

## Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

### Part I Reporting Issuer

1 Issuer's name <b>ORIX Corporation</b>		2 Issuer's employer identification number (EIN) <b>13-2792249</b>	
3 Name of contact for additional information <b>Sachiko Nakane</b>	4 Telephone No. of contact <b>+81-3-3435-3121</b>	5 Email address of contact <b>ir_contact@orix.jp</b>	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact <b>World Trade Center Building, SOUTH TOWER, 2-4-1 Hamamatsu-cho</b>		7 City, town, or post office, state, and ZIP code of contact <b>Minato-ku, Tokyo 105-5135, Japan</b>	
8 Date of action <b>February 27, 2025</b>		9 Classification and description <b>ADS ratio change</b>	
10 CUSIP number <b>686330101</b>	11 Serial number(s)	12 Ticker symbol <b>8591 (TSE), IX (NYSE)</b>	13 Account number(s)

### Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ► **The ratio of ORIX Corporation's ("ORIX") American Depositary Shares ("ADSs") has changed from one (1) ADS representing five (5) common shares to a new ratio of one (1) ADS representing one (1) common share. The record date for the ADS ratio change was February 26, 2025. The effective date of the ADS ratio change was February 27, 2025.**

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► **The number of ORIX's common shares underlying the ADSs has not changed. Although immediately after the ADS ratio change the number of ADSs owned by each ADR holder was multiplied by five (5), each ADR holder's aggregate tax basis in the holder's total number of ADSs (and ORIX's common shares underlying the ADSs) remained the same. Immediately after the ADS ratio change, each ADR holder is required to allocate the basis in its ADSs owned immediately prior to the ADS ratio change among the ADSs owned immediately after the ADS ratio change. An ADR holder owning five (5) ADSs immediately after the ADS ratio change in lieu of one (1) ADS owned immediately prior to the ADS ratio change will have a tax basis in each of such five (5) ADSs equal to one-fifth of the tax basis in the original ADS to which such five (5) ADSs relate. As a hypothetical example (for illustrative purposes only), if an ADR holder owned immediately prior to the ADS ratio change one (1) ADS with a tax basis of \$20, then immediately after the ADS ratio change the ADR holder will own five (5) ADSs, each of which with a tax basis of \$4. A holder that acquired ADSs at different prices will have different tax bases in the holder's ADSs.**

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► **See above.**

**Part II Organizational Action** (continued)

**17** List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ►

**If required to take a position, ORIX intends to take the position that the ADS ratio change is not a realization event for U.S. federal income tax purposes.**

**18** Can any resulting loss be recognized? ► **No loss is recognized with respect to the ADS ratio change.**

**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ►

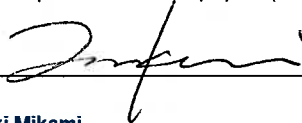
**The reportable tax year is 2025 for shareholders reporting taxable income on a calendar year basis.**

**For shareholders reporting taxable income on a basis other than calendar year, the reportable year is the shareholder's year that includes February 27, 2025.**

**Sign Here**

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ►



Date ►

March 3, 2025

Print your name ► **Yasuaki Mikami**

Title ► **Senior Managing Executive Officer**

**Paid Preparer Use Only**

Print/Type preparer's name

Preparer's signature

Date

Check ☐ if self-employed PTIN

Firm's name ►

Firm's EIN ►

Firm's address ►

Phone no.