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ANALYSIS OF ATCG'S RELATIONSHIPS WITH RELATED BODIES

According to the terms and definitions of the standard MEST ISO/IEC 17011:2018, an interested party is a person or organization that has a direct or indirect interest in accreditation. A direct interest relates to the interests of those seeking accreditation, while an indirect interest relates to the interests of those who use or rely on the services of accredited conformity assessment bodies.

Interested parties may include conformity assessment bodies, their associations and their clients, industry representatives, trade associations, scheme owners, governmental regulatory authorities or other governmental bodies, as well as non-governmental organizations, including consumer organizations.

In accordance with Clause 4.4.5 of MEST ISO/IEC 17011:2018, ATCG has documented and implements processes that provide for the effective involvement of interested parties in safeguarding impartiality and ensures balanced representation of interested parties so that no single interest predominates.

In accordance with Clause 4.4.6 of MEST ISO/IEC 17011:2018, the accreditation body identifies, analyses and evaluates risks, addresses risks, and monitors and documents risks related to impartiality arising from its activities, including any conflicts arising from its relationships with interested parties. The process includes identification of and consultation with appropriate interested parties, as described in Clause 4.4.5, in order to advise on matters affecting impartiality, including transparency and public perception.

This approach ensures that the activities of bodies related to the Accreditation Body of Montenegro (related bodies) do not compromise the confidentiality, objectivity and impartiality of the accreditation process.

The Analysis of Relationships with Related Bodies constitutes documented information on relationships with related bodies in order to identify risk situations leading to conflicts of interest, whether arising internally within ATCG or from the activities of related bodies.

Based on the following reference documents — MEST EN ISO/IEC 17011:2018, the Law on Accreditation (Official Gazette of Montenegro, Nos. 54/09 and 43/15), and the Decision on Establishment of the Accreditation Body of Montenegro (Official Gazette of Montenegro, No. 21/07) — ATCG has identified the following related bodies.

1. Ministry of Economic Development, including Quality Infrastructure Institutions

ATCG is an independent and non-profit organization performing its activities in accordance with the Law on Accreditation (Official Gazette of Montenegro, Nos. 54/09 and 43/15) and the Decision on the Establishment of the Accreditation Body of Montenegro (Official

Gazette of Montenegro, No. 21/07).

Through the proposal of the annual State Budget Law, the Founder participates in securing the financial resources necessary for the uninterrupted operation of ATCG (including funds related to ATCG's membership and participation in European and international accreditation organizations). The Founder is in no way involved in the accreditation procedures of conformity assessment bodies, neither in the assessment process nor in the decision-making process on accreditation. On behalf of the Founder, supervision over the legality of ATCG's work in performing activities defined by law is exercised by the ministry responsible for quality infrastructure.

In accordance with the Law, ATCG acquired the status of a legal entity by registration in the Central Register of the Commercial Court in Podgorica (registration number 10-0000163).

The organizational structure is defined by the ATCG Statute of July 2017 and is described in the Quality Manual (QM.00).

As the Ministry of Economic Development is responsible for quality infrastructure, the Institute for Standardization of Montenegro (ISME) and the Bureau of Metrology (ZZM) are considered related bodies within the meaning of the requirements of MEST EN ISO/IEC 17011:2018.

Taking into account the scope of activities performed by these two institutions pursuant to the relevant legislation, the following is noted:

- **The Institute for Standardization of Montenegro (ISME)** does not perform conformity assessment activities nor consultancy services.
- **The Bureau of Metrology (ZZM)** does not perform consultancy services; however, it carries out conformity assessment of measuring instruments against prescribed requirements (Article 1 of the Law on Metrology).

The Bureau of Metrology is accredited for the following activities: calibration of temperature and relative humidity measuring instruments; calibration of small- and large-volume measuring instruments; calibration of length measuring instruments; calibration of pressure measuring instruments; calibration of standards and measuring instruments for electrical quantities, frequency and time interval; calibration of measuring devices for radon concentration in air.

With regard to this part of its activities, the following facts have been established:

- ZZM and ATCG have different top management;
- ZZM employs personnel different from those involved in accreditation decision-making processes;
- ZZM has no possibility to influence the outcome of assessments for the purpose of accreditation;

- ZZM does not provide consultancy services in the field of accreditation;
- ZZM has a clearly distinct name, logo and symbols.

ATCG concludes that there is no undue influence on the impartiality of the Accreditation Body and no risk of conflict of interest arising from these relationships.

2. Related Bodies of Accredited Organizations that Are Part of the State Administration and/or Owned by the Government of Montenegro

To date, ATCG has accredited a number of organizations that are part of the state administration or are owned by the Government of Montenegro. These accredited organizations include:

Ministry of Interior – Forensic Centre of Montenegro; Ministry of Education, Science and Innovation – accredited bodies operating within state universities; Ministry of Health – Institute of Public Health of Montenegro (IJZCG), Health Centre Bar, Primary Health Care Centre of the Capital City; Ministry of Agriculture, Forestry and Water Management – Specialized Veterinary Laboratory, Certification Body for Organic Agriculture “Monteorganika”; Ministry of Ecology, Sustainable Development and Development of the North – Institute of Hydrometeorology and Seismology.

All the above-mentioned accredited organizations:

- have different top management;
- employ personnel different from those involved in accreditation decision-making processes;
- have no possibility to influence the outcome of assessments for accreditation purposes;
- have clearly distinct names, logos and symbols;
- do not provide consultancy services in the field of accreditation.

ATCG concludes that there is no undue influence of these accredited organizations on the impartiality of the Accreditation Body and no risk of conflict of interest arising from these relationships.

3. Top Management of ATCG

In accordance with Clause 5.7 of MEST EN ISO/IEC 17011:2018, ATCG has identified its top management as having overall authority and responsibility for establishing policies related to the operation of the accreditation body, overseeing the implementation of those policies, supervising financial matters, making accreditation decisions, and entering into contractual arrangements. Members of the Management Board are entrusted with the authority and responsibility for establishing policies governing the operation of the Accreditation Body and monitoring their implementation.

A new composition of the Management Board has been appointed, taking into account

the general selection criteria (Decision on Appointment No. 11-100/25-3759/3 of 06 November 2025), namely:

- professional integrity and reputation;
- absence of direct or indirect interest in the activities of conformity assessment bodies (CABs);
- not performing any function in accredited or applicant CABs;
- absence of ownership or managerial roles in CABs;
- ability to act in the public interest;
- signing a declaration of impartiality, confidentiality and absence of conflict of interest.

Based on the applied criteria and the conducted analysis, it is established that the composition of the ATCG Management Board does not include representatives of accredited conformity assessment bodies, nor individuals with direct commercial interests in accreditation procedures. Identified potential risks to impartiality have been assessed as low or controlled. **It is therefore concluded that the composition of the Management Board does not compromise the impartiality of the Accreditation Body within the meaning of MEST EN ISO/IEC 17011:2018.**

4. Relationship with Accredited CABs

With regard to accredited conformity assessment bodies (CABs), and taking into account the established mechanisms for safeguarding impartiality, **as well as the fact that the contractual relationship between clients and ATCG clearly defines the obligations of impartiality, confidentiality and avoidance of conflict of interest, it is concluded that no risk has been identified that could compromise the impartiality of the Accreditation Body.**

All of the above was discussed within the framework of a meeting of the ATCG Expert Collegium and was subject to risk analysis, with the implementation of measures aimed at reducing identified risks to the lowest possible level.

Periodic review of identified risks and measures for their mitigation in relation to impartiality, through the analysis of relationships with related bodies, as well as the re-evaluation of potential risks to impartiality, shall be carried out on a continuous basis using various mechanisms, including consultation with relevant interested parties.

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