



NIPPON KAIJI KYOKAI

Process for Filings of Complaints, Objections and Fraudulent Behaviour

Revision History

Revision No.	Revision Date	Revised Sections	Reasons for Revision
0	11.01.2016	-	Newly enacted
1	04.01.2020	-	Revised due to organizational restructuring and changes in department names.
2	12.01.2021	Overall	Changed document number, made stamping unnecessary and Changed complaint handling and objection process.
3	10.01.2025	Overall	Dealing with fraudulent behaviour were added and revised completely.



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1. Applicability

- 1. This procedure sets forth the provisions on the handling process of filings of complaints, objections and fraudulent behaviours pertaining to the product certification operations provided by ClassNK.

2. Definition of Terms

- 1. For the purposes of these guidelines, the terms and definitions are given in below table, together with the relevant definitions contained in JIS Q 17065.

Term	Definition
Complaint	Written declaration to ClassNK an individual or organization expressing dissatisfaction, with an expectation of response, regarding matters related to the product certification services provided by ClassNK or products certified by ClassNK,
Objection	Written declaration to ClassNK by a requester or registrant requesting reconsideration of an adverse decision made by ClassNK in relation to its product certification services provided by ClassNK.
Fraudulent behaviour	Written declaration to ClassNK by a requester, registrant, or stakeholders any intentional misrepresentation, concealment of information, or provision of false information that may lead to deliberate violation of the certification rules (standards) in relation to the product certification services provided by ClassNK.
Filer	A person who has filed a complaint, objection, or fraudulent behaviour to ClassNK.
Requester	A person who submits an application for review of certification services to ClassNK.
Registrant	A requester who requests ClassNK to provide certification services to whom ClassNK has issued certification documents.
JAB	Japan Accreditation Board.

3. Language

- 1. Languages for filings of complaints, objections and fraudulent behaviours shall be in Japanese or English. Other languages shall not be accepted.

4. Complaint

4.1 Filing of complaint

- 1. A filer of complaints may declare the written filing of complaints to the ClassNK regarding the complaint that may be related to the certification activities and certification scope for which the ClassNK is responsible as certification body.
- 2. ClassNK may not be able to respond to the complaint about the registrant due to confidentiality obligations between ClassNK and the registrant. In this case, it is recommended that the complaint be made directly to the registrant prior to presenting the complaint to ClassNK.
- 3. If the complaint is not allowed to share with the registrant, the filer of the complaint shall indicate this in the complaint document in advance.

4.2 Investigation and Acceptance

- 1. In order to determine whether to accept or reject the complaint, ClassNK shall investigate whether the content of the complaint is applied under 4.1-1. In this case, the filer of the complaint shall cooperate with ClassNK.
- 2. ClassNK shall notify the filer of the complaint regarding the result and reason of the acceptance or rejection of the filing of the complaint.

4.3 Verification and Action

- 1. If ClassNK accepted the filing of the complaint in 4.2-2., ClassNK may collect additional information necessary to verify the content. In this case, the filer of the complaint shall cooperate with ClassNK continuously.

- 2. If the subject of the complaint is a registrant, ClassNK may make an inquiry to the registrant for verification.
- 3. ClassNK shall determine the action to be taken by ClassNK in response to the filing of the complaint based on the result of verification.

4.4 Notification of result

- 1. If ClassNK determined the action to be taken in response to the filing of the complaint, ClassNK shall notify the filer of the complaint about it.

4.5 Publication of complaints

- 1. If requested by the filer of the complaint, NK considers publishing the content of the complaint and the action. If the subject of the complaint is a registrant, NK also consults with the registrant and considers the property and scope of publication.

5. Objection

5.1 Filing of objection

- 1. A filer of an objection (requester or registrant) may express in writing an objection to the decision of the certification within 30 days counting from the day following the decision of the certification by ClassNK.

5.2 Investigation and Acceptance

- 1. In order to determine whether to accept or reject the objection, ClassNK shall investigate validity of the content of the objection. In this case, the filer of the objection shall cooperate with ClassNK.
- 2. ClassNK shall notify the filer of the objection regarding the result and reason of the acceptance or rejection of the filing of the objection.

5.3 Verification and Action

- 1. If ClassNK accepted the filing of the objection in 5.2-2., ClassNK may collect additional information necessary to verify the content. In this case, the filer of the objection shall cooperate with ClassNK continuously.
- 2. ClassNK shall determine the action to be taken by ClassNK in response to the filing of the objection based on the result of verification.

5.4 Notification of result

- 1. If ClassNK determined the action to be taken in response to the filing of the objection, ClassNK shall notify the filer of objection about it.

5.5 Publication of objections

- 1. If requested by the filer of the objection, NK considers publishing the content of the objection and the action.

6. Fraudulent Behaviour

6.1 Filing of fraudulent behaviour

- 1. If a requester or registrant is found to be engaging in the fraudulent behaviour in the certification activities and certification scope for which ClassNK is responsible as a certification body, the filer shall promptly (within 30 business days) submit a written filing of the fraudulent behaviour to ClassNK.

6.2 Investigation and Acceptance

- 1. In order to determine whether to accept or reject the fraudulent behaviour, ClassNK shall investigate the content of the fraudulent behaviour. In this case, the filer of the fraudulent behaviour shall cooperate with ClassNK.
- 2. ClassNK shall notify the filer of fraudulent behaviour regarding the result and reason of the acceptance or rejection of the filing of the fraudulent behaviour.
- 3. If ClassNK accepted the filing of the fraudulent behaviour, ClassNK shall suspend certification about subject

to the filing of the fraudulent behaviour.

-4. If ClassNK accepted the filing of the fraudulent behaviour, The requester and registrant subject to the filing of the fraudulent behaviour shall apply to ClassNK for the occasional surveillance. If the requester and registrant don't apply for the occasional surveillance within 6 months from the date on which the suspension of the certification was decided, the certification shall be cancelled.

6.3 Verification and Action

-1 If ClassNK accepted the filing of the fraudulent behaviour in 6.2-2, ClassNK verifies whether the content of the fraudulent behaviour has a significant impact on the certification decision by occasional surveillance.

-2. ClassNK shall determine the action to be taken by ClassNK in response to the filing of the fraudulent behaviour based on the result of occasional surveillance.

6.4 Notification of result

-1. If ClassNK determined the action to be taken in response to the filing of the fraudulent behaviour, ClassNK shall notify the filer, requester and registrant about it.

6.5 Publication of fraudulent behaviour

-1. As an action to be taken by ClassNK, if ClassNK determines cancellation of the certification subject to the filing of the fraudulent behaviour, ClassNK shall announce the fact of the cancellation of certification for one year after the cancellation or until it is confirmed that the cancellation has been newly certified, whichever is shorter.

6.6 Report to JAB

-1. ClassNK shall promptly report to JAB the acceptance of the filing of the fraudulent behaviour and the action to be taken by ClassNK in response to the filing.

6.7 Handling of fraudulent behaviour by other certification bodies

-1. The requester or registrant whose certification has been cancelled due to the fraudulent behaviour by other certification bodies shall promptly report it to ClassNK (within 30 business days). In this case, ClassNK shall not accept any application for certification from the requester or registrant for a period of 1 year after the cancellation of certification or until it is confirmed that the reasons for cancellation of certification have been resolved and that measures to prevent recurrence have been taken, whichever is longer.

-2. If ClassNK accepts an application from an organization or individual whose certification has been cancelled due to the fraudulent behaviour by other certification bodies, ClassNK shall report this information to JAB.

ADMINISTRATIVE PROCEDURE

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ClassNK

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