# **International Petroleum Corp. 2022 Tax Balances, Fiscal Terms and Royalties Rates**



International Petroleum Corp.





# Disclaimer

#### **Economics Assumptions**

All balances are estimated at January 1, 2022

#### **Forward Looking Statements**

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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: 23-27%

- Federal Income Tax 15%
- -Saskatchewan Province Income Tax 12%
- -Alberta Province Income Tax 8%

### 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

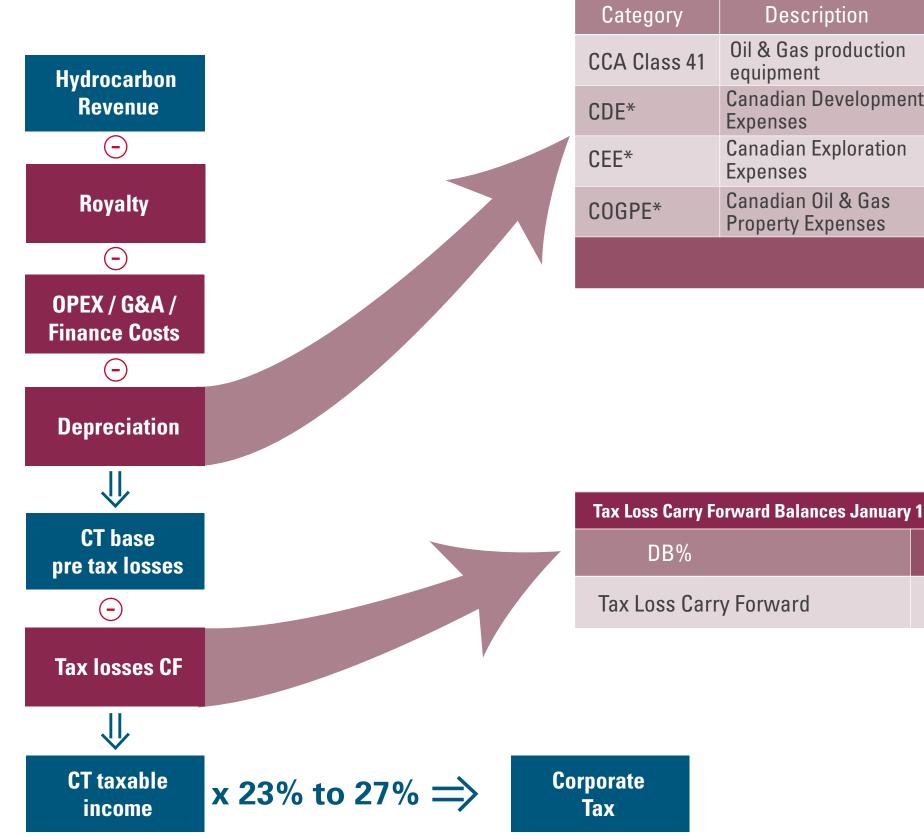
Asset <sup>(1)</sup>	Onion Lake Thermal	Other Conventional Oil Alberta	Suffield Gas	Suffield EOR	Ferguson	Mooney	Other Conventional Oil Saskatchewan
Province	Saskatchewan	Alberta	Alberta	Alberta	Alberta	Alberta	Saskatchewan
Production Category	Enhanced Oil Recovery Projects	Oil ARF to modernised	Gas 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 <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

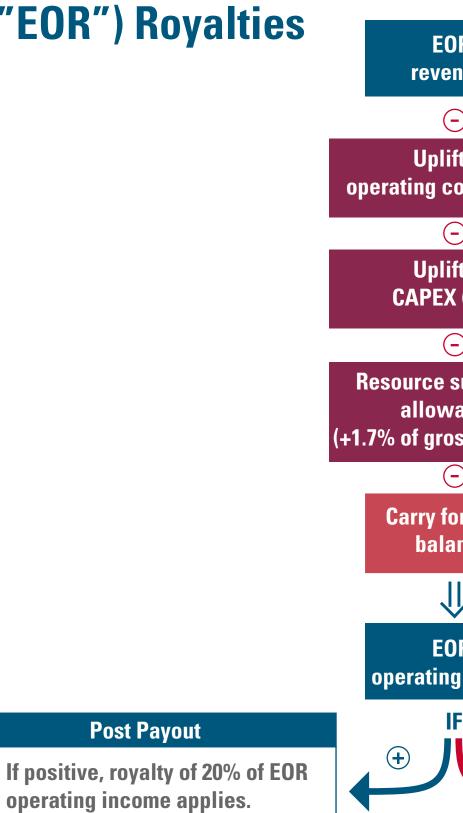


Historic Depreciation Bring Forward Balances January 1, 2022 (million CAD)				
Category	Description	DB%	Total	
CCA Class 41	Oil & Gas production equipment	25%	228	
CDE*	Canadian Development Expenses	30%	107	
CEE*	Canadian Exploration Expenses	100%	34	
COGPE*	Canadian Oil & Gas Property Expenses	10%	262	
		Total	631	

1, 2022 (millionCAD)	
Total	
543	

# 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 149

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Ξ	
ifted X (+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 +1.15% 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 +0.62% 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

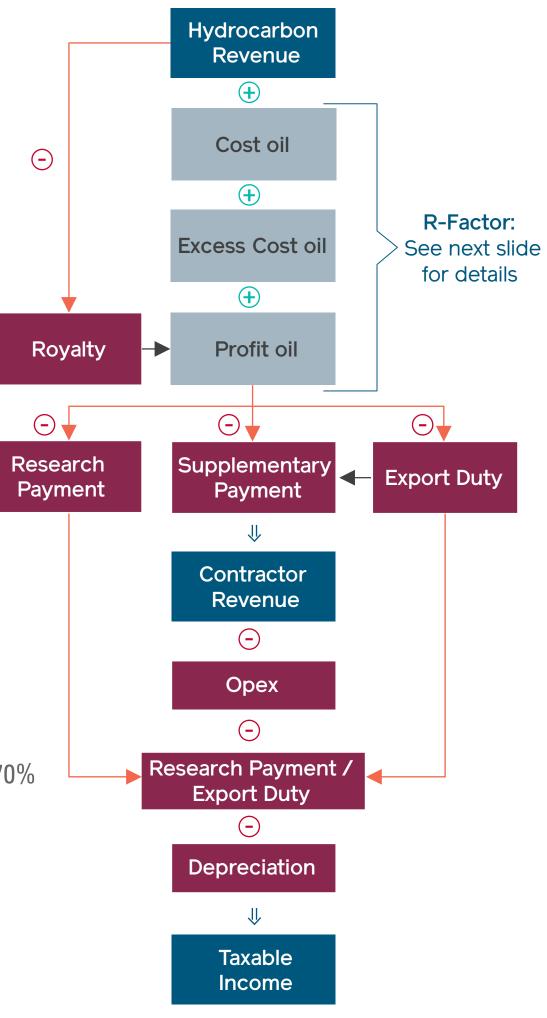
- Royalty = 10% \* Hydrocarbon Revenue
- Cost Oil = Min (unrecovered costs, Hydrocarbon Revenue \* R-Factor)
- Excess Cost oil = (Hydrocarbon Revenue \* R-Factor Cost oil) \* R-Factor
- Profit Oil = (Hydrocarbon Revenue Royalty Cost Oil Excess Costs Oil) \* R-Factor

### **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%



# 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						
	R-Factor	Cos	st Oil %			
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	50% 40%				
Threshold 6	3.0	40%	20%			
	I	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 T	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		
Cumulative Cost Oil to recover	(gross)	433
PITATax		
Cumulative E&A Pool	(gross)	14
Historic Facilities Expenditure	(gross)	38
Drilling <sup>(2)</sup>	(gross)	4
Tax Loss brought forward	(gross)	71

<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: 4.90 USD/bbl
  - Offshore fields: 0.33 USD/bbl

## **Royalty**

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

## **Corporate Tax**

- Tax rate 25%
- 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	6.25% of Year -2
15th June Year	12.5% of Year - 1
15th Sept Year	18.75% of Year -
15th Dec Year	25.0% of Year - 1
15th May Year +1	25.0% of Year les

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

#### ey, Mimosas

less payment 15/03

1 less payments 15/03 and 15/06

less payments 15/03, 15/06 and 15/09

as payments 15/03, 15/06, 15/09 and 15/12

# France **Tax Depreciation**

1

Tax Depreciation Schedule: CAPEX (Net IPC)					
as at 01.01.2022	2022	2023	2024	2025	2026
Aquitaine Basin	0.25	0.07	0.02	-	
Paris Basin	6.8	6.2	5.2	2.6	1.2

Tax Depreciation Schedule: Abandonment (Net IPC)						
as at 01.01.2022	2022	2023	2024	2025	2026	
Aquitaine Basin	0.05	-	-	-	-	
Paris Basin	0.2	0.3	0.3	0.2	0.2	

# Million EUR 6 2027 1.0 6 2027 6 2027 –



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