

Transocean Ltd. and subsidiaries Supplemental Effective Tax Rate Analysis

(in millions, except tax rates)

	Three months ended						Six months ended				
	June 30, 2018		March 31, 2018		June 30, 2017			June 30, 2018		June 30, 2017	
Loss before income taxes Litigation matters Acquisition and restructuring costs Loss on impairment of goodwill and other assets (Gain) loss on disposal of assets, net Loss on retirement of debt Adjusted income (loss) before income taxes	\$	(1,054) - 11 1,014 (1) 2 (28)	\$	(149) - 7 - (6) - (148)	\$	(1,716) 2 113 1,597 48 46	\$	(1,203) - 18 1,014 (7) 2 (176)	\$	(1,661) (6) 2 113 1,595 <u>48</u> 91	
Income tax expense (benefit) Litigation matters Acquisition and restructuring costs Loss on impairment of goodwill and other assets (Gain) loss on disposal of assets, net Loss on retirement of debt Changes in estimates ⁽¹⁾ Adjusted income tax expense (benefit) ⁽²⁾	\$	85 - - - (91) (6)	\$	63 - - - - - - - - - - - - - - - - - - -	\$	(37) 1 - - 70 34	\$	148 - - - - - - - - - - - - - - - - - - -	\$	(77) 1 - - - - 147 71	-
Effective Tax Rate ⁽³⁾		(8.0)	%	(42.2)	%	2.2	%	(12.3)	%	4.7	%
Effective Tax Rate, excluding discrete items (4)		22.0	%	(42.8)	%	74.0	%	(32.5)	%	78.0	%

- ⁽¹⁾ Our estimates change as we file tax returns, settle disputes with tax authorities or become aware of other events and include changes in (a) deferred taxes, (b) valuation allowances on deferred taxes and (c) other tax liabilities.
- ⁽²⁾ The three months ended June 30, 2018 includes \$18 million of additional tax benefit reflecting the catch-up effect of an decrease in the annual effective tax rate from the previous quarter estimate.
- ⁽³⁾ Our effective tax rate is calculated as income tax expense divided by income before income taxes.
- ⁽⁴⁾ Our effective tax rate, excluding discrete items, is calculated as income tax expense, excluding various discrete items (such as changes in estimates and tax on items excluded from income before income taxes), divided by income before income tax expense, excluding gains and losses on sales and similar items pursuant to the accounting standards for income taxes and estimating the annual effective tax rate.