	None ...	Child must be dependent. The support of a dependent child under 21 or of a child over 21 and dependent because of incapacity gives title to the larger abatement ( <i>see</i> page 18A or paragraph 7 of the text, page 386).
St. Christopher and Nevis	£15 ...	16 (at beginning of income year)	£600 (before allowance of abatement)	Stepchild included, also illegitimate child if parents have married. Not allowed to non-British non-residents.

PAGE 43.—*Insert—*

India—Mysore—No allowance.

India—Travancore—No allowance.

Under Australia—Commonwealth, for “£40” read “£50.”

## BASUTOLAND.

The Basutoland Income Tax Proclamation, 1923, (No. 36 of 1923), imposes income tax for the year 1922-23 at the same rates as were in force for the year 1921-22. A note should be made accordingly at—

PAGE 45.—Introductory paragraph.

PAGE 49.—Paragraph 9 (Normal Tax).

PAGE 50.—Paragraph 9 (Super-tax).

PAGE 52.—Section VIII.

PAGE 45, paragraph 1 (2) (a), line 2.—*Insert* a comma after “goods” where it first appears, and *delete* the comma after “goods” where it secondly appears.

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**BECHUANALAND PROTECTORATE.**

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The Bechuanaland Protectorate Income Tax Proclamation, 1923, (No. 30 of 1923), imposes income tax for the year 1922-23 at the same rates as were in force for the year 1921-22. A note should be made accordingly at—

PAGE 53.—Introductory paragraph.

PAGE 57.—Paragraph 9.

PAGE 60.—Section VIII.

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**KENYA.**

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PAGE 66, Section VIII.—The penultimate ordinance is—  
The Income Tax Amendment (No. 2) Ordinance,  
1921. (No. XXIII, 1921.)

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**RHODESIA—NORTHERN.**

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Income tax is imposed for the income year 1922-23 at the same rates as were in force for the income year 1921-22. A note should be made accordingly at—

PAGE 72.—Introductory.

PAGE 76.—9. Rates of Tax.

PAGE 79.—Section VIII—*add* to list of Proclamations—

The Northern Rhodesia Income Tax (Amendment)  
Proclamation, 1923. (No. 3 of 1923.)

The Northern Rhodesia Income Tax (Amendment  
No. 2) Proclamation, 1923. (No. 13 of 1923.)

PAGE 79, paragraph 19.—Second sub-paragraph, lines 8-9.—  
*For* “The value . . . circumstances” *read* “The  
cost price or standard value so adopted.”

RHODESIA—NORTHERN—*continued.*

It has been ascertained that the super-tax was in force for the income year 1919-20 only. The following references to super-tax are accordingly erroneous and should be deleted :—

PAGE 72, paragraph 1.—First sub-paragraph “(including super-tax).”

PAGE 74, paragraph 4.—(c) “and super-tax.”

PAGE 75, paragraph 6.—Last line.

Paragraph 7.—(b) All.

PAGE 76, paragraph 8 (a)—Last sentence. (b)—“in computing . . . super-tax.”

Paragraph 9, sub-paragraphs 2-5 (*see* substituted sub-paragraph below).

Paragraph 11, first sub-paragraph—“and super-tax.”

PAGE 77, paragraph 13, third sub-paragraph—Last sentence.

PAGE 76.—The following should be inserted as second sub-paragraph to paragraph 9—

“Taxable amount” is the net income after allowing all the deductions and allowances, and excluding dividends and debenture interest taxed at the source.

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RHODESIA—SOUTHERN.

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The Income Tax Ordinance, 1923, (No. 9, 1923), imposes income tax for the income year 1922-23 at the same rates as were in force for the income year 1921-22. A note should be made accordingly at—

PAGE 80.—Introductory paragraph.

PAGE 84.—9. Rates of Tax.

PAGE 87.—Section VIII.

PAGE 87, paragraph 19, second sub-paragraph, lines 8-9.—

*For* “The value . . . circumstances” *read* “The cost price or standard value so adopted.”

RHODESIA—SOUTHERN—*continued.*

It has been ascertained that the super-tax was in force for the income year 1919-20 only. The following references to super-tax are accordingly erroneous and should be deleted :—

PAGE 80, paragraph 1, first sub-paragraph—“(including super-tax).”

PAGE 82, paragraph 4, (c)—“and super-tax.”

PAGE 83, paragraph 6.—Last line.

PAGES 83-84, paragraph 7 (b).—The whole.

PAGE 84, paragraph 8 (a).—Last sentence. (b)—“in computing . . . super-tax.”

Paragraph 9, sub-paragraphs 2-5 (*see* substituted sub-paragraph below).

Paragraph 11, first sub-paragraph—“and super-tax.”

PAGE 85, paragraph 13, third sub-paragraph.—Last sentence.

PAGE 84—The following should be inserted as second sub-paragraph to paragraph 9 :—

“Taxable amount” is the net income after allowing all the deductions and allowances, and excluding dividends and debenture interest taxed at the source.

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 SEYCHELLES.
 

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PAGE 88.—*For* the introductory paragraph *read*—

**Introductory.**—The note summarises the law in force from 1920 to 1923 inclusive.

[*Note.*—The law has been amended for the year 1924, the lines laid down by the Model Ordinance prepared by an Interdepartmental Committee being followed—*see* the report of the Committee, Cmd. 1788. A digest of the amended law will be published in a later supplement.]

### SOUTH AFRICA—UNION.

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The Income Tax Act, 1923, (No. 19, 1923), imposes income tax for the year 1922-23 at the same rates as were in force for the year 1921-22. A note should be made accordingly at—

PAGE 90.—Introductory paragraph.

PAGE 95.—Paragraph 9 (i).

PAGE 96.—Paragraph 9 (ii).

PAGE 108.—Section VIII.

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### SOUTH AFRICA—TRANSVAAL.

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The Poll Tax and the Companies Tax are summarised on pages 375-377 (Supplement No. 1). A note should be made accordingly at page 108.

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### SWAZILAND.

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By the Swaziland Income Tax Proclamation, 1923, (No. 27 of 1923), income tax is imposed for the year 1922-23 at the same rates as were in force for the year 1921-22. A note should be made accordingly at—

PAGE 112.—Introductory paragraph.

PAGE 116.—Paragraph 9.

PAGE 119.—Section VIII.

On page 117, paragraph 12, in the second line, after "Collector" add "who may allow payment by instalments."

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### ANTIGUA.

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The law for 1923 is summarised on pages 379-383 (Supplement No. 1). A note should be made accordingly at page 123.

**BARBADOS.**

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PAGE 127.—*Substitute* for the introductory paragraph—

**Introductory.**—The note summarises the law in force for 1923.

PAGE 129.—In the second line of paragraph 9, for “1922\*” read “1923.” *Delete* the footnote.

PAGE 130.—For the first five lines of paragraph 12 read—

**12. Due Date, Taxation at the Source etc.**—The tax is (under the Regulations) payable on 30th September, but if it exceeds £5 payment of one-half may be deferred until 31st December. A surcharge of 5 per cent. is made on late payments.

PAGE 131, VIII, TABLE OF ACTS.—*Delete* “Finance Act, 1922. (1922-13.)” and *add* at the end  
Finance Act, 1923. (1923-11.)

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**CANADA—DOMINION.**

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PAGE 137.—For the first three lines of the introductory paragraph *substitute*—

**Introductory.**—The note summarises the law in force for the years 1922 and 1923, *i.e.*, under which tax is imposed on income of these respective years.

PAGE 138.—*Delete* paragraph 2 (ii) and *substitute*—

- (ii) The incomes of consuls and consuls general, officials and officers of a foreign country, Great Britain or any of its self-governing dominions, if their duties require them to reside in Canada and they are not engaged in any other business or calling, and provided in the case of consuls, etc., of a foreign country that they are citizens of the country they represent, and that that country grants a similar exemption to officials of the Government of Canada.



CANADA—DOMINION—*continued.*

PAGE 140.—*Delete* paragraph 5 and *insert* the following addition to paragraph 4, and new paragraph 5 :—

Interest on borrowed capital is allowed as a deduction only up to such a rate (not greater than the rate actually payable) as is allowed by the Minister of Finance.

5. **Set-off of Losses.**—The set-off of losses is prevented in general by a provision that “the income of a taxpayer shall be deemed to be not less than the income derived from his chief position, occupation, trade, business or calling.” The Minister of Finance is given full power to determine which position etc., or which combination of positions etc., is to be treated as the chief position, etc.

PAGE 144, VIII—TABLE OF ACTS.—*Add* at the end—  
13 & 14 Geo. V., 1923, chap. 52.

CANADA—ALBERTA.

PAGE 146, line 1.—After “tax” *insert*—  
“on authorised capital and”

Under TABLE OF ACTS, after the first-mentioned Act *insert*—  
Statute Law Amendment Act, 1923. (1923, ch. 5.)

CANADA—BRITISH COLUMBIA.

PAGE 147, Introductory.—*Substitute*—

**Introductory.**—The note summarises the “Taxation Act,” assented to on 16th December, 1922, which amends and consolidates previous Acts regarding taxation of income. The new provisions came into force on 3rd April, 1923.

PAGE 149.—*For* paragraph 4 (d) *read*—

(d) Any tax imposed by the Taxation Act (i.e., personal-property tax, real-property tax or the special taxes indicated in paragraphs 18 and 20) or the Local Improvement Act.

CANADA—BRITISH COLUMBIA—*continued.*

PAGE 151, paragraph 10, lines 5 and 6.—*Delete* the words in brackets. *Add* at the end of the paragraph,  
*See also* paragraphs 18 and 20.

PAGE 152, paragraph 8 (a), lines 3-4.—*Delete* “ under . . . Act.”

Lines 7-8.—*Delete* “ under . . . Acts.”

PAGE 152, paragraph 18 (c), lines 3-4.—*Delete* “ under . . . Act.”

Line 5.—*Delete* “ under . . . Act.”

PAGE 153, paragraph 20 (a), line 2.—*For* “ dry-salting ” *read* “ pickling.”

Lines 5-6.—*Delete* “ under . . . Act.”

Line 7.—*Delete* “ under . . . Act.”

Lines 12-13.—*Delete* “ and cured.”

Line 13.—*For* “ hundredweight ” *read* “ hundred pounds weight.”

Paragraph 20 (b), lines 6-7.—*Delete* “ under . . . Act.”

Line 8.—*Delete* “ under . . . Act.”

PAGE 154, paragraph 20 (d).—*For* first two lines *read*—

(d) *Railways.*—Railway companies are with certain exceptions charged with a special tax at the rate

Paragraph 20 (e), lines 2-3.—*Delete* “ under . . . Act.”

Paragraph 20 (f), line 1.—*Insert* a comma after “ Insurance\*.”

Lines 5-6.—*Delete* “ under . . . Act.”

PAGE 155, paragraph 20 (f).—After the first sub-paragraph *insert*—

Insurance companies are allowed deductions for re-insurance premiums paid to other companies licensed in British Columbia, and for premiums refunded.

Section VIII.—*Delete* and *read*—

## VIII.—TABLE OF ACTS.

Taxation Act. (13 Geo. V., 1922, chap. 75.)

## CANADA—MANITOBA.

PAGE 157.—*Delete* the paragraph relating to income tax and *insert* instead—

The income tax law for the year 1923 is summarised on pages 385-388 (Supplement No. 1).

## CANADA—ONTARIO.

PAGE 167, paragraph 4. Deductions—*Insert* asterisks after “receipts” in line 2 and “value” in line 4.

*Insert as footnote—*

\* In the case of a nickel or nickel-copper mine if it cannot be shown that the output has been *bona fide* sold in the ordinary course of business (*e.g.*, if the sale is made directly or indirectly by one company to an associated or ancillary company, or to a company which substantially controls the price to the selling company), the annual profits are ascertained by :—

- (i) ascertaining the market value of the fine metal or other products suitable for direct use in industries or arts without further treatment, arising from or contained in the output of the mine,
- (ii) deducting from this the actual cost of marketing, refining and treating, and
- (iii) making the deductions (a) to (f).

This method may also be applied in the case of other mines where there is no means of ascertaining the market value or where there is no established price or value of the output.

PAGE 169, paragraph 9, last two lines.—*For* “rate of 2 cents” *substitute* “rate generally of 2/10 of a cent.”

Paragraph 11, Provisions regarding Double Taxation.—*Delete* the whole paragraph.

## CANADA—SASKATCHEWAN.

PAGE 178, line 9 from foot of page—*For* “ $\frac{1}{2}$  per cent.” *read* “ $\frac{1}{4}$  of 1 per cent.”

Line 4, from foot of page.—*For* “ $\frac{1}{2}$  per cent.” *read* “ $\frac{1}{4}$  of 1 per cent.”

**GRENADA.**

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The law in force for the year 1922 continues in force for the year 1923. A note should be made accordingly at—

PAGE 182.—Introductory.

PAGE 183.—9. Rates of Tax.

[*Note.*—The law has been amended for the year 1924, the lines laid down by the Model Ordinance prepared by an Inter-departmental Committee being followed—*see* the report of the Committee, Cmd. 1788. A digest of the amended law will be published in a later supplement.]

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**NEWFOUNDLAND.**

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PAGE 194.—*Add* at the end of paragraph 2—

The following exemption has been made by the Minister of Finance under the powers conferred on him by the provisions of the Income Tax Act :—

- (xi) The income of a non-resident alien or foreign corporation, which consists exclusively of earnings derived from a ship or ships, documented under the laws of a foreign country, which grants an equivalent exemption to citizens of Newfoundland and to corporations in Newfoundland.
- 

**ST. CHRISTOPHER AND NEVIS.**

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The law in force for 1923 is summarised on pages 389–394 (Supplement No. 1). A note should be made accordingly at page 200.

**TRINIDAD AND TOBAGO.**

---

The law in force for 1923 is summarised on pages 395-399 (Supplement No. 1). A note should be made accordingly at page 212.

---

**BRITISH INDIA.**

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PAGE 228, Paragraph 17.—Non-resident Traders, Ship-owners etc. *Insert* as second last sub-paragraph :—

As regards a person residing out of British India and carrying on business in British India as the owner or charterer of a ship, where there is no resident agent tax is payable by the master of the ship, at the rate applicable to a company on 5 % of the full amount paid for carriage of passengers, livestock or goods from any port in British India. The port authorities may detain the ship until payment is made. In the year following the payment the owner may claim to have his total income liable to Indian income-tax assessed on the previous year basis in the usual way, and the payment made on the above basis is then treated as an advance payment in respect of the adjusted liability.

PAGE 229. VIII.—TABLE OF ACTS. *Add* :—

The Indian Income-tax (Amendment) Act, 1923. (No. XV of 1923.)

The Indian Income-tax (Further Amendment) Act, 1923. (No. XXVII of 1923.)

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**AUSTRALIA—COMMONWEALTH.**

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PAGE 238.—Introductory. For "1922-23" read "1923-24."  
Paragraph 1.—Income Charged. Second sub-paragraph. Delete all of (3).

AUSTRALIA—COMMONWEALTH—*continued.*

PAGE 239, Paragraph 1.—Income Charged. Next after (8), add :—

- (9) The interest on any loan raised in Australia after 31st December, 1923, by the Commonwealth or a State or by any authority constituted under any law of the Commonwealth or a State.
- (10) The interest on loans raised in Australia after 31st December, 1923, by the government of any country or dominion outside the Commonwealth or by any authority constituted under any law of such country or dominion—if the recipient of the interest resides in Australia, or is chargeable with income tax under the Income Tax Assessment Act, 1922-23. (A loan is "raised in Australia" if subscriptions thereto are invited in Australia.)

PAGE 240, Paragraph 2.—Income Exempted. Add to (viii) :—

(See page 239, paragraph 1 (9), as to Commonwealth income tax on interest on loans raised in Australia after 31st December, 1923, by the Commonwealth. State income tax will, after a date to be fixed by proclamation, be imposed on such interest.)

PAGE 240, Paragraph 2.—Income Exempted. Add as (xi) :—

- (xi) Income derived directly from primary production (*i.e.*, from cultivation of land, maintenance of animals or poultry, mining, fisheries, and the manufacture of dairy produce by the producer of the raw material) in the Northern Territory by a resident in that territory prior to 1st July, 1927.

PAGE 241, Paragraph 3.—Year and Basis of Assessment. Second sub-paragraph, 1st line. After "tax" insert :—  
for a taxpayer other than a company

AUSTRALIA—COMMONWEALTH—*continued.*

PAGE 242, Paragraph 4.—Deductions. Add to (viii) :—  
or oil, or in any company whose principal business is afforestation. (For 1923-24 deduction is allowed of calls paid during the year commencing 1st July, 1921, on shares in a company or syndicate prospecting for oil in Australia.)

(ix) *Delete all.*

PAGE 244, Paragraph 7.—Personal Allowances. (1), second line :—

*For " £40 " read " £50."*

PAGE 246, paragraph 9.—Rates of Tax. Fourth and heading of fifth sub-paragraph. (From "The computation" to "as follows :—"). *Delete all and substitute :—*

The computation of tax is based on the taxable income, *i.e.*, the income after all deductions and allowances have been made. The rate for a taxpayer other than a company is determined by an average taxable income computed in the manner indicated in paragraph 3, and the rate of tax so determined is applied to the actual taxable income of the year preceding the year for which the assessment is made. (*See* paragraph 13 as to taxation of a shareholder in respect of dividends.)

For the financial year beginning 1st July, 1923, the rates are as follows :—

PAGE 248, paragraph 9.—Rates of Tax. II.—*Additional Tax. For " 1922-23 " read " 1923-24."*

III.—*Income of a Company. Delete sub-paragraphs (a) and (b) and substitute :—*

(a) For the taxable income the rate is 1s. in the £.

(b) For interest to absentees, on debentures or on money lodged at interest with the company, the rate is 1s. in the £.

PAGE 249, paragraph 9.—Rates of Tax. V.—*Rebate in respect of Business Income. Last line :—For " 2s. 5d. in the £ " read " the rate for the taxable income of a company (see page 248, III)."*

PAGES 249-250. VI.—Three Headings of Tables. After " 1922-23 " add " and 1923-24."

AUSTRALIA—COMMONWEALTH—*continued.*

PAGE 252, paragraph 12.—Due Date, Taxation at the Source etc. First sub-paragraph, fourth line :—After “per cent.” insert “per annum.”

Second sub-paragraph. *Delete* and *substitute* :—“As to taxation at the source of dividends and interest paid by companies, *see* paragraph 13.”

PAGE 253, paragraph 13.—Companies and Income from Companies. First and second sub-paragraph, *delete* all down to “Assessment Act, 1922,” and *substitute* :—

13. Companies and Income from Companies.—For the purposes of income tax “company” includes all bodies or associations, corporate or unincorporate, but not partnerships. The general principle followed from 1923-24 (inclusive) is to assess the company on its taxable income at a flat rate. The shareholder is not required to pay tax on the dividends, unless his rate of tax on income from property (if the dividends are included) exceeds the company’s rate of tax ; he is then also allowed rebate of the amount of tax paid by the company on his dividends. Special provision is made for the taxation of interest paid to absentees and of interest on bearer debentures. No abatement is allowed to companies.

The following is the text of the relative provisions of the Income Tax Assessment Act, 1922-23.

PAGES 254-5, paragraph 13.—Companies and Income from Companies. At the end of section 16 (b) insert the following provisos ; also *delete* section 20, subsections (1) and (2) (down to “shareholder or person” on page 255) and insert new version below :—

“Provided where the dividends, bonuses, profits or shares referred to in sub-paragraphs (i) or (ii) of this paragraph have been distributed out of profits upon which any company has paid or is liable to pay tax under the provisions of any Income Tax Act which comes into operation after the 30th day of June 1923 the amount of those dividends, bonuses, profits or shares shall be excluded from the assessment of the income of the taxpayer unless the rate of tax payable by him on income from property, if the dividends, bonuses, profits or shares are included, exceeds the rate of tax paid or payable by the company ;



AUSTRALIA—COMMONWEALTH—continued.

“ Provided further that if the rate of tax exceeds the rate of tax paid or payable by the company, the taxpayer shall be entitled to a rebate in his assessment of the amount of tax paid by the company on that part of the said dividends, bonuses and profits, and of the face value of the said shares, which is included in his taxable income.”

. . . . .

“ Section 20. (1) [Repealed.]

“(2) In addition to any other income tax payable by it, a company shall also pay income tax on—

“(a) [Repealed.]

“(b) The interest paid or credited by the company to any person, who is an absentee, on money raised by debentures of the company and used in Australia, or on money lodged at interest in Australia with the company; and

“(c) Interest paid or credited in respect of debentures payable to bearer the names and addresses of the holders of which are not supplied to the Commissioner by the company as if the total amount so paid or credited were the income of an individual.

“ Provided that a company shall be entitled to deduct and retain for the use of the company from the amount payable to any of the persons referred to in paragraph (b) of this sub-section such amount as is necessary to pay the tax which becomes due in respect of that amount;

“ Provided also that a company shall be entitled to deduct and retain for the use of the company from the interest payable to any person who is a holder of debentures payable to bearer an amount which bears the same proportion to the amount paid by the company under paragraph (c) of this sub-section as the interest payable to that person bears to the total interest payable in respect of those debentures;

“ Provided further that, where the Commissioner is satisfied that the holder of debentures payable to bearer is a person who is not liable to furnish a return, the Commissioner may refund to that person the amount of the tax paid by the company in respect of the debentures of that person;

“ Provided further that where a company pays tax under this sub-section on any interest, and the member, shareholder or person includes that interest in his return, the proportionate amount of tax paid by the company in respect of the interest shall be deducted from the total tax payable by the member, shareholder or person.”

AUSTRALIA—COMMONWEALTH—*continued.*

PAGE 255, paragraph 13.—Companies and Income from Companies. Insert as Section 20 (5) :—

“(5) For the purpose of ascertaining the taxable income of a life insurance company there shall be deducted from the total assessable income, in addition to any other deductions allowed by this Act, so much of the assessable income as :—

- (a) is available for distribution and is distributed to the members of the company ; and
- (b) consists of premiums paid upon the policies issued by the company.”

PAGE 256.—Section 21. Sub-section (4). *Delete.*

PAGES 257-8. *Delete* all page 257, and first sub-paragraph of page 258.

PAGE 261, paragraph 17.—Non-resident Traders, Ship-owners etc. (4) *Shipowners etc.* Third line. For “ 10 ” read “ 7½.”

PAGE 262. VIII.—TABLE OF ACTS, and footnote\*. *Delete* all, and *substitute* :—

19. **Farming.**—In computing the assessable income of an owner of livestock, the value of the natural increase of such stock, born during the year in which the income is derived, may at the owner’s option be left out of account. He is then not assessed in respect of the increase except in so far as he has disposed of it. The owner cannot revoke the option, once he has exercised it.

20. **Life Insurance Companies.**—(See section 20 (5), quoted in paragraph 13, page 255.)

## VIII.—TABLE OF ACTS.

Income Tax Assessment Act, 1922.† (No. 37 of 1922.)

Income Tax Act, 1923. (No. 26 of 1923.)

Income Tax Assessment Act, 1923.† (No. 27 of 1923.)

Taxation of Loans Act, 1923. (No. 30 of 1923.)

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\* Section 23 is the general section dealing with deductions. Its main provisions are set out in paragraph 4 above. Paragraph (c) of sub-section 1 of section 23 is the paragraph dealing with the allowance for diminished value by wear and tear.

† The Income Tax Assessment Act, 1922, as amended by the Income Tax Assessment Act, 1923, may be cited as the Income Tax Assessment Act, 1922-1923.

## AUSTRALIA—NORTHERN TERRITORY.

PAGE 274.—*Add to paragraph 17 :—*

Non-resident shipowners are charged tax on 5 % of outward freights etc. The master of the ship may be assessed as agent.

## AUSTRALIA—TASMANIA.

PAGE 302.—*Delete the introductory paragraph, the first cross heading and the first subparagraph of paragraph 1, and substitute :—*

**Introductory.**—This note summarises the law in force for the year 1923, but amendments made by the 1923 Act, which will come into force in 1924, are also shown.

Commonwealth income tax is also payable in general.

### I.—SCOPE OF THE TAX.

1. **Income Charged.**—For 1923 only the income tax applies to incomes arising, accruing, earned or derived in or from the state. For 1924 the tax will apply (as it did up to 1922) to income arising, accruing, received in or derived from the state.

PAGE 305.—7. **Personal Allowances.** In line 13 for “£200” read “£156”; in line 15 for “£156” read “£100.”

PAGE 306.—Third line on the page. For “1922.” read “1923.”

PAGES 306-7.—*Delete paragraph 11 and the first sub-para. of para. 12 and substitute :—*

11. **Provisions regarding Double Taxation.**—For 1923 the only provision in force is as follows :—A person resident in Tasmania and carrying on a manufacturing business in Tasmania who sells outside the state a portion, not less in value than 60 % of the total value of the products manufactured by him in the state, is entitled to a deduction from the Tasmanian tax on his income of income tax (other than Australian Commonwealth income tax) payable elsewhere in respect of the profits from such sales. The Tasmanian income tax payable in any case may not, however, be reduced by the relief below one-third of the amount of tax that would have been payable if the total profits had been derived from sales of such products in Tasmania.

AUSTRALIA—TASMANIA—*continued.*

For 1924 relief is allowed as follows:—Where a taxpayer residing in Tasmania derives any income from a source outside Tasmania, he may deduct from the Tasmanian tax upon that income the amount of any income tax (except Commonwealth of Australia income tax) paid by him elsewhere on the same income. Where income is derived from mortgages of land assessed to land tax elsewhere, the land tax on the mortgages may be similarly deducted. This relief is subject, however, to the proviso that a person resident in Tasmania and carrying on a manufacturing business in Tasmania who sells outside the state a portion not less in value than 60% of the total value of the products manufactured by him in the state, may not have his Tasmanian income tax reduced by this relief below one-third of the amount of tax that would have been payable if the total profits had been derived from the sale of such products in Tasmania.

12. **Due Date, Taxation at the Source etc.**—For 1923 the notice of assessment specifies the date for payment: for 1924 the date for payment is 30 days after service by post of the notice of assessment, but the time may be extended by the Commissioner or payment by instalments allowed.

There is no provision for a fine for late payment of 1923 tax, but for 1924 if tax is not paid by the time fixed additional tax is payable from that time at the rate of 10 % per annum upon the unpaid amount.

REG 310.—*Insert new paragraph:—*

19. **Farming.**—For 1924, in computing the assessable income of an owner of live stock, the value of the natural increase of such stock, born during the year in which the income is derived, may at the owner's option be left out of account. He is then not assessed in respect of the increase except in so far as he has disposed of it. The owner cannot revoke the option, once he has exercised it.

## VIII.—TABLE OF ACTS.

*Add:—*

The Land and Income Taxation Act, 1923. (No. 13, 1923.)

AUSTRALIA—WESTERN AUSTRALIA.

---

PAGE 322. *Delete* the fourth sub-paragraph on the page and *substitute* :—

Goods, sustenance or land given in respect of services rendered are taxable, and also the rental value of quarters or residence where that forms part of the emoluments of any office or employment.

PAGE 327. *Delete* paragraph 10 and *substitute* :—

10. **Set-off of Land Tax paid in Western Australia.**  
—If a person is assessed for income tax on profits derived directly from the ownership, use or cultivation of any parcel of land (except from quarrying or timber-cutting) he is allowed an abatement from the income tax on those profits of the amount of the land tax paid in respect of that parcel of land.

PAGE 330. VIII.—TABLE OF ACTS.

The serial numbers of the last two Acts are No. 41 of 1922 and No. 17 of 1923 respectively.

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NEW ZEALAND.

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PAGE 341.—Introductory. *Add* at the end—“ and 1923-24.”

[*Note*.—The law has been amended and consolidated for 1924-25. The consequent alterations in the digest will be shown in a later supplement when the rates for 1924-25 have been determined.]

Paragraph 1, line 6.—*For* “ of ” *read* “ or.”

PAGE 342, paragraph 1, last line. *For* “ chargeable ” *read* “ not in practice charged.”

PAGE 347.—9. Rates of Tax.—*Add* at the end.—

For 1923-24 the rates are the same, except that the tax under (3) is reduced by 20%.

12. Due Date etc.—*Delete* the first sentence of the second sub-paragraph—“ If the tax . . . is given.”

NEW ZEALAND—*continued.*

PAGE 352. 20 (ii) *Insurance Companies.*—*Insert* between the second and third of the four sub-paragraphs under this heading a new sub-paragraph :—

Under the Insurance Companies' Deposits Act, 1921-22, (1921-22, No. 40), companies (other than New Zealand companies) carrying on in New Zealand the business of insurance against fire, accident or employers' liability are required to lodge a deposit with the Public Trustee. Under the Insurance Companies' Deposits Amendment Act, 1923, (1923, No. 3), income derived by the company from moneys so deposited is charged with income tax separately from any other income of the company at the rate which would be payable if the company received in or derived from New Zealand no other income.

PAGE 353. VIII.—TABLE OF ACTS.

*Add :—*

Land and Income Tax (Annual) Act, 1923. (1923, No. 25.)

---

## APPENDIX.

## PAGE 363.—RHODESIA—NORTHERN.

1919-20. For "Super-tax.—1s. in the £" read:—

Super-tax.—1s. in the £ on taxable income (including dividends and interest) of individuals; subject to abatement of £5,000 less £1 for every £ of income above £5,000.

1920-21.—Delete "and Super-tax."

## RHODESIA—SOUTHERN.

1918-19. In second line, for "£500" read "£1,500."

1919-20. For "Super-tax.—As for 1921-22" read:—

Super-tax.—1s. in the £ on taxable income (including dividends and interest) of individuals; subject to abatement of £5,000 less £1 for every £ of income above £5,000.

1920-21. Delete "and Super-tax."

## PAGE 364.—Before the note headed "SUDAN" insert:—

## SOUTH AFRICA—TRANSVAAL.

The rates of tax imposed by the Poll Tax Ordinance, 1921, were as follows:—

- (1) Married individuals.—£2 10s. plus £1 for every £10 of the Union income tax paid.
- (2) Unmarried individuals:—
  - (i) Under 25 years of age and not income tax payers—£2 10s.
  - (ii) Others.—£3 15s. plus £1 10s. for every £10 of Union income tax paid.

PAGE 364.—Under "BARBADOS," for "are given in the text" read were the same as for 1923.

PAGE 365.—CANADA—BRITISH COLUMBIA. At the foot of the page insert:—

The rates of tax in force in 1922 under the Income and Personal-property Taxation Act (1921, Second Session, chap. 48) were the same as shown in the text.

APPENDIX—*continued.*

PAGE 369. After BRITISH INDIA *insert* :—

INDIA—MYSORE.

Income Tax.

The basis of assessment in 1920/21 (the first year of assessment), 1921/22 and 1922/23 was the income of the year of assessment. The rates of tax were the same for those three years, as follows :—

	Rate per rupee on taxable income.	
	annas.	pies.
<i>Taxable</i> income—less than Rs. 2,400	...	Nil.
<i>Taxable</i> income not less than Rs. 2,400 and <i>total</i> income—		
Less than Rs. 9,000	...	3
„ „ Rs. 25,000	...	4½
„ „ Rs. 50,000	...	6
„ „ Rs. 75,000	...	9
Rs. 75,000 and upwards	...	1 0

Super-tax.

1923/24 is the first year of assessment.

ADDENDUM.

PAGE 374.—In last line, before “ derived ” *insert* deemed to be.



**INCOME TAXES**  
**IN THE**  
**BRITISH DOMINIONS.**

**A Digest of the Laws imposing Income Taxes  
and Cognate Taxes in the British Dominions,  
Colonies, Protectorates, etc.**

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Compiled in the Inland Revenue Department, London.

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**SUPPLEMENT No. 2.**



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1924.

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## PREFACE.

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THIS supplement contains additions or amendments to "Income Taxes in the British Dominions," consequent on the receipt of information since the first supplement went to press. The supplement is divided into two parts. The first part is a series of additional pages of the book. This matter is not primarily intended to be taken out of this supplement and incorporated in the existing volume, but is so arranged that this can be done if it is desired. The second part contains a series of additions and corrections which are intended to be incorporated in the text of the book.

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INLAND REVENUE,

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July, 1924.

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## SEYCHELLES.

**Introductory.**—The note summarises the law in force for 1924. The law as revised is based on the Model Income Tax Ordinance prepared by an Interdepartmental Committee in 1922 (*see* its report, published in December, 1922—Cmd. 1788).

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—In general terms, residents are liable in respect of income from any source in or out of Seychelles; non-residents are liable in respect of income from any source in Seychelles. As regards income from sources out of Seychelles, no tax is payable by recipients who are in Seychelles temporarily and have not resided there for six months in all in the year preceding the year of assessment.

Income includes the annual value of land and improvements thereon owned and used, or used rent-free, for the purpose of residence or enjoyment, the annual value being deemed to be 5 per cent. of the capital value.

### 2. Income Exempted.—

- (i) The official emoluments of the officer administering the Government.
- (ii) Income of local authorities not derived from trade or business.
- (iii) Income of building or friendly societies.
- (iv) The official emoluments of members of the permanent consular services of foreign countries.
- (v) The official emoluments of persons in the service of the Imperial Government in Seychelles (including H.M. forces).
- (vi) Wound and disability pensions and war gratuities to members of H.M. forces.
- (vii) The income of the Government Savings Bank.
- (viii) Income of minors under the age of eighteen years, and of unmarried women, including widows, when such income is less than Rs. 200.
- (ix) Pensions payable out of the revenue of the colony.

SEYCHELLES—*continued.*

## II.—COMPUTATION OF INCOME.

**3. Year and Basis of Assessment.**—The income tax is levied for each calendar year upon the chargeable income (*i.e.*, net income after making all deductions, exemptions and allowances) for the year preceding the year of assessment. Where accounts are usually made up on a date other than the 31st December, the assessment may be made on the basis of the accounts for the business year ending in the calendar year preceding the year of assessment.

**4. Deductions.**—Among the expenses allowed are :—

- (i) Interest payable on any borrowed capital employed in acquiring the income ;
- (ii) Expenditure on replacement of obsolete plant or machinery equivalent to its written-down value less any sum realised by its sale ;
- (iii) Expenditure on repairs of premises and plant, and for renewal, repair or alteration of any articles employed in acquiring the income ;
- (iv) Bad and (to the extent that they are estimated to be bad) doubtful debts, recoveries being treated as income when received ;
- (v) An allowance for wear and tear of property, including plant and machinery, arising from the employment of such property in a trade, business, profession or vocation ;
- (vi) Land tax, rural house tax and export duties paid during the year immediately preceding the year of assessment.

**5. Set-off of Losses.**—Any loss incurred in the basis year in any trade, business, profession or vocation of any person may be set off against his income from other sources for the same year. Any balance of loss not so set off may, until it is exhausted, be set off against the income for the next five years in succession—but the tax for any of those years must not be so reduced to less than one-half the amount which would have been payable if the set-off had not been allowed.

## III.—PERSONAL ALLOWANCES ETC.

**6. Exemption Limit.**—The income of minors under the age of eighteen, and of unmarried women (including widows),

SEYCHELLES—*continued.*

if less than Rs. 200, is exempt. In other cases the fixed tax of Rs. 2 is payable if the income is less than Rs. 200.

## 7. Personal Allowances.—

- (i) The deductions specified in this paragraph and in paragraph 8 are allowed only where the income apart from such deductions exceeds Rs. 1,000, and then only to such an amount as will not reduce the chargeable income (*see* paragraph 3) below Rs. 1,000. They are not allowed to non-British non-residents.
- (ii) A deduction (not to exceed Rs. 1,500 for any individual) is allowed of one-tenth of the earned income of any individual. In cases where the set-off mentioned in paragraph 5 may be made, this deduction is allowed only in respect of the excess of the earned income over the loss so set-off.
- (iii) A deduction of Rs. 300 is allowed where the income of an individual, apart from this deduction and the deductions specified in paragraphs 7 (iv) and 8, does not exceed Rs. 15,000, and a deduction of Rs. 600 is allowed where such income exceeds Rs. 15,000.
- (iv) The following deductions are allowed to an individual whose income, apart from these deductions and the deductions specified in paragraphs 7 (iii) and 8, does not exceed Rs. 15,000:—
  - (a) Rs. 300, in respect of wife living with or wholly maintained by the individual during the basis year;
  - (b) Rs. 100, in respect of every child (including step-child, but not illegitimate child), living, dependent on him, and under 18 years of age at the commencement of the basis year.

8. Life Insurance and Similar Allowances.—Annual insurance premiums paid by the taxpayer on his life or on that of his wife, or annual contributions by him to the Widows' and Orphans' or other similar Fund, in Seychelles, up to one-sixth of his income (estimated before making the deductions

SEYCHELLES—*continued.*

specified in paragraph 7 (iv) and in this paragraph), are allowed as deductions, except to a non-British non-resident. (See also paragraph 7 (i).)

## IV.—COMPUTATION OF TAX.

9. Rates of Tax.—The rates of tax payable for the year of assessment 1924 are:—

On the chargeable income (*see* paragraph 3) of persons other than companies—

On chargeable income of less than Rs. 1,000 ..	Per cent.	1
(subject to a minimum tax of Rs. 2).		
On chargeable income of Rs. 1,000 or more—	Per cent.	
on the first Rs. 1,000 or part thereof ..		2
" " second Rs. 1,000 " " ..		2½
" " third Rs. 1,000 " " ..		3
" " fourth Rs. 1,000 " " ..		3½
" " fifth Rs. 1,000 " " ..		4
" " sixth Rs. 1,000 " " ..		4½
" " next Rs. 9,000 (up to Rs. 15,000)		5
" " " Rs. 5,000 ( " " Rs. 20,000)		5½
" " excess over Rs. 20,000 ..		6
On the chargeable income of companies ..		5
On interest payable to a non-resident ( <i>see</i> paragraph 17)		5
( <i>See</i> paragraph 7 (ii) for earned income relief.)		

11. Provisions regarding Double Taxation.—For the purposes of Seychelles income tax, income is assessable without any deduction for United Kingdom income tax (including super-tax), or Empire income tax (*i.e.*, any income tax charged in any other British dominion, colony or protectorate which provides by law for relief in a similar manner in respect of tax charged on income there and in Seychelles).

Any person who has paid or is liable to pay Seychelles income tax and has paid or is liable to pay United Kingdom income tax for the same year in respect of the same part of his income is entitled to relief from Seychelles income tax at a rate equal to the excess of the appropriate rate of Seychelles



SEYCHELLES—*continued.*

tax over half the appropriate rate of United Kingdom tax, or if the Seychelles rate exceeds the United Kingdom rate, at half the United Kingdom rate. A certificate issued on behalf of the Commissioners of Inland Revenue in the United Kingdom is *prima facie* evidence of the appropriate rate of United Kingdom tax in any particular case.

A person liable to Seychelles income tax and to Empire income tax for the same year in respect of the same part of his income is entitled to relief from Seychelles tax:—

- (i) if resident in Seychelles, at the Empire rate or at half the Seychelles rate, whichever is the less ;  
or
- (ii) if not resident in Seychelles, at half the Empire rate, or the excess of the Seychelles rate over half the Empire rate, whichever is the less.

The appropriate rate of Seychelles tax is determined by dividing the tax payable for the year (before deduction of the double income tax relief) by the amount of the income in respect of which the Seychelles tax has been charged, except that where Seychelles tax is charged on an amount other than the ascertained amount of the actual profits the rate of tax is determined by the (Seychelles) Commissioner. The Empire rate of tax is computed in a similar manner.

Where a person is for any year of assessment resident both in Seychelles and in a place where Empire income tax is charged, he is deemed to be resident where during that year he resides for the longer period.

## V.—PAYMENT.

**12. Due Date, Taxation at the Source etc.**—The time for payment (prescribed by the Ordinance) is in general during the month of August. If tax is not paid by 31st August an additional 10 per cent. of its amount is payable.

The Ordinance provides for the payment of tax by deduction monthly in the cases of salaries from the Government of the colony. Employers are also required to deduct the tax due for the year from the wages of any persons in their employment during the month of July, and to pay the tax so deducted to the Treasury by 31st August.

Income (including interest) payable to non-residents (*see* paragraph 17) and dividends (*see* paragraph 13) are taxed at the source.

SEYCHELLES—*continued.*

Claims for repayment of tax paid in excess must be made within two years from the end of the year of assessment.

## VI.—CORPORATE, JOINT ETC. INCOME.

**13. Companies and Income from Companies.**—Companies registered in Seychelles are entitled to deduct tax from dividends, and the tax so deductible is set off against the tax charged on the income (including such dividends) of the shareholder.

**14. Partnerships.**—A return of the partnership income is required, but each partner's share of the total income of the partnership is assessable in his hands.

**15. Married Women.**—The income of a married woman living with her husband is deemed to be his income and is charged in his name, but the wife's proportionate part of the tax may, if necessary, be collected from her.

## VII.—SPECIAL TRADES ETC.

**17. Non-resident Traders, Shipowners etc.**—Provisions have been made in the terms set forth in Clause 27 of the Model Ordinance (*cf.* Income Tax Act, 1918, of the United Kingdom, General Rules 5-8, 10-12) for assessing Seychelles agents of non-residents, for making assessments in cases where residents are controlled by non-residents, for charging non-residents on the basis of a percentage of turnover, for restricting assessments on non-residents to the "merchanting" profit, etc.

If any person pays mortgage or debenture interest to a non-resident and is entitled to a deduction for such interest under paragraph 4 (i), he must deduct and account for tax at the rate of 5 per cent.

*See* also paragraph 20.

**20. Insurance Companies.**—In the case of insurance companies (other than life insurance companies) where the profits accrue partly outside Seychelles, the profit is computed by taking the gross premiums, interest and other income received or receivable in Seychelles, deducting premiums returned to the insured, premiums paid on re-insurances, actual losses (less losses covered by re-insurance), agency

**SEYCHELLES—continued.**

expenses, and a fair proportion of head office expenses, and making an adjustment for increase or decrease in the reserve for unexpired risks.

Life insurance companies are taxed on the investment income, less management expenses and commission. If the company receives premiums outside Seychelles the investment income is apportioned in the ratio of premiums received in Seychelles to total premiums, and tax is payable on such apportioned sum less Seychelles expenses and a fair proportion of head office expenses.

**VIII.—TABLE OF ORDINANCES.**

The Income Tax Ordinance, 1923. (No. 7, 1923.)

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## BRITISH HONDURAS.

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**Introductory.**—The note summarises the law in force for 1924. The law as revised is based on the Model Income Tax Ordinance prepared by an Interdepartmental Committee in 1922 (*see its report, published in December, 1922—Cmd. 1788*).

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—In general terms, residents are liable in respect of income from any source in or out of British Honduras; non-residents are liable in respect of income from any source in British Honduras. As regards income from sources out of British Honduras, no tax is payable by recipients who are in British Honduras temporarily and have not resided there for six months in all in the year preceding the year of assessment.

Income includes the annual value of land and improvements thereon owned and used, or used rent-free, for the purpose of residence or enjoyment, the annual value being deemed to be 5 per cent. of the capital value.

#### **2. Income Exempted.**—

- (i) The official emoluments of the officer administering the Government.
- (ii) Income of local authorities not derived from trade or business.
- (iii) Income of building or friendly societies.
- (iv) The official emoluments of members of the permanent consular services of foreign countries.
- (v) The official emoluments of persons in the service of the Imperial Government in British Honduras (including H.M. forces).
- (vi) Wound and disability pensions and war gratuities to members of H.M. forces.
- (vii) The income of the Government Savings Bank.

### II.—COMPUTATION OF INCOME.

**3. Year and Basis of Assessment.**—The income tax is levied for each calendar year upon the chargeable income (*i.e.*, net income after making all deductions, exemptions and allowances) for the year preceding the year of assessment.

BRITISH HONDURAS—*continued.*

Where accounts are usually made up on a date other than the 31st December, the assessment may be made on the basis of the accounts for the business year ending in the calendar year preceding the year of assessment.

**4. Deductions.**—Among the expenses allowed are:—

- (i) interest payable on any borrowed capital employed in acquiring the income ;
- (ii) expenditure on replacement of obsolete plant or machinery equivalent to its written-down value less any sum realised by its sale ;
- (iii) expenditure on repairs of premises and plant, and for renewal, repair or alteration of any articles employed in acquiring the income ;
- (iv) bad and (to the extent that they are estimated to be bad) doubtful debts, recoveries being treated as income when received ;
- (v) an allowance for wear and tear of property, including plant and machinery, arising from the employment of such property in a trade, business, profession or vocation ;
- (vi) expenditure on re-forestation of timber land in order to make good depletion caused by felling timber.

**5. Set-off of Losses.**—Any loss incurred in the basis year in any trade, business, profession, or vocation of any person may be set off against his income from other sources for the same year. Any balance of loss not so set off may until it is exhausted be set off against the income for the next five years in succession—but the tax for any of those years must not be so reduced to less than one half the amount which would have been payable if the set-off had not been allowed.

### III.—PERSONAL ALLOWANCES ETC.

**6. Exemption Limit.**—The allowance mentioned in the first sub-paragraph of paragraph 7 establishes in effect an exemption limit of \$500, except for non-British non-residents.

**7. Personal Allowances.**—Every individual resident in British Honduras and every non-resident British subject is allowed an abatement of \$500.

A deduction (not to exceed \$500 for any individual) is allowed of one-tenth of the earned income of any individual

BRITISH HONDURAS—*continued*.

except a non-British non-resident. In cases where the set-off mentioned in paragraph 5 may be made, this deduction is allowed only in respect of the excess of the earned income over the loss so set off.

The following deductions are allowed to any individual except a non-British non-resident :—

- (a) \$250 in respect of wife living with or wholly maintained by the individual during the basis year ;
- (b) \$125 in respect of every child (including step-child but not illegitimate child) living and under 16 years of age at the commencement of the basis year.

8. **Life Insurance and Similar Allowances.**—Annual insurance premiums paid by the taxpayer on his life or on that of his wife, or annual contributions by him to a 'Widows' and Orphans' or other similar Fund in any colony, up to one-sixth of his income (estimated before making the deductions in respect of wife, children, and insurance premiums), are allowed as deductions, except to a non-British non-resident.

## IV.—COMPUTATION OF TAX.

9. **Rates of Tax.**—The rates payable for the year of assessment 1924 are :—

On the chargeable income (*see* paragraph 3) of persons other than companies :—

	\$	Per cent.
On the first .. .. .	500	$\frac{1}{4}$
On the next .. .. .	1,500	$\frac{3}{4}$
"  "  "  "  "  "  "  "	1,500	1
"  "  "  "  "  "  "  "	1,500	$1\frac{1}{2}$
"  "  "  "  "  "  "  "	2,500	$2\frac{1}{4}$
"  "  "  "  "  "  "  "	2,500	3
"  "  "  "  "  "  "  "	5,000	4
"  "  "  "  "  "  "  "	5,000	5
"  "  "  "  "  "  "  "	5,000	$7\frac{1}{2}$
"  "  "  "  "  "  "  "	5,000	10
"  "  "  "  "  "  "  "	10,000	$12\frac{1}{2}$
"  "  "  "  "  "  "  "	20,000	15
On balance .. .. . (above 60,000)		$17\frac{1}{2}$

On the chargeable income of companies, in the \$ .. 8 cents.  
 On mortgage or debenture interest payable to a non-resident (*see* paragraph 17), in the \$ .. 8 cents.  
*See* paragraph 7 for earned income relief.

BRITISH HONDURAS—*continued.*

11. **Provisions regarding Double Taxation.**—For the purposes of British Honduras income tax, income is assessable without any deductions for United Kingdom income tax (including super-tax), or Empire income tax (*i.e.*, any income tax charged in any other British dominion, colony or protectorate which provides by law for relief in a similar manner in respect of tax charged on income there and in British Honduras).

Any person who has paid or is liable to pay British Honduras income tax, and has paid or is liable to pay United Kingdom income tax for the same year in respect of the same part of his income, is entitled to relief from British Honduras income tax at a rate equal to the excess of the appropriate rate of British Honduras tax over half the appropriate rate of United Kingdom tax, or, if the British Honduras rate exceeds the United Kingdom rate, at half the United Kingdom rate. A certificate issued on behalf of the Commissioners of Inland Revenue in the United Kingdom is *prima facie* evidence of the appropriate rate of United Kingdom tax in any particular case.

A person liable to British Honduras income tax and to Empire income tax for the same year in respect of the same part of his income is entitled to relief from British Honduras tax:—

- (i) if resident in British Honduras, at the Empire rate or half the British Honduras rate, whichever is the less; or
- (ii) if not resident in British Honduras, at half the Empire rate, or the excess of the British Honduras rate over half the Empire rate, whichever is the less.

The appropriate rate of British Honduras tax is determined by dividing the tax payable for the year (before deduction of the double income tax relief) by the amount of the income in respect of which the British Honduras tax has been charged, except that where British Honduras tax is charged on an amount other than the ascertained amount of the actual profits the rate of tax is determined by the (British Honduras) Commissioners. The Empire rate of tax is computed in a similar manner.

Where a person is for any year of assessment resident both in British Honduras and in a place where the Empire income tax is charged he is deemed to be resident where during that year he resides for the longer period.

BRITISH HONDURAS—*continued.*

## V.—PAYMENT.

12. **Due Date, Taxation at the Source etc.**—The time for payment is within thirty days after service of a notice of assessment. If tax is not paid within the prescribed time an additional 5 per cent. of its amount is payable.

Interest payable to non-residents (*see* paragraph 17) and dividends (*see* paragraph 13) are taxed at the source.

Claims for repayment of tax paid in excess must be made within two years from the end of the year of assessment.

## VI.—CORPORATE, JOINT ETC. INCOME.

13. **Companies and Income from Companies.**—Companies registered in British Honduras are entitled to deduct tax from dividends, and the tax so deductible is set off against the tax charged on the income (including such dividends) of the shareholder.

14. **Partnerships.**—A return of the partnership income is required, but each partner's share of the total income of the partnership is assessable in his hands.

15. **Married Women.**—The income of a married woman living with her husband is deemed to be his income and is charged in his name, but the wife's proportionate part of the tax may, if necessary, be collected from her.

## VII.—SPECIAL TRADES ETC.

17. **Non-resident Traders, Shipowners etc.**—Provisions have been made in the terms set forth in Clause 27 of the Model Ordinance (*cf.* Income Tax Act, 1918, of the United Kingdom, General Rules 5-8, 10-12) for assessing British Honduras agents of non-residents, for making assessments in cases where residents are controlled by non-residents, for charging non-residents on the basis of a percentage of turnover, for restricting assessments on non-residents to the "merchanting" profit, etc.

If any person pays mortgage or debenture interest to a non-resident and is entitled to a deduction for such interest under paragraph 4 (i), he must deduct and account for tax at the rate of 8 cents in the dollar.

*See also* paragraph 20.



BRITISH HONDURAS—*continued.*

20. **Insurance Companies.**—In the case of insurance companies (other than life insurance companies) where the profits accrue partly outside British Honduras, the profit is computed by taking the gross premiums, interest and other income received or receivable in British Honduras, deducting premiums returned to the insured, premiums paid on re-insurances, actual losses (less losses covered by re-insurance), agency expenses, and a fair proportion of head office expenses, and making an adjustment for increase or decrease in the reserve for unexpired risks.

Life insurance companies are taxed on investment incomes, less management expenses and commission. If the company receives premiums outside British Honduras, the investment income is apportioned in the ratio of premiums received in British Honduras to total premiums, and tax is payable on such apportioned sum less British Honduras expenses and a fair proportion of head office expenses.

## VIII.—TABLE OF ORDINANCES.

Income Tax Ordinance, 1923. (No. 36—1923.)

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## GRENADA.

**Introductory.**—The note summarises the law in force for 1924. The law as revised is based on the Model Income Tax Ordinance prepared by an Interdepartmental Committee in 1922 (*see* its report, published in December, 1922—Cmd. 1788).

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—In general terms residents are liable in respect of income from any source in or out of Grenada; non-residents are liable in respect of income from any source in Grenada. As regards income from sources out of Grenada, no tax is payable by recipients who are in Grenada temporarily and have not resided there for six months in all in the year preceding the year of assessment.

Income includes the annual value of land and improvements thereon owned and used, or used rent-free, for the purpose of residence or enjoyment, the annual value being deemed to be the annual value as assessed under the Towns Administration Ordinances or the Taxes Management Ordinances.

### 2. Income Exempted.—

- (i) The official emoluments of the officer administering the Government of the colony.
- (ii) Income of local authorities not derived from trade or business.
- (iii) Income of building or friendly societies.
- (iv) The official emoluments of members of the permanent consular services of foreign countries.
- (v) The official emoluments of persons in the service of the Imperial Government in Grenada (including H.M. forces).
- (vi) Wound and disability pensions and war gratuities to members of H.M. forces.
- (vii) Income of the Government Savings Bank.
- (viii) Income from debentures issued under the Local Loan Ordinance, 1917.
- (ix) Interest payable to non-residents on all loans charged on the public revenue of Grenada.

### II.—COMPUTATION OF INCOME.

**3. Year and Basis of Assessment.**—The income tax is levied for each calendar year upon the chargeable income

GRENADA—*continued*.

(i.e., net income after making all deductions, exemptions and allowances) for the year preceding the year of assessment. Where accounts are usually made up on a date other than the 31st December, the assessment may be made on the basis of the accounts for the business year ending in the calendar year preceding the year of assessment.

4. **Deductions.**—Among the expenses allowed are :—

- (i) interest payable on any borrowed capital employed in acquiring the income ;
- (ii) expenditure on replacement of obsolete plant or machinery equivalent to its written-down value less any sum realised by its sale ;
- (iii) expenditure on repairs of premises and plant, and for renewal, repair or alteration of any articles employed in acquiring the income ;
- (iv) bad and (to the extent that they are estimated to be bad) doubtful debts, recoveries being treated as income when received ;
- (v) an allowance for wear and tear of property, including plant and machinery, arising from the employment of such property in a trade, business, profession or vocation (this allowance is calculated annually on the written-down value of the machinery or plant) ;
- (vi) an allowance (prescribed by the rules) for annuities ;
- (vii) (as prescribed by the rules) land and house tax or town rates ;
- (viii) (as prescribed by the rules) fire insurance premiums for property from which income is derived.

5. **Set-off of Losses.**—Any loss incurred in the basis year in any trade, business, profession or vocation of any person may be set off against his income from other sources for the same year. Any balance of loss not so set off may, until it is exhausted, be set off against the income for the next five years in succession, but the tax for any of those years must not be so reduced to less than one-half the amount which would have been payable if the set-off had not been allowed.

## III.—PERSONAL ALLOWANCES ETC.

6. **Exemption Limit.**—The allowance mentioned in the first sub-paragraph of paragraph 7, establishes in effect an exemption limit of £100, except for non-British non-residents.

GRENADA—*continued.*

**7. Personal Allowances.**—Every individual resident in Grenada and every non-resident British subject is allowed an abatement of £100.

A deduction (not to exceed £100 for any individual) is allowed of one-tenth of the earned income of any individual except a non-British non-resident. In cases where the set-off mentioned in paragraph 5 may be made, this deduction is allowed only in respect of the excess of the earned income over the loss so set off.

The following deductions are allowed to any individual except a non-British non-resident, whose income, apart from these deductions but allowing the abatement of £100, does not exceed £1,000 :—

- (a) £25, in respect of wife living with or wholly maintained by the individual during the basis year ;
- (b) £25, in respect of every child (including step-child but not illegitimate child) living and under 16 years of age at the commencement of the basis year.

**8. Life Insurance and Similar Allowances.**—Annual insurance premiums paid by the taxpayer on his life or on that of his wife, or annual contributions by him to the Widows' and Orphans' or other similar Fund in Grenada, up to one-sixth of his income (estimated before making the allowances for wife, children and life insurance) are allowed as deductions, except to a non-British non-resident.

## IV.—COMPUTATION OF TAX.

**9. Rates of Tax.**—The rates payable for the year of assessment 1924 are :—

On the chargeable income (*see* paragraph 3) of persons other than companies :—

			<i>s.</i>	<i>d.</i>
For every £ of the first	£300	..	0	6
..	next £300	..	1	0
..	£400	..	1	6
..	£500	..	2	3
..	£500	..	3	0
..	£500	..	3	9
..	£500	..	4	6
..	rest of the income	..	5	6

GRENADA—*continued.*

	<i>s. d.</i>
On the chargeable income of companies, for every £ of the income .. .. .	3 0
On interest payable to a non-resident ( <i>see</i> paragraph 17), in the £ .. .. .	1 0
<i>See</i> paragraph 7 for earned income relief.	

**11. Provisions regarding Double Taxation.**—For the purposes of Grenada income tax, income is assessable without any deduction for United Kingdom income tax (including super-tax) or Empire income tax (*i.e.*, any income tax charged in any other British Dominion, colony or protectorate which provides by law for relief in a similar manner in respect of tax charged on income there and in Grenada).

Any person who has paid or is liable to pay Grenada income tax and has paid or is liable to pay United Kingdom income tax for the same year in respect of the same part of his income, is entitled to relief from Grenada income tax at a rate equal to the excess of the appropriate rate of Grenada tax over half the appropriate rate of United Kingdom tax, or, if the Grenada rate exceeds the United Kingdom rate, at half the United Kingdom rate. A certificate issued on behalf of the Commissioners of Inland Revenue in the United Kingdom is *prima facie* evidence of the appropriate rate of United Kingdom tax in any particular case.

A person liable to Grenada income tax and to Empire income tax for the same year in respect of the same part of his income is entitled to relief from Grenada tax:—

- (i) if resident in Grenada, at the Empire rate or half the Grenada rate, whichever is the less; or
- (ii) if not resident in Grenada, at half the Empire rate or the excess of the Grenada rate over half the Empire rate, whichever is the less.

The appropriate rate of Grenada tax is determined by dividing the tax payable for the year (before deduction of the double income tax relief) by the amount of the income in respect of which the Grenada tax has been charged, except that where Grenada tax is charged on an amount other than the ascertained amount of the actual profits the rate of tax is determined by the (Grenada) Commissioner. The Empire rate of tax is computed in a similar manner.

**GRENADA—continued.**

Where a person is for any year of assessment resident both in Grenada and in a place where Empire income tax is charged he is deemed to be resident where during that year he resides for the longer period.

**V.—PAYMENT.**

12. **Due Date, Taxation at the Source etc.**—Payment of tax is in general to be made within 30 days after service of notice of assessment. If tax is not paid within the prescribed time an additional 5 per cent. of its amount is payable.

As regards salaries of public officials, and also pensions paid out of the revenue of the colony, the rules prescribe deduction of the tax in six proportionate monthly amounts, beginning in July.

Interest payable to non-residents (*see* paragraph 17) and dividends (*see* paragraph 13) are taxed at the source.

Claims for repayment of tax paid in excess must be made within two years from the end of the year of assessment.

**VI.—CORPORATE, JOINT ETC. INCOME.**

13. **Companies and Income from Companies.**—Companies registered in Grenada are entitled to deduct tax from dividends, and the tax so deductible is set off against the tax charged on the income (including such dividends) of the shareholder.

14. **Partnerships.**—A return of the partnership income is required, but each partner's share of the total income of the partnership is assessable in his hands.

15. **Married Women.**—The income of a married woman living with her husband is deemed to be his income and is charged in his name, but the wife's proportionate part of the tax may, if necessary, be collected from her.

**VII.—SPECIAL TRADES ETC.**

17. **Non-resident Traders, Shipowners, etc.**—Provisions have been made in the terms set forth in Clause 27 of the Model Ordinance (*cf.* Income Tax Act, 1918, of the United Kingdom, General Rules 5-8, 10-12) for assessing Grenada agents of non-residents, for making assessments in cases where residents are controlled by non-residents, for charging non-residents on the basis of a percentage of turnover,

GRENADA—*continued.*

for restricting assessments on non-residents to the "merchandising" profit, etc.

If any person pays mortgage or debenture interest to a non-resident and is entitled to a deduction for such interest under paragraph 4 (i), he must deduct and account for tax at the rate of 1s. in the £.

See also paragraph 20.

**20. Insurance Companies.**—In the case of insurance companies (other than life insurance companies) where the profits accrue partly outside Grenada, the profit is computed by taking the gross premiums, interest and other income received or receivable in Grenada, deducting premiums returned to the insured, premiums paid on re-insurances, actual losses (less losses covered by re-insurance), agency expenses, and a fair proportion of head office expenses, and making an adjustment for increase or decrease in the reserve for unexpired risks.

Life insurance companies are taxed on investment incomes, less management expenses and commission. If the company receives premiums outside Grenada, the investment income is apportioned in the ratio of premiums received in Grenada to total premiums, and tax is payable on such apportioned sum less Grenada expenses and a fair proportion of head office expenses.

#### VIII.—TABLE OF ORDINANCES.

The Income Tax Ordinance, 1923. (No. 18-1923.)

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## ST. LUCIA.

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**Introductory.**—The note summarises the law in force for 1924. The law as revised is based on the Model Income Tax Ordinance prepared by an Interdepartmental Committee in 1922 (*see its report, published in December, 1922—Cmd. 1788*).

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—In general terms, residents are liable in respect of income from any source in or out of St. Lucia; non-residents are liable in respect of income from any source in St. Lucia. As regards income from sources out of St. Lucia, no tax is payable by recipients who are in St. Lucia temporarily and have not resided there for six months in all the year preceding the year of assessment.

Income includes the annual value of land and improvements thereon owned and used, or used rent-free, for the purpose of residence or enjoyment, the annual value being deemed to be the annual value as assessed under the local Ordinances or in other cases 6 per cent. of the capital value of such land and improvements.

### 2. Income Exempted.—

- (i) The official emoluments of the Governor of the Windward Islands and the officer administering the Government.
- (ii) Income of local authorities not derived from trade or business.
- (iii) Income of building or friendly societies.
- (iv) The official emoluments of members of the permanent consular services of foreign countries.
- (v) The official emoluments of persons in the service of the Imperial Government of St. Lucia (including H.M. forces).
- (vi) Wound and disability pensions and war gratuities to members of H.M. forces.
- (vii) The income of the Government Savings Bank.



ST. LUCIA—*continued*.

II.—COMPUTATION OF INCOME.

3. **Year and Basis of Assessment.**—The income tax is levied for each calendar year upon the chargeable income (*i.e.*, net income after making all deductions, exemptions and allowances) for the year preceding the year of assessment. Where accounts are usually made up on a date other than the 31st December, the assessment may be made on the basis of the accounts for the business year ending in the calendar year preceding the year of assessment.

4. **Deductions.**—Among the expenses allowed are:—

- (i) interest payable on any borrowed capital employed in acquiring the income ;
- (ii) expenditure on replacement of obsolete plant or machinery equivalent to its written-down value less any sum realised by its sale ;
- (iii) expenditure on repairs of premises and plant, and for renewal repair or alteration of any articles employed in acquiring the income ;
- (iv) bad and (to the extent that they are estimated to be bad) doubtful debts, recoveries being treated as income when received ;
- (v) an allowance for wear and tear of property, including plant and machinery, arising from the employment of such property in a trade, business, profession or vocation (this allowance is calculated annually on the written-down value of the machinery or plant) ;
- (vi) rates and taxes on lands or buildings (not including income tax) ;
- (vii) premiums paid on any fire insurance policy on property used in acquiring the income.

5. **Set-off of Losses.**—Any loss incurred in the basis year in any trade, business, profession or vocation of any person may be set off against his income from other sources for the same year. Any balance of loss not so set off may until it is exhausted be set off against the income for the next five years in succession—but the tax for any of those years must not be so reduced to less than one-half the amount which would have been payable if the set-off had not been allowed.

## ST. LUCIA—continued.

## III.—PERSONAL ALLOWANCES ETC.

6. **Exemption Limit.**—The allowance mentioned in paragraph 7 establishes in effect an exemption limit of £100, except for non-British non-residents.

7. **Personal Allowances.**—A deduction of £100 is allowed in the case of an individual who is resident in the colony or who is a British subject.

8. **Life Insurance and Similar Allowances.**—Annual insurance premiums paid by the taxpayer on his life or on that of his wife, or annual contributions by him to the Widows' and Orphans' or other similar Fund in St. Lucia, up to one-sixth of his chargeable income (estimated before making the deductions specified in this paragraph), are allowed as deductions, except to a non-British non-resident.

## IV.—COMPUTATION OF TAX.

9. **Rates of Tax.**—The rates of tax payable for the year of assessment 1924 are :—

On the chargeable income (*see* paragraph 3) of persons other than companies—

	In the £.	
	<i>s.</i>	<i>d.</i>
On the first £100 .. .. .	0	4
„ „ next £200 .. .. .	0	6
„ „ „ £300 .. .. .	1	0
„ „ „ £400 .. .. .	1	6
„ „ „ £500 .. .. .	2	3
„ „ „ £500 .. .. .	3	0
„ „ „ £500 .. .. .	3	9
„ „ „ £500 .. .. .	4	6
„ „ remainder (above £3,000).. .. .	5	6
On the chargeable income of companies .. .. .	2	6
On mortgage or debenture interest payable to a non-resident ( <i>see</i> paragraph 17) .. .. .	1	0

11. **Provisions regarding Double Taxation.**—For the purposes of St. Lucia income tax, income is assessable without any deduction for United Kingdom income tax (including super-tax), or Empire income tax (*i.e.*, any income tax charged

ST. LUCIA—*continued.*

in any other British dominion, colony or protectorate which provides by law for relief in a similar manner in respect of tax charged on income there and in St. Lucia).

Any person who has paid or is liable to pay St. Lucia income tax and has paid or is liable to pay United Kingdom income tax for the same year in respect of the same part of his income is entitled to relief from St. Lucia income tax at a rate equal to the excess of the appropriate rate of St. Lucia tax over half the appropriate rate of United Kingdom tax, or, if the St. Lucia rate exceeds the United Kingdom rate, at half the United Kingdom rate. A certificate issued on behalf of the commissioners of Inland Revenue in the United Kingdom is *prima facie* evidence of the appropriate rate of United Kingdom tax in any particular case.

A person liable to St. Lucia income tax and to Empire income tax for the same year in respect of the same part of his income is entitled to relief from St. Lucia tax :—

- (i) if resident in St. Lucia, at the Empire rate or at half the St. Lucia rate, whichever is the less ; or
- (ii) if not resident in St. Lucia, at half the Empire rate, or the excess of the St. Lucia rate over half the Empire rate, whichever is the less.

The appropriate rate of St. Lucia tax is determined by dividing the tax payable for the year (before deduction of the double income tax relief) by the amount of the income in respect of which the St. Lucia tax has been charged, except that where St. Lucia tax is charged on an amount other than the ascertained amount of the actual profits the rate of tax is determined by the (St. Lucia) Commissioner. The Empire rate of tax is computed in a similar manner.

Where a person is for any year of assessment resident both in St. Lucia and in a place where Empire income tax is charged he is deemed to be resident where during that year he resides for the longer period.

## V.—PAYMENT.

12. **Due Date, Taxation at the Source etc.**—The time for payment (prescribed by the Ordinance) is within one month after the service of a notice of assessment. If the tax is not paid within the prescribed period an additional 5 per cent. of its amount is payable.

**St. Lucia—continued.**

As regards salaries and fees of public officials, and also pensions paid out of the revenue of the colony, the rules prescribe deduction of the tax in proportionate monthly amounts, beginning in July.

Income (including interest) payable to non-residents (*see* paragraph 17) and dividends (*see* paragraph 13) are taxed at the source.

Claims for repayment of tax paid in excess must be made within two years from the end of the year of assessment.

**VI.—CORPORATE, JOINT ETC. INCOME.**

**13. Companies and Income from Companies.**—Companies registered in St. Lucia are entitled to deduct tax from dividends, and the tax so deductible is set off against the tax charged on the income (including such dividends) of the shareholder.

**14. Partnerships.**—A return of the partnership income is required, but each partner's share of the total income of the partnership is assessable in his hands.

**15. Married Women.**—The income of a married woman living with her husband is deemed to be his income and is charged in his name, but the wife's proportionate part of the tax may, if necessary, be collected from her.

**VII.—SPECIAL TRADES ETC.**

**17. Non-resident Traders, Shipowners etc.**—Provisions have been made in the terms set forth in Clause 27 of the Model Ordinance (*cf.* Income Tax Act, 1918, of the United Kingdom, General Rules 5-8, 10-12) for assessing St. Lucia agents of non-residents, for making assessments in cases where residents are controlled by non-residents, for charging non-residents on the basis of a percentage of turnover, for restricting assessments on non-residents to the "merchandising" profit, etc.

If any person pays mortgage or debenture interest to a non-resident and is entitled to a deduction for such interest under paragraph 4 (i), he must deduct and account for tax at the rate of 1s. in the £.

*See also* paragraph 20.

**20. Insurance Companies.**—In the case of insurance companies (other than life insurance companies) where the

*ST. LUCIA—continued.*

profits accrue partly outside St. Lucia, the profit is computed by taking the gross premiums, interest and other income received or receivable in St. Lucia, deducting premiums returned to the insured, premiums paid on re-insurances, actual losses (less losses covered by re-insurance), agency expenses, and a fair proportion of head office expenses, and making an adjustment for increase or decrease in the reserve for unexpired risks.

Life insurance companies are taxed on the investment income, less management expenses and commission. If the company receives premiums outside St. Lucia the investment income is apportioned in the ratio of premiums received in St. Lucia to total premiums, and tax is payable on such apportioned sum less St. Lucia expenses and a fair proportion of head office expenses.

## VIII.—TABLE OF ORDINANCES.

The Income Tax Ordinance, 1924. (No. 8 of 1924.)

## ST. VINCENT.

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**Introductory.**—The note summarises the law in force for 1924. The law as revised is based on the Model Income Tax Ordinance prepared by an Interdepartmental Committee in 1922 (*see its report, published in December, 1922—Cmd. 1788*).

### I.—SCOPE OF THE TAX.

1. **Income Charged.**—In general terms, residents are liable in respect of income from any source in or out of St. Vincent; non-residents are liable in respect of income from any source in St. Vincent. As regards income from sources out of St. Vincent, no tax is payable by recipients who are in St. Vincent temporarily and have not resided there for six months in all in the year preceding the year of assessment.

Income includes the annual value of land and improvements thereon owned and used, or used rent-free, for the purpose of residence or enjoyment, the annual value being deemed to be the annual value as assessed under the local Ordinances.

### 2. **Income Exempted.**—

- (i) The official emoluments of the Governor of the Windward Islands and of the officer administering the Government.
- (ii) Income of local authorities not derived from trade or business.
- (iii) Income of registered agricultural credit or friendly societies.
- (iv) The official emoluments of members of the permanent consular services of foreign countries.
- (v) The official emoluments of persons in the service of the Imperial Government in St. Vincent (including H.M. forces).
- (vi) Wound and disability pensions and war gratuities to members of H.M. forces.
- (vii) The income of the Government Savings Bank or other Government institution or concern.

ST. VINCENT—*continued.*

## II.—COMPUTATION OF INCOME.

**3. Year and Basis of Assessment.**—The income tax is levied for each calendar year upon the chargeable income (*i.e.*, net income after making all deductions, exemptions and allowances) for the year preceding the year of assessment. Where accounts are usually made up on a date other than the 31st December, the assessment may be made on the basis of the accounts for the business year ending in the calendar year preceding the year of assessment.

**4. Deductions.**—Among the expenses allowed are:—

- (i) interest payable on any borrowed capital employed in acquiring the income ;
- (ii) expenditure on replacement of obsolete plant or machinery equivalent to its written-down value less any sum realised by its sale ;
- (iii) expenditure on repairs of premises and plant, and for renewal, repair or alteration of any articles employed in acquiring the income ;
- (iv) bad and (to the extent that they are estimated to be bad) doubtful debts, recoveries being treated as income when received ;
- (v) an allowance for wear and tear of property, including plant and machinery, arising from the employment of such property in a trade, business, profession, or vocation (this allowance is calculated annually on the written-down value of the machinery or plant) ;
- (vi) rates and taxes on real estate (not including income tax) ;
- (vii) premiums paid on any fire or hurricane insurance policy on property used in acquiring the income ;
- (viii) an allowance (prescribed by the rules) for annuities.

**5. Set-off of Losses.**—Any loss incurred in the basis year in any trade, business, profession, or vocation of any person may be set off against his income from other sources for the same year. Any balance of loss not so set off may until it is exhausted be set off against the income for the next five years in succession—but the tax for any of those years must not be so reduced to less than one-half the amount which would have been payable if the set-off had not been allowed.

ST. VINCENT—*continued.*

## III.—PERSONAL ALLOWANCES ETC.

6. **Exemption Limit.**—The allowance mentioned in the first sub-paragraph of paragraph 7 establishes in effect an exemption limit of £100, except for non-British non-residents.

7. **Personal Allowances.**—Every individual resident in St. Vincent and every non-resident British subject is allowed an abatement of £100.

A deduction (not to exceed £100 for any individual) is allowed of one-tenth of the earned income of any individual. In cases where the set-off mentioned in paragraph 5 may be made, this deduction is allowed only in respect of the excess of the earned income over the loss so set off. (This deduction is not allowed to a non-British non-resident.)

The following deductions are allowed to any individual (except a non-resident non-British subject) whose income, apart from these deductions, does not exceed £500 :—

- (a) £50, in respect of wife living with or wholly maintained by the individual during the basis year ;
- (b) £25, in respect of every child (including step-child but not illegitimate child) living and under 16 years of age at the commencement of the basis year.

8. **Life Insurance and Similar Allowances.**—Annual insurance premiums paid by the taxpayer on his life or on that of his wife, or annual contributions by him to any Widows' and Orphans' or other similar Fund in St. Vincent, up to one-sixth of his income (estimated before making this deduction and the deductions for wife and children) are allowed as deductions, except to a non-British non-resident.

## IV.—COMPUTATION OF TAX.

9. **Rates of Tax.**—The rates of tax payable for the year of assessment 1924 are :—

On the chargeable income (*see* paragraph 3) of persons other than companies :—

	In the £		
	<i>s.</i>	<i>d.</i>	
On the first £300 .. ..	0	5	
„ „ next £300 .. ..	0	10	
„ „ „ £400 .. ..	1	3	



ST. VINCENT—*continued.*

	In the £
	s. d.
On the next £500 .. .. .	1 8
” ” ” £500 .. .. .	2 1
” ” ” £500 .. .. .	2 6
” ” ” £500 .. .. .	3 0
” ” ” £500 .. .. .	3 6
” ” remainder (above £3,500) ..	4 0
On the chargeable income of companies ..	2 0
On interest payable to a non-resident (see paragraph 17) .. .. .	1 0

*See* paragraph 7 for earned income relief.

**11. Provisions regarding Double Taxation.**—For the purposes of St. Vincent income tax, income is assessable without any deduction for United Kingdom income tax (including super-tax), or Empire income tax (*i.e.*, any income tax charged in any other British dominion, colony or protectorate which provides by law for relief in a similar manner in respect of tax charged on income there and in St. Vincent).

Any person who has paid or is liable to pay St. Vincent income tax, and has paid or is liable to pay United Kingdom income tax for the same year in respect of the same part of his income is entitled to relief from St. Vincent income tax at a rate equal to the excess of the appropriate rate of St. Vincent tax over half the appropriate rate of United Kingdom tax, or, if the St. Vincent rate exceeds the United Kingdom rate, at half the United Kingdom rate. A certificate issued on behalf of the Commissioners of Inland Revenue in the United Kingdom is *prima facie* evidence of the appropriate rate of United Kingdom tax in any particular case.

A person liable to St. Vincent income tax and to Empire income tax for the same year in respect of the same part of his income is entitled to relief from St. Vincent tax :—

- (i) if resident in St. Vincent, at the Empire rate or at half the St. Vincent rate, whichever is the less ;  
or
- (ii) if not resident in St. Vincent, at half the Empire rate, or the excess of the St. Vincent rate over half the Empire rate, whichever is the less.

The appropriate rate of St. Vincent tax is determined by dividing the tax payable for the year (before deduction of the double income tax relief) by the amount of the income in

**ST. VINCENT—continued.**

respect of which the St. Vincent tax has been charged, except that where St. Vincent tax is charged on an amount other than the ascertained amount of the actual profits the rate of tax is determined by the (St. Vincent) Commissioner. The Empire rate of tax is computed in a similar manner.

Where a person is for any year of assessment resident both in St. Vincent and in a place where Empire income tax is charged he is deemed to be resident where during that year he resides for the longer period.

**V.—PAYMENT.**

**12. Due Date, Taxation at the Source etc.**—The time for payment (prescribed by the rules) is on or before 30th September. If tax is not paid by that date an additional 5 per cent. of its amount is payable.

As regards salaries of public officials, and also pensions paid out of the revenue of the colony, the rules allow deduction of the tax in six proportionate monthly payments, beginning in July.

Income (including interest) payable to non-residents (*see* paragraph 17) and dividends (*see* paragraph 13) are taxed at the source.

Claims for repayment of tax paid in excess must be made within two years from the end of the year of assessment.

**VI.—CORPORATE, JOINT ETC. INCOME.**

**13. Companies and Income from Companies.**—Companies registered in St. Vincent are entitled to deduct tax from dividends, and the tax so deductible is set off against the tax charged on the income (including such dividends) of the shareholder.

**14. Partnerships.**—A return of the partnership income is required, but each partner's share of the total income of the partnership is assessable in his hands.

**15. Married Women.**—The income of a married woman living with her husband is deemed to be his income and is charged in his name, but the wife's proportionate part of the tax may, if necessary, be collected from her.

ST. VINCENT—*continued.*

## VII.—SPECIAL TRADES ETC.

17. **Non-resident Traders, Shipowners etc.**—Provisions have been made in the terms set forth in Clause 27 of the Model Ordinance (*cf.* Income Tax Act, 1918, of the United Kingdom, General Rules 5-8, 10-12) for assessing St. Vincent agents of non-residents, for making assessments in cases where residents are controlled by non-residents, for charging non-residents on the basis of a percentage of turnover, for restricting assessments on non-residents to the "merchandising" profit, etc.

If any person pays mortgage or debenture interest to a non-resident and is entitled to a deduction for such interest under paragraph 4 (i), he must deduct and account for tax at the rate of 1s. in the £.

*See also paragraph 20.*

20. **Insurance Companies.**—In the case of insurance companies (other than life insurance companies) where the profits accrue partly outside St. Vincent, the profit is computed by taking the gross premiums, interest and other income received or receivable in St. Vincent, deducting premiums returned to the insured, premiums paid on re-insurances, actual losses (less losses covered by re-insurance), agency expenses, and a fair proportion of head office expenses, and making an adjustment for increase or decrease in the reserve for unexpired risks.

Life insurance companies are taxed on the investment income, less management expenses and commission. If the company receives premiums outside St. Vincent, the investment income is apportioned in the ratio of premiums received in St. Vincent to total premiums, and tax is payable on such apportioned sum less St. Vincent expenses and a fair proportion of head office expenses.

## VIII.—TABLE OF ORDINANCES.

The Income Tax Ordinance, 1924. (No. 5 of 1924.)

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## AUSTRALIA—TASMANIA.

**Introductory.**—The note summarises the law in force for 1924 and 1925.

Commonwealth income tax is also payable in general.

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—The tax applies to income arising, accruing, received in or derived from the state.

The annual value of immovable property used by the owner as a residence is not taxable as income. On the other hand, the annual value of a house or quarters, occupied rent free in respect of employment or services, is taxable.

“Income” also includes *inter alia* :—

- (1) Money derived by way of royalty or bonuses, and premiums, fines etc., paid in connection with leasehold estates, also any payment received by a lessee upon the assignment or transfer of a lease to another person, after deducting the portion (if any) which is properly attributable to the transfer of any tangible assets belonging to the lessee, and so much of any fine, premium etc., or of any sum paid by the lessee for the assignment or transfer of the lease as is properly attributable to the period of the lease unexpired at the time of assignment or transfer by him. Tax is, however, not chargeable on the proceeds of the sale, transfer or assignment of the lease of a mining property (other than coal mining) by a *bona-fide* prospector or by a person, partnership, syndicate or company who or which does not make a business of buying and selling mining properties and who or which purchased the lease from a *bona-fide* prospector and worked the property in a proper and efficient manner.
- (2) Profits accruing to a taxpayer from the sale of an estate or interest in land (other than a leasehold estate or interest), including the goodwill of any business carried on on the land, where the estate or interest was bought during the income year or the three preceding years.
- (3) 5 per cent. of the capital amount of a retiring allowance which is paid in a lump sum.

AUSTRALIA—TASMANIA—*continued.*

- (4) The value of allowances or gratuities (other than retiring allowances paid in a lump sum), bonuses etc., whether in money, goods, sustenance or land given to a taxpayer in connection with any employment or services.
- (5) The proceeds of the sale of trading stock after 30th June, 1922 (whether included in the sale of a business or not).

“Income” does not include appreciation in the value of property.

The tax applies to income represented by prizes in any lottery authorized by law in Tasmania, and all such income is liable to taxation without any exemption whatever.

2. **Income Exempted.**—Among the exemptions are :—

- (i) The income of the Governor.
- (ii) The salaries of the Agent-General and of his officers so far as such salaries are derived from the state.
- (iii) The revenues of Marine Boards and Municipal Corporations, Water Trusts and statutory local bodies receiving revenue of any kind for the purposes of or in relation to local self-government.
- (iv) The incomes of certain companies, societies, public bodies or public trusts not carrying on business and not engaged in any trade for the purpose of profit to be divided amongst the members.
- (v) The funds and incomes of any registered friendly society or trade union.
- (vi) The dividends and profits of the State Savings Bank and the Agricultural Bank of Tasmania.
- (vii) The Police Provident Fund, the Closer Settlements Fund, and any fund exempted from taxation by the statute creating it.
- (viii) The income from debentures, inscribed stock, or Treasury Bills issued or guaranteed by the Government of Tasmania and redeemable elsewhere than in Tasmania.
- (ix) The income of every person arriving in Tasmania for a period of six months after his arrival. (This does not apply to companies nor to any person carrying on a business in the state.)
- (x) Pensions under the War Pensions Act, 1914, of the Commonwealth.

AUSTRALIA—TASMANIA—*continued.*

## II.—COMPUTATION OF INCOME.

3. **Year and Basis of Assessment.**—The tax is charged for the year ending 31st December on the basis of the income of the year ending 30th June immediately preceding the year of assessment. (The financial year of the state runs from the 1st July to the 30th June.) Returns may, however, be made for the twelve months ending on the balancing day nearest to the 30th June in the case of any taxpayer whose books are not made up to the 30th June.

4. **Deductions.**—The following deductions are allowable :—

- (i) Losses, outgoings and expenses actually incurred in the production of income.
- (ii) Sums paid by way of interest on money borrowed and used for business purposes, or of rent-charge or other charge on land, but if payable to a person outside Tasmania the payer is liable to pay tax as the agent of the recipient.
- (iii) Expenditure on repairs of business premises or of premises let to tenants.
- (iv) Expenditure on repairs or alteration of machinery, implements etc., used for business purposes.
- (v) An allowance for depreciation through wear and tear of any machinery, implements etc., used for business purposes, such depreciation not being of a kind that could be made good by repairs. The taxpayer's own depreciation fund, if any, is to be the measure of the allowance, subject to the Commissioner's approval. Any allowance granted under (iv) above is to be taken into consideration in calculating this allowance.
- (vi) Fire insurance premiums in respect of business premises, plant, or stock-in-trade.
- (vii) Debts proved bad and actually written off in the year of income, which have not previously been allowed as a deduction, provided that all recoveries are credited as income in the year in which received, and are subject to tax.
- (viii) In the case of income from rent of land liable to Tasmanian land tax, sums paid by way of interest on mortgage, rentcharge or other charge thereon, and any Tasmanian or Commonwealth land tax paid thereon.

AUSTRALIA—TASMANIA—*continued.*

- (ix) Where land liable to Tasmanian or Commonwealth land tax is occupied by the owner for business purposes, deductions similar to those mentioned in (viii).
- (x) In the case of income from mortgages (of land) liable to land tax outside Tasmania, a deduction of such land tax.
- (xi) Where a taxpayer who is the lessee under a lease or the assignee or transferee of a lease, has paid a fine, premium or similar consideration for a lease or the renewal of a lease or a sum for the assignment or transfer of a lease of premises or machinery used for the production of income, the Commissioner may allow as a deduction the amount obtained by dividing the sum so paid by the number of years of the unexpired period of the lease at the date the amount was so paid. The aggregate of the deductions so allowed is not to exceed the sum so paid if paid on or after the 30th June, 1922, or the part of the sum so paid which is proportionate to the unexpired portion of the lease from 30th June, 1922, if the sum was paid before that date.

A deduction calculated on a similar basis is allowed for the annual sum necessary to recoup the expenditure covenanted to be made on improvements on land by a lessee who has no tenant rights in the improvements.

Deduction is prohibited in respect of :—

- (a) Depreciation of buildings ;
- (b) Income tax or land tax (except as in (viii) and (ix) above) ;
- (c) Any loss or expense recoverable under any insurance or contract of indemnity.

5. **Set-off of Losses.**—Where a taxpayer, either alone or with other persons, carries on, or has an interest as partner in, more than one business, he may deduct losses from profits ; and if a taxpayer, carrying on one or more businesses, either alone or otherwise, makes a loss therein, the loss is deductible from his income from the produce of property.

AUSTRALIA—TASMANIA—*continued.*

Where a taxpayer sells (otherwise than in connection with any business) estates or interests (not being leasehold estates or interests) in land, and makes a net loss on the whole of such sales during the year, such loss is not deductible from his other income.

Losses of any year cannot be deducted from the profits of a subsequent year.

## III.—PERSONAL ALLOWANCES ETC.

6. **Exemption Limit.**—The exemption limit is £156 in the case of an individual who is married, or is a widower or widow with a dependent child under 16 years of age, and £125 in the case of an unmarried individual.

7. **Personal Allowances.**—An individual who is married, or is a widower or widow (with a dependent child under 16 years of age), and whose income does not exceed £500, is allowed abatement of £1 for every £3 by which the income is less than £500.

An unmarried individual whose income does not exceed £400 is allowed abatement of £1 for every £6 by which the income is less than £400.

These abatements are allowed as far as possible from income from business.

A deduction of £25 in respect of each child under 16 years of age at the beginning of the income year, and wholly maintained by the taxpayer, is granted in the case of taxpayers whose income (before allowing the above-mentioned abatement) does not exceed £400.

## IV.—COMPUTATION OF TAX.

9. **Rates of Tax.**—Differentiation in rate as regards taxpayers other than companies is made between (a) "income from business," defined as "all income arising or accruing from any trade, manufacture, profession, employment, occupation or business of any kind, whether carried on in [Tasmania] or elsewhere; and all income consisting of salaries, wages, allowances, fees, commissions, emoluments, pensions or stipends," and (b) "income from property," defined as any income "not being income from business." (Profits derived from the sale of an estate or interest in land (*see* paragraph



AUSTRALIA—TASMANIA—*continued.*

1, (2)) and income arising from the sale of trading stock (see paragraph 1, (5)) are deemed to be "income from business.")

The scales of taxation are based on the taxable amount of income (after the deduction of abatement), the rates of tax for the years 1924 and 1925 being as follows:—

I.—*General Scale of Rates.*—The following formulæ give the rates of charge under the scheme of graduation in the Act.

(A) *Income from Business.*—(1) For so much of the taxable amount as does not exceed £3,000, the average rate of tax is given by the formula

$$R = \left( 3 + \frac{3}{800} I \right),$$

where R = average rate of tax in pence per £,

and I = taxable amount in £.

Under this formula the tax on £3,000 is £178 2s. 6d.

(2) For every £ in excess of £3,000 up to £5,000, the tax is  $\frac{27}{1.625}$  pence.

(3) For every £ in excess of £5,000, the tax is  $\frac{30}{1.625}$  pence.

These three rates are respectively multiplied by 1.625.

(B) *Income from Property.*—(1) For such part of the taxable amount as does not exceed £546, the Act gives the following formula for calculation of the rate of tax:—

$$R = \left( 3 + \frac{I}{181.058} \right),$$

where R and I have the same meanings as at A (1) above.

(2) For such part of the income as exceeds £546, but does not exceed £2,000, the Act prescribes that "the additional tax for each additional pound of the taxable amount above £546 shall increase continuously with the increase of the taxable

## AUSTRALIA—TASMANIA—continued.

amount in a curve of the second degree in such a manner that the increase of tax for one pound increase of the taxable amount shall be—

“ 11·713	} pence for the pound sterling between	} £545 10s. and £546 10s.	
12·768			£599 10s. „ £600 10s.
14·672			£699 10s. „ £700 10s.
16·512			£799 10s. „ £800 10s.
18·288			£899 10s. „ £900 10s.
20·000			£999 10s. „ £1,000 10s.
27·600			£1,499 10s. „ £1,500 10s.
33·600			£1,999 10s. „ £2,000 10s.”

The Act provides no formula in this case, but the following formula has been computed, R and I having the same meanings as at A (1) above, and I not being less than £546 nor more than £2,000.

$$R = -1\frac{1}{15} \left( \frac{I}{1000} \right)^2 + 11\frac{2}{3} \left( \frac{I}{1000} \right).$$

(3) For every £ in excess of £2,000 up to £5,000, the tax is  $\frac{33}{1\cdot625}$  pence.

(4) For every £ in excess of £5,000, the rate is  $\frac{36}{1\cdot625}$  pence.

These three rates are respectively multiplied by 1·625.

(C) *Mixed Incomes.*—The rule in the case of mixed incomes is as follows :—For every pound sterling of the taxable amount of income from business the rate of tax is ascertained by dividing the total amount of tax that would be payable under the scale above if the total taxable amount of the taxpayer had been exclusively income from business by such total taxable amount. The rate for the taxable amount of the income from property is ascertained by dividing the total amount of the tax that would be payable under the scale above if the total taxable amount of the taxpayer had been exclusively income from property (other than dividends) by such total taxable amount.

The rate in each case is multiplied by 1·625.

AUSTRALIA—TASMANIA—*continued.*

II.—*Income of a Company.*—("Company" includes all bodies or associations, corporate or unincorporate, but not partnerships.)

- (a) For the taxable income the rate is 1s. 9d. in the £.
- (b) For dividends the rate is 1s. 9d. in the £.

III.—*Lottery Prizes.*—Tax at the rate of 2s. in the £ is payable in respect of prizes won in any Tasmanian lottery.

IV.—*Profits from Manufacture or Sale of Liquor.*—(See paragraph 20). Additional tax 1s. in the £.

11. **Provisions regarding Double Taxation.**—Where a taxpayer residing in Tasmania derives any income from a source outside Tasmania, he may deduct from the Tasmanian tax on that income the amount of any income tax paid by him elsewhere on the same income, or the amount of tax on such income calculated at his average Tasmanian rate on the whole of his income of the class to which the extra-Tasmanian income belongs, whichever is the less. No deduction is allowed in respect of Commonwealth of Australia income tax.

This relief is subject to the proviso that a person resident in Tasmania and carrying on a manufacturing business in Tasmania who sells outside the state a portion not less in value than 60 per cent. of the total value of the products manufactured by him in the state, may not have his Tasmanian income tax reduced by this relief below one-third of the amount of tax that would have been payable if the total profits had been derived from the sale of such products in Tasmania.

V.—PAYMENT.

12. **Due Date, Taxation at the Source etc.**—The date for payment is 30 days after service by post of the notice of assessment, but the Commissioner may extend the time or permit payment by instalments.

If tax is not paid by the time fixed, additional tax is payable from that time at the rate of 10 per cent. per annum upon the unpaid amount.

Provision is made for payment of tax on interest on debentures at the source, but this provision is not operative as regards any year in which income from property is not charged at a flat rate. (The rate has been a graduated one since 1912.)

**AUSTRALIA—TASMANIA—continued.**

Dividends are taxed at the source (*see* paragraph 13).

Claims for repayment of tax paid in excess must be made within twelve months after the overpayment.

**VI.—CORPORATE, JOINT ETC. INCOME.****13. Companies and Income from Companies.—**

("Company" includes all bodies or associations, corporate or unincorporate, but not partnerships.) Companies having their head office or chief place of business in Tasmania must, within seven days after declaring a dividend, forward to the Commissioner a declaration showing the amount of the dividend, and pay income tax thereon.

Companies incorporated outside Tasmania, which carry on mining operations in Tasmania in connection with other business and also carry on business outside Tasmania, are required to furnish a statement apportioning the profits, and to pay tax on so much of the dividend as represents profits derived from the business of the company carried on in Tasmania.

Companies with their head office or chief place of business in Tasmania (except building societies, and mining companies whose head office is in Tasmania, but the whole of whose mining operations are carried on elsewhere than in Tasmania), are assessed on the full amount of the income of the year ending 30th June immediately preceding the year of assessment, allowance being made for tax already paid in respect of dividends. The taxable amount in any year must not be less than the amount of the dividends. The mining companies incorporated outside Tasmania already referred to are similarly taxed, but allowance is made for the tax on only so much of the dividends as represents profits derived from the business carried on in Tasmania. In the case of such companies, the amount of the income represented by profits in respect of products derived from Tasmania for use outside Tasmania in the processes of any business of the company other than mining may be assessed at £15 per 100 tons of such product.

In the case of a mining company having its head office in Tasmania, but carrying on the whole of its mining operations elsewhere, the taxable amount is taken to be one-half of all dividends.

Tax must be paid on dividends before they are distributed, and may be deducted from the dividends. Dividends, when

AUSTRALIA—TASMANIA—*continued.*

income tax has been paid thereon at the source in Tasmania, are (for purposes of calculating the recipient's rate of tax) included in his taxable amount of income, but they are not again subject to taxation.

14. **Partnerships.**—Partnerships are expressly excluded from the definition of “company” (*see* 9, II).

15. **Married Women.**—Section 29 of the principal Act provides that the income of a married woman shall be liable to taxation in like manner as if she were unmarried, while Section 108 provides that, “where judgment has been signed against any person for income tax payable solely in respect of the income of his wife, such judgment may be enforced against the separate estate of the wife of such person in the same manner as if the judgment had been signed against the wife of such person.”

## VII.—SPECIAL TRADES ETC.

17. **Non-resident Traders, Shipowners etc.**—Where a non-resident sells or disposes of any goods by means of a company or other agent in Tasmania, whether the goods are in Tasmania or are by the contract to be brought into Tasmania, and whether the contract is made by the agent in Tasmania, or by or on behalf of the principal out of Tasmania, and, further, whether the moneys arising therefrom are paid to or received by the principal directly or otherwise, the income accruing to the principal is assessable on the agent, the taxable amount, failing other satisfactory determination, being taken to be 5 per cent. upon the net proceeds of sale. The agent in such cases is personally liable for all purposes of the Act, without, however, exonerating the principal.

Non-resident shipowners or charterers are assessable through their agents on  $7\frac{1}{2}$  per cent. of the receipts in respect of goods, passengers, etc., shipped in the state and carried to a final destination. Where there is no agent other than the master of the ship, or in default of a return, such master may be assessed, the tax being payable prior to the clearance of the ship.

In the case of persons in Tasmania temporarily for business purposes, security for the due assessment and payment of income tax may be required.

AUSTRALIA—TASMANIA—*continued.*

The following provisions deal with the basis of liability of companies which have not their head office or chief place of business in the state, but carry on business in the state. In no case must the taxable amount be assessed at less than £1,000 :—

- (1) *Banking Companies.*—A sum bearing the same proportion to the total profits as the assets and liabilities in the state bear to the total assets and liabilities, not including liabilities to capital or reserves.
- (2) *Insurance Companies other than Life.*—50 per cent. of the net premiums received in the state (excluding premiums paid away on re-insurances effected in the state).
- (3) *Life Insurance Companies.*—20 per cent. of the premiums received in the state.
- (4) *Shipping Companies.*— $7\frac{1}{2}$  per cent. of the receipts for goods, passengers etc., shipped in the state.
- (5) *Mercantile Companies.*—The profits made on the Tasmanian business ; such profits may be assessed on the basis of 5 per cent. of the turnover.
- (6) *Savings Banks* (established under Act of Council, 12 Victoriae, No. 1).—5 per cent. of the reserve fund on the 30th June immediately preceding the year of assessment.
- (7) *Other Companies.*—The profits made on the Tasmanian business ; such profits may be assessed on the basis of 5 per cent. of the capital employed in the state.

19. **Farming.**—In computing the assessable income of an owner of livestock, the value of the natural increase of such stock, born during the year in which the income is derived, may at the owner's option be left out of account. He is then not assessed in respect of the increase except in so far as he has disposed of it. The owner cannot revoke the option, once he has exercised it.

20. **Manufacture or Sale by certain Persons of Liquor.**  
—Where any taxpayer derives profit on the manufacture or sale of any liquor as defined by "The Licensing Act, 1902," under a wholesale or importer's licence under that Act, an additional tax (*see* 9, IV) is payable on such profits. The taxpayer is allowed to deduct from this special tax the

AUSTRALIA—TASMANIA—*continued.*

amount of the fee paid by him in respect of the above licence in the income year. Where the taxpayer is a company, the taxable amount of its income is for the purposes of this special tax deemed to be its full income before deducting dividends payable.

## VIII.—TABLE OF ACTS.

- The Land and Income Taxation Act, 1910. (No. 47, 1910.)  
 The Land and Income Taxation Act, 1911. (No. 35, 1911.)  
 The Land and Income Taxation Act, 1912. (No. 35, 1912.)  
 The Land and Income Taxation Act, 1914. (No. 23, 1914.)  
 The Land and Income Taxation Act, 1915. (No. 40, 1915.)  
 The Land and Income Taxation Act, 1918. (No. 63, 1918.)  
 The Land and Income Taxation Act, 1921. (No. 46, 1921.)  
 The Land and Income Taxation Act, 1923. (No. 13, 1923.)  
 The Income Tax Act, 1924. (No. 33, 1924.)  
 The Land and Income Taxation Act, 1924. (No. 43, 1924.)
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## Additions and Amendments to the Text of “Income Taxes in the British Dominions.”

### INDEX TO “DOMINIONS.”

PAGE 5.—*Correct the entries as follows:—*

Antigua ... ..	123 & 379	15 14A & 14B	37	41	364
British Honduras ... ..	133 & 431	16 & 16A	38	42	365
Grenada ... ..	182 & 437	21 & 20A	38	42	366
Guernsey ... ..	354	36 & 36A	40	44	373
Honduras, British ... ..	133 & 431	16 & 16A	38	42	365
Leeward Islands— Antigua ... ..	123 & 379	15 14A & 14B	37	41	364

PAGE 6.—*Correct the entries as follows:—*

St. Lucia ... ..	204 & 443	24 & 24B	38	42	367
St. Vincent ... ..	208 & 449	25 & 24C	38	42	367
Seychelles ... ..	88 & 423	12 & 12A	37	41	363
Tasmania ... ..	302 & 455	31 & 32A	39	43	371
Tobago—Trinidad and Trinidad and Tobago } }	212 & 395	25, 24A & 24C	38	43	367
Windward Islands— Grenada ... ..	182 & 437	21 & 20A	38	42	366
St. Lucia ... ..	204 & 443	24 & 24B	38	42	367
St. Vincent ... ..	208 & 449	25 & 24C	38	42	367



## Additions and Amendments—*continued.*

### TABLE OF INCOME TAX RATES.

PAGE 11.—In the Nyasaland Protectorate column, after “1921-22” *insert* “1922-23 and 1923-24.”

*Insert* new page 12A as given below.

PAGES 13-14.—In the Orange Free State columns, after “1921-22” *insert* “and 1922-23.”

PAGE 14A.—In the heading of Transvaal column, *insert* “1922 and 1923.”

*Insert* new page 14B as given below.

PAGE 16.—In the British Honduras column, after “1922” *insert* “and 1923.”

*Insert* new page 16A as given below.

PAGES 19-20.—In the Prince Edward Island columns, after “1922” *insert* “1923 and 1924.”

*Insert* new page 20A as given below.

PAGE 21.—In the Dominica column, after “1922” *insert* “1923 and 1924.”

PAGES 22-23.—In the Jamaica columns, after “1922” *insert* “1923 and 1924.”

In the Newfoundland columns, after “1922” *insert* “and 1923.”

PAGE 24.—In the St. Lucia column, after “1922” *insert* “and 1923.”

PAGE 24A.—In the St. Kitts and Nevis column, after “1923” *insert* “and 1924.”

In the same column, under “Rates of Tax for Individuals” *insert* :—

“On interest or annual payment by a resident to a non-resident .. .. . 6*d.* in the £.”

and under “Rates of Tax for Companies” *insert* :—

“On interest or annual payment by a resident to a non-resident .. .. . 6*d.* in the £.”

TABLE OF INCOME TAX RATES—*continued.*

PAGE 24A.—In the Trinidad column, under “Exemption Limit,” for “residents” read “non-residents.”

*Insert new page 24B as given below.*

*Insert new page 24C as given below.*

PAGE 25.—In the St. Vincent column, after “1922” insert “and 1923.”

PAGE 28.—In the New South Wales column, after “1921–22” insert “and 1922–23.”

In the Northern Territory column, after “1922” insert “1923 and 1924.”

PAGE 29.—In the heading, after “1922–23” insert “and 1923–24.” Under “Exemption Limit,” add:—

EXEMPTION:	<i>Income Tax.</i> —For 1923–24, £250.
LIMIT.	<i>Super-tax.</i> —For 1923–24, £250 in addition to the abatement allowed for income tax.

PAGE 30.—In the heading, after “1922–23” insert “and 1923–24.” Under “Abatement,” add:—

ABATEMENT:	<i>Income Tax.</i> —For 1923–24, £250, less £1 for every complete £3 by which the total income exceeds £250, allowed first against income from property.
	<i>Super-tax.</i> —For 1923–24, the deduction of £26 mentioned in the first subparagraph is increased to £40.

PAGES 31–32.—In the South Australia columns, after “1921–22” insert “and 1922–23.”

Under “Rates of Tax for Companies,” add:—

“From 1st July, 1923, on interest paid to absentees, and on bearer debenture interest .. 1s. in the £.”

TABLE OF INCOME TAX RATES—*continued.*

*Insert* new pages 32A and 32B as given below.

PAGES 33-34.—In the Western Australia columns, after  
“1922-23” *insert* “and 1923-24.”

PAGE 35.—In the Fiji column, after “1922” *insert* “1923  
and 1924.”

*Insert* new page 36A as given below.

TABLE OF INCOME TAX RATES—*continued.*

	SEYCHELLES. 1924.																								
RATES OF TAX FOR INDIVIDUALS.	<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Chargeable income in rupees—</th> <th style="text-align: right;">Rates per cent. in rupees.</th> </tr> </thead> <tbody> <tr> <td>Not exceeding 1,000 ... ..</td> <td style="text-align: right;">1</td> </tr> <tr> <td>Exceeding 1,000—</td> <td></td> </tr> <tr> <td>  On the first 1,000 ... ..</td> <td style="text-align: right;">2</td> </tr> <tr> <td>  " next 1,000 ... ..</td> <td style="text-align: right;">2½</td> </tr> <tr> <td>  " " 1,000 ... ..</td> <td style="text-align: right;">3</td> </tr> <tr> <td>  " " 1,000 ... ..</td> <td style="text-align: right;">3½</td> </tr> <tr> <td>  " " 1,000 ... ..</td> <td style="text-align: right;">4</td> </tr> <tr> <td>  " " 1,000 ... ..</td> <td style="text-align: right;">4½</td> </tr> <tr> <td>  " " 9,000 ... ..</td> <td style="text-align: right;">5</td> </tr> <tr> <td>  " " 5,000 ... ..</td> <td style="text-align: right;">5½</td> </tr> <tr> <td>  On balance (above 20,000) ... ..</td> <td style="text-align: right;">6</td> </tr> </tbody> </table> <p>(The minimum tax chargeable is 2 rupees.)  On mortgage or debenture interest paid by a resident to a non-resident ... .. 5 per cent.  (A deduction of one-tenth of earned income, but not more than Rs. 1,500, is allowed to each individual, except to a non-British non-resident. The scale is applied to the income so reduced.)</p>	Chargeable income in rupees—	Rates per cent. in rupees.	Not exceeding 1,000 ... ..	1	Exceeding 1,000—		On the first 1,000 ... ..	2	" next 1,000 ... ..	2½	" " 1,000 ... ..	3	" " 1,000 ... ..	3½	" " 1,000 ... ..	4	" " 1,000 ... ..	4½	" " 9,000 ... ..	5	" " 5,000 ... ..	5½	On balance (above 20,000) ... ..	6
Chargeable income in rupees—	Rates per cent. in rupees.																								
Not exceeding 1,000 ... ..	1																								
Exceeding 1,000—																									
On the first 1,000 ... ..	2																								
" next 1,000 ... ..	2½																								
" " 1,000 ... ..	3																								
" " 1,000 ... ..	3½																								
" " 1,000 ... ..	4																								
" " 1,000 ... ..	4½																								
" " 9,000 ... ..	5																								
" " 5,000 ... ..	5½																								
On balance (above 20,000) ... ..	6																								
RATES OF TAX FOR COMPANIES.	5 per cent.																								
EXEMPTION LIMIT.	Minors under 18 and unmarried women (including widows), Rs. 200.																								
ABATEMENT.	Rs. 300 where income does not exceed Rs. 15,000. Rs. 600 where income exceeds Rs. 15,000. Not allowed to companies. Not allowed to non-British non-residents.																								

TABLE OF INCOME TAX RATES—*continued.*

	ANTIGUA. 1924.	
RATES OF TAX FOR INDIVIDUALS.	Income—	In the £
	First £100 ... ..	s. d.
	Next £100 ... ..	0 2
	„ £200 ... ..	0 4
	„ £200 ... ..	0 6
	„ £200 ... ..	0 9
	„ £200 ... ..	1 0
	„ £200 ... ..	1 6
	„ £200 ... ..	2 0
	„ £300 ... ..	2 9
	Balance (above £1,500) ... ..	3 6
	On mortgage or debenture interest paid by a resident to a non-resident ... .. 6 <i>d.</i> in the £ (A deduction of one-tenth of earned income, but not more than £200, is allowed to each individual except to a non-British non-resident. The scale is applied to the income so reduced.)	
RATES OF TAX FOR COMPANIES.	<i>Registered in Antigua—</i> As for individuals.	
	<i>Registered out of Antigua—</i>	
	If income does not exceed £1,000 ... ..	1 <i>s.</i> in £
	If income exceeds £1,000 ... ..	5 <i>s.</i> in £
	On mortgage or debenture interest paid by a resident to a non-resident ... .. 6 <i>d.</i> in £	
EXEMPTION LIMIT.	£100. Not allowed to companies registered out of Antigua. (The limit is in effect increased to a resident married taxpayer by the deduction for a wife. <i>See</i> above for earned income relief.)	
ABATEMENT.	None. (If the income does not exceed £500 a deduction of £25 is made to a resident married taxpayer. <i>See</i> above for earned income relief.)	

TABLE OF INCOME TAX RATES—*continued.*

BRITISH HONDURAS. 1924.	
RATES OF TAX FOR INDIVIDUALS.	Per cent.
First \$500 ... ..	½
Next \$1,500 ... ..	¾
„ \$1,500 ... ..	1
„ \$1,500 ... ..	1½
„ \$2,500 ... ..	2½
„ \$2,500 ... ..	3
„ \$5,000 ... ..	4
„ \$5,000 ... ..	5
„ \$5,000 ... ..	7½
„ \$5,000 ... ..	10
„ \$10,000 ... ..	12½
„ \$20,000 ... ..	15
Balance (above \$60,000) ... ..	17½
On mortgage or debenture interest paid by a resident to a non-resident ... .. 8 cents in the dollar. (A deduction of one-tenth of earned income, but not more than \$500, is allowed to each individual, except to a non-British non-resident. The scale is applied to the income so reduced.)	
RATES OF TAX FOR COMPANIES.	8 cents in the dollar. On mortgage or debenture interest paid by a resident to a non-resident ... .. 8 cents in the dollar.
EXEMPTION LIMIT.	\$500. (In the case of a married man, in effect, \$750). See above for earned income relief. Not allowed to companies. Not allowed to non-British non-residents.
ABATEMENT.	\$500. (In the case of a married man, in effect, \$750). Not allowed to companies. Not allowed to non-British non-residents.

TABLE OF INCOME TAX RATES—*continued.*

—	GREENADA. 1924.
<b>RATES OF TAX FOR INDIVIDUALS.</b>	In the £. <i>s. d.</i> First £300 ... .. 0 6 Next £300 ... .. 1 0 „ £400 ... .. 1 6 „ £500 ... .. 2 3 „ £500 ... .. 3 0 „ £500 ... .. 3 9 „ £500 ... .. 4 6 Balance (above £3,000) ... .. 5 6 On mortgage or debenture interest paid by a resident to a non-resident ... .. 1 <i>s.</i> in the £. (A deduction of one-tenth of earned income, but not more than £100, is allowed to each individual, except to a non-British non-resident. The scale is applied to the income so reduced.)
<b>RATES OF TAX FOR COMPANIES</b>	3 <i>s.</i> in the £. On mortgage or debenture interest paid by a resident to a non-resident ... .. 1 <i>s.</i> in the £1.
<b>EXEMPTION LIMIT.</b>	£100. (In the case of a married man, in effect, £125. <i>See</i> above for earned income relief). Not allowed to companies. Not allowed to non-British non-residents.
<b>ABATEMENT.</b>	£100. (Deduction for wife, if income does not exceed £1,000, £25.) Not allowed to companies. Not allowed to non-British non-residents.

TABLE OF INCOME TAX RATES—*continued.*

ST. LUCIA. 1924.	
<b>RATES OF TAX FOR INDIVIDUALS.</b>	In the £. s. d.
First £100 ... ..	0 4
Next £200 ... ..	0 6
" £300 ... ..	1 0
" £400 ... ..	1 6
" £500 ... ..	2 3
" £500 ... ..	3 0
" £500 ... ..	3 9
" £500 ... ..	4 6
Balance (above £3,000) ... ..	5 6
On mortgage or debenture interest paid by a resident to a non-resident, in the £ ...	1 0
<b>RATES OF TAX FOR COMPANIES.</b>	2s. 6d. in the £. On mortgage or debenture interest paid by a resident to a non-resident, in the £ ...
	1 0
<b>EXEMPTION LIMIT.</b>	£100. Not allowed to companies. Not allowed to non-British non-residents.
<b>ABATEMENT.</b>	£100. Not allowed to companies. Not allowed to non-British non-residents.



TABLE OF INCOME TAX RATES—*continued.*

	ST. VINCENT. 1924.	TRINIDAD AND TOBAGO. 1924.
	In the £ <i>s. d.</i>	In the £ <i>s. d.</i>
RATES OF TAX FOR INDIVIDUALS	First £300 ... 0 5	First £500 ... 0 3
	Next £300 ... 0 10	Next £250 ... 0 6.
	„ £400 ... 1 3	„ £250 ... 0 9
	„ £500 ... 1 8	„ £500 ... 1 0
	„ £500 ... 2 1	„ £500 ... 1 6
	„ £500 ... 2 6	„ £1,000 ... 2 0
	„ £500 ... 3 0	„ £1,000 ... 2 6
	„ £500 ... 3 6	„ £1,000 ... 3 0
	Balance (above £3,500) ... 4 0	„ £1,000 ... 4 0
	„ £2,000 ... 5 0	„ £2,000 ... 5 0
On mortgage or debenture interest paid by a resident to a non-resident, in the £, 1s. 0d. (A deduction of one-tenth of earned income, but not more than £100, is allowed to each individual, except to a non-British non-resident. The scale is applied to the income so reduced.)	Balance (above £8,000) ... 6 0	
RATES OF TAX FOR COMPANIES.	2s. in the £. On mortgage or debenture interest paid by a resident to a non-resident, 1s. in the £.	Life Insurance Companies —see paragraph 20 of the text, p. 399. Other companies...2s. 6d. in the £.
EXEMPTION LIMIT.	£100. (In the case of a married man, in effect, £150.) See above for earned income relief. Not allowed to companies. Not allowed to non-British non-residents.	£250 (in effect increased to £350 for a married tax- payer). Not allowed to companies. Not allowed to non-British non-residents.
ABATEMENT.	£100. (In the case of a married man whose income does not exceed £500, in effect, £150.)  Not allowed to companies. Not allowed to non-British non-residents.	The amount of tax charge- able on £250 at the lowest rate is deducted from the tax assessed. (A deduction of £100 is also made to a married taxpayer.)  Not allowed to companies. Not allowed to non-British non-residents.

TABLE OF INCOME TAX RATES—*continued.*

AUSTRALIA—TASMANIA.* 1924 and 1925.	
RATES OF TAX FOR INDIVIDUALS.	<p>In the formulæ I = taxable amount in pounds.</p> <p><i>Earned—</i></p> <p>Not exceeding £3,000 :— <math>\left(3 + \frac{3}{800} I\right)</math> pence in the £.</p> <p>For every £ in excess of £3,000, up to £5,000 :— <math>\frac{27}{1.625}</math> pence.</p> <p>For every £ in excess of £5,000 :— <math>\frac{30}{1.625}</math> pence.</p> <p>(These rates are respectively multiplied by 1.625.)</p> <p><i>Unearned—</i></p> <p>Not exceeding £546 :— <math>\left(3 + \frac{I}{181.058}\right)</math> pence in the £.</p> <p>For every £ in excess of £546, up to £2,000 :— <math>\left\{ -1\frac{1}{3} \left(\frac{I}{1000}\right)^2 + 11\frac{1}{2} \left(\frac{I}{1000}\right) \right\}</math> pence.</p> <p>For every £ in excess of £2,000, up to £5,000 :— <math>\frac{33}{1.625}</math> pence.</p> <p>For every £ in excess of £5,000 :— <math>\frac{36}{1.625}</math> pence.</p> <p>(These rates are respectively multiplied by 1.625.)</p> <p><i>Additional Tax on profits from manufacture or sale by certain persons of liquor (see text, page 465)</i></p> <p style="text-align: right;">1s. in the £.</p> <p><i>Tasmanian Lottery Prizes</i> ... .. 2s. in the £.</p>
RATES OF TAX FOR COMPANIES.	<p>Taxable income, and dividends 1s. 9d. in the £.</p> <p><i>Additional Tax on profits from manufacture or sale by certain persons of liquor (see text, page 465)</i></p> <p style="text-align: right;">1s. in the £.</p> <p><i>Tasmanian Lottery Prizes</i> ... .. 2s. in the £.</p>

\* See also Commonwealth tax.

TABLE OF INCOME TAX RATES—*continued.*

	AUSTRALIA—TASMANIA.* 1924 and 1925.	
<b>EXEMPTION LIMIT.</b>	Married persons, or widowed persons (having a dependent child under 16)	£156.
	Unmarried persons ... ..	£125.
	Not allowed to companies.	
<b>ABATEMENT.</b>	Married persons, or widowed persons (having a dependent child under 16) ... ..	£1 for every £3 by which net income is less than £500.
	Unmarried persons ... ..	£1 for every £6 by which net income is less than £400.
	Allowed first against earned income. Not allowed to companies.	

*See also Commonwealth Tax.*

TABLE OF INCOME TAX RATES—*continued.*

	GUERNSEY. 1924.					
<b>RATES OF TAX FOR INDIVIDUALS.</b>	4d. in the £.					
<b>RATES OF TAX FOR COMPANIES.</b>	As for individuals.					
<b>EXEMPTION LIMIT.</b>	£125. Not allowed to absentees or companies.					
<b>ABATEMENT.</b>	Income not exceeding.			Abatement.		
	£200...	...	...	...	...	£125
	£300...	...	...	...	...	£100
	£400...	...	...	...	...	£60
	£600...	...	...	...	...	£40
	Not allowed to absentees or companies.					

## LIFE INSURANCE AND SIMILAR ALLOWANCES.

PAGE 37.—Add the following entry:—

Seychelles (1924)	One-sixth of total income.	Annual premiums on life of taxpayer or his wife, and annual contributions to widows' and orphans' fund. Not allowed to non-British non-residents.
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PAGE 38.—Under British Honduras add "and annual contributions to widows' and orphans' fund."

PAGE 38.—Add the following entries:—

Grenada (1924)	One-sixth of total income.	Annual premiums on life of taxpayer or his wife, and annual contributions to widows' and orphans' fund. Not allowed to non-British non-residents.
St. Lucia (1924)	One-sixth of total income.	Annual premiums on life of taxpayer or his wife, and annual contributions to widows' and orphans' fund. Not allowed to non-British non-residents.
St. Vincent (1924)	One-sixth of total income.	Annual premiums on life of taxpayer or his wife, and annual contributions to widows' and orphans' fund. Not allowed to non-British non-residents.
Trinidad and Tobago (1924)	One-sixth of total income.	Annual premiums on life of taxpayer or his wife, and annual contributions to widows' and orphans' fund. Not allowed to non-British non-residents.

PAGE 39.—Under Queensland, after “children,” where first occurring, insert “(or, from income year 1922-23 onwards, his wife).”

ALLOWANCES FOR CHILDREN.

PAGE 41.—Add the following entry :—

Seychelles (1924)	Rs. 100	18 (at beginning of income year).	Rs. 15,000	Child must be dependent. Stepchild included, but not illegitimate child. Not allowed to non - British non-residents.
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Under Antigua, after “£500 ” add “None for 1924.”

PAGE 42.—Add the following entries :—

British Honduras (1924)	\$125 ...	16 (at beginning of income year).	None ...	Stepchild included, but not illegitimate child. Not allowed to non - British non-residents.
Grenada (1924)	£25 ...	16 (at beginning of income year).	£1,000 ...	Stepchild included, but not illegitimate child. Not allowed to non - British non-residents.
St. Vincent (1924)	£25 ...	16 (at beginning of income year).	£500 ...	Stepchild included, but not illegitimate child. Not allowed to non - British non-residents.

PAGE 43.—Add the following entry :—

Trinidad and Tobago (1924)	£30	...	16 (at beginning of income year).	None	...	Age limit 18 if child attends university, school, etc. Stepchild in- cluded, but not illegitimate child. Not allowed to non - British non-residents.
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Under Queensland, under "£26" add "£40 for income year 1922-23."

Under South Australia, under "£15" add "£30 for income year 1922-23." and in last column add "For income year 1922-23, adopted child is included."

Add the following entry for Tasmania :—

Tasmania (1924 and 1925)	£25	...	16 (at beginning of income year)	£400	...	Child must be wholly main- tained.
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Under Western Australia, under "£40" add "£50 for income year 1922-23."

## NYASALAND PROTECTORATE.

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No amending legislation has been received in this case, and it may therefore be taken that the law in force for the year 1921-22 continues in force for 1922-23 and 1923-24. A note should be made accordingly at—

PAGE 67.—Introductory paragraph.

PAGE 68.—Paragraph 9.

PAGE 69.—Paragraph 10.

---

## SEYCHELLES.

---

The law for 1924 is summarised on pages 423-429 (Supplement No. 2). A note should accordingly be made at page 88.

---

## SOUTH AFRICA—UNION.

---

In Supplement No. 1, page xvii, for "PAGE 108" read "PAGE 101."

---

## SUDAN.

---

No amending legislation has been received in this case, and it may therefore be taken that the law in force for 1923 continues in force for 1924. A note should be made accordingly at page 109, introductory paragraph.

---

## ANTIGUA.

---

PAGE 379. Introductory.—*After* "1923" insert "and 1924."

2. Income Exempted.—*After* each of the two subsections (viii) and (ix), insert "(For 1923 only)."



ANTIGUA—*continued.*

PAGE 380. 6. Exemption Limit.—*Delete* paragraph and substitute :—

6. Exemption Limit.—Incomes less than £100 are exempt, except in the case (for 1923) of companies, and (for 1924) of companies registered out of Antigua.

PAGE 381. 7. Personal Allowances.—Second sub-paragraph. *Add* :—

For 1924, the deduction under (a) is granted only if the individual's income, apart from that deduction and any deduction under (b) does not exceed £500—but the deductions under (b) are granted irrespective of the amount of the individual's income.

9. Rates of Tax.—*Add* new paragraph for 1924 :—

9. Rates of Tax.—The rates of tax payable for the year of assessment 1924 are :—

On incomes of persons and companies other than companies registered out of Antigua :—

	<i>s.</i>	<i>d.</i>
On every £ of the first £100 .. .. .	0	2
„ £ from £101 to £200 .. .. .	0	4
„ £ „ £201 „ £400 .. .. .	0	6
„ £ „ £401 „ £600 .. .. .	0	9
„ £ „ £601 „ £800 .. .. .	1	0
„ £ „ £801 „ £1,000 .. .. .	1	6
„ £ „ £1,001 „ £1,200 .. .. .	2	0
„ £ „ £1,201 „ £1,500 .. .. .	2	9
„ £ beyond £1,500 .. .. .	3	6

On incomes of companies registered out of Antigua :—

Where the income does not exceed

£1,000 .. .. . 1s. in the £.

Where the income exceeds £1,000 .. .. . 5s. in the £.

On interest payable to a non-resident (*see* paragraph 17) .. .. .

6d. in the £.

*See* paragraph 7 for earned income relief.

ANTIGUA—*continued.*

---

PAGE 381. 11. Provisions regarding Double Taxation.—

*Add* to first sub-paragraph :—

For 1924 United Kingdom super-tax is deductible.

---

PAGE 383. VIII.—TABLE OF ORDINANCES.

*Add* :—

The Income Tax Ordinance, 1923, Amendment Ordinance, 1923. (No. 18 of 1923.)

---

BARBADOS.

---

PAGE 127. Introductory.—*Add* :—

[*Note.*—The law has been amended for the year 1924. A note on the amendments will be published in a later supplement.]

---

BRITISH HONDURAS.

---

PAGE 133.—Introductory. After "1922" insert "and 1923."

The law for 1924 is summarised on pages 431–436 (Supplement No. 2). A note should accordingly be made at page 133.

---

CANADA—BRITISH COLUMBIA.

---

PAGE 147.—Introductory (as amended by Supplement No. 1, page xix). *Add*, as second sub-paragraph :—

Dominion of Canada income tax is in general also payable.

•

CANADA—BRITISH COLUMBIA—*continued.*


---

PAGE 152.—In the first reference to page 152, on page xx of Supplement No. 1, for “8 (a)” read “18 (a).”

---

## GRENADA.

---

The law for 1924 is summarised on pages 437–442 (Supplement No. 2). A note should accordingly be made at page 182.

---

## JAMAICA.

---

No amending legislation has been received in this case, and it may therefore be taken that the law in force for 1921 and 1922 continues in force for 1923 and 1924. A note should be made accordingly at page 186, introductory paragraph.

---

## NEWFOUNDLAND.

---

No amending legislation has been received in this case, and it may therefore be taken that the law in force for the income year 1922 continues in force for the income year 1923. A note should be made accordingly at

PAGE 192.—Introductory paragraph.

PAGE 196.—Paragraph 9.

**ST. CHRISTOPHER AND NEVIS.**

---

No amending legislation has been received in this case, and it may therefore be taken that the law in force for 1923 continues in force for 1924. A note should be made accordingly at

PAGE 389.—Introductory paragraph.

PAGE 391.—Paragraph 9.

---

Also, *add* to paragraph 9 :—

For interest or annual payment to a non-resident (*see* paragraph 17). ... .. 6*d.* in the £

---

**ST. LUCIA.**

---

PAGE 204.—Introductory. After “1922” *insert* “and 1923.”

PAGE 205.—Paragraph 9. After “1922” *insert* “and 1923.”

The law for 1924 is summarised on pages 443–448 (Supplement No. 2). A note should accordingly be made at page 204.

---

**ST. VINCENT.**

---

PAGE 208.—Introductory. After “1922” *insert* “and 1923.”

PAGE 209.—Paragraph 9. After “1922” *insert* “and 1923.”

The law for 1924 is summarised on pages 449–454 (Supplement No. 2). A note should accordingly be made at page 208.

## TRINIDAD AND TOBAGO.

---

PAGE 395.—Introductory. After “1923” insert “and 1924.”

.....

PAGE 396.—6. Exemption Limit. *Add* new paragraph, for 1924 :—

6. Exemption Limit.—For 1924 the allowances mentioned in new paragraph 7, (1) and (2), establish in effect an exemption limit of £250 (£350 in the case of a married taxpayer), except for non-British non-residents.

.....

PAGE 397.—*Add* new paragraphs, for 1924 :—

7. Personal Allowances.—For 1924, every individual resident in Trinidad and every non-resident British subject is allowed :—

- (1) Relief equal to the tax on £250 at the lowest rate.
- (2) A deduction of £100, if he is a married man whose wife was living with or wholly maintained by him during the income year.
- (3) A deduction of £30 in respect of each child (including a step-child but not an illegitimate child) who was living and under the age of 16 years at the commencement of the income year, or who, if over 16 years but under 18 years, was then receiving full-time instruction at a university, school or other educational establishment.

8. Life Insurance and Similar Allowances.—For 1924, annual insurance premiums paid by the taxpayer on his life or on that of his wife, or annual contributions to the Public Service Widows' and Orphans' Fund of Trinidad or to any similar fund, up to one-sixth of his income (estimated before making this allowance and the allowances for wife and children), are allowed as deductions, except to a non-British non-resident.

TRINIDAD AND TOBAGO—*continued.*

## IV.—COMPUTATION OF TAX.

9. Rates of Tax.—The rates of tax payable for the year of assessment 1924 are:—

For persons other than companies:—

	<i>s.</i>	<i>d.</i>
On each £ up to £500 .. .. .	0	3
„ £ from £501 to £750 .. .. .	0	6
„ „ £751 „ £1,000 .. .. .	0	9
„ „ £1,001 „ £1,500 .. .. .	1	0
„ „ £1,501 „ £2,000 .. .. .	1	6
„ „ £2,001 „ £3,000 .. .. .	2	0
„ „ £3,001 „ £4,000 .. .. .	2	6
„ „ £4,001 „ £5,000 .. .. .	3	0
„ „ £5,001 „ £6,000 .. .. .	4	0
„ „ £6,001 „ £8,000 .. .. .	5	0
„ £ above £8,000 .. .. .	6	0

For companies other than life insurance companies:—

	<i>s.</i>	<i>d.</i>
On each £ .. .. .	2	6

For life insurance companies, *see* paragraph 20.

PAGE 399. VIII.—TABLE OF ORDINANCES.

*Add:—*

The Income Tax (Amendment) Ordinance, 1924 (No. 2—1924).

**AUSTRALIA—NEW SOUTH WALES.**

---

No amending legislation has been received in this case, and it may therefore be taken that the law under which tax was payable on 1921-22 incomes continues in force as regards 1922-23 incomes. A note should be made accordingly at :—

PAGE 263.—Introductory paragraph.

PAGE 267.—Paragraph 9.

---

**AUSTRALIA—QUEENSLAND.**

---

PAGE 275.—Introductory.—After “1922-23” *add* “and 1923-24.” After “1921-22” *add* “and 1922-23 respectively.”

---

1. **Income Charged.**—*Add* new sub-section (1), for 1922-23 income year, as follows :—

- (1) Net gains, in the income year 1922-23, from the sale of real property in connection with any business of the taxpayer—or from other sales of real property, and also sales of personal property, where the seller acquired the property during the year in which the sale takes place or the six years prior thereto. (Profits from selling standing crops with a property are taxable irrespective of the number of years for which the seller owned the property.)

*Add* new sub-section (4), for 1922-23 income year, as follows :—

- (4) Five per cent. of the capital amount of a retiring allowance or gratuity paid in a lump sum.
- 

*Add* to the third sub-paragraph :—

For the income year 1922-23 there is no division of the income specified at (4).

AUSTRALIA—QUEENSLAND—*continued.*

---

PAGE 276.—Sub-section (c). *Add:—*

The prizes mentioned are not liable to income tax as regards the 1922-23 income year.

Sub-section (d). *Add:—*

This item is not to be included as income for the 1922-23 income year.

---

*Add, as final sub-paragraph to paragraph 1:—*

Income tax will be imposed on the interest on any loan raised (after a date to be fixed by proclamation) by Queensland or by any authority constituted under its laws. The interest on loans raised in Queensland after 31st December, 1923, by the government of any country or dominion outside the Commonwealth, or by any authority constituted under any law of such country or dominion, is liable to income tax—if the recipient of the interest resides in Queensland or is chargeable with Queensland income tax. (A loan is “raised in Queensland” if subscriptions thereto are invited in Queensland.)

---

2. **Income Exempted.**—Sub-section (iv). *Add:—*

(This exemption does not apply to any Queensland or Commonwealth loan interest which is made liable to income tax by any Queensland or Commonwealth Act. See final sub-paragraph of paragraph 1.)

---

PAGE 277.—4. **Deductions.** Sub-section (v). *Add:—*

(v) For the 1922-23 income year, deduction is not allowed of any interest paid by the taxpayer on any mortgage of his residence.



AUSTRALIA—QUEENSLAND—*continued.*

PAGE 278.—*Add to sub-section (vii) :—*

For the 1922-23 income year, the provision as to averaging these repairs, on a three years basis, does not apply, and no deduction is permitted in respect of any residence owned and occupied (or occupied rent-free) by the taxpayer.

*Add to sub-section (viii) :—*

For the 1922-23 income year, no allowance is granted for depreciation of an owned or rent-free residence.

PAGE 279. *Add to deductions allowed :—*

(xix) Calls paid in the 1922-23 income year on shares in a mining company or syndicate carrying on mining operations in Queensland for gold, silver, base metals, rare minerals, or oil, or in any company or syndicate whose principal business is afforestation.

PAGE 281. Line 2. *Add :—*

For the 1922-23 income year, the exemption limit is £250.

## 7. Personal Allowances.

*Add to sub-paragraph (a)—*

For the 1922-23 income year, the abatement is £250, less £1 for every complete £3 by which that income exceeds £250 ; also, as far as possible, abatements are made from income from the produce of property.

*Add to sub-paragraph (b)—*

For the 1922-23 income year, the deductions under heads (i), (ii) and (iii) are increased from £26 to £40 in each case ; also, as far as possible, these deductions are made from income from personal exertion.

AUSTRALIA—QUEENSLAND—*continued.*

## PAGE 282.—8. Life Insurance and Similar Allowances.

*Add to sub-paragraph (a)—*

For the 1922-23 income year, deduction is allowed of premiums of this kind (not exceeding £50) paid in respect of insurance on the life of the taxpayer's wife.

9. Rates of Tax. *Add after first sub-paragraph :—*

Paragraph 9 applies also for the year 1923-24 (*i.e.*, rates imposed on 1922-23 income), except for the alteration (indicated below) as regards the super-tax exemption limit.

PAGE 285.—*Super-tax.* Second sub-paragraph. *Add :—*

As regards the 1922-23 income year, for £200 (lines 3 and 4) *read* £250 in each case.

PAGE 286. Paragraph 12. *Add :—*

The Income Tax Act Amendment Act of 1923, which came into force on 23rd November, 1923, altered these provisions by directing that, if the tax is not paid by the due date, 10 per cent. per annum on the amount of unpaid tax is to be added—but the Commissioner may, at his discretion, reduce or remit the additional tax.

Paragraph 13, (1). *Add :—*

For the 1922-23 income year, the latter part of the first sentence should be read as follows :—

“ and (b) of all reserves created out of taxed profits and invested in the business (including all profit and loss account credit balances) as was, during the year in which the profits were earned, invested in the assets of the business which were used to produce taxable profits of the company.”

AUSTRALIA—QUEENSLAND—*continued.*

---

PAGE 287. Sub-paragraph 2. *Add to (iii) :—*

This provision has been repealed in respect of the 1922-23 income year.

---

PAGE 288. Footnote\*. *Add :—*

As regards the 1922-23 income year, the final sentence in this footnote should be read with the words " or the payment of interest on such debentures " *deleted.*

---

PAGE 289.—Sub-paragraph (10). *Add :—*

As regards the 1922-23 income year, the word " six " in line 7 should be read as " nine "—and the following addition should be made at line 11 :—

A similar concession applies to distributions or transfers to reserve, within the above-mentioned period, of profits made by certain co-operative bodies registered under the Primary Producers' Co-operative Associations Act of 1923. (Such distributed profits are, however, taxable in the hands of shareholders or members receiving them.)

---

PAGE 291.—(2) *Insurance Companies other than Life. (a).*  
*Add :—*

For the 1922-23 income year the paying company *must* deduct income tax and super-tax (at 2½ per cent. on the premiums).

AUSTRALIA—QUEENSLAND—*continued.*

---

PAGE 293.—

VIII.—TABLE OF ACTS.

*Add* :—

The Income Tax Act Amendment Act of 1923. (No. 42, 1923.).

---

AUSTRALIA—SOUTH AUSTRALIA.

---

PAGE 294.—Introductory. *Add* to first sentence :—

and for the income year 1922-23 (tax payable in 1924).

1. **Income Charged.** *Add* to third sub-paragraph :—

For the income year 1922-23, payments (subject to certain deductions) made on transferring leases (except of Crown lands occupied for agricultural and similar purposes) are taxable as income.

---

PAGE 295.—1. **Income Charged.** *Insert* as final sub-paragraph :—

Income tax will be imposed on (a) interest on any loan raised (after a date to be fixed by proclamation) by the state or by any authority constituted under its laws, and (b) interest received by any resident in the state on any loan raised (after a date to be fixed by proclamation) by the Commonwealth or by any authority constituted under its laws.

---

2. **Income Exempted.** (iii). *Add* :—

(But *see* final sub-paragraph of paragraph 1.)

AUSTRALIA—SOUTH AUSTRALIA—*continued.*

3. Year and Basis of Assessment. *Add* to the first sub-paragraph :—

Tax in respect of the income year 1922-23 is payable during the calendar year 1924, but no particular date in 1924 is specified by the Taxation Act Further Amendment Act, 1923.

PAGE 296.—4. Deductions. *Add* as (vii) :—

(vii) For the income year 1922-23 a proportion (obtained by dividing the sum so paid by the number of years of lease unexpired when the sum was paid) of any fine, premium etc., paid for the lease, or for the renewal or transfer of the lease, of premises or machinery used to produce income.

*Add* to (d) :—

(except as in (vii) above).

PAGE 297.—7. Personal Allowances. *Add* :—

As regards the income year 1922-23, the active service abatement-increase mentioned in the second sub-paragraph is no longer granted, and the deduction for every child, as described in the third sub-paragraph, is increased from £15 to £30, and is extended to include adopted children—the allowance of £100, described in the third sub-paragraph, for certain persons on active service outside the Commonwealth is no longer granted.

PAGE 298, line 3. *Add* :—

It also includes, for the income year 1922-23, payments (subject to certain deductions) made on transferring leases (except of Crown lands occupied for agricultural and similar purposes). (*See* paragraph 1, 1922-23, additional sub-paragraph.)

AUSTRALIA—SOUTH AUSTRALIA—*continued.*

-----

*Add at the end of (1) :—*

The tax payable in 1924, on income for the twelve months to 30th June, 1923, is computed in a similar manner by adding 25 per cent. to the tax under the scales shown.

-----

PAGE 299. *Add new head at the end of paragraph 9 :—*

(4) *Interest paid by Companies to Absentees and on Debentures payable to Bearer.*—For the income year 1922-23, in addition to any other income tax payable by it, a company is required to deduct and account for tax at 1s. in the £ (which rate includes the 25 per cent. super tax) on the interest paid to any absentee on debentures or loans, and on the interest paid in respect of debentures payable to bearer. ("Absentee" is defined as a non-resident in Australia who has no Australian agent to whom such interest is paid.)

-----

PAGE 299, paragraph 12.—*Add the following new sub-paragraphs :—*

The tax in respect of the income year 1922-23 is in general payable within thirty days after service of the assessment notice. If it is not paid within that period, interest at 10 per cent. per annum from the due date is incurred.

*See also paragraph 9 (4) as to the deduction of tax from non-residents etc.*

-----

Paragraph 13.—*Add the following new sub-paragraph :—*

*See paragraph 9 (4) as to interest paid by companies to absentees etc.*

AUSTRALIA—SOUTH AUSTRALIA—*continued.*

---

PAGE 300, paragraph 17.—*Add* new sub-paragraph, between fourth and fifth sub-paragraphs :—

*See* paragraph 9 (4) as to interest paid by companies to absentees.

---

PAGE 301.—

VIII.—TABLE OF ACTS.

*Add* :—

Taxation Act Further Amendment Act, 1923. (No. 1583.)

---

AUSTRALIA—TASMANIA.

---

The law for 1924 and 1925 is summarised on pages 455–466 (Supplement No. 2). A note should accordingly be made at page 302.

---

AUSTRALIA—VICTORIA.

---

PAGE 311. Introductory.—*Add* :—

[*Note.*—The law has been amended for the year 1923-24. A note on the amendments will be published in a later supplement.]

**AUSTRALIA—WESTERN AUSTRALIA.**

---

**PAGE 321.—Introductory.** *Add* to second sentence :—“ and for 1923-24.”

---

**PAGE 325. Line 3.** *Add* :—

Deduction is also allowed for the assessment year 1923-24 of money donations to Government or incorporated institutions established for benevolent, charitable, scientific or educational purposes, as well as of money expended for educational scholarships or bursaries.

---

**PAGE 326.—7. Personal Allowances.** *Add* :—

For the assessment year 1923-24, the child allowance is £50.

---

**PAGE 327.—9. Rates of Tax.** *Add* :—

For the year ending 30th June, 1924, the rates of income tax and super-tax are the same as for the year to 30th June, 1923, but in order to be liable to super-tax the income must exceed £264 after making all the deductions and abatements allowed.

---

**12. Due Date, Taxation at the Source etc.—Last line on page.** After “ 1922-23 ” *add* “ and 1923-24.”

---

**PAGE 330. VIII.—TABLE OF ACTS.**

*Add* :—

**Land Tax and Income Tax Act, 1923. (No. 57 of 1923.)**



FIJI.

No amending legislation has been received in this case, and it may, therefore, be taken that the law in force for 1921 and 1922 continues in force for 1923 and 1924. A note should be made accordingly at page 335, introductory paragraph.

---

NEW ZEALAND.

Supplement No. 1, pages xxxi-xxxii. *Delete* all matter relating to New Zealand, and in place of the amendments there prescribed, make the following:—

PAGE 341.—Introductory.

After "1922-23" *add* "and 1923-24."

Paragraph 1, line 6. *For* "of" *read* "or."

---

PAGE 342. Paragraph 1, last line. *For* "chargeable" *read* "not in practice charged."

---

PAGE 343. 2. Income Exempted. *Add*:—

(viii) For the assessment year 1923-24, income derived by any owner of land from the direct use or cultivation thereof. (This exemption does not apply to profits from the extraction, removal or sale of minerals or timber. A person owning land and also renting land, and using both for dealing in livestock, meat, butter, cheese or wool, or in crops (other than flax), sustained or produced by such land, is assessable on the profits from dealing in so much of the said livestock or products as exceeds the sustaining or producing capacity of the land owned by him.)

(ix) For the assessment year 1923-24, income derived by banking companies from debentures of companies and of public or local authorities.

NEW ZEALAND—*continued.*

---

4. Deductions.—(ii) *Add* :—

For the assessment year 1923-24, this provision does not apply to premises.

---

PAGE 344. (v). *Add* :—

For the assessment year 1923-24, the deduction is 5 per cent. per annum on the *capital* value of the above-mentioned interest in land.

---

PAGE 347. 9. Rates of Tax. *Add at end* :—

For 1923-24 the rates are as stated for 1922-23, except that the tax computed under head (3) is subject to a deduction of 20 per cent.

---

PAGE 347. Paragraph 12. *Add at end of first sub-paragraph* :—

For 1923-24 the additional tax is computed at a flat rate of 5 per cent. only.

---

*Add at end of second sub-paragraph* :—

For 1923-24 the rebate of 5 per cent. is no longer granted.

---

PAGE 348. Second sub-paragraph. *Add* :—

For 1923-24 this deduction is not to be made in the case of interest paid on debentures held by a banking company.

---

Fourth sub-paragraph. *Add* :—

For 1923-24 this deduction is not to be made in the case of interest paid on debentures held by a banking company.

NEW ZEALAND—*continued.*

PAGE 351. 19. Farming. *Add:—*  
and to paragraph 2 (viii).

PAGE 352. First sub-paragraph. *Add:—*

For the assessment year 1923-24, such debentures are included in the banking company's capital, and the income therefrom is not taxable by deduction. (*See* paragraph 2, (ix).)

PAGE 352.—(ii) Insurance Companies.—*Insert* between the second and third of the four sub-paragraphs under this head a new sub-paragraph:—

Under the Insurance Companies' Deposits Act, 1921-22 (1921-22, No. 40), companies (other than New Zealand companies) carrying on in New Zealand the business of insurance against fire, accident or employers' liability are required to lodge a deposit with the Public Trustee. Under the Insurance Companies' Deposits Amendment Act, 1923 (1923, No. 3), income derived by the company from moneys so deposited is charged with income tax separately from any other income of the company at the rate which would be payable if the company received in or derived from New Zealand no other income.

Second sub-paragraph from foot of page. In line 1, for "an" read "a life."

PAGE 353. VIII.—TABLE OF ACTS.

*Add:—*

Land and Income Tax Act, 1923. (1923, No. 21.)  
Land and Income Tax (Annual) Act, 1923. (1923, No. 25.)

## GUERNSEY.

PAGE 354.—Introductory. After “1923” insert “and 1924.”

PAGE 356.—6. Exemption Limit. *Add:—*

For 1924 the exemption limit is £125.

7. Personal Allowances. *Add:—*

7. Personal Allowances.—If the total income:—

		an abatement
	but does	is allowed for
exceeds	not exceed	1924 of
£	£	£
125	200	125
200	300	100
300	400	60
400	600	40

For 1924, where the total income does not exceed £700 a deduction of £75 is allowed in respect of the wife of the taxpayer if living with or wholly maintained by him during the year of assessment.

9. Rates of Tax. *Add:—*

The rate of tax for 1924 is 4*d.* in the £.

PAGE 358.

## TABLE OF LAWS.

*Add:—*

Loi portant modification à la loi sur la Taxe sur le Revenu (1924), approved by Order in Council of 21st March, 1924.

# INCOME TAXES

IN THE

# BRITISH DOMINIONS

**A Digest of the Laws imposing Income Taxes  
and Cognate Taxes in the British Dominions,  
Colonies, Protectorates, etc.**

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Compiled in the Inland Revenue Department, London.

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**SUPPLEMENT No. 3.**



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## PREFACE.

---

THIS supplement contains additions or amendments to "Income Taxes in the British Dominions," consequent on the receipt of information since the second supplement went to press. The supplement is divided into two parts. The first part is a series of additional pages of the book. This matter is not primarily intended to be taken out of this supplement and incorporated in the existing volume, but is so arranged that this can be done if it is desired. The second part contains a series of additions and corrections which are intended to be incorporated in the text of the book.

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INLAND REVENUE,  
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*January, 1925*

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## DOMINICA.

---

**Introductory.**—The note summarises the law in force for 1924. The law as revised is based on the Model Income Tax Ordinance prepared by an Inter-departmental Committee in 1922 (*see* its report, published in December, 1922—Cmd. 1788).

Dominica is one of the five Presidencies constituting the Colony of the Leeward Islands.

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—In general terms, residents are liable in respect of income from any source in or out of Dominica; non-residents are liable in respect of income from any source in Dominica. As regards income from sources out of Dominica, no tax is payable by recipients who are in Dominica temporarily and have not resided there for six months in all in the year preceding the year of assessment.

There is no provision for charging as income the annual value of land and improvements thereon owned and used, or used rent-free, for the purpose of residence or enjoyment.

### 2. Income Exempted :—

- (i) The official emoluments of the Governor of the Leeward Islands and of the officer administering the Presidency.
- (ii) Income of local authorities not derived from trade or business.
- (iii) Income of statutory or registered building societies.
- (iv) The official emoluments of members of the permanent consular services of foreign countries.
- (v) The official emoluments of persons in the service of the Imperial Government in Dominica (including H.M. forces).
- (vi) Wound and disability pensions and war gratuities to members of H.M. forces.
- (vii) The income of the Government Savings Bank.
- (viii) The incomes of ministers of religion derived from their occupation as such.
- (ix) Contributions to the Public Officers' Guarantee Fund.

DOMINICA—*continued.*

## II.—COMPUTATION OF INCOME.

**3. Year and Basis of Assessment.**—The income tax is levied for each calendar year upon the chargeable income (*i.e.*, net income after making all deductions, exemptions and allowances) for the year preceding the year of assessment. Where accounts are usually made up on a date other than the 31st December, the assessment may be made on the basis of the accounts for the business year ending in the calendar year preceding the year of assessment.

**4. Deductions.**—Among the expenses allowed are :—

- (i) Interest payable on any borrowed capital employed in acquiring the income ;
- (ii) Expenditure on replacement of obsolete plant or machinery equivalent to its written-down value less any sum realised by its sale ;
- (iii) Expenditure on repairs of premises and plant, and for renewal repair or alteration of any articles employed in acquiring the income ;
- (iv) Bad and (to the extent that they are estimated to be bad) doubtful debts, recoveries being treated as income when received ;
- (v) An allowance for wear and tear of property, including plant and machinery, arising from the employment of such property in a trade, business, profession or vocation.

**5. Set-off of Losses.**—Any loss incurred in the basis year in any trade, business, profession or vocation of any person may be set off against his income from other sources for the same year. Any balance of loss not so set off may until it is exhausted be set off against the income for the next five years in succession—but the tax for any of those years must not be so reduced to less than one-half the amount which would have been payable if the set-off had not been allowed.

## III.—PERSONAL ALLOWANCES ETC.

**6. Exemption Limit.**—The exemption limit is £100.

**7. Personal Allowances.**—A deduction (not to exceed £200 for any individual) is allowed of one-tenth of the earned income of any individual. In cases where the

DOMINICA—*continued.*

set-off mentioned in paragraph 5 may be made, this deduction is allowed only in respect of the excess of the earned income over the loss so set-off. (This deduction is not allowed to a non-British non-resident.)

The following deductions are allowed to any individual (except a non-resident non-British subject):—

- (a) £25, in respect of wife living with or wholly maintained during the basis year by the individual, if his income, apart from these deductions, does not exceed £500;
- (b) £15, in respect of every child (including step-child but not illegitimate child), living and under 16 years of age at the commencement of the basis year—provided that for every child exceeding three the deduction allowed is £25.

**8. Life Insurance and Similar Allowances.**—Annual insurance premiums paid by the taxpayer on his life or on that of his wife, or annual contributions by him to any Widows' and Orphans' or other similar Fund in Dominica, up to one-sixth of his income (estimated before making this deduction and the deductions for wife and children) are allowed as deductions, except to a non-British non-resident.

## IV.—COMPUTATION OF TAX.

**9. Rates of Tax.**—The rates of tax payable for the year of assessment 1924 are:—

On the chargeable income (*see* paragraph 3) of persons and companies, amounting to £100 and upwards:—

	In the £.	
	s.	d.
On the first £100 .. ..	0	2
.. .. next £100 .. ..	0	4
.. .. " £200 .. ..	0	6
.. .. " £200 .. ..	0	9
.. .. " £200 .. ..	1	0
.. .. " £200 .. ..	1	6
.. .. " £200 .. ..	2	0
.. .. " £300 .. ..	2	9
.. .. remainder (above £1,500)	3	6
On interest payable to a non-resident ( <i>see</i> paragraph 17) .. ..	0	6

*See* paragraph 7 for earned income relief.

DOMINICA—*continued.*

**11. Provisions regarding Double Taxation.**—For the purposes of Dominica income tax, income is assessable without any deduction for United Kingdom income tax.

Any person who has paid or is liable to pay Dominica income tax and has paid or is liable to pay United Kingdom income tax for the same year in respect of the same part of his income is entitled to relief from Dominica income tax of the amount paid by deduction or otherwise as income tax in the United Kingdom. A certificate issued on behalf of the Commissioners of Inland Revenue in the United Kingdom is *primâ facie* evidence of the appropriate rate of United Kingdom tax in any particular case.

## V.—PAYMENT.

**12. Due Date, Taxation at the Source etc.**—The time for payment is, in general, between 1st July and 31st August. If tax is not paid by the latter date an additional 5 per cent. of its amount is payable.

As regards salaries of public officials, and also pensions paid out of the revenue of Dominica, the rules prescribe deduction of the tax in proportionate monthly amounts, beginning in January.

Income (including interest) payable to non-residents (*see* paragraph 17) and dividends (*see* paragraph 13) are taxed at the source.

Claims for repayment of tax paid in excess must be made within two years from the end of the year of assessment.

## VI.—CORPORATE, JOINT ETC. INCOME.

**13. Companies and Income from Companies.**—Companies registered in Dominica are entitled to deduct tax from dividends, and the tax so deductible is set off against the tax charged on the income (including such dividends) of the shareholder.

**14. Partnerships.**—A return of the partnership income is required, but each partner's share of the total income of the partnership is assessable in his hands.

**15. Married Women.**—The income of a married woman living with her husband is deemed to be his income and is charged in his name, but the wife's proportionate part of the tax may, if necessary, be collected from her.

DOMINICA—*continued.*

VII.—SPECIAL TRADES ETC.

**17. Non-resident Traders, Shipowners etc.**—Provisions have been made in the terms set forth in Clause 27 of the Model Ordinance (*cf.* Income Tax Act, 1918, of the United Kingdom, General Rules 5-8, 10-12) for assessing Dominica agents of non-residents, for making assessments in cases where residents are controlled by non-residents, for charging non-residents on the basis of a percentage of turnover, for restricting assessments on non-residents to the "merchandising" profit etc.

If any person pays mortgage or debenture interest to a non-resident and is entitled to a deduction for such interest under paragraph 4 (i), he must deduct and account for tax at the rate of 6*d.* in the £.

*See* also paragraph 20.

**20. Insurance Companies.**—In the case of insurance companies (other than life insurance companies) where the profits accrue partly outside Dominica, the profit is computed by taking the gross premiums, interest and other income received or receivable in Dominica, deducting premiums returned to the insured, premiums paid on reinsurances, actual losses (less losses covered by reinsurance), agency expenses, and a fair proportion of head office expenses, and making an adjustment for increase or decrease in the reserve for unexpired risks.

Life insurance companies are taxed on the investment income, less management expenses and commission. If the company receives premiums outside Dominica, the investment income is apportioned in the ratio of premiums received in Dominica to total premiums, and tax is payable on such apportioned sum less Dominica expenses and a fair proportion of head office expenses.

VIII.—TABLE OF ORDINANCES.

The Income Tax Ordinance, 1924. (No. 6 of 1924.)

The General Tax Acts Consolidation Ordinance, 1899, Amendment Ordinance, 1924. (No. 15 of 1924.)

## INDIA - MAYURBHANJ.

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**Introductory.**—Mayurbhanj is an Indian state, but being under the protection of His Majesty is a “dominion” within the meaning of Section 27 of the Finance Act, 1920.

The note summarises the law in force from 1st April, 1922.

### I.—SCOPE OF THE TAX.

**1. Income Charged.**—The Mayurbhanj Income-tax Regulation II of 1922 imposes tax on all income from whatever source derived, arising or received in Mayurbhanj, or deemed to arise or be received in Mayurbhanj.

Salary etc. paid by the state or by a Mayurbhanj local authority to a Mayurbhanj subject or state employee resident out of Mayurbhanj, and “any income, made by the State subject outside the State,” are chargeable.

The whole income accruing from transactions carried on partly in Mayurbhanj and partly outside it is assessable if the income cannot be apportioned between the transactions in the state and those outside it.

“Profits accruing or arising in the State to any person resident in the State by reason of his employment, though not received in the State, are to be regarded as ‘income’ and are liable to assessment.”

(See also paragraph 17, third sub-paragraph.)

**2. Income Exempted.**—Among the exemptions granted by the Regulation are :—

- (i) Agricultural income. (The full definition is substantially the same as for British India—see page 228, paragraph 19.)
- (ii) Income of local authorities.
- (iii) “Valuation of residential houses.”
- (iv) Income of members of the ruling family not removed from the Chief by more than three generations.
- (v) Any allowance granted to meet specific expenses of an office or employment of profit.

INDIA—MAYURBHANJ—*continued.*

**II.—COMPUTATION OF INCOME.**

**3. Year and Basis of Assessment.**—The year of assessment is the year ending 31st March. Assessments are made on the basis of the income of the previous year, ending 31st March, or of a period of 12 months (ending in that year), for which accounts have been made up, if the taxpayer so elects. Where a taxpayer becomes liable to tax for the first time during the year of assessment, or during the year preceding that year, he is assessable upon an average of his income for such period as the Collector may direct.

For purposes of compounding the tax in certain cases, assessments may be based on the average income of the three or more preceding years (*see* paragraph 12, third sub-paragraph).

Salaries, annuities etc. are apparently taxed by reference to the actual amount received during the year of assessment (*see* paragraph 12, second sub-paragraph).

**4. Deductions.**—In computing the income and profits from any business, allowance is made for any expenditure (not being capital expenditure or personal expenses of the taxpayer) incurred solely for the purposes of making such income or earning such profits.

In computing the earnings or profits from any profession or vocation, allowance is made for expenses incurred in connection with the vocation etc.

In computing the income from transactions carried on partly in the state and partly outside it, income-tax "levied in respect of the transactions by any other native State or by British Government" is allowed as "part of the expenses of the firm's business."

**III.—PERSONAL ALLOWANCES ETC.**

**6. Exemption Limit.**—Any person whose income from all sources is less than Rs. 1,000 is exempt from income-tax. "Person" is defined as including a firm, a company, an association and a Hindu undivided family.

**7. Personal Allowances.**—No provision is made for abatement, and there are no allowances for children or dependents.

INDIA-MAYURBHANJ—*continued.*

**8. Life Insurance and Similar Allowances.—**~~PCONA~~ provision of this kind directs that in computing the income of "any Government Officer whose services have been lent to the State" a deduction is to be allowed of any sum paid by him to effect insurance on his own or on his wife's life or in respect of a deferred annuity on his own or on his wife's life, or as a contribution to any provident fund to which the (British) Provident Funds Act, 1897, and Provident Insurance Societies Act, 1912, relate. This allowance is not to exceed one-sixth of the total income.

## IV.—COMPUTATION OF TAX.

**9. Rates of Tax.**—The amounts and rates of tax for the year 1922-23 and subsequent years are as follows:—

Annual taxable income	Amount of tax.
Less than Rs. 1,000 . . . . .	Rs. nil
Rs. 1,000 or upwards, but less than Rs. 1,250	20
„ 1,250 „ „ „ „ „ 1,500	28
„ 1,500 „ „ „ „ „ 1,750	35
„ 1,750 „ „ „ „ „ 2,000	42
	<i>Rate of tax.</i>
„ 2,000 or upwards . . . . .	5 pies* per rupee.
Where the income consists of salary only, even if less than Rs. 2,000.	do.

Where the income is derived *partly from agriculture* (see exemption in paragraph 2 (i)) and partly from business, and the total income from both sources is Rs. 1,000 or upwards, "the part of the income from the assessable business is liable to assessment at a special rate of four pies per rupee . . . . . irrespective of the assessable minimum."

The above amounts and rates apply to individuals, firms, companies, and Hindu undivided families alike. The term "annual taxable income" is not expressly defined by the Regulation or its Rules, but appears to comprise the nett income of the preceding year remaining after making the deductions mentioned in paragraph 4, or the average income as computed for purposes of

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\* 12 pies = 1 anna : 16 annas = 1 rupee.



INDIA-MAYURBHANJ—*continued.*

compounding the tax in certain cases (*see* paragraph 12), or the actual salary, annuity etc. of the year of assessment as taxed by deduction (*see* paragraph 12).

11. **Provisions regarding Double Taxation.**—The only provision under this head is that set out in paragraph 4, third sub-paragraph.

## V.—PAYMENT.

12. **Due Date, Taxation at the Source etc.**—Tax is in general due and payable within 60 days from the date of receipt of the demand note. In case of default the Collector may, in his discretion, recover a sum not exceeding double the amount of the arrears.

Salaries, annuities, pensions and gratuities payable by the state, or by any local or municipal authority, are charged with income tax at the source, the person making payment being required to deduct tax and to pay it over to the state. Where salaries, annuities etc. are payable by any other classes of employers, the latter may arrange with the state for deduction and payment of the tax in a similar manner, and are allowed 1 per cent. commission on the amount of tax so collected. The rate at which tax is deducted is, generally speaking, determined “solely with reference to the month’s salary”; and repayment of any excess tax paid may be made to the employee should his total income from all sources for the year of assessment prove to be less than Rs. 1,000.

The Collector may arrange with any taxpayer (except with a person in respect of his salary or with a company), “for a composition for the tax for a period of three years and on such terms as he [the Collector] thinks fit.” The composition is to be based on the average income of the three or more preceding years—and payment of the agreed amount is to be made in each year of the period comprised in the arrangement.

Claims to repayment of tax must be made within one year from the date of the demand note concerned.

## VI.—CORPORATE, JOINT ETC. INCOME.

13. **Companies.**—Foreign or partly foreign associations carrying on business in the state, whether their principal place of business is situated in the state or not, are declared to be companies and liable to income tax in Mayurbhanj.

INDIA-MAYURBHANJ—*continued.*

There are no provisions as to deduction of tax, paid by a company, from its dividends—but the dividends are not charged with tax in the hands of the shareholders “when the company is liable to tax.”

15. **Married Women.**—A married woman is apparently chargeable as if unmarried, although there is no specific provision to that effect in the Regulation or Rules.

16. **Hindu Undivided Family.**—The income of a Hindu undivided family is assessed to income tax on the family, and any income which a person enjoys as member of the family is entirely excluded from consideration, for purposes of his income tax, when the family is liable to tax.

## VII.—SPECIAL TRADES ETC.

17. **Non-resident Traders, Shipowners etc.**—In the case of any person residing out of Mayurbhanj, all profits arising to such person, either directly or indirectly through or from any business connection or property in Mayurbhanj, are deemed to be income arising within Mayurbhanj, and are chargeable to income tax in the name of that person's agent.

Where a person not resident in Mayurbhanj and not a Mayurbhanj subject or a firm or company constituted within Mayurbhanj or a branch thereof, carries on business with a person resident in Mayurbhanj, and it appears to the Collector that owing to the close connection between the resident and the non-resident and to the substantial control exercised by the non-resident over the resident, the course of business between those persons is so arranged that the business done by the resident in pursuance of his connection with the non-resident produces to the resident either no profits or less than the ordinary profits which might be expected to arise in that business, the profits derived therefrom, or reasonably deemed to be derived therefrom, are chargeable to income tax in the name of the resident person. The “profits of a person not resident in the State on goods consigned by him for sale to an agent residing in the State” are assessable under these provisions.

INDIA-MAYURBHANJ—*continued.*

“ In the case of a Company, registered in the State or not, the profits accruing or arising from business carried on in the State by the Company though not paid and received in the State are liable to State Income-tax.”

Where, in the case of the state branch of a non-resident company or firm, no accounts are kept either at its head office abroad or at its branch in the state, or such accounts do not permit accurate computation of “ the share of the profits properly due to the State branch,” a percentage, having regard to the nature of the business done, of the turn-over of the business done by the state branch is taken as being the income of that branch for assessment purposes. “ Where this procedure proves unsuitable, any other more reliable method of calculation should be adopted.”

(See also paragraph 1, third sub-paragraph and paragraph 13, first sub-paragraph.)

**18. Mining Concerns.**—An owner of mines (whether worked by himself or lessees) is liable to pay income tax on the net profit derived, or royalty received, by him from the mines.

## VIII.—TABLE OF REGULATIONS.

The Mayurbhanj Income-tax Regulation II of 1922.

## INDIAN STATES.

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State income taxes are also in force in the following Indian states, in addition to Mysore (law summarised on pages 401–410, Supplement No. 1), Travancore\* (law summarised on pages 411–418, Supplement No. 1) and Mayurbhanj (law summarised on pages 473–478, Supplement No. 3) :—

Akalkot.*	Khairagarh.*
Bahawalpur.	Korea.*
Baroda.	Loharu.*
Bastar.*	Makari.*
Benares *	Malerkotla.
Chhukhadan.*	Manipur.
Dhar.*	Nandgaon.*
Jashpur.*	Patiala.
Jind.	Phaltan.*
Kalsia.	Raigarh.*
Kankar.*	Sachin.*
Kapurthala.*	Sarangarh.*
Kawardha.*	

*Double Taxation Relief between British India and Indian States.*—Arrangements have been made between the Government of British India and those of the above-mentioned states which are marked with an asterisk, for relief in respect of double income-tax on income taxed both in British India and in any of those states. The total relief to be granted is intended to equal the tax at the lower of the two rates of tax concerned, half of the relief being granted by British India and half by the Indian state.

. . . . .

It is not proposed to include in "Income Taxes in the British Dominions" summaries of the income tax laws of any of the states named above. Should a case arise, however, in which particulars of the law of any state are required, an application, stating the precise nature of the information desired, may be addressed to the Director of Statistics and Intelligence, Inland Revenue, Somerset House, London, W.C.2.

**IRISH FREE STATE (SAORSTAT EIREANN).**

**Finance Act, 1924. (No. 27 of 1924.)**

*Section 1.*—(1) For the year 1924–25 income tax is charged at the rate of 5s. in the £, and super tax is charged at the following rates:—

	In the £. s. d.
In respect of the first £2,000 . . . . .	Nil.
On the excess over £2,000 up to £2,500 ..	1 6
"    "    £2,500    "    £3,000 ..	2 0
"    "    £3,000    "    £4,000 ..	2 6
"    "    £4,000    "    £5,000 ..	3 0
"    "    £5,000    "    £6,000 ..	3 6
"    "    £6,000    "    £7,000 ..	4 0
"    "    £7,000    "    "    ..	4 6

(2) The income tax and super tax provisions in force in the Free State during the year 1923–24 apply (subject to this Act) for the year 1924–25.

*Section 2.*—Interest on Free State Government securities, which have been or may be issued, may be made payable without deduction of income tax, but all such interest is chargeable to income tax in the hands of the recipients.

*Section 3.*—An exemption from Free State income tax for the year 1924–25 is granted to charities in Great Britain and Northern Ireland; the exemption is similar to that granted to Irish Free State charities from British income tax for the year 1924–25 under Section 32 of the British Finance Act, 1924.

*Section 4.*—Any addition to a pension, salary etc. by way of war or cost of living bonus, is deemed to be chargeable as salary, pension etc. and not as perquisites, for the purpose of any assessment (for any year) which is made or becomes final and conclusive after 12th June, 1924.

*Section 5.*—If any person assessed in the Free State for any of the three years ending 5th April, 1926, in respect of income from stocks, shares or rents in Great Britain or

IRISH FREE STATE (SAORSTAT EIREANN)—*continued.*

Northern Ireland, proves that his total actual income from those sources for that year is less by more than 20 per cent. than the average income from those sources on which he has been or should have been assessed, he is entitled to relief by repayment of the difference between the tax paid by him and the tax which he would have paid if he had been assessed on such total actual income.

*Section 37.*—Sections 47 of the Finance (No. 2) Act, 1915, and 63 of the Finance Act, 1916, as respectively adapted by the Irish Free State, exempt from income tax and super tax the income from certain British Government securities so long as they remain in the beneficial ownership of persons not ordinarily resident in the Irish Free State, and the income from certain securities issued in the United States of America by United Kingdom local authorities so long as they are held by persons not domiciled in the Irish Free State or by British subjects not ordinarily resident in the Irish Free State. The present section, which applies to Irish Free State income tax and super tax, for any financial year beginning on or after 6th April, 1924, provides that neither exemption shall apply to the income from such securities so long as they are in the beneficial ownership of persons who are either domiciled or ordinarily resident in Great Britain or Northern Ireland.

*Section 43.*—On and from 6th April, 1924, the provisions by which weekly wage earners employed by way of manual labour are assessed to tax in respect of their wages in each quarter of the year instead of in the whole year, cease to have effect, and such income becomes assessable annually under the ordinary rules of Schedule E.

**Additions and Amendments to the Text of "Income  
Taxes in the British Dominions."**

**INDEX TO "DOMINIONS."**

PAGE 5.—*Correct* the entries and *insert* new entries as follows :—

Dominica .. ..	180 & 467	21 & 20B	38	42	366
India—					
Mayurbhanj .. ..	473	26c	38	43	—
Indian States .. ..	479	—	—	—	—
Irish Free State .. ..	413 & 481	—	—	—	—
Leeward Islands—					
Dominica .. ..	180 & 467	21 & 20B	38	42	366
Mayurbhanj .. ..	473	26c	38	43	—

**Additions and Amendments—continued.****TABLE OF INCOME TAX RATES.**

PAGE 10.—In both columns, after “ 1922-23 ” insert “ and 1923-24 ”.

PAGE 12.—In the Rhodesia column, after “ 1922-23 ” insert “ and 1923-24 ”.

PAGES 13-14.—In the Union of South Africa columns, after “ 1922-23 ” insert “ and 1923-24 ”.

PAGE 14B.—In “ ABATEMENT ” section, for “ £25 ” read “ £50 ”.

PAGE 15.—In the Swaziland column, after “ 1922-23 ” insert “ and 1923-24 ”.

PAGE 16.—In the Barbados column, after “ 1923 ” insert “ and 1924 ”.

PAGES 17-18.—In the Canada—Dominion columns, after “ 1923 ” insert “ and 1924 ”.

*Insert new page 20B given below.*

PAGE 21.—In the Dominica column, for “ 1922, 1923 and 1924 ”, read “ 1922 and 1923 ”.

PAGE 26.—In the British India column, after “ 1923-24 ” insert “ and 1924-25 ”.

*Insert new page 26c given below.*

PAGES 33-34.—In the Victoria columns, after “ 1922-23 ” insert “ and 1923-24 ”.

PAGE 36.—In the Isle of Man column, after “ 1923-24 ” insert “ and 1924-25 ”.

**RATES OF TAX FOR INDIVIDUALS.** *Add:*—For 1924-25 the rates shown for 1923-24 are respectively increased to 10*d.*, 1*s.* 0½*d.*, 1*s.* 3*d.* and 1*s.* 5½*d.*

**RATES OF TAX FOR COMPANIES.** *Add:*—For 1924-25 the amended rates are as for individuals.



TABLE OF INCOME TAX RATES—*continued.*

DOMINICA, 1924.	
RATES OF TAX FOR INDIVIDUALS.	In the £ s. d.
	First £100.. .. . 0 2
	Next £100.. .. . 0 4
	„ £200.. .. . 0 6
	„ £200.. .. . 0 9
	„ £200.. .. . 1 0
	„ £200.. .. . 1 6
	„ £200.. .. . 2 0
	„ £300.. .. . 2 9
	Balance (above £1,500) .. . 3 6
	On mortgage or debenture interest paid by a resident to a non-resident .. 0 6
	(A deduction of one-tenth of earned income, but not more than £200, is allowed to each individual, except to a non-British non-resident. The scale is applied to the income so reduced.)
RATES OF TAX FOR COMPANIES.	As for individuals.
EXEMPTION LIMIT.	£100. (In the case of a married man, in effect, £125. See above for earned income relief.) Allowed to companies.
ABATEMENT.	None. (Deduction for wife, if income does not exceed £500, £25. Not allowed to non-British non- residents.) See above for earned income relief.

TABLE OF INCOME TAX RATES—*continued.*

	INDIA-MAYURBHANJ.* From 1922-23 inclusive.	
RATES OF TAX FOR INDIVIDUALS.	Annual taxable income—	<i>Amount of tax.</i>
	Less than Rs. 1,000 .. ..	Nil.
	Rs. 1,000 up to Rs. 1,249 .. ..	Rs. 20
	.. 1,250 .. .. 1,499 .. ..	.. 28
	.. 1,500 .. .. 1,749 .. ..	.. 35
	.. 1,750 .. .. 1,999 .. ..	.. 42
	.. .. ..	<i>Rate of tax.</i>
	.. 2,000 or upwards .. ..	5 pies per rupee.
	Where income consists of salary only, even if less than Rs. 2,000	do.
	Income partly from agriculture and partly from business, and totalling Rs. 1,000 or over—on the income from <i>business</i> ..	4 pies per rupee.
RATES OF TAX FOR COMPANIES.	As for individuals.	
EXEMPTION LIMIT.	Rs. 1,000.	
ABATEMENT.	None.	

\* 12 pies = 1 anna ; 16 annas = 1 rupee.

**LIFE INSURANCE AND SIMILAR ALLOWANCES.**PAGE 38.— *Add the following entries :—*

Dominica (1924)	One-sixth of total income.	Annual premiums on life of taxpayer or his wife, and annual contributions to widows' and orphans' fund. Not allowed to non-British non-residents.
India— Mayurbhanj	One-sixth of total income.	Premiums on life of taxpayer or his wife, or for annuity to either or contributions to provident funds. Allowed only to "any Government Officer whose services have been lent to the State."

**ALLOWANCES FOR CHILDREN.**PAGE 42.— *Add the following entries :—*

Canada— Dominion (1923)	The limit of amount for each child is increased to \$500.		
Dominica (1924)	£15, each of first three —£25 others.	16 (at beginning of income year).	£500 Stepchild included, but not illegitimate child. Not allowed to non - British non-residents.

PAGE 43.— *Add the following entry :—*

India— Mayurbhanj	No allowance.
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**BASUTOLAND.**

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PAGE 45. **Introductory.**—

After " 1923 " *insert* " and 1924 ".

For " that year " *read* " those years ".

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PAGE 49. **9. Rates of Tax.**—*Add* to first sub-paragraph :—

The same rates of normal tax apply in respect of the twelve months ending 30th June, 1924.

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PAGE 50. Paragraph 9. **Super-Tax.**—*Add* to first sub-paragraph :—

The same rates of super-tax apply in respect of the twelve months ending 30th June, 1924.

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PAGE 52. VIII.—TABLE OF PROCLAMATIONS.—*Add* :—  
The Basutoland Income Tax Proclamation, 1924.  
(No. 22 of 1924.)

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**BECHUANALAND PROTECTORATE.**

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PAGE 53. **Introductory.**—

After " 1923 " *insert* " and 1924 ".

For " that year " *read* " those years ".

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PAGE 57. **9. Rates of Tax.**—*Add* to first sub-paragraph :—

The same rates apply in respect of the twelve months ending 30th June, 1924.

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PAGE 60. VIII.—TABLE OF PROCLAMATIONS.—*Add* :—  
Bechuanaland Protectorate Income Tax Proclamation, 1924. (No. 23 of 1924.)

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**RHODESIA—NORTHERN.**

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**PAGE 72. Introductory.—**

After " 1923 " *insert* " and 1924 ".

For " that year " *read* " those years ".

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**PAGE 73. 2. Income Exempted.— Add to (i) :—**

(The 1924 Ordinance No. 8 extends this exemption to the incomes of the Governor and his personal staff.)

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**PAGE 76. 9. Rates of Tax.— Add to first sub-paragraph :—**

The same rates apply in respect of the twelve months ending 31st March, 1924.

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**PAGE 79. TABLE OF PROCLAMATIONS.—**

In the heading, after " PROCLAMATIONS " *add* " AND ORDINANCES."

*Add* new title :—

The Income Tax (Amendment) Ordinance, 1924.  
(No. 8 of 1924.)

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**RHODESIA—SOUTHERN.**

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**PAGE 80. Introductory.—**

After " 1923 " *insert* " and 1924 ".

For " that year " *read* " those years ".

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**PAGE 81. 2. Income Exempted. (x).— Add :—**

This provision has been repealed as from 1st April, 1924.

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RHODESIA—SOUTHERN—*continued.*PAGE 84. 8. **Life Insurance and Similar Allowances.**(b).—*Add* :—

The provision “ if the making . . . employment ” has been repealed as from 1st April, 1924.

9. **Rates of Tax.**—*Add* to first sub-paragraph :—

The same rates apply in respect of the twelve months ending 31st March, 1924.

PAGE 85. 12. **Due Date etc.** Second sub-paragraph.—*Add* :—

The Income Tax Act, 1924, in force from 11th July, 1924, provides that repayment claims must be made within two years from the date of the notice of assessment.

## PAGE 87. VIII.—TABLE OF ORDINANCES.—

In the heading, after “ ORDINANCES ” *add* “ AND ACTS ”.

*Add* new title :—

The Income Tax Act, 1924. (No. 17, 1924.)

**SOUTH AFRICA—UNION.**PAGE 90. **Introductory.**—

After “ 1922-23 ” *insert* “ and 1923-24 ”.

For “ that year ” *read* “ those years ”.

PAGE 95. 9. **Rates of Tax.** (i).—*Add* to first sub-paragraph :—

The same rates of normal tax apply in respect of the twelve months ending 30th June, 1924.

SOUTH AFRICA—UNION—*continued.*

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PAGE 96. Paragraph 9. (ii) **Super-tax**.—*Add* to first sub-paragraph :—

The same rates of super-tax apply for the year 1923-24.

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PAGE 101. VIII.—TABLE OF ACTS.—*Add* :—  
Income Tax Act, 1924. (No. 26, 1924.)

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**SWAZILAND.**

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PAGE 112. **Introductory**.—

After " 1923 " *insert* " and 1924 ".

For " that year " *read* " those years ".

---

PAGE 116. 9. **Rates of Tax**.—*Add* to first sub-paragraph :—

The same rates apply in respect of the twelve months ending 30th June, 1924.

---

PAGE 119. VIII.—TABLE OF PROCLAMATIONS.—*Add* :—  
The Swaziland Income Tax Proclamation, 1924.  
(No. 18 of 1924.)

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**TANGANYIKA TERRITORY.**

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PAGE 120. **Introductory.**—

After " 1923-24 " *add* " and the year of assessment 1924-25."

---

**1. Profits Charged.**— *Add* :—

Commencing with the year of assessment, 1924-25, the tax is not charged on the profits of professions.

---

**2. Profits Exempted.** (ii).— *Add* :—

This provision is repealed as from 1st April, 1924. (See addition to paragraph 1 above.)

---

PAGE 121. **6. Exemption Limit.**— *Add* :—

For the year of assessment, 1924-25, the limit is 3,000 shillings.

---

**9. Rates of Tax.**— *Add* :—

For the year of assessment 1924-25, where the profits exceed 3,000 shillings, the tax payable is 80 shillings on the first 3,000 shillings and 4 per cent. on the balance.

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**11. Provisions regarding Double Taxation.**— *Add* :—

All of these provisions are repealed as from 1st April, 1924.

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PAGE 122. **VIII.—TABLE OF ORDINANCES.**— *Add* :—

Profits Tax Ordinance, 1924. (No. 7 of 1924.)

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**ANTIGUA.**

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PAGE 381. 7. **Personal Allowances.** Second sub-paragraph.— *Add* :—

From 1924, inclusive, the deduction in respect of wife is £50.

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*Add*, as final sub-paragraph :—

From 1924, inclusive, a deduction of £25, distinct from any of the above deductions, is granted to any individual who is resident in Antigua or who is a British subject.

---

PAGE 382. 11. **Provisions regarding Double Taxation.**—

*Add* :—

The amended provisions from 1924, inclusive, are as follows :—

For the purposes of Antigua income tax, income is assessable without any deduction for United Kingdom income tax (including super-tax), or Empire income tax (*i.e.* any income tax charged in any other British dominion, colony, or protectorate which provides by law for relief in a similar manner in respect of tax charged on income there and in Antigua).

Any person who has paid or is liable to pay Antigua income tax and has paid or is liable to pay United Kingdom income tax for the same year in respect of the same part of his income, is entitled to relief from Antigua tax at a rate equal to the excess of the appropriate rate of Antigua tax over half the appropriate rate of United Kingdom tax, or, if the Antigua rate exceeds the United Kingdom rate, at half the United Kingdom rate.

A person liable to Antigua income tax and to Empire income tax for the same year in respect of the same part of his income is entitled to relief from Antigua tax :—

ANTIGUA—*continued.*

---

- (i) If resident in Antigua, at the Empire rate or half the Antigua rate, whichever is the less ; or
- (ii) If not resident in Antigua, at half the Empire rate, or the excess of the Antigua rate over half the Empire rate, whichever is the less.

A certificate issued on behalf of the Commissioners of Inland Revenue in the United Kingdom is *prima facie* evidence of the appropriate rate of United Kingdom tax in any particular case.

The appropriate rate of Antigua tax is determined by dividing the tax payable for the year (before deduction of the double income tax relief) by the amount of the income in respect of which the Antigua tax has been charged, except that where Antigua tax is charged on an amount other than the ascertained amount of the actual profits the rate of tax is determined by the (Antigua) Commissioners. The Empire rate of tax is computed in a similar manner.

Where a person is for any year of assessment resident both in Antigua and in a place where Empire income tax is charged, he is deemed to be resident where during that year he resides for the longer period.

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PAGE 383. VIII.—TABLE OF ORDINANCES.—*Add* :—  
The Income Tax Ordinance, 1924. (No. 5 of 1924.)

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**BARBADOS.**

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PAGE 127. *Introductory.*—*Add* :—  
The note, as altered by the following amendments, summarises the law in force for 1924.

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BARBADOS—*continued.***2. Income Exempted.—***Add :—*

- (iv) From the year of assessment 1924 inclusive, the official emoluments of the Governor.
- (v) From the year of assessment 1924 inclusive, wound and disability pensions and war gratuities to members of H.M. forces.

**PAGE 129. 9. Rates of Tax.**

In the second line, after " 1923 ", *add* " and 1924 ".

**PAGE 131. VIII.—TABLE OF ACTS.—***Add :—*

- Income Tax (Amendment) Act, 1924. (1924-4.)
- Income Tax (Amendment) Act, 1924 (No. 2). (1924-19.)
- Finance Act, 1924. (1924-26.)

**PAGE 132. Paragraph 21. *Add :—***

No legislation continuing these taxes after 31st March, 1923, has been received, and it may therefore be taken that they ceased to have effect as from that date.

**CANADA—DOMINION.****PAGE 137. Introductory.** In the first sub-paragraph, after " 1923 " *insert* " and 1924."*Add* third sub-paragraph :—

Under " An Act to amend The Department of Customs and Excise Act " (14 & 15 Geo. V., 1924, chap. 37), in force from 19th July, 1924, any mention in this note of " Minister " or " Minister of Finance " is to be read as referring to the Minister of Customs and Excise.

**1. Income Charged.**—*Add* to third sub-paragraph :—

(*See*, however, additional paragraph 17 as regards further provision concerning non-residents' income, for years from 1923 inclusive.)

---

PAGE 140. **4. Deductions.**—*Add* as third sub-paragraph :—

An allowance, at the Minister's discretion, may be made for bad debts.

---

*Add*, as fourth sub-paragraph :—

Deduction is prohibited in respect of the annual value of property, except the rent paid for the use of such property, in connection with a business to earn the assessable income.

---

**7. Personal Allowances.**—*Add* to first sub-paragraph :—

For years from 1923, inclusive, the allowance is \$500.

---

**9. Rates of Tax.**—*Add* to first sub-paragraph :—

The same rates apply in respect of 1923 and 1924 income.

---

PAGE 143. **13. Companies and Income from Companies.**

*Add*, between the second and third sub-paragraphs :—

For years from 1923 inclusive, the provisions summarised in the preceding sub-paragraph have been repealed, and it is provided instead that where any corporation carrying on business in Canada purchases from a parent, subsidiary or associated corporation at more than, or sells to such a corporation at less than, the fair market price, the Minister may determine the income having regard to the fair price in those transactions.

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*Add*, between former fourth and fifth sub-paragraphs :—

Where any incorporated company is wound up, discontinued or reorganised, the distribution in any form of its property is deemed payment of a dividend to the extent that it has on hand undistributed income.

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PAGE 144. **14. Partnerships.** *Add*, as third sub-paragraph :—

Where the husband of a partner in a business receives any salary or other remuneration therefrom, so much of any such payment as bears a similar proportion to the wife's interest in the partnership is added to and taxable with the wife's income—or *vice versa* if a wife is employed by a partnership which includes her husband.

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**15. Married Women.**

In third sub-paragraph, *for* "second sub-paragraph" *read* "second and third sub-paragraphs."

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*Add*, as fourth sub-paragraph :—

Payments made to a husband as employee of his wife, or to a wife as employee of her husband, are not allowed as a deduction from business profits.

---

PAGE 144. *Add* new section and paragraph :—

VII.—SPECIAL TRADES ETC.

**17. Non-resident Traders, Shipowners, etc.**—For years from 1923 inclusive, if a non-resident person wholly or partly produces, grows, mines, creates, manufactures, improves, packs, preserves or constructs anything in Canada and exports it without sale prior to its export, he is deemed to carry

CANADA—DOMINION—*continued.*

on business in Canada and to earn there a part (determinable by a method at the Minister's discretion) of any profit derived from its sale.

For years from 1923 inclusive any non-resident person who solicits orders or offers anything for sale in Canada through an agent or employee (whether the transaction is completed in or outside, or partly in or outside, Canada), or who lets anything used in Canada, or who receives royalty or the like for anything used or sold in Canada, is deemed to carry on business in Canada, and to earn there a part (determinable by a method at the Minister's discretion) of the income so derived.

*See* also paragraph 1, third sub-paragraph.

PAGE 144. VII.—TABLE OF ACTS.—*Add* :—  
14 & 15 Geo. V., 1924, chap. 46.

## CANADA—BRITISH COLUMBIA.

PAGE 147. **Introductory.**—*Add* :—  
Amendments to the "Taxation Act" by later acts are also shewn below.

PAGE 150. 10. **Set-off of other Taxes paid in the Province.**  
*Add* :—  
The Taxation Act Amendment Act, 1923, assented to 21st December, 1923, reduced the personal-property tax rate to one-half of one per cent.

PAGE 155. VIII.—TABLE OF ACTS.—*Add* :—  
Taxation Act Amendment Act, 1923. (14 Geo. V., 1923, chap. 69.)

## CANADA—ONTARIO.

PAGE 167. 4. Deductions.—*Add* :—

The special provisions summarised in the footnote (see Supplement No. 1, page xxi) to paragraph 4 have been repealed by the Mining Tax Act, 1924, which came into force on 17th April, 1924.

PAGE 168. 4. Deductions.—*Add to (f)* :—

The Mining Tax Act, 1924, in force from 17th April, 1924, inserts after "Ireland" the following :—  
 "(in so far as the same are referable to operations carried on in Great Britain or Ireland)."

PAGE 168. 9. Rates of Tax.—*Add* :—

The Mining Tax Act, 1924, made the annual profits of nickel or nickel-copper mines liable to the same rates of tax as the annual profits of other mines, under a new scale, as follows :—

On excess above		Rate per cent.
\$10,000 up to	\$1,000,000	.. 3
\$1,000,000 ..	\$5,000,000	.. 5
\$5,000,000 ..	\$10,000,000	.. 6
\$10,000,000 ..	\$15,000,000	.. 7
\$15,000,000 —	a percentage or percentages increasing in like progression.	

PAGE 170. VIII.—TABLE OF ACTS.—*Add* :—

The Mining Tax Act, 1924. (14 Geo. V., 1924, chap. 10.)

## CANADA—PRINCE EDWARD ISLAND.

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PAGE 172. **Introductory.**— *Add* :—

[*Note.*—Some minor amendments have been made in the law for the year 1924. A note thereon will be published in a later supplement.]

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## DOMINICA.

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The law for 1924 is summarised on pages 467–471 (Supplement No. 3). A note should accordingly be made at page 180.

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## ST. LUCIA.

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PAGE 443. **2. Income Exempted.**— *Add* :—

(viii) Interest payable to non-residents on all loans charged on the public revenue of St. Lucia, or on the revenue of any local authority. (This is exempted as from 1st January, 1924, by Proclamation No. 5 of 1924.)

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PAGE 447. **Line 7.** *Add* :—

Certain loan interest paid to non-residents is, however, exempted from tax as from 1st January, 1924 (*see* paragraph 2 (viii)).

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## TRINIDAD AND TOBAGO.

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PAGE 398. **Paragraph 12.**— *Add* :—

For 1924, the regulations prescribe in general that tax is to be paid in two equal instalments, by 15th August, 1924, and 31st October, 1924, respectively.

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## BRITISH INDIA.

PAGE 217. **Introductory.**—After “ 1923-24 ” *add* “ and 1924-25.”

PAGE 218. **2. Income Exempted.**—(iii) *Add* :—

For years of assessment from 1924-25 inclusive, the exemption granted to provident insurance societies has been repealed, but that granted to provident funds to which the Provident Funds Act, 1897, applies, still holds good.

PAGE 220. Paragraph 3. First sub-paragraph.—*Add* :—  
(From 1st April, 1924, the Indian Board of Inland Revenue is replaced by the Central Board of Revenue.)

Second sub-paragraph.—*Add* :—

For years of assessment from 1924-25 inclusive, for the words “ *commenced after the 31st March, 1922,* ” *substitute* “ on which income tax was *not* at any time charged under the Indian Income-tax Act, 1918.”

Third sub-paragraph.—*Add* :—

For years of assessment from 1924-25 inclusive, *omit* the words “ which was in existence on 1st April, 1922, and ”.

PAGE 221. **4. Deductions.**—(4), (vi).—*Add* :—

(From 1st April, 1924, the Indian Board of Inland Revenue is replaced by the Central Board of Revenue.)

BRITISH INDIA—*continued.*

PAGE 223. Paragraph 8.—First sub-paragraph on this page.—*Add* :—

For years of assessment from 1924–25 inclusive, *omit* from the first sentence all words after “applies” (*i.e.* “or to any . . . . that Act”).

9. **Rates of Tax.**—*Add* :—

The same rates of income-tax and super-tax apply for the year 1924–25.

PAGE 225. After second sub-paragraph on the page, *insert* new sub-paragraph :—

As to the arrangements recently made between the Government of British India and certain Indian states, for relief in respect of double income-tax on incomes taxed both in British India and in any of these states, *see* Supplement No. 3, page 479.

Paragraph 12.—Second sub-paragraph, line 6. After “1923–24”, *add* “and 1924–25”.

PAGE 229. VIII.—TABLE OF ACTS.—*Add* :—

The Indian Finance Act, 1924.

The Indian Income-tax (Amendment) Act, 1924. (No. XI of 1924.)

**INDIA—TRAVANCORE.**

PAGE 415.—*Insert* new paragraph, next to paragraph 9 :—

11. **Provisions regarding Double Taxation.**—

As regards relief in respect of double income-tax on incomes taxed both in Travancore and in British India, *see* Supplement No. 3, page 479.

**AUSTRALIA—VICTORIA.**

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**PAGE 311. Introductory.**—*Add* to first sentence :—  
and (as amended) for 1923–24.

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**1. Income Charged.**—*Add* to last sentence of second sub-paragraph :—  
—*see* fifth sub-paragraph below, for 1923–24.

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*Add* as fifth sub-paragraph :—

From the year of assessment, 1923–24 inclusive, "income" includes money derived by way of royalty or bonuses, and premiums, fines etc. paid in connection with leasehold estates, also any payment received by a lessee upon the assignment or transfer of a lease to another person, after deducting the portion (if any) which is properly attributable to the transfer of any tangible assets belonging to the lessee, and so much of any fine, premium etc., or of any sum paid by the lessee for the assignment or transfer of the lease as is properly attributable to the period of the lease unexpired at the time of assignment or transfer by him.

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*Add* as sixth sub-paragraph :—

From the year of assessment, 1923–24 inclusive, "income" includes 5 per cent. of the capital amount of a retiring allowance or gratuity which is paid in a lump sum.

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*Add* as seventh sub-paragraph :—

From the year of assessment, 1923–24 inclusive, "income" includes the proceeds of the sale of trading stock after 30th June, 1922 (whether included in the sale of a business or not).

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AUSTRALIA—VICTORIA—*continued.*

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PAGE 313.—*Add to (iv) :—*

(From the year of assessment, 1923–24 inclusive, all losses and outgoings not of a capital nature, including commission, discount, travelling expenses, interest and expenses actually incurred in gaining or producing the assessable income.)

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*Add to (v) :—*

(From the year of assessment, 1923–24 inclusive, all rates and taxes actually paid during the basic year under any Act of the Parliament of Victoria except the Income Tax Acts.)

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*Add to (vii) :—*

(From the year of assessment, 1923–24 inclusive, the provisions as to deduction of interest are as shown in the addition to (iv) above.)

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*Add to (ix) :—*

(For years of assessment from 1923–24 inclusive, *see* page 311, paragraph 1, fifth sub-paragraph.)

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*Add to (xii) :—*

(From the year of assessment, 1923–24 inclusive, a percentage allowance for diminished value by wear and tear, during the year of income, of machinery, implements, utensils, rolling-stock and articles (including beasts of burden and working beasts) used by the taxpayer for the purpose of producing income, such wear and tear not being of a kind that may be made good by repairs; the provision mentioned in the second sentence of (xii) continues to apply—and the deduction under (xi) is taken into account in computing the allowance under this subsection.)

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AUSTRALIA—VICTORIA—*continued.*


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PAGE 314.—*Add*, between subsection (xvii) and the final sub-paragraph :—

The following deductions are also allowed, without any restriction as to the residence or total income of the taxpayer :—

- (xviii) From the year of assessment 1923–24 inclusive, where a taxpayer, who is the lessee under a lease or the assignee or transferee of a lease, has paid on or after 1st July, 1922, any fine, premium or similar consideration for a lease or the renewal of a lease or a sum for the assignment or transfer of a lease of premises or machinery used for the production of income, the Commissioner may allow as a deduction the amount obtained by dividing the sum so paid by the number of years of the unexpired period of the lease at the date the amount was so paid. The aggregate of the deductions so allowed is not to exceed the sum so paid.

A deduction calculated on a similar basis is allowed for the annual sum necessary to recoup the expenditure on improvements on land made under covenant with the lessor by a lessee who has no tenant rights in the improvements.

- (xix) Employer's contributions to approved benefit or pension funds for employees.
- 

PAGE 315. Sub-section (d), line 8 :—

For "has" *read* "have".

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Sub-section (f).—*Add* :—

Wastage of a lease or loss occasioned by the expiration of a lease. (*See*, however, addition to deduction (xii), page 313, and also deduction (xviii), page 314.)

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AUSTRALIA—VICTORIA—*continued.*

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PAGE 317. Second sub-paragraph.— *Add* :—

The rates of tax for the year ending 30th June, 1924, are the same as those for the year ending 30th June, 1923.

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PAGE 318. Paragraph 12.— *Add* :—

As regards years of assessment from 1923-24 inclusive, the duty is in general due and payable thirty days after the service by post of a notice of assessment—the date of payment must not be before the 1st January in the year of assessment. If any tax is not paid within one month after the due date, 10 per cent. per annum on the unpaid sum is added. The Commissioner may at discretion remit any part of the additional tax, or may permit payment of tax to be made by instalments.

Claims for repayment of tax paid in excess, in connection with assessments made after 1st July, 1922, must be made within three years of the date of payment.

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PAGE 320.—VIII. TABLE OF ACTS.— *Add* :—

Income Tax Act, 1923. (No. 3313.)  
Income Tax Acts Amendment Act, 1923. (No. 3319.)

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**ISLE OF MAN.**

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**PAGE 359. Introductory.**—

After "1923-24" add "and 1924-25".

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**PAGE 361. 9. Rates of Tax.**— *Add* :—

For the year 1924-25 the rates are as follows :—

	Rate of Tax in the £.	
If the total income does not exceed £500	10d.	
" " " " " " £1,000	1s. 0½d.	
" " " " " " £1,500	1s. 3d.	
" " " " exceeds £1,500	1s. 5½d.	

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**IRISH FREE STATE (SAORSTAT EIREANN).**

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**PAGE 419. Second sub-paragraph.**— *Add* :—

The Free State income tax and super-tax legislation for 1924-25 is summarised on pages 481-482 (Supplement No. 3).

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**PAGE 422. Insert** at end of the text :—

**Life Assurance—Companies in Great Britain  
and Northern Ireland.**

The Inland Revenue (Adaptation of Taxing Acts) First Supplemental Order, 1924 (No. 3 of 1924), contains the following provisions, with effect as from 6th April, 1923 :—

For purposes of relief in respect of life insurance premiums paid to any insurance company legally established in any British possession (Income Tax Act, 1918, Section 32, sub-section 1 (a) ), and for purposes of assessment of any assurance company having its head office in any British possession (Income Tax Act, 1918, Schedule D, Case III, Rule 3 (2), proviso) the words " British possession " include Great Britain and Northern Ireland.

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