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carryforwards in India are available for an 8 year period from the period in which they were generated. China has net operating loss carryforwards for income tax purposes of \$5,541 which are available to offset future taxable income over a five-year period.

In India, where we had pretax income of \$711 in 2014 and \$2,045 in 2013, we have a 100% rate reduction tax holiday which expires 15 years from the date of commissioning of the solar energy system and is available for a 10 year period starting from the date on which the project entity starts claiming the holiday. The tax holiday is effective through March 31, 2026.

In Malaysia, where we had pretax income of \$154 in 2014 and a pretax loss of \$1,570 in 2013, we have a tax holiday for all three project entities allowing for accelerated tax depreciation on qualified solar assets placed in service.

In Thailand, where we had pretax losses of \$407 in 2014 and \$468 in 2013, we have a 100% rate reduction tax holiday for the first eight years, and a 50% rate reduction for the next five years. The tax holiday is effective through 2026.

In South Africa, where we had pretax income of \$106 in 2014 and a pretax loss of \$1,562 in 2013, we have a tax holiday allowing for accelerated tax depreciation on qualified solar assets placed in service.

In China, where we had a pretax loss of \$3,059 and \$2,373 in 2014 and 2013, respectively, we have a 100% rate reduction tax holiday for the first three years, and a 50% rate reduction for the next three years. The tax holiday is effective through 2018.

Primarily due to cumulative losses, we determined that it was more likely than not that certain net operating losses and other deferred tax assets would not be realized in the future. As a result, the valuation allowance against deferred tax assets was increased by \$6,804 during 2014.

The Company has no uncertain tax positions for 2013 and 2014. It is the Company's policy to include any penalties or interest associated with uncertain tax positions in income tax expense.

**7. Derivative instruments**

A summary of all interest rate and currency swap instruments outstanding as of December 31, 2014 and 2013 is as follows:

<u>Type of instrument</u>	<u>Notional amount in local currency (in millions)</u>	<u>Notional currency</u>	<u>Interest rate</u>	<u>Variable rate</u>	<u>Termination date</u>
Interest rate swap #1 - Economic Hedge	89.7	Malaysian Ringgit	4.3%	KLIBOR	March 31, 2028
Interest rate swap #2 - Economic Hedge	35.7	Malaysian Ringgit	4.4%	KLIBOR	March 31, 2028
Interest rate swap #3 - Economic Hedge	173.0	Thai Baht	6.5%	MLR -2.0%	December 31, 2023
Interest rate swap #4 - Cash Flow Hedge		South African Rand	13.0%	JIBAR SAFEX + 4.4%	September 30, 2031
Currency swap - Cash Flow Hedge	1,856.0	South African Rand	JIBAR SAFEX + 4.4%	LIBOR + 2.2%	September 30, 2031

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