



Digital Europe Programme (DIGITAL)

Call for proposals

Accelerating the best use of technologies

DIGITAL-2026-BESTUSE-TECH-EDMO-09

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EUROPEAN HEALTH AND DIGITAL EXECUTIVE AGENCY (HaDEA)

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CALL FOR PROPOSALS

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0. Introduction

This is a call for proposals for EU **action grants** in the field of Accelerating the best use of technologies under the **Digital Europe Programme (DIGITAL)**.

The regulatory framework for this EU Funding Programme is set out in:

- Regulation 2024/2509 ([EU Financial Regulation](#))¹
- the basic act (Digital Europe Regulation [2021/694](#))².

The call is launched in accordance with the amended 2025-2027 Work Programme³ and will be managed by the **European Health and Digital Executive Agency (HaDEA)** ('Agency').

The call covers the following topic:

- **DIGITAL-2026-BESTUSE-TECH-EDMO-09-HUBS: European Digital Media Observatory**

We invite you to read the **call documentation** carefully, and in particular this Call document, the Model Grant Agreement, the [EU Funding & Tenders Portal Online Manual](#) and the [EU Grants AGA — Annotated Grant Agreement](#).

These documents provide clarifications and answers to questions you may have when preparing your application:

- the [Call document](#) outlines the:
 - background, objectives, scope, outcomes and deliverables, KPIs to measure outcomes and deliverables, targeted stakeholders, type of action and funding rate and specific topic conditions (sections 1 and 2)
 - timetable and available budget (sections 3 and 4)
 - admissibility and eligibility conditions (including mandatory documents; sections 5 and 6)
 - criteria for financial and operational capacity and exclusion (section 7)
 - evaluation and award procedure (section 8)
 - award criteria (section 9)
 - legal and financial set-up of the Grant Agreements (section 10)
 - how to submit an application (section 11).
- the [Online Manual](#) outlines the:
 - procedures to register and submit proposals online via the EU Funding & Tenders Portal ('Portal')

¹ Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast) ('EU Financial Regulation') (OJ L, 2024/2509, 26.9.2024).

² Regulation (EU) 2021/694 of the European Parliament and of the Council of 29 April 2021 establishing the Digital Europe Programme (OJ L 166, 11.5.2021, p. 1).

³ Commission Implementing Decision C(2025) 6650 of 06.10.2025 amending Implementing Decision C(2025) 1839 on the financing of the Digital Europe Programme and the adoption of the work programme for 2025-2027.

- recommendations for the preparation of the application.
- the AGA — Annotated Grant Agreement contains:
 - detailed annotations on all the provisions in the Grant Agreement you will have to sign in order to obtain the grant (*including cost eligibility, payment schedule, accessory obligations, etc*).

1. Background

The roll-out and best use of digital capacities will focus on priority areas such as the support to SMEs and public authorities in their digital transformation and will also provide resources to activities started in previous programmes, for which the continuation of funding is essential to avoid disruption.

The activities will be organised around five main strands:

- Blockchain
- Deployment of Public Services
- Interoperable Europe
- Justice and consumers
- Confidence in digital transition

Participation is open to all eligible entities as established by Article 18 of the Digital Europe programme, in particular public sector entities as well as private sector organisations, including SMEs, NGOs and international organisations.

2. Objectives — Scope — Outcomes and deliverables — KPIs to measure outcomes and deliverables — Targeted stakeholders — Type of action and funding rate — Specific topic conditions

DIGITAL-2026-BESTUSE-TECH-EDMO-09-HUBS — European Digital Media Observatory

Objectives

The European Digital Media Observatory (EDMO) is an independent multidisciplinary community serving as a collaborative platform for fact-checkers, researchers and media literacy experts. It carries out activities to fight disinformation and strengthen societal resilience in Europe. EDMO is composed of the national or regional hubs and a central platform and governance structure which supports and coordinates them.

The objective of this topic is to finance the work of independent national or regional hubs in order to ensure the coverage of geographical areas covered by the EDMO hubs for which the funding is ending in 2026⁴. In this regard, a hub may cover more than one eligible country with similar online information ecosystems within an EU region. However, an eligible country will be covered by only one hub, unless this can be duly justified by the online information ecosystem.

A hub involves organisations active in one or several eligible country (ies), that will provide specific knowledge of the local information environment(s) to:

⁴ Member States covered by this Call are: Belgium, the Czech Republic, Denmark, Finland, France, Ireland, Italy, Luxembourg, the Netherlands, Poland, Portugal, Slovakia, Spain, Sweden, as well as Norway, in the European Economic Area (EEA). The applicants may also propose covering additional EEA countries and/or Associated Countries.

- strengthen the monitoring and analysis of the online information environment, detect and expose disinformation campaigns, with the aim of contributing to situational awareness across the EU.
- support election integrity by monitoring and analysing election-related disinformation campaigns and manipulation.
- focus on building societal resilience and expanding outreach and communication efforts to engage a broad audience and design effective responses relevant for national audiences.

The activities of the hubs are carried out in full independence from third-party entities including public authorities.

Scope

In view of the rapidly changing media, technological, geopolitical, legal and policy environment affecting the disinformation landscape, the EDMO hubs need to stand ready to react and adapt their activities to emerging needs and crisis situations. This applies to all areas of activities of the hubs.

The EDMO hubs should cover at least the following activities:

1. Reinforce the EDMO network by:

- actively participating in the EDMO governance structure, including electing hub representatives and ensuring smooth and agile communication with the EDMO network by appointing a single contact point for coordination activities among the hubs and the governance structure.
- contributing to the planning and implementation of the EDMO network long-term strategy, contributing to design and, once in place, fully adhere to the EDMO independence framework.
- actively participating in relevant joint activities of EDMO in key areas; such as monitoring and analysis for situational awareness, investigations, fact-checking, support for election integrity, fact-checking, media literacy and societal resilience, as well as in specific thematic collaborative activities.
- contributing to the EDMO annual conference and ensuring a wide participation of the members of the consortia.
- participating in and contributing to the EDMO hubs meetings and other relevant EDMO network events, including internal meetings of the EDMO network such as preparatory meetings in advance of the activation of the Code of Conduct on Disinformation⁵ Rapid Response System (RRS) on elections.⁶
- keeping the EDMO network and the European Commission informed with sufficiently advanced notice about all the initiatives and events organised by using the EDMO platform to share information and collaborate in joint activities, whether in relation to fact-checking, investigations, or other action areas.

⁵ <https://digital-strategy.ec.europa.eu/en/library/code-conduct-disinformation>

⁶ The RRS is a time-bound dedicated framework of cooperation and communication among relevant signatories of the Code of Conduct on Disinformation, which allows non-platform signatories to swiftly report time-sensitive content or accounts that they deem to present threats to the integrity of the electoral process and discuss them with the platforms in light of their respective policies. The RRS is implemented by the signatories for the EU Parliament and national level elections (e.g., presidential or parliamentary) within EU Member States.

- reporting regularly to the EDMO network, the European Commission and the public about its activities in each area of activity (situational awareness, monitoring of elections and crises, fact-checking, media literacy...) in the form of brief quarterly updates as a minimum (e.g. newsletters or factsheets). These reports should also be made available in English and distributed to various communication channels, adapted to reach also specialised or general audiences.

2. Monitor and analyse the online information ecosystem for situational awareness, including by detecting, fact-checking and exposing disinformation campaigns and information manipulation techniques:

- **Analytical capabilities:** The hubs should perform a continuous monitoring of the online information ecosystem in the country(ies) they cover to detect and analyse disinformation related trends, actors and techniques. If a hub intends to use previously developed technological tools or to develop new tools, including AI-based tools, to support its detection and analysis of sophisticated disinformation campaigns (enabling for example synthetic media identification, malicious bot network mapping, cross-platform narrative tracking and coordinated inauthentic behaviour detection), the proposal should clearly explain which new functionalities will be used or developed. The foreseen tools should be fully functional by the end of the project. The hubs are encouraged to develop these technological tools in cooperation with other hubs. Whenever possible the developed tools or functionalities shall be made available to other EDMO hubs.
- **(Joint) investigations:**
The hubs should perform in-depth investigations and analyses in order to identify key trends, patterns, actors, methods related to specific disinformation campaigns and information manipulation techniques (e.g. malicious use of ads and/or political ads, coordinated inauthentic behaviour, generative AI content, narratives analysis etc.), analyse the impact of the policies of online platforms on information integrity as well as on information integrity, as well as the impact of disinformation campaigns on society and democracy. Each hub should contribute to joint investigations of the EDMO network at least once before the end of the grant period.
Whenever relevant and possible, especially for joint projects, hubs should use a common methodology. In the context of their investigation and analysis activities, the hubs should be ready to adapt to emerging needs related to the EU policy framework (in particular the Digital Services Act⁷ and the Code of Conduct on Disinformation), reacting to new developments and priorities.
- **Elections and crisis monitoring:** The hubs should perform an effective and dynamic monitoring of elections and crisis situations in the country(ies) they cover, including by participating actively in the Rapid Response System (RRS) of the Code of Conduct on Disinformation. This involves contributing to and following relevant EDMO guidelines, participating in meetings such as knowledge-transfer meetings, RRS preparatory meetings, and, on a rotational basis, meetings of the EDMO Election Taskforce.⁸ These activities should also include media literacy aspects and the dissemination of public facing materials related to elections coverage.

⁷ [Regulation \(EU\) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC \(Digital Services Act\)](#)

⁸ Based on a schedule to be established by the EDMO network, taking into account election dates in the respective countries.

- **Fact-checking:** The hubs should:
 - contribute to the periodic EDMO fact-checking briefs;
 - publish their fact-checks and include them in the relevant repositories, including the fact-checking repository that will be established by the “European Network of Fact-Checkers” (ENFC) project⁹;
 - publish their fact-checks on their website and disseminate them proactively in various forms such as via fact-checking briefs, cooperation with the media, etc.

The hubs are also expected to help promote and contribute, if they are willing to do so, to the Fact-Checkers Protection Scheme of the ENFC project within their own national/regional fact-checkers’ communities. More generally, hubs are expected to cooperate and seek synergies with the ENFC to ensure their initiatives and those of the ENFC are complementary.

The hub¹⁰ must include one or more fact-checking organisation(s) which taken together, cover the whole geographical area of the hub.

3. Develop practical actions to strengthen societal resilience and media literacy, boosting the public’s ability to take more informed decisions, navigate more safely in the online environment, and critically assess information. These activities should cover the relevant country(ies) or linguistic area(s) and should be designed in cooperation with the EDMO network. These activities should involve, among others:

- Carrying out and/or contributing to (joint) surveys and analyses on the societal susceptibility to disinformation and foreign information manipulation and interference, based as much as possible on a common methodology across the EDMO network. The analysis should identify trends and propose suggestions to boost societal resilience.
- Fostering the growth of local media literacy activities, including for example trainings, capacity building and awareness-raising activities. Whenever possible, a recording or write-up of the trainings and other activities should be made publicly available on the EDMO hub website. More generally, hubs are expected to leverage on the exchange of good practices and materials stored on the EDMO platform and contribute to the relevant EDMO repositories with their own material, including by providing input for EDMO’s monthly “Media Literacy Digest”.
- Supporting the work of the EDMO Media Literacy Council and participating in the EU-wide online media literacy campaigns organised by the EDMO network.
- The hubs should also explore possibilities of developing and implementing joint media literacy activities and campaigns.

4. Foster the growth of a strong national and regional multidisciplinary community and become a point of reference in the relevant geographical area

⁹ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/topic-details/DIGITAL-2025-BESTUSE-08-FACTCHECK>

¹⁰ The hub must include at least one independent fact-checking organisation or a fact-checking unit from an independent media organisation with proven fact-checking activities in the last 12 months. The applicant must provide in the Application Form B Section 2.3: i) information that it is a fact-checker as per its statute and it fulfils the description given in the next subsection; ii) demonstrate that there is a publicly available statement or policy regarding advocacy/political positions from the organisation and its staff, iii) demonstrate that it has published at least 10 (ten) fact-checks in the previous twelve months; iv) information regarding the source(s) of its funding and demonstrate independence from external funders. The applicant should also include the information whether it is a member of IFCN or EFCSN. If an applicant is not yet a member of these networks, they should either commit to apply for at least EFCSN membership or provide an explanation for why they are not in a position to do so.

by building cooperation with a wide network of relevant stakeholders, in particular independent fact-checkers, media practitioners, content creators, influencers, civil society organisations, media literacy experts, and other disinformation specialists, beyond the organisations involved in the proposal. The applicants must have the ability to reach out to a large network of experts. To this end, the applicants must prove to have in place a broad network of experts and/or organisations they intend to cooperate with, which are not involved in the proposal. Such cooperation should also provide expertise in relevant areas of investigation and research (e.g. security, health, climate change, migration, economics, European policies or other relevant areas prone to disinformation). The applicants must include evidence in their proposal on how they cooperate and intend to expand cooperation with such a network of experts.

5. Communicate and reach out through various channels to a broad audience (e.g. by traditional and online media outlets, podcasts, social media, etc.) and carry out related communication campaigns about its activities.

This includes the dissemination of:

- the fact-checks produced by the hub;
- the results of investigation or research activities related to the analysis of disinformation campaigns as well as trends and risks related to the disinformation phenomenon;
- media literacy related activities and material.

The communication activities should target the general public as well as specialists in the field, where appropriate by preparing targeted content for different audiences and for different media. Each hub should indicate in its proposal the type of collaborations intended for this purpose with independent media outlets and, if applicable, with independent content creators operating within its territory or linguistic area.

For the general public, the communication should focus on sharing concrete project results from the hubs and the network. The communication materials should be attractive, easy to understand, and should be made widely accessible. The most relevant content should be translated into English to allow further sharing within the EDMO network.

The hubs will also coordinate their communication activities with the EDMO network as appropriate. In particular, the hubs should be involved in dissemination of the activities and results of the EDMO network, including, when relevant, activities of other EDMO hubs, and promote EDMO events to media professionals and citizens. To this end, the hubs will follow the requirements of the communication strategy designed by the EDMO governance. Hubs should also, where relevant and possible, share their outputs and materials with the EDMO network for broader dissemination across the EU.

The communication plan, developed at early stage of the project, should clearly indicate the target groups and the KPIs.

The hubs should organise outreach events (e.g. conferences, workshops) to disseminate information about their activities and foster the growth of and exchange within the local stakeholder community. This could also include awareness raising on the EU policy framework as well as on activities and results of other EDMO hubs. The hubs should inform the European Commission and the EDMO network about upcoming events organised and invite the European Commission to those events where relevant.

Hubs should also provide targeted and relevant **training activities** relevant to their stakeholder community.

The hubs are also expected to be involved in the design and delivery of the regular EU-wide public information campaigns promoting EDMO's work, and to provide input to EDMO's answers to public consultations and other activities of the network related to EU policies.

Applicants who already received funding under previous Digital Europe Programme calls on EDMO Hubs and who plan to apply again under this call must clearly explain in the relevant section of the application of their proposal (notably the section of Relevance) how their proposed Action will build on and/or differ from the Action funded under the previous call(s). Applicants must clearly explain how their proposed Action will build upon the previously funded Hub.

Outcomes and deliverables

- Produce analyses, reports, and where relevant alerts based on a continuous monitoring of the online information environment aimed at detecting and exposing disinformation campaigns, thereby contributing to situational awareness, in the geographical and linguistic area(s) covered by the hub.
- Participate in and produce time-sensitive relevant insights for the dynamic monitoring of elections and crisis situations in the geographical area covered by the hub, including in the framework of the Rapid Response System (RRS) of the Code of Conduct on Disinformation.
- Produce a continuous flow of fact-checks which will also be stored in EDMO's repositories and, once available, in fact-checking repository that will be established by the ENFC project.
- Produce (contributions to) in-depth investigations or analyses on key trends, patterns, actors, methods related to specific disinformation campaigns and information manipulation techniques, on the impact of the policies of online platforms on information integrity, as well as the impact of disinformation campaigns on society and democracy. Deliver practice-oriented reports and studies on specific disinformation campaigns and/or relevant disinformation phenomena.
- Deliver media literacy campaigns, events and/or trainings at national/regional level to increase citizens' awareness and societal resilience.
- Implement a communication strategy building on the targeted use of various channels (e.g. traditional and online media outlets, podcasts, social media, etc.) aiming to reach a broad audience (both professional audience and the general public) in line with the EDMO network's overall communication strategy. Organising relevant outreach and training activities.
- Deliver an annual report on the activities of the hub. It shall include information on i) key achievements in each of the main activity areas of the hub, including situational awareness, election and crisis monitoring, fact-checking, media literacy and societal resilience; ii) the cooperation with other hubs; iii) participation in the EDMO governance body and in joint projects; (iv) additional funds received by the hubs; and v) the process and safeguards put in place to preserve the independence of the hub; vi) efforts to foster the growth of a regional multidisciplinary independent community.

- Each Hub should have a website already up and running, whereby all information is published in the languages covered by the national/regional hub. The main menu should be also available in English.

KPIs to measure outcomes and deliverables

Each Hub should include at least the following KPIs:

- Produce or contribute at least 100 fact-checks.
- Conduct or contribute to practice oriented, agile research activities to deliver at least 10 **reports, studies and/or investigations** on specific disinformation campaigns or relevant disinformation phenomena. The reports, studies and/or investigations may be produced at the hub's own initiative or jointly with the EDMO network and/or other hubs. This KPI should include at least one contribution to a joint investigation of the EDMO network.
- Deliver at least 5 media literacy campaigns and/or events at national/regional level.
- Deliver annual reports on the activities of the hub.
- Demonstrate a wide reach of the hub's communication, outreach and training activities, including reaching specialists and the general public, based on relevant KPIs (including the number of published media articles, podcasts and social media posts as well as the reach and engagement with such posts) based on a strong communication and outreach plan.
- Define the number of new or updated online resources made available by the hubs (including for instance online posts or articles, trainings, etc.).

Targeted stakeholders

Targeted stakeholders are European fact-checkers, preferably recognised by reputable fact-checking networks such as EFCNS or IFCN. Media practitioners, media literacy specialists, experts and researchers working on disinformation, online content creators, as well as other stakeholders which conduct relevant activities related to disinformation including open-source intelligence. A hub should involve a data scientist, as well as a communication specialist with expertise in collaborating with professional media outlets and in communication activities carried out through social media.

For the purposes of this call, a fact-checking organisation is intended as an organisation that:

- Regularly publishes nonpartisan reports on the accuracy of widely circulated claims of interest to society and of statements by major institutions, public figures and/or other. This includes the verification of multimedia content that reached a wide public. Provide through online links: i) Proof of legal or organisational statute; ii) fact-checks published in the previous three months.
- Fact-checks claims using the same standard for every fact check; adheres to the highest quality standard in journalism, content verification and/or research; does not concentrate fact-checking efforts on any one side; follows the same process for every fact check and lets the evidence dictate conclusions; does not advocate or take policy positions on the issues it fact-checks.
- Is transparent about its funding sources and states clearly where its funding comes from. If it accepts funding from other organisations, it ensures that funders have no influence over the conclusions it reaches in its reports.
- It details the professional background of all key staff in the organisation and explains the organisational structure and legal status. It clearly indicates a way for readers to communicate with the organisation.

- Publishes its corrections policy and follows it scrupulously. It corrects clearly and transparently in line with the corrections policy, seeking so far as possible to ensure that readers see the corrected version.

Type of action and funding rate

SME Support Actions — 50% funding rate and 75% funding rate (for SMEs).



For more information on Digital Europe types of action, see *Annex 1*.

Specific topic conditions

- For this topic, multi-beneficiary applications are mandatory and specific conditions for the consortium composition apply (see *section 6*)
- For this topic, following reimbursement option for equipment costs applies: full costs only (see *section 10*)
- The following parts of the award criteria in *section 9* are exceptionally NOT applicable for this topic:
 - extent to which the project would reinforce and secure the digital technology supply chain in the Union*
 - extent to which the proposal can overcome financial obstacles such as the lack of market finance*
 - extent to which the proposal addresses environmental sustainability and the European Green Deal goals, in terms of direct effects and/or in awareness of environmental effects*

3. Available budget

The estimated available call budget is **EUR 6 000 000**.

Specific budget information per topic can be found in the table below:

Topic	Topic budget
DIGITAL-2026-BESTUSE-TECH-EDMO-09-HUBS	EUR 6 000 000

We reserve the right not to award all available funds or to redistribute them between the call priorities, depending on the proposals received and the results of the evaluation.

4. Timetable and deadlines

Timetable and deadlines (indicative)	
Call opening:	04 November 2025
<u>Deadline for submission:</u>	<u>03 March 2026 – 17:00:00 CET (Brussels)</u>
Evaluation:	April - May 2026
Information on evaluation results:	June 2026
GA signature:	September 2026

5. Admissibility and documents

Proposals must be submitted before the **call deadline** (see *timetable section 4*).

Proposals must be submitted **electronically** via the Funding & Tenders Portal Electronic Submission System (accessible via the Topic page in the [Calls for proposals](#) section). Paper submissions are NOT possible.

Proposals (including annexes and supporting documents) must be submitted using the forms provided *inside* the Submission System (⚠ NOT the documents available on the Topic page — they are only for information).

Proposals must be **complete** and contain all the requested information and all required annexes and supporting documents:

- Application Form Part A — contains administrative information about the participants (future coordinator, beneficiaries and affiliated entities) and the summarised budget for the project (*to be filled in directly online*)
- Application Form Part B — contains the technical description of the project (*template to be downloaded from the Portal Submission System, completed, assembled and re-uploaded*)
- **mandatory annexes and supporting documents** (*templates to be downloaded from the Portal Submission System, completed, assembled and re-uploaded*):
 - detailed budget table/calculator: not applicable
 - CVs of core project team: not applicable
 - activity reports of last year: not applicable
 - list of previous projects (key projects for the last 4 years): not applicable
 - other annexes: The consortium shall submit **a self-declaration letter demonstrating the independence of all consortium members from public authorities**. The self-declaration should therefore clearly outline:
 - a) how **each consortium member** ensures independence from public authorities. Should a consortium member have a status of public body or be operational under the supervision of another public authority, a thorough justification on the separation of duties should be included in the letter.
 - b) In the case where the members of the consortium receive funding from external sources, they should include detailed information

on how the consortium guarantees that the hub and all its activities remain fully independent and free from any external influence to ensure impartiality and maintain the integrity of its operations.

At proposal submission, you will have to confirm that you have the **mandate to act** for all applicants. Moreover, you will have to confirm that the information in the application is correct and complete and that all participants comply with the conditions for receiving EU funding (*especially eligibility, financial and operational capacity, exclusion, etc*). Before signing the grant, each beneficiary and affiliated entity will have to confirm this again by signing a declaration of honour (DoH). Proposals without full support will be rejected.

Your application must be **readable, accessible and printable** (please check carefully the layout of the documents uploaded).

Proposals are limited to maximum **70 pages** (Part B). Evaluators will not consider any additional pages.

You may be asked at a later stage for further documents (*for legal entity validation, financial capacity check, bank account validation, etc*).

 For more information about the submission process (including IT aspects), consult the [Online Manual](#).

6. Eligibility

Eligible participants (eligible countries)

In order to be eligible, the applicants (beneficiaries and affiliated entities) must:

- be legal entities (public or private bodies)
- be established in one of the eligible countries, i.e.:
 - EU Member States (including overseas countries and territories (OCTs))
 - non-EU countries:
 - listed EEA countries and countries associated to the Digital Europe Programme ([list of participating countries](#))

Beneficiaries and affiliated entities must register in the [Participant Register](#) — before submitting the proposal — and will have to be validated by the Central Validation Service (REA Validation). For the validation, they will be requested to upload documents showing legal status and origin.

Other entities may participate in other consortium roles, such as associated partners, subcontractors, third parties giving in-kind contributions, etc (*see section 13*).

Specific cases and definitions

Natural persons — Natural persons are NOT eligible (with the exception of self-employed persons, i.e. sole traders, where the company does not have legal personality separate from that of the natural person).

International organisations — International organisations are NOT eligible, unless they are International organisations of European Interest within the meaning of Article 2 of the Digital Europe Regulation (i.e. international organisations the majority of whose members are Member States or whose headquarters are in a Member State).

Entities without legal personality — Entities which do not have legal personality under their national law may exceptionally participate, provided that their representatives have the capacity to undertake legal obligations on their behalf, and offer guarantees for the protection of the EU financial interests equivalent to that offered by legal persons¹¹.

EU bodies — EU bodies (with the exception of the European Commission Joint Research Centre) can NOT be part of the consortium.

Associations and interest groupings — Entities composed of members may participate as 'sole beneficiaries' or 'beneficiaries without legal personality'¹². ⚠ Please note that if the action will be implemented by the members, they should also participate (either as beneficiaries or as affiliated entities, otherwise their costs will NOT be eligible).

Countries currently negotiating association agreements — Beneficiaries from countries with ongoing negotiations for participating in the programme (*see list of participating countries above*) may participate in the call and can sign grants if the negotiations are concluded before grant signature and if the association covers the call (i.e. is retroactive and covers both the part of the programme and the year when the call was launched).

EU restrictive measures — Special rules apply for entities subject to [EU restrictive measures](#) under Article 29 of the Treaty on the European Union (TEU) and Article 215 of the Treaty on the Functioning of the EU (TFEU)¹³. Such entities are not eligible to participate in any capacity, including as beneficiaries, affiliated entities, associated partners, subcontractors or recipients of financial support to third parties (if any).

EU conditionality measures — Special rules apply for entities subject to measures adopted on the basis of EU Regulation 2020/2092¹⁴. Such entities are not eligible to participate in any funded role (beneficiaries, affiliated entities, subcontractors, recipients of financial support to third parties, etc). Currently such measures are in place for Hungarian public interest trusts established under the Hungarian Act IX of 2021 or any entity they maintain (see [Council Implementing Decision \(EU\) 2022/2506](#), as of 16 December 2022).

For more information, see [Rules for Legal Entity Validation, LEAR Appointment and Financial Capacity Assessment](#).

Consortium composition

Proposals must be submitted by:

- minimum 2 independent applicants (beneficiaries; not affiliated entities).
- the coordinator of the consortium must be established in an EU Member State to be covered by the hub.

Eligible activities

Applications will only be considered eligible if their content corresponds wholly (or at least in part) to the topic description for which they are submitted.

Eligible activities are the ones set out in section 2 above.

¹¹ See Article 200(2)(c) EU Financial Regulation [2024/2509](#).

¹² For the definitions, see Articles 190(2) and 200(2)(c) EU Financial Regulation [2024/2509](#).

¹³ Please note that the EU Official Journal contains the official list and, in case of conflict, its content prevails over that of the [EU Sanctions Map](#).

¹⁴ Regulation (EU, Euratom) 2020/2092 of the European Parliament and of the Council of 16 December 2020 on a general regime of conditionality for the protection of the Union budget (OJ L 325, 20.12.2022, p. 94).

Projects should take into account the results of projects supported by other EU funding programmes. The complementarities must be described in the project proposals (Part B of the Application Form).

Projects must comply with EU policy interests and priorities (*such as environment, social, security, industrial and trade policy, etc*). Projects must also respect EU values and European Commission policy regarding reputational matters (*e.g. activities involving capacity building, policy support, awareness raising, communication, dissemination, etc*).

Ethics

Projects must comply with:

- highest ethical standards and
- applicable EU, international and national law (including the [General Data Protection Regulation 2016/679](#)).

Proposals under this call will have to undergo an ethics review to authorise funding and may be made subject to specific ethics rules (which become part of the Grant Agreement in the form of ethics deliverables, *e.g. ethics committee opinions/notifications/authorisations required under national or EU law*).

For proposals involving development, testing, deployment, use or distribution of AI systems, the ethics review will in particular check compliance with the principles of human agency and oversight, diversity/fairness, transparency and responsible social impact, while the experts performing the technical evaluation will assess the robustness of the AI systems (i.e. their reliability not to cause unintentional harm).

Security

Projects involving EU classified information must undergo security scrutiny to authorise funding and may be made subject to specific security rules (detailed in a security aspects letter (SAL) which is annexed to the Grant Agreement).

These rules (governed by Decision [2015/444](#)¹⁵ and its implementing rules and/or national rules) provide for instance that:

- projects involving information classified TRES SECRET UE/EU TOP SECRET (or equivalent) can NOT be funded
- classified information must be marked in accordance with the applicable security instructions in the SAL
- information with classification levels CONFIDENTIEL UE/EU CONFIDENTIAL or above (and RESTREINT UE/ EU RESTRICTED, if required by national rules) may be:
 - created or accessed only on premises with facility security clearance (FSC) from the competent national security authority (NSA), in accordance with the national rules
 - handled only in a secured area accredited by the competent NSA
 - accessed and handled only by persons with valid personnel security clearance (PSC) and a need-to-know
- at the end of the grant, the classified information must either be returned or

¹⁵ See Commission Decision 2015/444/EU, Euratom of 13 March 2015 on the security rules for protecting EU classified information (OJ L 72, 17.3.2015, p. 53).

continue to be protected in accordance with the applicable rules

- action tasks involving EU classified information (EUCI) may be subcontracted only with prior written approval from the granting authority and only to entities established in an EU Member State or in a non-EU country with a security of information agreement with the EU (or an administrative arrangement with the Commission)
- disclosure of EUCI to third parties is subject to prior written approval from the granting authority.

Please note that, depending on the type of activity, facility security clearance may have to be provided before grant signature. The granting authority will assess the need for clearance in each case and will establish their delivery date during grant preparation. Please note that in no circumstances can we sign any grant agreement until at least one of the beneficiaries in a consortium has facility security clearance.

Further security recommendations may be added to the Grant Agreement in the form of security deliverables (*e.g. create security advisory group, limit level of detail, use fake scenario, exclude use of classified information, etc*).

Beneficiaries must ensure that their projects are not subject to national/third-country security requirements that could affect implementation or put into question the award of the grant (*e.g. technology restrictions, national security classification, etc*). The granting authority must be notified immediately of any potential security issues.

7. Financial and operational capacity and exclusion

Financial capacity

Applicants must have **stable and sufficient resources** to successfully implement the projects and contribute their share. Organisations participating in several projects must have sufficient capacity to implement all projects.

The financial capacity check will be carried out on the basis of the documents you will be requested to upload in the [Participant Register](#) during grant preparation (*e.g. profit and loss account and balance sheet, business plan, audit report produced by an approved external auditor, certifying the accounts for the last closed financial year, etc*). The analysis will be based on neutral financial indicators, but will also take into account other aspects, such as dependency on EU funding and deficit and revenue in previous years.

The check will normally be done for all beneficiaries, except:

- public bodies (entities established as public body under national law, including local, regional or national authorities) or international organisations
- if the individual requested grant amount is not more than EUR 60 000.

If needed, it may also be done for affiliated entities.

If we consider that your financial capacity is not satisfactory, we may require:

- further information
- an enhanced financial responsibility regime, i.e. joint and several responsibility for all beneficiaries or joint and several liability of affiliated entities (*see below, section 10*)
- prefinancing paid in instalments
- (one or more) prefinancing guarantees (*see below, section 10*)

or

- propose no prefinancing
- request that you are replaced or, if needed, reject the entire proposal.



For more information, see [Rules for Legal Entity Validation, LEAR Appointment and Financial Capacity Assessment](#).

Operational capacity

Applicants must have the **know-how, qualifications and resources** to successfully implement the projects and contribute their share (including sufficient experience in projects of comparable size and nature).

This capacity will be assessed together with the 'Implementation' award criterion, on the basis of the competence and experience of the applicants and their project teams, including operational resources (human, technical and other) or, exceptionally, the measures proposed to obtain it by the time the task implementation starts.

If the evaluation of the award criterion is positive, the applicants are considered to have sufficient operational capacity.

Applicants will have to show their capacity via the following information:

- general profiles (qualifications and experiences) of the staff responsible for managing and implementing the project
- description of the consortium participants

Additional supporting documents may be requested, if needed to confirm the operational capacity of any applicant.

Exclusion

Applicants which are subject to an **EU exclusion decision** or in one of the following **exclusion situations** that bar them from receiving EU funding can NOT participate¹⁶:

- bankruptcy, winding up, affairs administered by the courts, arrangement with creditors, suspended business activities or other similar procedures (including procedures for persons with unlimited liability for the applicant's debts)
- in breach of social security or tax obligations (including if done by persons with unlimited liability for the applicant's debts)
- guilty of grave professional misconduct¹⁷ (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- committed fraud, corruption, links to a criminal organisation, money laundering, terrorism-related crimes (including terrorism financing), child labour or human trafficking (including if done by persons having powers of representation,

¹⁶ See Articles 138 and 143 of EU Financial Regulation [2024/2509](#).

¹⁷ 'Professional misconduct' includes, in particular, the following: violation of ethical standards of the profession; wrongful conduct with impact on professional credibility; breach of generally accepted professional ethical standards; false declarations/misrepresentation of information; participation in a cartel or other agreement distorting competition; violation of IPR; attempting to influence decision-making processes by taking advantage, through misrepresentation, of a conflict of interests, or to obtain confidential information from public authorities to gain an advantage; incitement to discrimination, hatred or violence or similar activities contrary to the EU values where negatively affecting or risking to affect the performance of a legal commitment.

decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant

- shown significant deficiencies in complying with main obligations under an EU procurement contract, grant agreement, prize, expert contract, or similar (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- guilty of irregularities within the meaning of Article 1(2) of EU Regulation [2988/95](#) (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- created under a different jurisdiction with the intent to circumvent fiscal, social or other legal obligations in the country of origin or created another entity with this purpose (including if done by persons having powers of representation, decision-making or control, beneficial owners or persons who are essential for the award/implementation of the grant)
- intentionally and without proper justification resisted¹⁸ an investigation, check or audit carried out by an EU authorising officer (or their representative or auditor), OLAF, the EPPO, or the European Court of Auditors.

Applicants will also be rejected if it turns out that¹⁹:

- during the award procedure they misrepresented information required as a condition for participating or failed to supply that information
- they were previously involved in the preparation of the call and this entails a distortion of competition that cannot be remedied otherwise (conflict of interest).

8. Evaluation and award procedure

The proposals will have to follow the **standard submission and evaluation procedure** (one-stage submission + one-step evaluation).

An **evaluation committee** (assisted by independent outside experts) will assess all applications. Proposals will first be checked for formal requirements (admissibility, and eligibility, *see sections 5 and 6*). Proposals found admissible and eligible will be evaluated against the operational capacity and award criteria (*see sections 7 and 9*) and then ranked according to their scores.

For proposals with the same score (within a topic or budget envelope) a **priority order** will be determined according to the following approach:

Successively for every group of *ex aequo* proposals, starting with the highest scored group, and continuing in descending order:

- 1) Proposals focusing on a theme that is not otherwise covered by higher ranked proposals will be considered to have the highest priority.
- 2) The *ex aequo* proposals within the same topic will be prioritised according to the scores they have been awarded for the award criterion 'Relevance'. When these

¹⁸ 'Resisting an investigation, check or audit' means carrying out actions with the goal or effect of preventing, hindering or delaying the conduct of any of the activities needed to perform the investigation, check or audit, such as refusing to grant the necessary access to its premises or any other areas used for business purposes, concealing or refusing to disclose information or providing false information.

¹⁹ See Article 143 EU Financial Regulation [2024/2509](#).

scores are equal, priority will be based on their scores for the criterion 'Impact'. When these scores are equal, priority will be based on their scores for the criterion 'Implementation'.

- 3) If this does not allow to determine the priority, a further prioritisation can be done by considering the overall proposal portfolio and the creation of positive synergies between proposals, or other factors related to the objectives of the call. These factors will be documented in the panel report.
- 4) After that, the remainder of the available call budget will be used to fund projects across the different topics in order to ensure a balanced spread of the geographical and thematic coverage and while respecting to the maximum possible extent the order of merit based on the evaluation of the award criteria.



No commitment for funding — Invitation to grant preparation does NOT constitute a formal commitment for funding. We will still need to make various legal checks before grant award: *legal entity validation, financial capacity, exclusion check, etc.*

Grant preparation will involve a dialogue in order to fine-tune technical or financial aspects of the project and may require extra information from your side. It may also include adjustments to the proposal to address recommendations of the evaluation committee or other concerns. Full compliance will be a pre-condition for signing the grant.

If you believe that the evaluation procedure was flawed, you can submit a **complaint** (following the deadlines and procedures set out in the evaluation result letter). Please note that notifications which have not been opened within 10 days after sending will be considered to have been accessed and that deadlines will be counted from opening/access (see also [Funding & Tenders Portal Terms and Conditions](#)). Please also be aware that for complaints submitted electronically, there may be character limitations.

9. Award criteria

The **award criteria** for this call are as follows:

1. Relevance

- Alignment with the objectives and activities as described in section 2
- Contribution to long-term policy objectives, relevant policies and strategies, and synergies with activities at European and national level
- Extent to which the project would reinforce and secure the digital technology supply chain in the EU*
- Extent to which the project can overcome financial obstacles such as the lack of market finance*

2. Implementation

- Maturity of the project
- Soundness of the implementation plan and efficient use of resources
- Capacity of the applicants, and when applicable the consortium as a whole, to carry out the proposed work

3. Impact

- Extent to which the project will achieve the expected outcomes and deliverables referred to in the call for proposals and, where relevant, the plans to disseminate and communicate project achievements
- Extent to which the project will strengthen competitiveness and bring important benefits for society
- Extent to which the project addresses environmental sustainability and the European Green Deal goals, in terms of direct effects and/or in awareness of environmental effects *.

*May not be applicable to all topics (see specific topic conditions in section 2).

Award criteria	Minimum pass score	Maximum score
Relevance	3	5
Implementation	3	5
Impact	3	5
Overall (pass) scores	10	15

Maximum points: 15 points.

Individual thresholds per criterion: 3/5, 3/5 and 3/5 points.

Overall threshold: 10 points.

Proposals that pass the individual thresholds AND the overall threshold will be considered for funding — within the limits of the available budget (i.e. up to the budget ceiling). Other proposals will be rejected.

10. Legal and financial set-up of the Grant Agreements

If you pass evaluation, your project will be invited for grant preparation, where you will be asked to prepare the Grant Agreement together with the EU Project Officer.

This Grant Agreement will set the framework for your grant and its terms and conditions, in particular concerning deliverables, reporting and payments.

The Model Grant Agreement that will be used (and all other relevant templates and guidance documents) can be found on [Portal Reference Documents](#).

Starting date and project duration

The project starting date and duration will be fixed in the Grant Agreement (*Data Sheet, point 1*). Normally the starting date will be after grant signature. A retroactive starting date can be granted exceptionally for duly justified reasons but never earlier than the proposal submission date.

Project duration: **18 months**

Extensions are possible, if duly justified and through an amendment.

Milestones and deliverables

The milestones and deliverables for each project will be managed through the Portal Grant Management System and will be reflected in Annex 1 of the Grant Agreement.

The following deliverables will be mandatory for all projects:

- additional deliverable on communication and dissemination plan, to be submitted in the first six months of the project.
- a data management plan that will cover all foreseeable data instances coming from the project, including media literacy activities, research etc.

Form of grant, funding rate and maximum grant amount

The grant parameters (*maximum grant amount, funding rate, total eligible costs, etc*) will be fixed in the Grant Agreement (*Data Sheet, point 3 and art 5*).

Project budget (requested grant amount): **Maximum EUR 750,000 per project.**

The grant awarded may be lower than the amount requested.

The grant will be a budget-based mixed actual cost grant (actual costs, with unit cost and flat-rate elements). This means that it will reimburse ONLY certain types of costs (eligible costs) and costs that were *actually* incurred for your project (NOT the *budgeted* costs). For unit costs and flat-rates, you can charge the amounts calculated as explained in the Grant Agreement (*see art 6 and Annex 2 and 2a*).

The costs will be reimbursed at the funding rate fixed in the Grant Agreement. This rate depends on the type of action which applies to the topic (*see section 2*).

Grants may NOT produce a profit (i.e. surplus of revenues + EU grant over costs). For-profit organisations must declare their revenues and, if there is a profit, we will deduct it from the final grant amount (*see art 22.3*).

Moreover, please be aware that the final grant amount may be reduced in case of non-compliance with the Grant Agreement (*e.g. improper implementation, breach of obligations, etc*).

Budget categories and cost eligibility rules

The budget categories and cost eligibility rules are fixed in the Grant Agreement (*Data Sheet, point 3 and art 6*).

Budget categories for this call:

- A. Personnel costs
 - A.1 Employees, A.2 Natural persons under direct contract, A.3 Seconded persons
 - A.4 SME owners and natural person beneficiaries
- B. Subcontracting costs
- C. Purchase costs
 - C.1 Travel and subsistence
 - C.2 Equipment
 - C.3 Other goods, works and services
- D. Other cost categories

- D.2 Internally invoiced goods and services
- E. Indirect costs

Specific cost eligibility conditions for this call:

- personnel costs:
 - average personnel costs (unit cost according to usual cost accounting practices)²⁰: Yes
 - SME owner/natural person unit cost²¹: Yes
- travel and subsistence unit costs²²: No (only actual costs)
- equipment costs:
 - full cost
- other cost categories:
 - costs for financial support to third parties: not allowed.
 - internally invoiced goods and services (unit cost according to usual cost accounting practices)²³: Yes
- indirect cost flat-rate: 7% of the eligible direct costs (categories A-D, except volunteers costs and exempted specific cost categories, if any).
- VAT: non-deductible/non-refundable VAT is eligible (but please note that since 2013 VAT paid by beneficiaries that are public bodies acting as public authority is NOT eligible)
- other:
 - in-kind contributions for free are allowed, but cost-neutral, i.e. they cannot be declared as cost
 - kick-off meeting: costs for kick-off meeting organised by the granting authority are eligible (travel costs for maximum 2 persons, return ticket to Brussels and accommodation for one night) only if the meeting takes place after the project starting date set out in the Grant Agreement; the starting date can be changed through an amendment, if needed
 - project websites: communication costs for presenting the project on the participants' websites or social media accounts are eligible; costs for *separate* project websites are not eligible
 - other ineligible costs: No.

Reporting and payment arrangements

The reporting and payment arrangements are fixed in the Grant Agreement (*Data Sheet, point 4 and art 21 and 22*).

After grant signature, you will normally receive a **prefinancing** to start working on the project (float of normally **65 %** of the maximum grant amount; exceptionally less or no

²⁰ [Decision](#) of 29 June 2021 authorising the use of unit costs based on usual cost accounting practices for actions under the Digital Europe Programme.

²¹ Commission [Decision](#) of 20 October 2020 authorising the use of unit costs for the personnel costs of the owners of small and medium-sized enterprises and beneficiaries that are natural persons not receiving a salary for the work carried out by themselves under an action or work programme (C(2020)7115).

²² Commission [Decision](#) of 12 January 2021 authorising the use of unit costs for travel, accommodation and subsistence costs under an action or work programme under the 2021-2027 multi-annual financial framework (C(2021)35).

²³ [Decision](#) of 29 June 2021 authorising the use of unit costs based on usual cost accounting practices for actions under the Digital Europe Programme.

prefinancing). The prefinancing will be paid 30 days from entry into force/10 days before starting date/financial guarantee (if required) – whichever is the latest.

There will be no interim payments.

Payment of the balance: At the end of the project, we will calculate your final grant amount. If the total of earlier payments is higher than the final grant amount, we will ask you (your coordinator) to pay back the difference (recovery).

All payments will be made to the coordinator.

 Please be aware that payments will be automatically lowered if you or one of your consortium members has outstanding debts towards the EU (granting authority or other EU bodies). Such debts will be offset by us — in line with the conditions set out in the Grant Agreement (*see art 22*).

Please also note that you are responsible for **keeping records** on all the work done and the costs declared.

Prefinancing guarantees

If a prefinancing guarantee is required, it will be fixed in the Grant Agreement (*Data Sheet, point 4*). The amount will be set during grant preparation and it will normally be equal or lower than the prefinancing for your grant.

The guarantee should be in euro and issued by an approved bank/financial institution established in an EU Member State. If you are established in a non-EU country and would like to provide a guarantee from a bank/financial institution in your country, please contact us (this may be exceptionally accepted, if it offers equivalent security).

Amounts blocked in bank accounts will NOT be accepted as financial guarantees.

Prefinancing guarantees are normally requested from the coordinator, for the consortium. They must be provided during grant preparation, in time to make the prefinancing (scanned copy via Portal AND original by post).

If agreed with us, the bank guarantee may be replaced by a guarantee from a third party.

The guarantee will be released at the end of the grant, in accordance with the conditions laid down in the Grant Agreement (*art 23*).

Certificates

Depending on the type of action, size of grant amount and type of beneficiaries, you may be requested to submit different certificates. The types, schedules and thresholds for each certificate are fixed in the Grant Agreement (*Data Sheet, point 4 and art 24*).

Liability regime for recoveries

The liability regime for recoveries will be fixed in the Grant Agreement (*Data Sheet, point 4.4 and art 22*).

For beneficiaries, it is one of the following:

- limited joint and several liability with individual ceilings — *each beneficiary up to their maximum grant amount*
- unconditional joint and several liability — *each beneficiary up to the maximum grant amount for the action*

or

- individual financial responsibility — *each beneficiary only for their own debts.*

In addition, the granting authority may require joint and several liability of affiliated entities (with their beneficiary).

Provisions concerning the project implementation

Security rules: *see Model Grant Agreement (art 13 and Annex 5)*

Ethics rules: *see Model Grant Agreement (art 14 and Annex 5)*

IPR rules: *see Model Grant Agreement (art 16 and Annex 5):*

- background and list of background: Yes
- protection of results: Yes
- exploitation of results: Yes
- rights of use on results: Yes
- access to results for policy purposes: Yes
- access to results in case of a public emergency: Yes
- access rights to ensure continuity and interoperability obligations: Yes

Communication, dissemination and visibility of funding: *see Model Grant Agreement (art 17 and Annex 5):*

- communication and dissemination plan: Yes
- dissemination of results: Yes
- additional dissemination obligations: No
- additional communication activities: Yes
- special logo: No

Specific rules for carrying out the action: *see Model Grant Agreement (art 18 and Annex 5):*

- specific rules for PAC Grants for Procurement: No
- specific rules for Grants for Financial Support: No
- specific rules for blending operations: No

Other specificities

Consortium agreement: Yes

Non-compliance and breach of contract

The Grant Agreement (chapter 5) provides for the measures we may take in case of breach of contract (and other non-compliance issues).



For more information, see [AGA — Annotated Grant Agreement](#).

11. How to submit an application

All proposals must be submitted directly online via the Funding & Tenders Portal Electronic Submission System. Paper applications are NOT accepted.

Submission is a **2-step process**:

a) create a user account and register your organisation

To use the Submission System (the only way to apply), all participants need to [create an EU Login user account](#).

Once you have an EU Login account, you can [register your organisation](#) in the Participant Register. When your registration is finalised, you will receive a 9-digit participant identification code (PIC).

b) submit the proposal

Access the Electronic Submission System via the Topic page in the [Calls for proposals](#) section (or, for calls sent by invitation to submit a proposal, through the link provided in the invitation letter).

Submit your proposal in 3 parts, as follows:

- Part A includes administrative information about the applicant organisations (future coordinator, beneficiaries, affiliated entities and associated partners) and the summarised budget for the proposal. Fill it in directly online
- Part B (description of the action) covers the technical content of the proposal. Download the mandatory word template from the Submission System, fill it in and upload it as a PDF file
- Annexes (see *section 5*). Upload them as PDF file (single or multiple depending on the slots). Excel upload is sometimes possible, depending on the file type.

The proposal must keep to the **page limits** (see *section 5*); excess pages will be disregarded.

Documents must be uploaded to the **right category** in the Submission System, otherwise the proposal may be considered incomplete and thus inadmissible.

The proposal must be submitted **before the call deadline** (see *section 4*). After this deadline, the system is closed and proposals can no longer be submitted.

Once the proposal is submitted, you will receive a **confirmation e-mail** (with date and time of your application). If you do not receive this confirmation e-mail, it means your proposal has NOT been submitted. If you believe this is due to a fault in the Submission System, you should immediately file a complaint via the [IT Helpdesk webform](#), explaining the circumstances and attaching a copy of the proposal (and, if possible, screenshots to show what happened).

Details on processes and procedures are described in the [Online Manual](#). The Online Manual also contains the links to FAQs and detailed instructions regarding the Portal Electronic Exchange System.

12. Help

As far as possible, ***please try to find the answers you need yourself***, in this and the other documentation (we have limited resources for handling direct enquiries):

- [Online Manual](#)
- Topic Q&A on the Topic page (for call-specific questions in open calls; not applicable for actions by invitation)
- [Portal FAQ](#) (for general questions).

Please also consult the Topic page regularly, since we will use it to publish call updates. (For invitations, we will contact you directly in case of a call update).

Contact

For individual questions on the Portal Submission System, please contact the [IT Helpdesk](#).

Non-IT related questions should be sent to the following email address: [Here](#)

Please indicate clearly the reference of the call and topic to which your question relates (see cover page).

13. Important



IMPORTANT

- **Don't wait until the end** — Complete your application sufficiently in advance of the deadline to avoid any last minute **technical problems**. Problems due to last minute submissions (*e.g. congestion, etc*) will be entirely at your risk. Call deadlines can NOT be extended.
- **Consult** the Portal Topic page regularly. We will use it to publish updates and additional information on the call (call and topic updates).
- **Funding & Tenders Portal Electronic Exchange System** — By submitting the application, all participants **accept** to use the electronic exchange system in accordance with the [Portal Terms & Conditions](#).
- **Registration** — Before submitting the application, all beneficiaries, affiliated entities and associated partners must be registered in the [Participant Register](#). The participant identification code (PIC) (one per participant) is mandatory for the Application Form.
- **Consortium roles** — When setting up your consortium, you should think of organisations that help you reach objectives and solve problems.

The roles should be attributed according to the level of participation in the project. Main participants should participate as **beneficiaries** or **affiliated entities**; other entities can participate as associated partners, subcontractors, third parties giving in-kind contributions. **Associated partners** and third parties giving in-kind contributions should bear their own costs (they will not become formal recipients of EU funding). **Subcontracting** should normally constitute a limited part and must be performed by third parties (not by one of the beneficiaries/affiliated entities). Subcontracting going beyond 30% of the total eligible costs must be justified in the application.

- **Coordinator** — In multi-beneficiary grants, the beneficiaries participate as consortium (group of beneficiaries). They will have to choose a coordinator, who will take care of the project management and coordination and will represent the consortium towards the granting authority. In mono-beneficiary grants, the single beneficiary will automatically be coordinator.
- **Affiliated entities** — Applicants may participate with affiliated entities (i.e. entities linked to a beneficiary which participate in the action with similar rights and obligations as the beneficiaries, but do not sign the grant and therefore do not become beneficiaries themselves). They will get a part of the grant money and must therefore comply with all the call conditions and be validated (just like beneficiaries); but they do not count towards the minimum eligibility criteria for consortium composition (if any). If affiliated entities participate in your project, please do not forget to provide documents demonstrating their affiliation link to your organisation as part of your application.
- **Associated partners** — Applicants may participate with associated partners (i.e. partner organisations which participate in the action but without the right to get grant money). They participate without funding and therefore do not need to be validated.
- **Consortium agreement** — For practical and legal reasons it is recommended to set up internal arrangements that allow you to deal with exceptional or unforeseen circumstances (in all cases, even if not mandatory under the Grant Agreement). The consortium agreement also gives you the possibility to redistribute the grant money according to your own consortium-internal principles and parameters (for instance, one beneficiary can reattribute its grant money to another beneficiary). The consortium agreement thus allows you to customise the EU grant to the needs inside your consortium and can also help to protect you in case of disputes.

- **Balanced project budget** — Grant applications must ensure a balanced project budget and sufficient other resources to implement the project successfully (e.g. *own contributions, income generated by the action, financial contributions from third parties, etc*). You may be requested to lower your estimated costs, if they are ineligible (including excessive).
- **Completed/ongoing projects** — Proposals for projects that have already been completed will be rejected; proposals for projects that have already started will be assessed on a case-by-case basis (in this case, no costs can be reimbursed for activities that took place before the project starting date/proposal submission).
- **No-profit rule** — Grants may NOT give a profit (i.e. surplus of revenues + EU grant over costs). This will be checked by us at the end of the project.
- **No cumulation of funding/no double funding** — It is strictly prohibited to cumulate funding from the EU budget (except under 'EU Synergies actions'). Outside such Synergies actions, any given action may receive only ONE grant from the EU budget and cost items may under NO circumstances be declared under two EU grants; projects must be designed as different actions, clearly delineated and separated for each grant (without overlaps).
- **Combination with EU operating grants** — Combination with EU operating grants is possible, if the project remains outside the operating grant work programme and you make sure that cost items are clearly separated in your accounting and NOT declared twice (see [AGA — Annotated Grant Agreement, art 6.2.E](#)).
- **Multiple proposals** — Applicants may submit more than one proposal for *different* projects under the same call (and be awarded funding for them).
Organisations may participate in several proposals.
BUT: if there are several proposals for *very similar* projects, only one application will be accepted and evaluated; the applicants will be asked to withdraw the others (or they will be rejected).
- **Resubmission** — Proposals may be changed and re-submitted until the deadline for submission.
- **Rejection** — By submitting the application, all applicants accept the call conditions set out in this this Call document (and the documents it refers to). Proposals that do not comply with all the call conditions will be rejected. This applies also to applicants: All applicants need to fulfil the criteria; if any one of them doesn't, they must be replaced or the entire proposal will be rejected.
- **Cancellation** — There may be circumstances which may require the cancellation of the call. In this case, you will be informed via a call or topic update. Please note that cancellations are without entitlement to compensation.
- **Language** — You can submit your proposal in any official EU language (project abstract/summary should however always be in English). For reasons of efficiency, we strongly advise you to use English for the entire application. If you need the call documentation in another official EU language, please submit a request within 10 days after call publication (for the contact information, see *section 12*).

- **Transparency** — In accordance with Article 38 of the [EU Financial Regulation](#), information about EU grants awarded is published each year on the [Europa website](#).

This includes:

- beneficiary names
- beneficiary addresses
- the purpose for which the grant was awarded
- the maximum amount awarded.

The publication can exceptionally be waived (on reasoned and duly substantiated request), if there is a risk that the disclosure could jeopardise your rights and freedoms under the EU Charter of Fundamental Rights or harm your commercial interests.

- **Data protection** — The submission of a proposal under this call involves the collection, use and processing of personal data. This data will be processed in accordance with the applicable legal framework. It will be processed solely for the purpose of evaluating your proposal, subsequent management of your grant and, if needed, programme monitoring, evaluation and communication. Details are explained in the [Funding & Tenders Portal Privacy Statement](#).

Annex 1

Digital Europe types of action

The Digital Europe Programme uses the following actions to implement grants:

Simple Grants

Description: Simple Grants (SIMPLE) are a flexible type of action used by a large variety of topics and can cover most activities. The consortium will mostly use personnel costs to implement action tasks, activities with third parties (subcontracting, financial support, purchase) are possible but should be limited.

Funding rate: 50%

Payment model: Prefinancing – (x) interim payment(s) – final payment

SME Support Actions

Description: SME Support Actions (SME) are a type of action primarily consisting of activities directly aiming to support SMEs involved in building up and the deployment of the digital capacities. This type of action can also be used if SMEs need to be in the consortium and make investments to access the digital capacities.

Funding rate: 50% except for SMEs where a rate of 75% applies

Payment model: Prefinancing – (x) interim payment(s) – final payment

Coordination and Support Actions (CSAs)

Description: Coordination and Support Actions (CSAs) are a small type of action (a typical amount of 1-2 Mio) with the primary goal to support EU policies. Activities can include coordination between different actors for accompanying measures such as standardisation, dissemination, awareness-raising and communication, networking, coordination or support services, policy dialogues and mutual learning exercises and studies, including design studies for new infrastructure and may also include complementary activities of strategic planning, networking and coordination between programmes in different countries.

Funding rate: 100%

Payment model: Prefinancing – (x) interim payment(s) – final payment

Grants for Procurement

Description: Grants for Procurement (GP) are a special type of action where the main goal of the action (and thus the majority of the costs) consist of buying goods or services and/or subcontracting tasks. Contrary to the PAC Grants for Procurement (see *below*) there are no specific procurement rules (i.e. usual rules for purchase apply), nor is there a limit to 'contracting authorities/entities'. Personnel costs should be limited in this type of action; they are in general used to manage the grant, coordination between the beneficiaries, preparation of the procurements.

Funding rate: 50 %

Payment model: Prefinancing - second prefinancing (to provide the necessary cash-flow to finance the procurements) – payment of the balance

PAC Grants for Procurement

Description: PAC Grants for Procurement (PACGP) are a specific type of action for procurement in grant agreements by 'contracting authorities/entities' as defined in the EU Public Procurement Directives (Directives 2014/24/EU , 2014/25/EU and 2009/81/EC) aiming at innovative digital goods and services (i.e. novel technologies on the way to commercialisation but not yet broadly available).

Funding rate: 50%

Payment model: Prefinancing - second prefinancing (to provide the necessary cash-flow to finance the procurements) – payment of the balance

Grants for Financial Support

Description: Grants for Financial Support (GfS) have a particular focus on cascading grants. The majority of the grant will be distributed via financial support to third parties with special provisions in the grant agreement, maximum amounts to third parties, multiple pre-financing and reporting obligations.

Annex 5 of the model grant agreements foresees specific rules for this type of action regarding conflict of interest, the principles of transparency, non-discrimination and sound financial management as well as the selection procedure and criteria.

In order to assure the co-financing obligation in the programme, the support to third parties should only cover 50% of third party costs.

Funding rate: 100% for the consortium, co-financing of 50% by the supported third party

Payment model: Prefinancing - second prefinancing (to provide the necessary cash-flow to finance sub-grants) – payment of the balance

Lump Sum Grants

Description: Lump Sum Grants (LS) reimburse a general lump sum for the entire project and the consortium as a whole. The lump sum is fixed ex-ante (at the latest at grant signature). on the basis of a methodology defined by the granting authority (either on the basis of a detailed project budget or other pre-defined parameters). The lump sum will cover all the beneficiaries' direct and indirect costs for the project. The beneficiaries do not need to report actual costs, they just need to claim the lump sum once the work is done. If the action is not properly implemented only part of the lump sum will be paid.

Funding rate: 100%/50%/50% and 75% (for SMEs)

Payment model: Prefinancing – (x) interim payment(s)– final payment

Framework Partnerships (FPAs) and Specific Grants (SGAs)

FPAs

Description: FPAs establish a long-term cooperation mechanism between the granting authority and the beneficiaries of grants. The FPA specifies the common objectives (action plan) and the procedure for awarding specific grants. The specific grants are awarded via identified beneficiary actions (with or without competition).

Funding rate: no funding for FPA

SGAs

Description: The SGAs are linked to an FPA and implement the action plan (or part of it). They are awarded via an invitation to submit a proposal (identified beneficiary action). The consortium composition should in principle match (meaning that only entities that are part of the FPA can participate in an SGA), but otherwise the implementation is rather flexible. FPAs and SGAs can have different coordinators ; other partners of the FPA are free to participate in an SGA or not. There is no limit to the amount of SGAs signed under one FPA.

Funding rate: 50%

Payment model: Prefinancing – (x) interim payment(s) – final payment

Annex 2**Eligibility restrictions under Articles 12(5) and (6) and 18(4) of the Digital Europe Regulation****Security restrictions Article 12(5) and (6)**

If indicated in the Digital Europe Work Programme, and if justified for security reasons, topics can exclude the participation of legal entities *established* in a third country or DEP associated country, or established in the EU territory but *controlled* by a third country or third country legal entities (including DEP associated countries)²⁴.

This restriction is applicable for SO1 (High Performance Computing), SO2 (Artificial Intelligence) and SO3 (Cybersecurity), but at different levels.

- In the case of SO3, the provision is implemented in the strictest way. When activated, only entities established in the EU AND controlled from the EU will be able to participate; entities from associated countries (which are normally eligible) can NOT participate — unless otherwise provided in the Work Programme.
- In SO1 and SO2, entities established in associated countries and entities controlled from non-EU countries may participate, if they comply with the conditions set out in the Work Programme (usually:
 - for the associated countries: be formally associated to Digital Europe Programme and receive a positive assessment by the Commission on the replies to their associated country security questionnaire.
 - for the participants: submission of a guarantee demonstrating that they have taken measures to ensure that their participation does not contravene security or EU strategic autonomy interests).



EEA countries (and participants from EEA countries) are exempted from these restrictions (and additional requirements) because EEA countries benefit from a status equivalent to the Member States.

In order to determine the ownership and control status, participants²⁵ will be required to fill in and submit an [ownership control declaration](#)* as part of the proposal (and later on be requested to submit supporting documents) (see [Guidance on participation in EU restricted calls with ownership and control restrictions](#)*).

In addition, where a guarantee is required, the participants will also have to fill in the [guarantee template](#)*, approved by the competent authorities of their country of establishment, and submit it to the granting authority which will assess its validity.

The activation of these restrictions will also make a number of specific provisions in the Grant Agreement applicable, such as country restrictions for eligible costs, country restrictions for subcontracting, and special rules for implementation, exploitation of results and transfers and exclusive licensing of results.

Thus:

²⁴ See Article 12(5) and (6) of the Digital Europe Regulation [2021/694](#).

²⁵ Beneficiaries and affiliated entities, associated partners and subcontractors — except for entities that are validated as public bodies by the Central Validation Service.

- participation in any capacity (as beneficiary, affiliated entity, associated partner, subcontractor or recipient of financial support to third parties) is also limited to entities established in and controlled from eligible countries
- project activities (included subcontracted work) must take place in eligible countries
- the Grant Agreement provides for specific IPR restrictions.

Strategic autonomy restrictions Article 18(4)

If indicated in the Digital Europe Work Programme, calls can limit the participation to entities *established* in the EU, and/or entities established in third countries associated to the programme for EU strategic autonomy reasons²⁶.

The activation of these restrictions will make a number of specific provisions in the Grant Agreement applicable, such as country restrictions for eligible costs, country restrictions for subcontracting, and special rules for implementation, exploitation of results and transfers and exclusive licensing of results.

 For more information, see [Guidance on participation in EU restricted calls with ownership and control restrictions](#)^{*}.

²⁶ See Article 18(4) of the Digital Europe Regulation [2021/694](#).