# **International Petroleum Corp. 2019 Tax Balances, Fiscal Terms and Royalties Rates**



International Petroleum Corp.





# Disclaimer

#### **Economics Assumptions**

All balances are estimated at January 1, 2019

#### **Forward Looking Statements**

This presentation contains statements and information which constitute "forward-looking statements" or "forward-looking information" (within the meaning of applicable securities legislation). Such statements and information (together, "forward-looking statements") relate to future events. Actual results may differ materially from those expressed or implied by forward-looking statements. The forward-looking statements contained in this presentation are expressly qualified by this cautionary statement. Forward-looking statements speak only as of the date of this presentation, unless otherwise indicated. IPC does not intend, and does not assume any obligation, to update these forward-looking statements, except as required by applicable laws.

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# Canada **Overview**

## Combination of royalties and corporate income tax

## Royalty payments due to the holder of the mineral rights and in some instances investors

- Holder of mineral rights can be Crown (Government), First Nations or Freehold (Private)
- Royalties calculated on well-by-well basis and vary based on province, well type and product price
- Gross Over-Riding Royalties (GORR's) also payable on certain assets

## Corporate Income Tax Rate: 27%

- Federal Income Tax -15%
- Provincial Income Tax -12% (Alberta and Saskatchewan)

## Depreciation

- Capital costs (including many drilling/completion expenses) depreciation categories between 10-30% declining balance
- Exploration cost depreciation 100%
- Non-capital losses: ability to carry forward (20 taxation years) against future income and capital gains
- Capital losses: ability to carry forward (indefinitely) only to shelter future capital gains
- Interest on debt is tax deductible
- Deduction of interest on non-arm's length debt may be subject certain limitations

# Canada **Royalties**

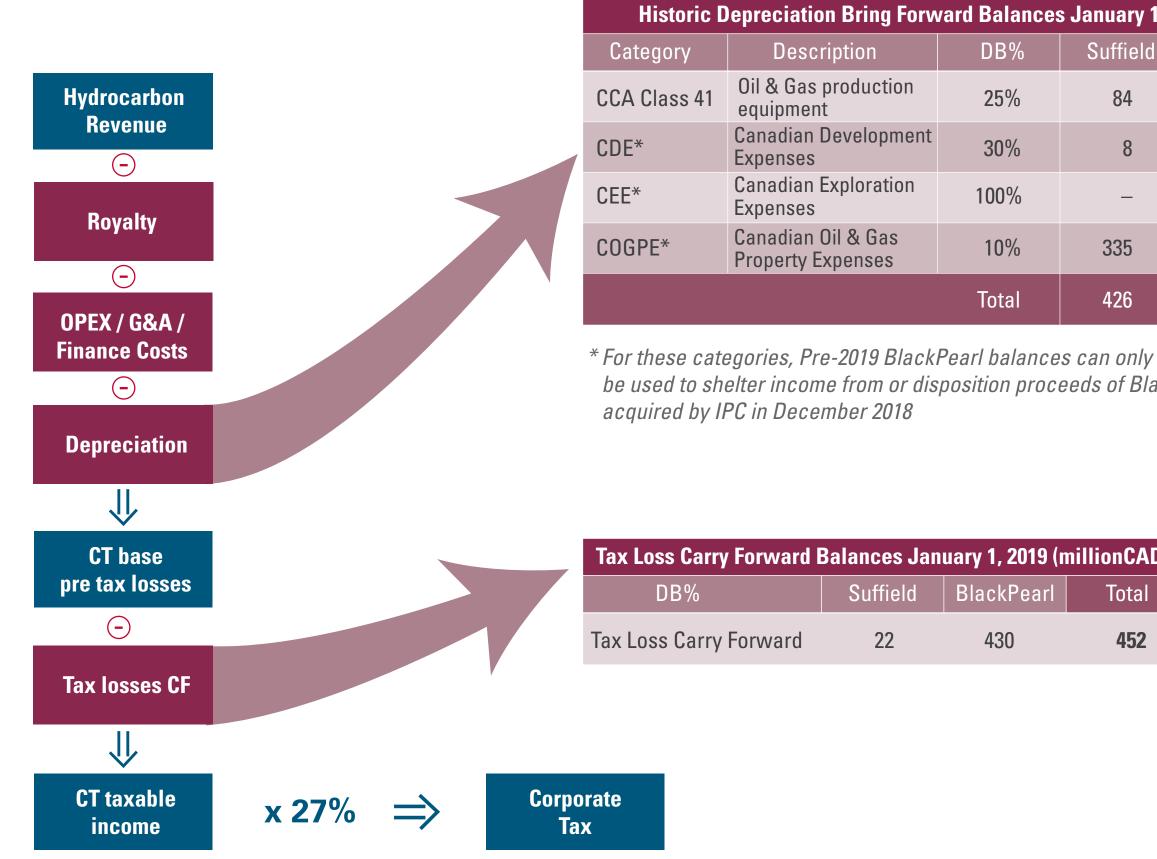
## For Blackrod see separate slide

Asset <sup>(1)</sup>	Onion Lake Thermal	Other Conventional Oil Alberta	Suffield Gas	Suffield EOR	Mooney	Other Conventional Oil Saskatchewan	
Province	Saskatchewan	Alberta	Alberta	Alberta Albe		Saskatchewan	
<b>Production Category</b>	Enhanced Oil Recovery Projects	Oil ARF to modernised	Gas ARF to modernised	Enhanced Hydrocarbon Recovery Program & Oil MRF to modernised EHRP & Oil MRF to modernised		New Heavy Oil (First Nations) 4 <sup>th</sup> Tier Heavy Oil (Crown)	
Royalty Estimate Range (Mineral rights)	1% pre payout 10-12% post payout <sup>(2)</sup>	3–7%	2–3%	5–10%	8–18%	16–20%	
GORR Range	8–10%	—	N/A	N/A	_	4—5%	
Total Royalty Estimate Range	9-11% pre payout 18-22% post payout	3–7%	2–3%	5–10%	8–18%	20–25%	

<sup>(1)</sup> For detail on Blackrod, please see "Blackrod Royalties" slide

<sup>(2)</sup> For detail on payout mechanism, please see "Onion Lake EOR Royalties" slide

# Canada **Corporate Tax**



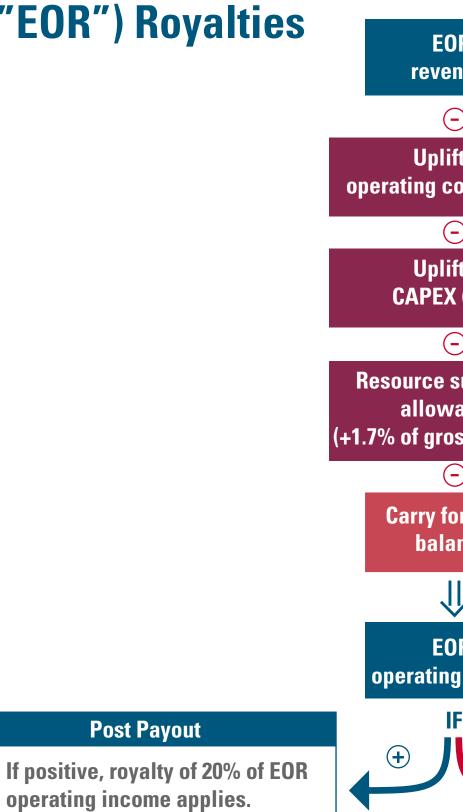
rv	rward Balances January 1, 2019 (million CAD)										
	DB%	Suffield	BlackPearl	Total							
	25%	84	298	381							
nt	30%	8	47	55							
	100%	-	34	34							
	10%	335	13	348							
	Total	426	392	818							

be used to shelter income from or disposition proceeds of BlackPearl assets

an	anuary 1, 2019 (millionCAD)					
	BlackPearl	Total				
	430	452				

# Canada **Onion Lake Enhanced Oil Recovery ("EOR") Royalties**

- The EOR royalty system was designed to recognise the higher investment and operating costs associated with EOR projects, so amounts payable depend on the profitability of each project
- Lower royalty rates apply prior to payout of the EOR investments



**Post Payout** 

operating income applies.

**EOR royalty carry forward** balance : Million CAD 375.5

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#### **Pre Payout**

egative, brought forward ainst next month's balance, alty of 1% of gross EOR enues applies

# Canada **Blackrod Royalties**

- Alberta oil sands project
- Blackrod royalties based on payout calculation







( + )

#### **Post Payout**

25% of net revenues when WTI is below 55 CAD/bbl +0.6% for every 5 CAD/bbl to 120 CAD/bbl (max 40% net revenues)





operating income



#### **Pre Payout**

1% of gross revenues when WTI is below 55 CAD/bbl +0.6% for every 5 CAD/bbl to 120 CAD/bbl (max 9% gross revenues)

# Malaysia **Overview – Marginal Tax Regime**

Marginal Tax Regime applies to

- Oil Fields < 30 mmbo
- Gas Field < 500 bcf

## **Production Sharing Contract (PSC)**

### **PSC** Revenue

- Royalty = 10% \* Hydrocarbon Revenue
- Cost Oil = Min (unrecovered costs, Hydrocarbon Revenue \* R-Factor)
- Excess Cost oil = (Hydrocarbon Revenue \* R-Factor Cost oil) \* R-Factor
- Profit Oil = (Hydrocarbon Revenue Royalty Cost Oil Excess Costs Oil) \* R-Factor

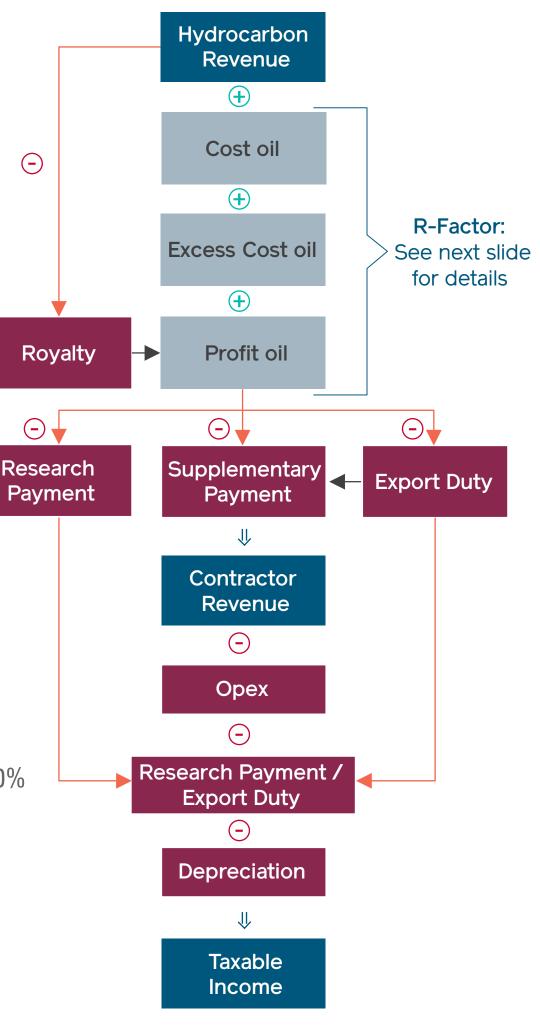
### **Other taxes and payments**

- Research Payment = (Cost oil + Excess Cost oil + Profit oil) \* 0.5%
- Export Duty = (Excess Cost oil + Profit oil) \* 10% (Standard), 0% (Marginal)
- Supplementary Payment = (Excess Cost oil + Profit oil Export Duty) \* Actual to Base Price ratio \* 70%
  - Base Price is given by PSC
- Contractor Revenue = Cost Oil + Excess Cost Oil + Profit oil Supplementary Payment

### **Corporate tax**

PITA marginal tax rate: 25%

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# Malaysia PM 307 PSC – Marginal Field Terms

R-Factor = Cumulative Contractor Revenue/Cumulative Cost

- Where Cost includes: OPEX, E&A, CAPEX and Decommissioning Provision

PM307: R-Factors								
		Cost Oil						
	R-Factor	%						
Threshold 1	0.0	70%						
Threshold 2	1.0	60%						
Threshold 3	1.4	50%						
Threshold 4	2.0	30%						
Threshold 5	2.5	30%						
Threshold 6	3.0	30%						
Excess Oil								
	<b>R-Factor</b>	<thv< th=""><th>&gt;THV</th></thv<>	>THV					
Threshold 1	0.0	n/a	n/a					
Threshold 2	1.0	80%	40%					
Threshold 3	1.4	70%	40%					
Threshold 4	2.0	60%	40%					
Threshold 5	2.5	2.5 50%						
Threshold 6	3.0	40%	20%					
		Profit Oil						
	<b>R-Factor</b>	<thv< th=""><th>&gt;THV</th></thv<>	>THV					
Threshold 1	0.0	80%	40%					
Threshold 2	1.0	70%	30%					
Threshold 3	1.4	60%	30%					
Threshold 4	2.0	50%	30%					
Threshold 5	2.5	40%	30%					
Threshold 6	3.0	30%	10%					

Field Threshold Volumes	
Oil (mmbo) Gas (bcf)	30 750
Supplementary Payment To	erms
Base Year	1996
Base Price Oil (USD/bbl)	25
Base Price Gas (USD/mmbtu)	1.80
Escalation Factor Oil (%/yr)	4%
Escalation Factor Gas (%/yr)	4%
Rate Oil	70%
Rate Gas	70%
R-Factor Threshold <sup>(1)</sup>	1

<sup>(1)</sup> Threshold achieved when the Cumulative Contractor Revenue = Cumulative Cost

PM 307: Opening Balances @	MUSD	
Cost Recovery		
Cummulative Cost Oil to recover	(gross)	365
PITATax		
Cumulative E&A Pool	(gross)	40
Historic Facilities Expenditure	(gross)	70
Drilling <sup>(2)</sup>	(gross)	10
Tax Loss brought forward	(gross)	10

<sup>(2)</sup> Future drilling has FYA of 40%

#### **Depreciation Method**

15% DB or UOP 10% SL (Marginal) 15% DB or UOP

# France **Overview**

## **Concession regime**

## **Local Levy**

### USD/bbl equivalents:

- Onshore fields: 4.50 USD/bbl
- Offshore fields: 0.36 USD/bbl

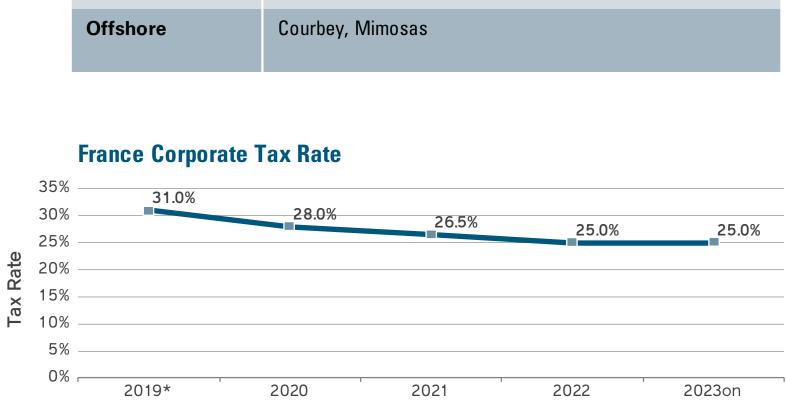
## **Royalty**

8% of production above 1500 tonnes per field (> 30 bopd)

## **Corporate Tax**

- Tax rate steps down to 25% by 2022
- 3.3% Contribution Additionnelle (if Gross Tax > €763k)
- Applicable at a company level

Field Type	Fields
Onshore	Courde Soudro Les Art
Offshore	Courbe



Corporate Tax Payment Schedule								
15th March Year	8.33% of Year -2							
15th June Year	16.66% of Year -1 less payment 15/03							
15th Sept Year	25% of Year -1 less payments 15/03 and 15/06							
15th Dec Year	33.33% of Year - 1 less payments 15/03, 15/06 and 15/09							
15th May Year +1	33.33% of Year less payments 15/03, 15/06, 15/09 and 15/12							

emanges, DML, Grandville,Hautefeuille, La Motte Noir, on, Vert La Gravelle, Villeperdue, Les Pins, Tamaris, bousiers, Merisier, Villeseneux, Amaltheus, Genièvre

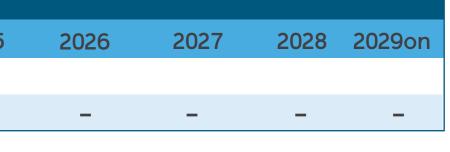
# France **Tax Depreciation**

### Corporate tax loss bring forward: 0.4 Million EUR

Tax Depreciation Schedule: CAPEX (Net IPC)									
as at 01.01.2019	2019	2020	2021	2022	2023	2024	2025		
Aquitaine Basin	0.96	0.66	0.29	0.06	0.01	-	_		
Paris Basin	7.5	4.2	2.4	1.4	0.6	0.4	0.1		

Tax Depreciation Schedule: Abandonment (Net IPC)											
as at 01.01.2019	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029on
Aquitaine Basin	-	-	-								
Paris Basin	2.0	0.7	0.2								

### Million EUR





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