



# **Digital Europe Programme (DIGITAL)**

## Call for proposals

AI Continent  
(DIGITAL-2026-AI-DATA-10)

Version 1.0  
1 April 2026



HISTORY OF CHANGES			
Version	Publication Date	Change	Page
1.0	01.04.2026	Initial version.	



**EUROPEAN COMMISSION**  
Directorate-General for Communications Networks, Content and Technology  
DATA  
Data Policy and Innovation

## CALL FOR PROPOSALS

### TABLE OF CONTENTS

TABLE OF CONTENTS .....	3
0. Introduction .....	4
1. Background .....	5
2. Topics Description .....	5
DIGITAL-2026-AI-DATA-10-COMPLIANCE - Digital solutions for regulatory compliance through data .....	5
3. Available budget .....	8
4. Timetable and deadlines .....	8
5. Admissibility and documents .....	8
6. Eligibility .....	10
7. Financial and operational capacity and exclusion .....	13
8. Evaluation and award procedure .....	15
9. Award criteria .....	16
10. Legal and financial set-up of the Grant Agreements .....	17
11. How to submit an application .....	21
12. Help .....	22
13. Important .....	23
Annex 1 .....	26
Annex 2 .....	29

## O. Introduction

This is call for proposals for EU action grants in the field of AI under the Digital Europe Programme (DIGITAL).

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

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

The call is launched in accordance with the 2025-2027 Work Programme<sup>3</sup> and will be managed by European Commission, Directorate-General for Communication, Networks, Content and Technology (DG CONNECT).

The call covers the topic

- **DIGITAL-2026-AI-DATA-10-COMPLIANCE - Digital solutions for regulatory compliance through data**

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'**)

---

<sup>1</sup> 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).

<sup>2</sup> 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).

<sup>3</sup> Commission Implementing Decision C(2026) 1781 final of 19/03/2026 amending Implementing Decision C(2025)1839 on the financing of the Digital Europe Programme and the adoption of the multiannual work programme 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*).

You are also encouraged to visit the [EU Funding & Tender Portal](#) to consult the list of projects funded previously.

## 1. Background

**Specific Objective 2 of the Digital Europe Programme aims to reinforce the EU’s core Artificial Intelligence (AI) capacities as a crucial driver for the digital transformation of the public and private sectors.**

The vision is to make Europe an AI continent, thriving on the development, integration and adoption of AI. As one of the financial instruments of the upcoming Apply AI Strategy, SO2 will support the development of world class AI models in the EU and foster **the integration of AI technologies into EU’s most strategic sectors, including healthcare, energy and research.** It will stimulate new industrial uses of AI and improve the delivery of various public services.

In addition, it will support the deployment of new digital solutions for regulatory compliance through data. The objective is to reduce the administrative burden of enterprises by applying advanced digital technologies to automatise the reporting process.

## 2. Topics Description

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

**DIGITAL-2026-AI -DATA-10-COMPLIANCE - Digital solutions for regulatory compliance through data**

### Objectives

This objective will support projects testing digital solutions for transmitting information relevant for compliance with EU legislation (e.g. regulations on environmental issues) and automate the compliance process for a number of pilot use cases. These projects will target regulatory reporting requirements, from aggregate data (e.g., company balance sheets) to detailed data (e.g., transactions, events, and product registrations). The aim is to leverage advanced technologies, including data capturing technologies, automatic transmission, analysis, cloud storage, and encryption, to ensure data security, confidentiality, and regulatory compliance. The strong focus should be given to privacy-preserving technologies to ensure trust between the reporting entity and regulatory authorities, safeguarding data confidentiality while enabling secure and efficient compliance processes.

Additionally, the projects will identify burdensome administrative challenges in the selected sectors that could be addressed by automated data-driven solutions, while close collaboration with reporting entities will be essential to enable direct communication with regulatory agencies for automated updates and ensure compliance

with evolving regulations. The approach will prioritize access controls and audit trails to enhance transparency and reduce the risk of non-compliance and penalties. Furthermore, the projects could incorporate the European Digital Identity Wallet, when available, to securely identify individuals and legal entities in data spaces, alongside trust services like electronic seals and ledgers.

### Scope

*The activities funded under this initiative will focus on the following aspects:*

Technical aspects:

- Utilize advanced technologies such as privacy-preserving technologies, data capturing technologies, automatic transmission and analysis, cloud storage and encryption for data security and compliance with regulations.
- Implement comprehensive APIs to enable real-time compliance and self-compliance checks.
- Employ machine learning algorithms for automated monitoring and reporting.
- Where possible, use precisely defined concepts available in the data catalogue entries of Common European Data Spaces enabling deterministic data collection.
- Establish direct communication channels with regulatory authorities for automated updates and reporting, keeping the system updated with changing regulations (e.g. by expressing the reporting requirements in machine readable and executable way).
- Ensure robust access control and maintain audit trails for transparency and accountability.
- Minimize the risk of non-compliance and potential penalties through these technological and procedural safeguards.
- Integrate the European Digital Identity Wallet for secure identification of individuals and legal entities, when available.
- Collaborate with providers of data space services and technology, with a particular emphasis on open-source solutions, such as the European Commission's Simpl programme.
- All systems must incorporate robust data privacy and security measures.
- Proposers must ensure that the systems developed are open source, interoperable with existing government data systems and adhere to European data standards and specifications.
- The system must be scalable to handle large volumes of data and high transaction rates.
- The system must be designed with end-users in mind, ensuring ease of use and accessibility.
- A comprehensive data governance framework must be established. This should include policies for data quality management, data stewardship, and data lifecycle management.
- Proposals should target legislations that have clear, quantifiable compliance metrics that can be automatically assessed using data analytics and they should

ensure no overlaps with ongoing initiatives (e.g. Digital Product Passport, Customs reform).

- This call aims to explore sectors with significant administrative burden such as agriculture, environment, manufacturing, healthcare and energy.

### Outcomes and deliverables

The objective is to deliver three to four projects that demonstrate the streamlining of regulatory reporting through automated and trusted sharing of compliance data. Each project will address the governance, technical, legal, and processing aspects of the solution.

The deliverables for each project include:

- A (legal) identification of administrative burden in the selected sectors
- A use case implemented under realistic operational conditions.
- A live demonstration of the use case presented by the participants.
- A final report outlining the results, methodologies, and key findings.

The outcomes, including the developed solutions, must be disseminated to relevant stakeholders, such as public administrations and private entities (particularly SMEs), to showcase the benefits of streamlining compliance processes and reducing administrative burdens.

### KPIs to measure outcomes and deliverables

- Number of use cases completed under realistic operational conditions.
- Successful live presentations (demos) of use cases delivered to stakeholders.
- The participation of regulating authorities or public administrations in the use cases would be an asset.
- Number of relevant stakeholders reached (e.g. public administrations, SMEs).
- Number of dissemination events, workshops, or reports shared.

### Targeted stakeholders

National and EU authorities (as data users)/ regulatory agencies public and private entities, businesses, farmers, etc/providers of compliance data (data holders), data sharing organisations, universities.

### Type of action and funding rate

Lump Sum Grants —50% funding rate



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, restrictions for the protection of European digital infrastructures, communication and information systems, and related supply chains apply (*see*

*sections 6 and 10, and Appendix 4 of the Digital Europe Work Programme 2025-2027)*

- For this topic, following reimbursement option for equipment costs applies: depreciation 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 8 500 000.

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

Topic	Topic budget
1 – DIGITAL-2026-AI-DATA-10-COMPLIANCE - Digital solutions for regulatory compliance through data	EUR 8 500 000

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:	21 April 2026
<u>Deadline for submission:</u>	<u>1 October 2026– 17:00:00 CEST (Brussels)</u>
Evaluation:	October-November 2026
Information on evaluation results:	January-February 2027
GA signature:	May-June 2027

### 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 (
  - detailed budget table/calculator: applicable
  - CVs of core project team: not applicable
  - activity reports of last year: not applicable
  - list of previous projects: not applicable)

Please be aware that since the detailed budget table serves as the basis for fixing the lump sums for the grants (and since lump sums must be reliable proxies for the actual costs of a project), the costs you include MUST comply with the basic eligibility conditions for EU actual cost grants (see [AGA – Annotated Grant Agreement, art 6](#)). This is particularly important for purchases and subcontracting, which must comply with best value for money (or if appropriate the lowest price) and be free of any conflict of interests. If the budget table contains ineligible costs, the grant may be reduced (even later on during the project implementation or after their end).

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*).

Please note that the call is also subject to restrictions for the protection of European digital infrastructures, communication and information systems, and related supply chains.

*Entities that are assessed as high-risk suppliers of mobile network communication equipment (and any entities they own or control) are not eligible to participate in any capacity, including as beneficiaries, affiliated entities, associated partners, third parties giving in-kind contributions, subcontractors or recipients of financial support to third parties (if any). Please see Appendix 4 of the Digital Europe Work Programme 2025-2027<sup>4</sup> for details and the assessment criteria.*

### *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 persons<sup>5</sup>.

---

<sup>4</sup> Commission Implementing Decision C(2026) 1781 final of 19/03/2026 amending Implementing Decision C(2025)1839 on the financing of the Digital Europe Programme and the adoption of the multiannual work programme 2025-2027

<sup>5</sup> See Article 200(2)(c) EU Financial Regulation [2024/2509](#).

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'**<sup>6</sup>. ⚠ 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)<sup>7</sup>. 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 2020/2092<sup>8</sup>. 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](#).

The identity of the applicant (and compliance with general eligibility conditions) will be verified through the documents provided in the [Participant Register](#) during legal entity validation (copy of the resolution, decision or other official document establishing the entity, etc).

### Consortium composition

For topic DIGITAL-2026-AI-DATA-10-COMPLIANCE - Digital solutions for regulatory compliance through data, proposals must be submitted by:

- minimum 3 independent applicants (beneficiaries; not affiliated entities) from 3 different eligible countries

### 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.

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).

---

<sup>6</sup> For the definitions, see Articles 190(2) and 200(2)(c) EU Financial Regulation [2024/2509](#).

<sup>7</sup> 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](#).

<sup>8</sup> 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 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](#)<sup>9</sup> 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 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

<sup>9</sup> 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).

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 participate<sup>10</sup>:

- 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 misconduct<sup>11</sup> (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, 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

<sup>10</sup> See Articles 138 and 143 of EU Financial Regulation [2024/2509](#).

<sup>11</sup> '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.

- 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 resisted<sup>12</sup> 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 that<sup>13</sup>:

- 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 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


<sup>12</sup> '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.

<sup>13</sup> See Article 143 EU Financial Regulation [2024/2509](#).

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.

All proposals will be informed about the evaluation result (evaluation result letter). Successful proposals will be invited for grant preparation; the other ones will be put on the reserve list or rejected.

 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:

- for topic DIGITAL-2026-AI-DATA-10-COMPLIANCE - Digital solutions for regulatory compliance through data – 24 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 dissemination and exploitation, to be submitted in the first six months of the project

### 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):

- for topic DIGITAL-2026-AI-DATA-10-COMPLIANCE - Digital solutions for regulatory compliance through data: between EUR 2 000 000 and EUR 5 000 000 per project

The grant awarded may be lower than the amount requested.

The grant will be a lump sum grant. This means that it will reimburse a fixed amount, based on a lump sum or financing not linked to costs. The amount will be fixed by the granting authority on the basis of the estimated project budget and a funding rate of 50%.

### 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:*

- Lump sum contributions <sup>14</sup>

*Specific cost eligibility rules for this call:*

- the lump sum amount must be calculated in accordance with the methodology set out in the lump sum authorising decision and using the detailed budget table/calculator provided (if any)
- the lump sum calculation should respect the following conditions:
  - for lump sums based on estimated project budgets: the estimated budget must comply with the basic eligibility conditions for EU actual cost grants (see [AGA – Annotated Grant Agreement, art 6](#))
  - for lump sums based on estimated project budgets: costs for financial support to third parties: not allowed
- **restrictions for the protection of European digital infrastructures, communication and information systems, and related supply chains:**
  - -equipment and other goods, works and/or services related to 5G/6G mobile network communication equipment, and other technologies linked to the

---

<sup>14</sup> [Decision](#) of 31 March 2023 authorising the use of lump sum contributions under the Digital Europe Programme 2021-2027.

**evolution of European communication networks must fulfil the conditions set out in the work programme to be eligible.**

### 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 80% of the maximum grant amount; exceptionally less or no 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.

### 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: No

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: [Write to us | European Union](#)

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)<sup>15</sup>.

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. Currently the following associated countries have a positive assessment: Switzerland,
  - 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, participants<sup>16</sup> 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:

<sup>15</sup> See Article 12(5) and (6) of the Digital Europe Regulation [2021/694](#).

<sup>16</sup> 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 reasons<sup>17</sup>.

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](#)<sup>\*</sup>.

---

<sup>17</sup> See Article 18(4) of the Digital Europe Regulation [2021/694](#).