

**Transocean Ltd. and subsidiaries**  
**Supplemental Effective Tax Rate Analysis**  
(In millions, except tax rates)

	Three months ended			Six months ended	
	June 30, 2020	March 31, 2020	June 30, 2019	June 30, 2020	June 30, 2019
Loss before income taxes	\$ (465)	\$ (395)	\$ (169)	\$ (860)	\$ (348)
Acquisition and restructuring costs	1	-	1	1	1
Gain on bargain purchase	-	-	(9)	-	(11)
Loss on impairment of assets	429	168	1	597	1
Loss on impairment of investment in unconsolidated affiliate	59	-	-	59	-
Loss on disposal of assets, net	-	-	2	-	1
(Gain) loss on retirement of debt	(4)	57	9	53	27
Adjusted income (loss) before income taxes	<u>20</u>	<u>\$ (170)</u>	<u>\$ (165)</u>	<u>(150)</u>	<u>\$ (329)</u>
Revenues recognized for the settlement of disputes	(157)			(157)	
Adjusted income (loss) before income taxes for determining effective tax rate	<u>\$ (137)</u>			<u>\$ (307)</u>	
Income tax expense (benefit)	\$ 32	\$ (4)	\$ 37	\$ 28	\$ 29
Acquisition and restructuring costs	-	-	-	-	-
Gain on bargain purchase	-	-	-	-	-
Loss on impairment of assets	(1)	1	-	-	-
Loss on impairment of investment in unconsolidated affiliate	-	-	-	-	-
Loss on disposal of assets, net	-	-	-	-	-
(Gain) loss on retirement of debt	-	-	-	-	-
Changes in estimates (1)	(8)	19	5	11	30
Revenues recognized for the settlement of disputes	(2)	-	-	(2)	-
Adjusted income tax expense (2)	<u>\$ 21</u>	<u>\$ 16</u>	<u>\$ 42</u>	<u>\$ 37</u>	<u>\$ 59</u>
<b>Effective Tax Rate (3)</b>	<b>(6.8) %</b>	<b>1.1 %</b>	<b>(21.9) %</b>	<b>(3.2) %</b>	<b>(8.3) %</b>
<b>Effective Tax Rate, excluding discrete items (4)</b>	<b>(15.0) %</b>	<b>(9.5) %</b>	<b>(25.4) %</b>	<b>(12.0) %</b>	<b>(18.0) %</b>

(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, 2020 included \$32 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.