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February 10, 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)

Procedures for filing an Appeal to the Supreme Court (including a Petition for Acceptance of 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.

Subsequently, the Company filed an appeal to the Tokyo High Court. However, on January 29, 2026, the court likewise ruled against the Company, dismissing its claims.

In response, the Company announces that, contesting the judgment, its Board of Directors has resolved today to proceed with filing an appeal to the Supreme Court (including a petition for acceptance of appeal) on February 10, 2026.

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. After carefully reviewing the judgment, the Company will continue to assert the validity of its claims through the appeal procedures to the Supreme Court (including a petition for acceptance of appeal).

Please note that the Company recorded approximately ¥1.7 billion in corporate income tax for the fiscal year ended December 31, 2021 and the payment has already been completed. As such, no impact on the financial results for the fiscal year ending December 31, 2026 is expected. However, depending on the outcome of the appeal, there may be an impact on financial results for the fiscal year ending December 31, 2026, or thereafter.

Should any matters arise in the future that require disclosure, the Company will promptly disclose.