

International Petroleum Corp.

2020 Tax Balances, Fiscal Terms and Royalties Rates



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Disclaimer

Economics Assumptions

All balances are estimated at January 1, 2020

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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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**

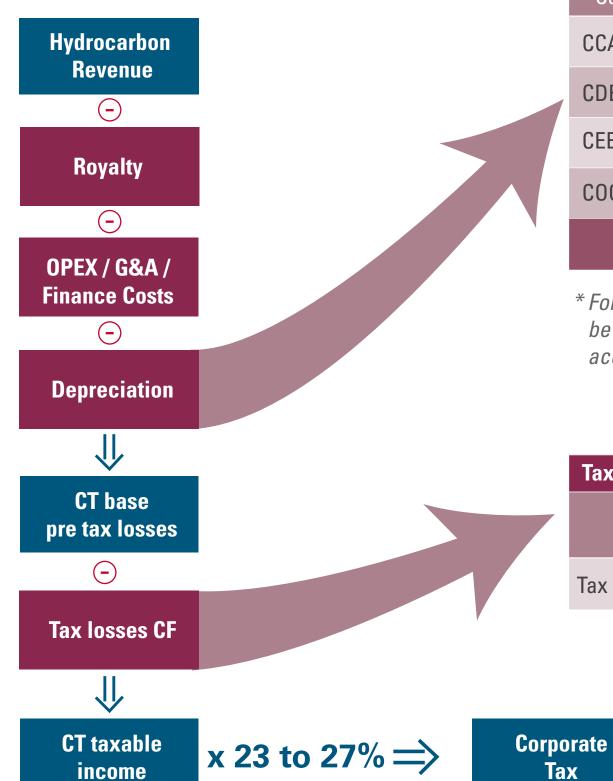
For Blackrod see separate slide

Asset ⁽¹⁾	Onion Lake Thermal	Other Conventional Oil Alberta	Suffield Suffield (G		Ferguson (Granite Oil Corp)	Mooney	Other Conventional Oil Saskatchewan	
Province	Saskatchewan	Alberta	Alberta	Alberta Alberta		Alberta	Saskatchewan	
Production Category	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 th Tier Heavy Oil (Crown)	
Royalty Estimate Range (Mineral rights)	1% pre payout 10-12% post payout ⁽²⁾	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%		5–10%	12-28%	8–18%	20–25%	

⁽¹⁾ For detail on Blackrod, please see "Blackrod Royalties" slide

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

Canada Corporate Tax



	Historic E	Depreciation Bring Forw	vard Balances	s January 1, 2	020 (million C	AD)
	Category	Description	DB%	Existing Canada	Granite	Total
	CCA Class 41	Oil & Gas production equipment	25%	316	9	325
1	CDE*	Canadian Development Expenses	30%	62	63	125
	CEE*	Canadian Exploration Expenses	100%	35	2	37
	COGPE*	Canadian Oil & Gas Property Expenses	10%	317	1	318
			Total	730	75	805

^{*} For these categories, Pre-2020 Granite balances can only be used to shelter income from or disposition proceeds of Granite assets to be acquired by IPC

Tax Loss Carry Forward Balances January 1, 2020 (millionCAD)							
DB%	Existing Canada	Granite	Total				
Tax Loss Carry Forward	469	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

EOR royalty carry forward balance: Million CAD 305

EOR revenues \odot **Uplifted** operating costs (+10%) <u>-</u> **Uplifted CAPEX (+5%)** <u>-</u> **Resource surcharge** allowance (+1.7% of gross revenues) (-)**Carry forward** balance **EOR** operating income If negative, brought forward against next month's balance, royalty of 1% of gross EOR

Post Payout

operating income applies.

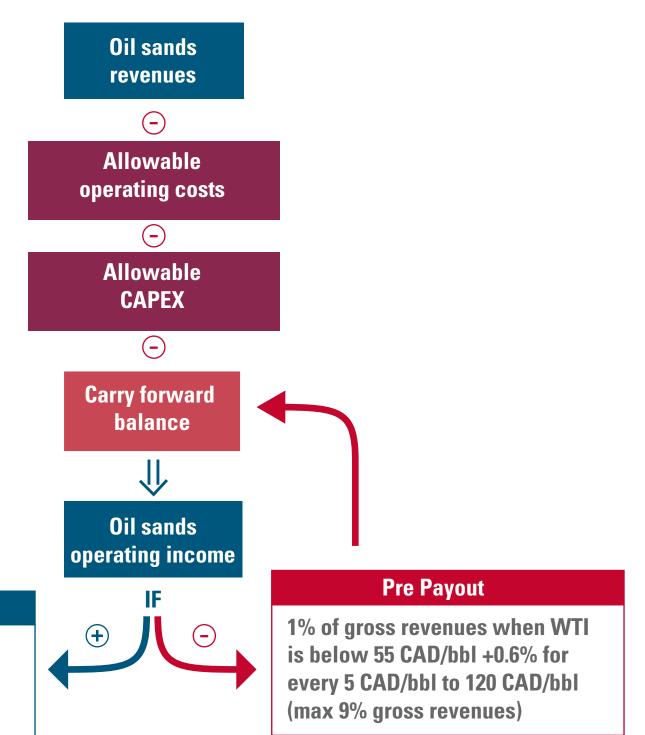
If positive, royalty of 20% of EOR

Pre Payout

revenues 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)

Malaysia

Overview – Marginal Tax Regime

Marginal Tax Regime applies to

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

Production Sharing Contract (PSC)

PSC Revenue

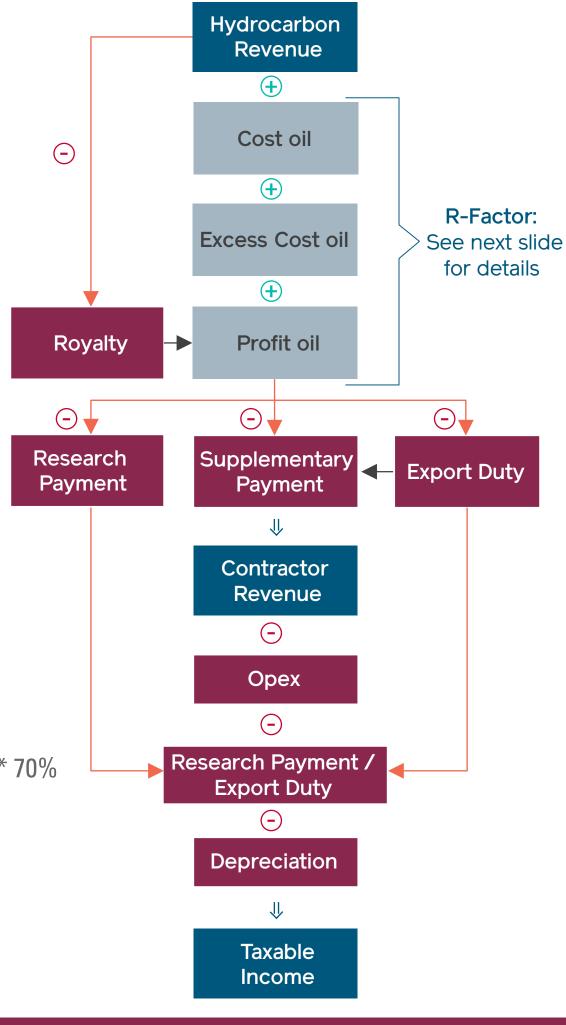
- Royalty = 10% * Hydrocarbon Revenue
- Cost Oil = Min (unrecovered costs, Hydrocarbon Revenue * R-Factor)
- Excess Cost oil = (Hydrocarbon Revenue * R-Factor Cost oil) * R-Factor
- Profit Oil = (Hydrocarbon Revenue Royalty Cost Oil Excess Costs Oil) * R-Factor

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%



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%							
	Excess Oil								
	R-Factor	<thv< th=""><th>>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							
	R-Factor	<thv< th=""><th>>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 Te	rms
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 (1)	1

⁽¹⁾ Threshold achieved when the Cumulative Contractor Revenue = Cumulative Cost

PM 307: Opening Balances	@ January 1, 2020	MUSD	Depreciation Method
Cost Recovery			
Cummulative Cost Oil to recover	(gross)	380	
PITA Tax			
Cumulative E&A Pool	(gross)	25	15% DB or UOP
Historic Facilities Expenditure	(gross)	60	10% SL (Marginal)
Drilling (2)	(gross)	8	15% DB or UOP
Tax Loss brought forward	(gross)	25	

⁽²⁾ Future drilling has FYA of 40%

France

Overview

Concession regime

Local Levy

• USD/bbl equivalents:

- Onshore fields: 4.46 USD/bbl

- Offshore fields: 0.33 USD/bbl

Royalty

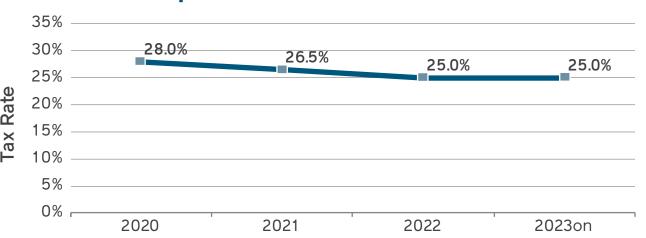
8% of production above 1500 tonnes per field (> 30 bopd)

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	Courdemanges, DML, Grandville, Hautefeuille, La Motte Noir, Soudron, Vert La Gravelle, Villeperdue, Les Pins, Tamaris, Les Arbousiers, Merisier, Villeseneux, Amaltheus, Genièvre
Offshore	Courbey, Mimosas

France Corporate Tax Rate



Corporate Tax Payment Schedule									
15th March Year	7% of Year -2								
15th June Year	14% of Year -1 less payment 15/03								
15th Sept Year	21% of Year -1 less payments 15/03 and 15/06								
15th Dec Year	28% of Year - 1 less payments 15/03, 15/06 and 15/09								
15th May Year +1	28% of Year less payments 15/03, 15/06, 15/09 and 15/12								

France

Tax Depreciation

Million EUR

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	-	-	-	-	-	-

