



**2023** ANNUAL REPORT

**BM**  
OFFSHORE



## 4.5.10 INCOME TAX EXPENSE

The numerical reconciliation between the applicable and effective tax rate is as follows:

|  | 2023        | 2022      |
|--|-------------|-----------|
| Result before tax of the Company for current year                          | (35)        | (29)      |
| <b>Corporate income tax against applicable rate (25.8%)</b>                | <b>9</b>    | <b>8</b>  |
| Results allocated by the members to the Company for current year           | (2)         | (2)       |
| Non-deductible costs   | (5)         | (5)       |
| Adjustments in respect of prior year(s)                                    | (0)         | -         |
| Profits from foreign operations  | (0)         | -         |
| Deferred tax effect on unrecognized tax losses for current year            | (2)         | (1)       |
| Deferred tax effect on unrecognized tax losses in respect of prior year(s) | (3)         | -         |
| <b>Total corporate income tax</b>  | <b>(3)</b>  | <b>-</b>  |
| <b>Effective corporate income tax rate</b>                                 | <b>(8%)</b> | <b>0%</b> |

The Company is the head of the fiscal unity for the Dutch corporate income tax (refer to 4.5.11 Commitments and Contingencies), where the Company will bear the burden of the corporate income tax charge, based on the taxable income of the fiscal unity, taking into account the losses available for set-off from the previous financial years, exempt profit components and after the addition of non-deductible costs that are attributable to the Netherlands.

The applicable Dutch corporate income tax rate for taxable income up to EUR 200 thousand (2022: EUR 395 thousand) is 19% (2022: 15%) and 25.8% (2022: 25.8%) for profits that exceed EUR 200 thousand (2022: EUR 395 thousand). The effective corporate income tax rate is -8% (2022: 0%).

## 4.5.11 COMMITMENTS AND CONTINGENCIES

### COMPANY GUARANTEES

SBM Offshore N.V. has issued a limited number of parent company guarantees with respect to long-term lease/operate contracts which have all been signed prior to 2010. Please refer to note 4.3.26 Commitments and Contingencies.

### FISCAL UNITY

SBM Offshore N.V. is head of a fiscal unity in which all Dutch entities are included, except for the entities that are held by SBM Holding Inc. S.A. and the joint venture entities. All tax liabilities and tax assets are transferred to the fiscal unity parent, however all members of the fiscal unity can be held liable for all tax liabilities concerning the fiscal unity.

Corporate income tax is levied at the head of the fiscal unity, based on the fiscal results allocated by the members to SBM Offshore N.V., taking into account an allocation of the benefits of the fiscal unity to the different members. The settlement amount, if any, is equal to the corporate income tax charge included in the Company income statement.

## 4.5.12 DIRECTORS' REMUNERATION

For further details on the Directors remuneration, reference is made to note 4.3.6 Employee Benefit Expenses of the consolidated financial statements.

## 4.5.13 NUMBER OF EMPLOYEES

There were no employees during the year under review (2022: none).

## 4.5.14 INDEPENDENT AUDIT FEES

For the audit fees relating to the procedures applied to SBM Offshore N.V. and its consolidated group entities by accounting firms and an external independent auditor, reference is made to note 4.3.32 Independent Auditor's Fees and Services of the consolidated financial statements.