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January 29, 2026

Company name: Nikkiso Co., Ltd.
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(Code No. 6376, TSE Prime Market)
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(Progress of the Disclosure Matter)

Notice Regarding the Tokyo High Court's Judgment in the Appeal Against Tax Reassessment under the Controlled Foreign Company (CFC) Tax Regime

As disclosed in Nikkiso Co., Ltd.'s (the "Company") announcement entitled, "Our View of Penalty Charges Resulting from Reassessment by Tax Authorities" dated August 16, 2021, the tax authorities determined that three foreign subsidiaries under the Clean Energy & Industrial Gases Group (the "CE&IG Group"), a consolidated subsidiary group of the Company, did not satisfy the exemption requirements under Japan's CFC tax regime. As a result, the Company received a tax reassessment and related actions on the FY 2018 business income of Nikkiso International Co., Ltd., a subsidiary of the Company and the parent company of the CE&IG Group.

Disputing the reassessment, the Company filed a lawsuit in the Tokyo District Court seeking revocation of the tax reassessment. However, on May 16, 2025, the court ruled against the Company and dismissed its claims.

As disclosed in the announcement entitled, "Notice Regarding an Appeal to the Tokyo High Court Against Tax Reassessment under the Controlled Foreign Company (CFC) Tax Regime" dated May 29, 2025, the Company filed an appeal to the Tokyo High Court. The Company hereby announces that it has today received a judgment from the court dismissing the Company's claims.

1. Background

・ Jul. 8, 2021	The Company received a notice of reassessment from the Tokyo Regional Taxation Bureau
・ Oct. 4, 2021	The Company submitted a request for reconsideration to the National Tax Tribunal
・ Sep. 6, 2022	The National Tax Tribunal issued a ruling. The Company’s claims were dismissed.
・ Feb. 28, 2023	The Company filed a lawsuit in the Tokyo District Court seeking revocation of the tax reassessment.
・ May 16, 2025	The Tokyo District Court delivered the ruling
・ May 29, 2025	The Company appealed to the Tokyo High Court
・ Jan. 29, 2026	The Tokyo High Court delivered the ruling

2. Future Outlook

The Company sincerely regrets that its claims were not accepted by the courts and finds the decisions difficult to accept. The Company will closely examine the details of the ruling and consider its future course of action. Should any matters arise in the future that require disclosure, the Company will promptly disclose.