

Transocean Ltd. and subsidiaries
Supplemental Effective Tax Rate Analysis

(in millions, except tax rates)

	Three months ended			Years ended	
	December 31, 2018	September 30, 2018	December 31, 2017	December 31, 2018	December 31, 2017
Loss before income taxes	\$ (133)	\$ (439)	\$ (111)	\$ (1,775)	\$ (3,003)
Litigation matters	-	-	(2)	-	(8)
Acquisition and restructuring costs	12	4	1	34	7
Bargain purchase gain	(10)	-	-	(10)	-
Loss on impairment of goodwill and other assets	18	432	-	1,464	1,498
(Gain) loss on disposal of assets, net	(1)	1	(6)	(7)	1,590
Loss on retirement of debt	-	1	6	3	55
Adjusted income (loss) before income taxes	<u>\$ (114)</u>	<u>\$ (1)</u>	<u>\$ (112)</u>	<u>\$ (291)</u>	<u>\$ 139</u>
Income tax expense (benefit)	\$ 110	\$ (30)	\$ (9)	\$ 228	\$ 94
Litigation matters	-	-	(1)	-	-
Acquisition and restructuring costs	-	-	-	-	1
Bargain purchase gain	-	-	-	-	-
Loss on impairment of goodwill and other assets	-	-	2	-	1
(Gain) loss on disposal of assets, net	-	-	-	-	-
Loss on retirement of debt	-	-	-	-	-
Changes in estimates (1)	(52)	(1)	(20)	(143)	37
Adjusted income tax expense (benefit) (2)	<u>\$ 58</u>	<u>\$ (31)</u>	<u>\$ (28)</u>	<u>\$ 85</u>	<u>\$ 133</u>
Effective Tax Rate (3)	(82.6) %	6.7 %	8.3 %	(12.8) %	(3.1) %
Effective Tax Rate, excluding discrete items (4)	(50.5) %	2,757.6 %	25.4 %	(29.2) %	95.2 %

(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 and year ended December 31, 2018 included \$24 million of additional tax expense, reflecting the cumulative effect of an increase 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 related to estimating the annual effective tax rate.