

July 1, 2025

Name of listed company:
Bandai Namco Holdings Inc.
Name of representative:
Yuji Asako,
President and Representative Director
(Code Number: 7832 TSE Prime Market)
Contact: Takashi Tsuji, Director, CFO

Notice Regarding Receipt of Tax Reassessment Notice From the Tokyo Regional Taxation Bureau

Bandai Namco Holdings Inc. (the “Company”) hereby announces that the Company has received a tax reassessment notice from the Tokyo Regional Taxation Bureau.

1. Background and Details

As a result of the regular tax audit conducted by the Tokyo Regional Taxation Bureau on some of the Company’s domestic consolidated subsidiaries (the “Group”) for the tax years from the fiscal year ending March 2021 to the fiscal year ending March 2023, the Company received the tax reassessment notice dated June 27, 2025, on June 30, 2025. The Company estimates that the amount of additional tax, including local taxes, etc., due to the tax reassessment disposition, etc. will be approximately 6,997 million yen.

The issues raised regarding the tax reassessment disposition, etc. include (i) the issues regarding the treatment of tax credits for research and development expenses mainly in the Digital business, similar to those raised in a previous case currently under litigation*, (ii) the issues regarding the tax treatment in the Toys and Hobby business, and (iii) the issues regarding the transfer pricing taxation of transactions between Japan and France in the Digital business.

Of these issues, the estimated tax amounts for the following issues have already been recorded in the respective fiscal years as follows: (i) the issues regarding the treatment of tax credits for research and development expenses mainly in the Digital business—fiscal year ending March 2022; (ii) the issues regarding tax treatment in the Toys and Hobby business—fiscal year ending March 2025.

In addition, with respect to (iii) the issues regarding the transfer pricing taxation of transactions between Japan and France in the Digital business, the Group believes that it has conducted appropriate tax treatment in relation to the transfer pricing taxation. Accordingly, the Group plans to provisionally record the tax amount relating to the portion of the tax reassessment disposition, etc., based on transfer pricing taxation in the amount of 2,114 million yen for the first quarter consolidated cumulative period of the fiscal year ending March 2026, and then apply for bilateral mutual agreement procedures with the tax authorities of Japan and France, and continue to assert the validity of our claims..

2. Impact on Business Performance

The impact of the tax reassessment disposition, etc. on the business performance for the fiscal year ending March 2026 is expected to be limited.

*Reference

November 9, 2021 press release: “Notice Regarding Recording of Income Taxes for Prior Periods”

<https://www.bandainamco.co.jp/files/Notice20Regarding20Recording20of20Income20Taxes20f.pdf>

March 1, 2023 press release: “Filing of Lawsuit for Cancellation of Corporate Income Tax Reassessment, Etc.”

https://www.bandainamco.co.jp/files/E_2023030120E9968BE7A4BAE383AAE383AAE383BCE382B9.pdf

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