

December 26, 2025

Company name:	HIKARI TSUSHIN, INC.
Representative:	Hideaki Wada, President and Representative Director (Securities code: 9435, TSE Prime)
Inquiries:	Investor and Public Relations (Tel.+81-3-6863-0124)

Notice Concerning the Filing of a Tax Lawsuit by a Consolidated Subsidiary

As disclosed in the press release titled “Regarding Certain Media Reports” dated March 21, 2024, the HIKARI TSUSHIN Group (the “Group”) was subject to a voluntary tax audit conducted by the Tokyo Regional Taxation Bureau concerning the fiscal years from the year ended March 2018 through the year ended March 2022. In connection with certain corporate reorganizations, including a share exchange previously conducted by Intea Holdings, Inc. (“Intea”), formerly a subsidiary of HIKARI TSUSHIN, INC. (the “Company”), the tax authorities determined that the effects of changes in the consolidated tax group resulting from a portion of those corporate reorganization transactions should not be recognized. As a result, a portion of Intea’s tax loss carryforwards was disallowed for tax purposes, and based on the notice of correction, the Company paid approximately JPY 2.1 billion (consisting of corporate tax, local corporate tax, and an additional tax for underreporting. No heavy additional tax was imposed).

The Group filed a request for review with the National Tax Tribunal in accordance with applicable laws and regulations, contesting the decision of the tax authorities. However, in July 2025, the Group received a written ruling from the Director-General of the National Tax Tribunal dismissing the request for review.

The Group firmly believes that the relevant corporate reorganization transactions and the Group’s tax treatments were lawful and appropriate, having been implemented based on sufficient consideration with the involvement of professional advisors. Accordingly, the Group has decided to seek judicial determination of this matter. On December 26, 2025, the Group filed a lawsuit with the Tokyo District Court seeking the revocation of the correction disposition.

Furthermore, certain media reports contain statements that differ from the facts, such as claims that Intea ceased to be a subsidiary after becoming a subsidiary of the Company, as well as assertions that the Group abused the consolidated taxation system. As stated above, the Group maintains that the relevant corporate reorganization transactions and tax treatments were lawful and appropriate, and will continue to assert its position.

The Group will continue to comply with all applicable laws and regulations and to fulfill its tax obligations appropriately, and respectfully requests the understanding of all concerned parties regarding the Group’s actions.

Reference:
“Regarding Certain Media Reports” dated March 21, 2024
https://www.hikari.co.jp/assets/pdf/news/240321_1.pdf