

Transocean Ltd. and Subsidiaries Supplemental Effective Tax Rate Analysis

(In US\$ millions)

	Three months ended						
		March 31, 2015		December 31, 2014		March 31, 2014	
Income (loss) from continuing operations before income taxes Add back (subtract):	\$	(384)	\$	(752)	\$	554	
Litigation matters		-		-		3	
One-time termination benefits		5		1		1	
Loss on impairment of goodwill and other assets		936		1,210		65	
Gain on disposal of other assets, net		(2)		(6)		-	
Loss on retirement of debt		-		8		1	
Adjusted income from continuing operations before income taxes		555		461		624	
Income tax (benefit) expense from continuing operations Add back (subtract):		83		10		80	
Litigation matters		-		-		1	
Loss on impairment of goodwill and other assets		62		48		-	
Gain on disposal of other assets, net		(1)		(2)		-	
Changes in estimates (1)		(1)		66		13	
Adjusted income tax expense from continuing operations (2)	\$	143	\$	122	\$	94	
Effective Tax Rate (3)		-21.6%		-1.3%		14.4%	
Annual Effective Tax Rate (4)		25.8%		26.5%		15.1%	

- (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 December 31, 2014 includes \$36 million of additional tax expense (benefit) reflecting the catchup effect of an increase (decrease) in the annual effective tax rate from the previous quarter estimate.
- (3) Effective Tax Rate is income tax expense for continuing operations, divided by income from continuing operations before income taxes.
- (4) Annual Effective Tax Rate is income tax expense for continuing operations, excluding various discrete items (such as changes in estimates and tax on items excluded from income before income taxes), divided by income from continuing operations 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.