Filed Through EDGE

GRAND PLAZA HOTEL CORPORATION

23 October 2025

The Philippine Stock Exchange, Inc.
6F, PSE Tower
5th Avenue corner 28th Street
Bonifacio Global City, Taguig City

Attention: Atty. Johanne Daniel M. Negre
Officer-in-Charge, Disclosure Department

RE: Grand Plaza Hotel Corporation – Notice issued by the Supreme Court on Commissioner of Internal Revenue vs. Grand Plaza Hotel Corporation (docketed as G.R. No. 255287 (Court of Tax Appeals (CTA) En Banc (EB) No. 2039))

Dear Sirs,

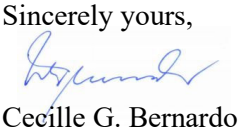
Please be informed that the Management of Grand Plaza Hotel Corporation ("**Corporation**") was advised by the Corporation's tax counsel today, 23 October 2025, that it received a copy of a Notice from the Supreme Court stating that in a resolution dated 7 April 2025 ("**Resolution**"), the Supreme Court has denied with finality the Petition for Review filed by the Commission of Internal Revenue ("**CIR**") (G.R. No. 255287, "*Commissioner of Internal Revenue vs. Grand Plaza Hotel Corporation"),* which sought to set aside the Court of Tax Appeals ("**CTA**") En Banc Decision dated 29 September 2020 and CTA En Banc Resolution dated 19 January 2021 which ruled in favor of the Corporation ("**Petition**").

By way of background, the Petition sought to (i) reverse and set aside the CTA En Banc Decision dated 29 September 2020 and Resolution dated 19 January 2021 and (ii) render a decision ordering the Corporation to pay the total amount of PhP 37,394,321.84, PhP 142,281,715.20, and PhP 326,352,191.20 representing withholding tax on compensation, value-added tax, and income tax assessment, respectively, or an aggregate amount of PhP 506,028,228.24 for taxable year 2008 as well as 25% and 50% surcharge, 20% deficiency and delinquency interest and 12% interest until full payment pursuant to the Tax Reform for Acceleration and Inclusion (**TRAIN**) law.

With the denial of the Petition, the Corporation is not liable for the payment of deficiency taxes in the total aggregate amount of PhP 506,028,228.24.

The Notice issued by the Supreme Court also directed the Resolution to be recorded in the Book of Entries of Judgment of the Supreme Court immediately.

Sincerely yours,



Cecille G. Bernardo
Assistant Compliance Officer
Grand Plaza Hotel Corporation

GRUBA LAW
GRUBA CAGANDA ADVINCULA MEJO & DE LA FUENTE
Date: 10-22-25
Time: 11:07 Received by:

Republic of the Philippines
Supreme Court
Baguio City

FIRST DIVISION

N O T I C E

Sirs/Mesdames:

Please take notice that the Court, First Division, issued a Resolution dated **April 7, 2025,** *which reads as follows:*

"G.R. No. 255287 (COMMISSIONER OF INTERNAL REVENUE, Petitioner **v. GRAND PLAZA HOTEL CORPORATION,** Respondent).— Acting on the Office of the Solicitor General's Motion for Reconsideration of the Resolution dated February 22, 2023, which denied the petition for review on *certiorari*, and considering that there is no substantial argument to warrant a modification of this Court's resolution, the Court resolved to ***DENY*** reconsideration with ***FINALITY***.

The Court further resolved to ***NOTE*** the:

(1) Office of the Solicitor General's Manifestation (incorporated in the Motion for Reconsideration), stating that it filed petitioner's Compliance dated July 7, 2023 on July 10, 2023 attaching the soft copy in compact disc the signed motion for extension of time to file petition for review; and

(2) respondent's Comment (to the CIR's Motion for Reconsideration) with Motion for the Issuance of an Entry of Judgment.

NO FURTHER pleadings, motions, letters or other communications shall be entertained herein.

Let an ***ENTRY*** of Judgment in this case be issued immediately."

By authority of the Court:

MARIA TERESA B. SIBULO
Division Clerk of Court

by:

JO ANN MARIE G. NULUD
Deputy Division Clerk of Court

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SEP 2 5 2025

The Solicitor General
Amorsolo St., Legaspi Village
1229 Makati City

Commissioner of Internal Revenue
Litigation Division
Bureau of Internal Revenue
Rm. 703, 7/F BIR Bldg.
1100 Quezon City

Court of Tax Appeals
Agham Rd., Diliman
1101 Quezon City
(CTA EB No. 2039)
(CTA Case No. 8992)

ZAMBRANO GRUBA CAGANDA &
ADVINCULA LAW OFFICES
Counsel for Respondent
27/F, 88 Corporate Center
Sedeño cor. Valero Streets
Salcedo Village
1227 Makati City

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