# **International Petroleum Corp. 2020 Tax Balances, Fiscal Terms and Royalties Rates**



International Petroleum Corp.





# Disclaimer

#### **Economics Assumptions**

All balances are estimated at January 1, 2020

#### **Forward Looking Statements**

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The completion of the acquisition of Granite Oil Corp. remains subject to the satisfaction of certain conditions. Completion is expected to occur in early March 2020.

# 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: 23-27%

- Federal Income Tax 15%
- Saskatchewan Province Income Tax 12%
- Alberta Province Income Tax 10% (2020), 9% (2021), 8% (2022 onwards)

### 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	Ferguson (Granite Oil Corp)	Mooney	Other Conventional Oil Saskatchewan
Province	Saskatchewan	Alberta	Alberta	Alberta	Alberta	Alberta	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	Oil ARF and Oil MRF to modernised (Crown and Freehold)	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>	4—7%	2–3%	5–10%	11-27%	8–18%	16–20%
GORR Range	9–11%	_	—	N/A	1%	-	4–5%
Total Royalty Estimate Range	10-12% pre payout 19-23% post payout	4–7%	2–3%	5–10%	<b>12-28</b> %	8–18%	20–25%

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<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**



Historic D	Historic Depreciation Bring Forward Balances January 1, 2020 (million CAD)									
ategory	Description	DB%	Existing Canada	Granite	Total					
A Class 41	Oil & Gas production equipment	25%	316	9	325					
E*	Canadian Development Expenses	30%	62	63	125					
-*	Canadian Exploration Expenses	100%	35	2	37					
GPE*	Canadian Oil & Gas Property Expenses	10%	317	1	318					
		Total	730	75	805					

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

an	nuary 1, 2020 (millionCAD)						
	Granite	Total					
	104	573					

# 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 305

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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-Fa	ctors		
		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%	
	E	Excess Oi	l
	<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	50%	40%
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 @	January 1, 2020	MUSD
Cost Recovery		
Cummulative Cost Oil to recover	(gross)	380
PITATax		
Cumulative E&A Pool	(gross)	25
Historic Facilities Expenditure	(gross)	60
Drilling <sup>(2)</sup>	(gross)	8
Tax Loss brought forward	(gross)	25

<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: 4.46 USD/bbl
- Offshore fields: 0.33 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 Pa	yment Schedule
15th March Year	7% of Year -2
15th June Year	14% of Year -1 le
15th Sept Year	21% of Year -1
15th Dec Year	28% of Year - 1
15th May Year +1	28% of Year less

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

less payment 15/03 less payments 15/03 and 15/06 less payments 15/03, 15/06 and 15/09 s payments 15/03, 15/06, 15/09 and 15/12

# France **Tax Depreciation**

Tax Depreciation Schedule: CAPEX (Net IPC)											
as at 01.01.2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030on
Aquitaine Basin	0.97	0.48	0.25	0.02	0.01	-					
Paris Basin	11.72	9.98	8.84	7.99	7.74	1.13	0.03	0.02	0.02	0.02	0.04

Tax Depreciation Schedule: Abandonment (Net IPC)											
as at 01.01.2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030on
Aquitaine Basin	-	-	-	-	_	-	-	-	-	_	-
Paris Basin	1.02	0.23	0.05	0.05	0.05	-	-	-	-	-	-

### Million EUR



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