

CALL FOR PROPOSALS

Investigations into Disinformation Dynamics

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The European University Institute and the Calouste Gulbenkian Foundation have established the European Media and Information Fund (hereafter EMIF) with a view

to addressing the phenomenon of online disinformation in Europe and promoting a more resilient and fact-based digital information ecosystem.

The present Call for Proposals establishes specific provisions regulating the process of applying for funding for the production of a range of multidisciplinary focus reports, covering both country-specific and thematic analyses that can provide new insights into concrete cases of disinformation, the specific mechanisms that enable its dissemination online, its effects on public opinion, and the impact of past and ongoing initiatives to counter disinformation.

Recent developments in the field of artificial intelligence (AI) have introduced new means to mass-produce misleading content. At the same time, a vibrant community of researchers, fact-checkers, media literacy experts and others has emerged as well, alongside a wide variety of innovative projects, initiatives and efforts to counter disinformation in Europe, which are themselves worthy of assessment. This developments take place in a context marked by the launch of new EU regulatory initiatives on AI-technology, and the introduction of new rules for very large platforms (VLOPs) under the Digital Services Act (DSA), the European Media Freedom Act (EMFA) and the Strengthened Code of Practice on Disinformation (CoP).

This Call aims at complementing the activities of the European Digital Media Observatory (hereafter EDMO), in cooperation with EDMO's National Hubs.

Applications shall be submitted online on emifund.eu and shall follow the evaluation and selection procedures detailed in this notice.

EMIF's Management Committee reserves the right to make any modifications and amendments to the terms and conditions set forth in this notice. These shall be made public on EMIF's website (emifund.eu) and will not affect grant applications submitted prior to such announcement.

1. Objectives

The key aim of this Call is to address the existing knowledge gaps on the scale and scope of disinformation in Europe and foster a better understanding of the phenomenon and its impact on European audiences. To this end, it supports a variety of multidisciplinary investigations in the form of case reports or situational analyses, designed, *inter alia*, to monitor the mechanisms that enable the monetisation of disinformation, or expose the techniques, tactics and protocols (TTPs) used to create, disseminate and amplify disinformation narratives, or measure their impact on relevant European audiences. In light of advances made in the study of disinformation, the development of new counter-measures and media literacy initiatives, and the introduction of new regulations, impact assessment and best practices analyses are much needed to take stock of the current situation in Europe. These will also be instrumental to inform the development of future initiatives in the field, and to ensure the long-term sustainability of the counter-disinformation community in Europe.

These investigations should combine best journalistic practices, outcomes from fact-checking activities, and analytical frameworks from leading research complementing the activities of the European Digital Media Observatory (hereafter EDMO), in cooperation with EDMO's National Hubs.

They should also aim at identifying best practices and appropriate methodologies, as well as original solutions for addressing disinformation threats..

This Call is specifically aimed at projects that can enlarge the current evidence base about the dynamics and characteristics of disinformation campaigns affecting European audiences, including foreign information manipulation and interference (FIMI), and designed to undermine European policies and values under the current geopolitical circumstances. These are considered particularly pertinent in light of the 2024 European Parliamentary elections, and by increasing efforts from state and non-

state actors from outside the EU to disrupt democratic processes and public discourse in EU Member States in general.

Examples of relevant projects under this Call include:

- *Anatomy of disinformation.* These reports could investigate the tactics, techniques and protocols (TTPs) commonly used by purveyors of disinformation to manipulate information and artificially amplify its reach. Given the fast-evolving nature of such TTPs, the proposed projects should leverage available knowledge with a view to identifying the web resources and technologies used in specific disinformation campaigns, as well as the interactions between online and offline behaviour. Particular interest goes out to projects that adopt a cross-platform, cross-lingual, and/or cross-country approach, and projects that study emerging technological risks (e.g. AI-generated (audio)visual and textual content). As such, projects should utilise expertise from the fields of fact-checking, journalism, network science, data and computer science. The ultimate objective should be exposing emerging disinformation narratives with the potential to influence the public discourse, as well as the agents, instigators, intermediaries and intended targets involved.
- *Investigations into comparative contentious issues.* Discussions spanning from the Covid-19 pandemic to climate or geopolitics often assume that the actors who are leveraging these topics for financial or political gain, and the citizens who are influenced by such disinformation campaigns, are largely similar for all of these topics. However, this has not yet been put to the test in a convincing manner. Dedicated investigations into this area could enhance the public understanding of the actors and targets of different disinformation campaigns.

- *Investigations into disinformation networks.* Dedicated projects could investigate links between originators, vectors, intermediaries and proxies to establish evidence of inauthentic coordinated behaviour through disinformation networks operating within a single online platform, or across different platforms, or across a mix of online and offline information sources. They should properly define the context in which the analysed cases of disinformation have occurred and, in order to strengthen the available evidence on the phenomenon, they should angle their investigations towards specific topics of public interest, or to specific manipulative behaviour cutting across different narratives, different languages, different media platforms, or different countries, and the use of new technologies within these networks
- *Investigations into foreign information manipulation and interference (FIMI).* Projects in this category could identify and analyse specific cases of state-sponsored disinformation campaigns, foreign interference in European political processes, and the manipulation of European audiences. These projects can reveal both recognised and unknown state actors targeting the European Union, its member states and direct neighbourhood, the strategies these actors employ, potential differences and similarities between these strategies, as well as their intended targets and potential objectives.
- *Investigations of climate-related disinformation*

Efforts to take effective action against climate change are hampered by disinformation spread by a variety of actors, through various means, and with diverse motives. Projects on this topic should identify major disinformation campaigns and narratives in Europe on the topic of climate change, the strategies and platforms used in these campaigns, and the actors that are involved. Particularly interest goes out to how prominent narratives and actors fit within the larger disinformation ecosystem, what the similarities and differences are with other anti-scientific narratives, and how these campaigns affect European publics and the implementation of environmental policies.

- *Investigations into the impact of disinformation.* Taking specific disinformation campaigns as a basis, the proposed projects could develop new insights regarding their impact on European citizens. Particular attention could be paid to the manner in which disinformation may affect specific audiences differently, depending on, among other things, their social background, status or gender. Audience measurement techniques could be deployed in order to quantify the exposure to disinformation and/or identify vulnerable groups within relevant audiences. Projects may focus on Europe as a whole, or on one or more European countries.

The projects funded under this Call are expected to:

- Strengthen and widen the evidence base regarding the disinformation phenomenon in Europe;
- Raise awareness on how disinformation is created and spread in Europe and/or at the level of individual European countries;
- Monitor the structure and functioning of the economy of disinformation within Europe;
- Enhance knowledge about relevant narratives and topics, specific features of online media manipulations and different forms of disinformation, including foreign information manipulation and interference;
- Pave the way for follow-on scientific research or innovative media literacy initiatives, including those that will be supported by EMIF;
- Foster collaborations between researchers, news media outlets, fact-checking organisations, civil society, online platforms and experts in digital advertising;
- Help assess the impact of past and ongoing initiatives and measures implemented to counter disinformation in Europe;

- Inform future initiatives, regulations and tools to counter disinformation in Europe;
- Help reduce the impact of disinformation campaigns.

2. Conditions of Admissibility

2.1. Deadline for Applications

To be admissible, applications must be sent no later than 29 April 2024 at 12:59 CET.

2.2. Size and Duration of Projects

Maximum grant per project: € 150 000.

Maximum duration per project: 9 months.

2.3. Eligible Applicants

To be eligible, any proposal must be submitted by a group of at least two legal entities (partnerships or consortia). The maximum number of partners in a partnership or a consortium applying for the grant has not been defined by EMIF and is to be decided by the Applicant. The partners must be abiding by recognised ethical and professional standards such as the European Code of Conduct for Research Integrity or the specific standards applicable to their field of activities (e.g., Code of Principles of the International Fact-Checking Network, deontological Codes for the Journalistic Profession applicable in their country of establishment).

Should an applicant not be a signatory to any code, it should explain how it ensures *de facto* adherence to the ethical and professional standards applicable to the type of activities carried out by its organisation.

The following types of organisations may apply and be funded as Lead Applicants or members of the consortium:

- (i) Non-profit organisations, including public service media
- (ii) Universities
- (iii) Educational institutions
- (iv) Research centres
- (v) Non-governmental organisations
- (vi) Media literacy organisations
- (vii) For-profit organisations of any status and size operating as fact-checkers, news media organisations, technology providers or research companies, on condition that the consortium integrates one or more entities mentioned above under points (i) to (vi).

Only applications submitted by legal entities established in the EU, EFTA or the UK are eligible. Organisations based in other countries may be part of a consortium, but their activities are not funded.

Specific tasks may be subcontracted out to entities or natural persons irrespective of their place of establishment.

Natural persons may be part of a consortium, but a natural person cannot lead the project. Activities and expenses pertaining to natural persons shall be allocated to the Lead Applicant.

State-controlled organisations – other than universities, research centres, educational institutions, and public media organisations with editorial independence – are not eligible to receive funding and cannot lead a consortium, but they may take part in the action/project at their own costs.

Consortia cannot be solely composed of entities affiliated with the Lead Applicant.

2.4. Partnership

All members of the consortium are jointly responsible for their proposal. Each organisation is responsible for submitting correct information in the proposal.

In order to assess the applicants' eligibility, the following supporting documents are requested:

- private entity: extract from the official journal, copy of articles of association, extract of trade or association register, certificate of liability to VAT (if, as in certain countries, the trade register number and VAT number are identical, only one of these documents is required);
- public entity (universities, research centres, educational institutions, and public media organisations with editorial independence): copy of the resolution, decision or other official document establishing the public law entity;
- natural persons: photocopy of identity card and/or passport; certificate of liability to VAT, if applicable (e.g., some self-employed persons).

The Lead Applicant submits the proposal on behalf (and in the name of) all members of the consortium. Mandates providing the Lead Applicant with the powers to do so are to be issued by all partners.

The Lead Applicant is responsible for managing the project, submitting reports and deliverables, and acting as an intermediary for all contacts with EMIF.

The other beneficiaries must implement their part of the project and contribute to the formal and administrative grant obligations (e.g., reporting, etc.).

After the Grant Agreement signature, the partners become jointly responsible for implementing the project activities. In accordance with the Grant Agreement, the liability regime is limited joint and several liability with individual ceilings, whereby the beneficiary is liable up to the maximum grant amount allocated for its tasks within the project.

2.5. Eligible Activities

Activities may be developed at local, regional, national, or international levels across the territory of the EU, EFTA and the UK. Cross-border activities within the EU, EFTA and the UK territories are eligible.

Proposals shall comply with the objectives of this Call as set out in Section 1.

The following types of activities are eligible:

- Investigations into one of the topics set out in Section 1 above, including acquisition and analysis of existing research, fact-checking materials and datasets;
- Production, distribution and adaptation in different languages of reports and analyses resulting from relevant investigations;
- Awareness-raising actions, including conferences, seminars, and events, and dissemination of the material created by the project;
- Usage of innovative tools to improve the understanding of systemic risks of the digital media ecosystem;
- Promotion of social media campaigns and other relevant activities aimed at countering disinformation by using the outcomes of the proposed investigations;

- Actions aiming at the creation and improvement of networks, exchanges of good practices, and uptake of innovative methodologies and relevant technologies.

Eligible activities shall be those that will be developed in addition to the applicant's current activities, and that will contribute to reducing the existing knowledge gaps on the scale and scope of disinformation in Europe and gain a better understanding about the impact of the policies implemented to counter it.

Proposals should include concrete deliverables, subdivided into work packages, and set clear, objectively verifiable and quantifiable performance indicators for the interim, final, and follow-up reports. The estimated reach should be substantiated by an outreach plan identifying appropriate means of communication and dissemination, including links to EDMO's website.

Activities deriving from cooperation with news media, online platforms, educational institutions, research and/or civil society organisations not directly involved in the projects are viewed positively as they may be effective means to gain relevant insights or to extend the outreach of the funded activities.

All actions will respect the academic autonomy of universities and research organisations, as well as the editorial independence of media organisations involved in the consortium, while allowing the grantees to select those research strands and interventions they find most appropriate, taking into account the specificities of the information environment in the targeted geographic area.

2.6. Financial Capacity

Each member of the consortium must have stable and sufficient resources to maintain their activity throughout the duration of the funded project.

The verification of the financial capacity shall not apply to public bodies such as universities, research centres and educational institutions.

The assessment of the financial capacity of each member of the consortium will be based on a declaration on their honour to be submitted with the application.

Additionally, each member of the consortium shall submit:

- the profit and loss account for the last two financial years for which the accounts were closed; and
- the balance sheet for the last two financial years for which the accounts were closed.
- For newly created entities, the business plan may replace the above documents.

If the financial capacity of the consortium as a whole or of the Lead Applicant is not sufficiently justified, the EMIF Unit may request further information.

2.7. Operational Capacity

Each member of the consortium must have the know-how, qualifications, and resources to successfully implement its tasks under the proposed action/project. In particular, applicants must demonstrate sufficient experience in projects of comparable size and nature, or proven knowledge in the field covered by this Call.

This capacity will be assessed on the basis of the competence and experience of each member of the consortium 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.

Each member of the consortium will have to submit an original “blue ink” signed declaration on their honour, and the following supporting documents in English:

- curriculum vitae or description of the profile of the people primarily responsible for managing and implementing the operation;
- the applicants’ activity reports, if available, or an exhaustive list of previous projects and activities performed and connected to the field of this Call or to the actions to be carried out; and
- a description of the technical equipment, tools, or facilities, as well as the human resources at the disposal of the applicant and involved in the project.

2.8. Exclusion Criteria

Applicants which are in one of the following exclusion situations cannot participate:

- bankruptcy, insolvency or winding-up procedures, affairs or assets administered by a court or a liquidator, arrangement with creditors, suspended business activities or other similar procedures;
- in breach of social security or tax obligations, established by a final judgement or a final administrative decision;
- guilty of grave professional misconduct (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), established by a final judgement or a final administrative decision;
- 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), established by a final judgment or a final administrative decision;

- shown significant deficiencies in complying with main obligations in the performance of a procurement contract, a grant agreement, or a grant decision, which has led to its early termination or to the application of liquidated damages or other contractual penalties (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 Regulation (EC) No 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);
- creation of an entity under a different jurisdiction with the intent to circumvent fiscal, social or other legal obligations in the country of origin (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), established by a final judgement or a final administrative decision;
- resident or ordinarily resident of an EU or US embargoed country;
- as a natural person, an employee of the government or an employee of a government-controlled entity.

Each member of the consortium, including the Lead Applicant, must provide an original “blue ink” signed declaration on their honour certifying that they are not in one of the situations referred to above.

EMIF shall not award a grant to an applicant who:

- is in one of the exclusion situations mentioned above; or
- has misrepresented information required as a condition for participating in the Call, or has failed to supply that information; or

- was previously involved in the preparation of this Call, thereby causing a distortion of competition that cannot be remedied otherwise (conflict of interest).

3. Submission of Applications

Applications shall be submitted using the **online application form** available on EMIF's website: emifund.eu.

Applications shall be submitted **in English** and specify the requested grant amount. Supporting documents shall be submitted in their original language, as well as in an English translation.

Applications submitted on paper are not accepted.

All templates of required documents can be found at MyGulbenkian account and at emifund.eu.

The project activities must be organised in work packages, including at least the following three:

WP 1 – Project management

WP 2 – Implementation plan for the proposed activities

WP 3 – Follow-up and dissemination

Once a proposal is submitted, the Lead Applicant will receive a confirmation e-mail. Absent this confirmation e-mail, the proposal should be considered as not submitted. If the Lead Applicant concerned believes this is due to a fault in the submission system, EMIF should be alerted within 5 days by email to be sent to info@emifund.eu with a reference to the Call's title: Investigations into the Dynamics of Disinformation,

explaining the circumstances. EMIF's Management Committee will decide on such cases.

Lead Applicants and members of a consortium cannot submit proposals simultaneously to the Calls (i) Research for a Transparent and Resilient Information Ecosystem and (ii) Enhancing Societal Resilience through Media and Information Literacy, as published on EMIF's website.

4. Evaluation and Award Procedure

4.1. Eligibility Checks

Based on the documentation provided by the applicant, the EMIF Unit at the Calouste Gulbenkian Foundation will identify all eligible projects that may be funded, by performing the following checks:

- Regularity of the application (including goals, size, and duration of project proposal)
- Eligibility of applicants
- Eligibility of the proposed activities
- Financial capacity
- Operational capacity (preliminary validation)
- Exclusion criteria
- All mandatory annexes/supporting documents in their original language, as well as in an English translation.

The applications that fail to satisfy any of the above eligibility checks will not go through the admissibility phase. Based on these checks, the list of projects admitted to the evaluation phase will be established.

Applicants whose applications are rejected at this stage shall be informed and have 5 working days to appeal, counted from the day after the notification. Appeals may be sent via email to: info@emifund.eu. Received appeals shall be analysed by the EMIF Unit and forwarded with an opinion to EMIF's Management Committee, which will make the final decision.

Applicants will be kept informed at each step of the process and a specific timeframe will be communicated to them regarding the selection and decision-making process, upon receipt of their application. All applicants will be informed about the decision by email.

All projects included in the list of admitted projects will move forward to the evaluation phase.

4.2. Evaluation Procedure

All admitted applications are evaluated by independent experts from several countries, appointed by EDMO. This shall guarantee equal opportunities for all potential beneficiaries.

Each application shall be evaluated by two experts. These experts will have the sole responsibility for ensuring the evaluation of the application's merit by scoring the pre-set selection criteria.

4.3. Selection Criteria

The evaluation will be made based on the following selection criteria:

Selection Criterion	Weight
<p>Relevance: to assess the contribution of the project’s expected results to the objectives of the Call listed in Section 1:</p> <ul style="list-style-type: none"> • Alignment of the proposed investigation activities with the objectives set out in Section 1; • Additionality of the proposed investigations compared to the available evidence base about the dynamics and evolving threats of disinformation in Europe, specificity of the proposed investigation angle, including (but not limited to) the focus on relevant narratives or relevant techniques, tactics and protocols used for disinformation purposes, the methodology proposed for the identification of (state-sponsored) disinformation networks or monetisation channels, the proposed approach for audience measurement and analysis; • Integration of expertise from different relevant professions, with a view to gaining original insights on the phenomenon. 	4
<p>Quality of content and activities: to assess the adequacy of the proposed methodologies to reach the objectives of the Call:</p> <ul style="list-style-type: none"> • Depth and width of the proposed investigation and comprehensiveness of the planned reports; • Potential follow-on research or media literacy activities that could be built upon the outcomes of the project; • Effective implementation of sound multi-disciplinary approaches and robust methodologies for data-gathering, fact-finding and analytical purposes; • Quality of the choice of case studies subject to investigation, adoption of a “disinformation-life-cycle” perspective and clear links 	2

<p>between the chosen topic and the social and political context in the targeted geography;</p> <ul style="list-style-type: none"> • Cost-efficiency of the proposed activities in the chosen domain. 	
<p>Project management: to assess the feasibility of the proposed project:</p> <ul style="list-style-type: none"> • Experience and diversity, including gender balance, of the proposed project team, as well as the efficiency of the team composition to reach the objectives of this Call; • Sufficiency and efficiency of the operational resources allocated to the project; • Clarity of the chosen methodology and clear allocation of responsibilities and corresponding budgets among the partners; • Quality of the proposed coordination mechanisms, quality control systems and arrangements to manage risks. • Guarantees and mechanisms for proper handling and safekeeping of sensitive and/or personal data used in the project. 	2
<p>Dissemination: to assess the expected impact of the proposed project:</p> <ul style="list-style-type: none"> • Quality of planned outreach activities, notably towards media and other stakeholders enabling a strong multiplier effect; • Quality of the strategies to exchange knowledge, ensure transferability of project's outcomes across relevant stakeholders, and monitor progress; • Potential impact at local, regional, national and/or European levels, beyond those directly involved in the project and beyond the project's lifetime, and delivery of indicators and metrics thereof • The project's sustainability and/or replicability, its potential for longevity beyond the funding periods. 	2
TOTAL	10

Each criterion shall be scored on a scale between 0 and 10 points, and an application must get at least 6 points in each criterion to be supported. The total score, on a scale between 0 and 100, is obtained by multiplying the criteria scores by the weights indicated above.

The classification of each application will be the simple average of the two scores assigned by the two independent experts. The best-scored projects will be discussed in a Selection Committee, composed of all the independent experts involved in the evaluation of the applications.

The Selection Committee will establish a ranked list of selected projects by consensus. In case a consensus cannot be reached, a majority rule is applied.

4.4. Decision on Grants

The proposed ranked lists of selected applications shall be submitted with the respective scores and justifications to EMIF's Management Committee to be approved. The application approval shall take into consideration an appropriate balance between countries, entities, and research areas.

All applications that, following the evaluation, have scored above the minimum threshold (60 points) will be considered for funding, based on their ranking and within the limits of the budget available for this Call (see Section 6 below).

EMIF's Management Committee may:

- decide to reduce the amount of the grant requested;
- decide not to give or reduce the pre-financing to the applicant;
- decide to give pre-financing covered by a bank guarantee (see Section 5.2 below);

- impose unconditionally and irrevocably the joint and several financial liability of all the co-beneficiaries or decide to reject the participation of the applicant in the proposal and request reallocation of the tasks to another applicant of the consortium or his replacement, without compromising the quality of the proposal.

Applicants will be duly notified by email about the outcome of the evaluation. The awarded projects will be announced on EMIF's website.

The awarded applications will have 3 months to start the project, counting from the approval notification date.

EMIF reserves the right to refuse funding for any application that contains or relates to offensive, obscene, pornographic, defamatory, or threatening content. This shall not be interpreted, in any way, to limit the grantees' exercise of free speech or scientific freedom.

4.5. Grant Agreement

After approval notification by EMIF's Management Committee, applicants which successfully pass the evaluation phase will be invited for grant preparation by the EMIF Unit with a view to enter into a Grant Agreement, detailing the purpose of the grant, the award conditions and level of funding, including deliverables, reporting requirements and payments. Invitation to grant preparation does not constitute a formal commitment to funding.

The grant preparation phase will involve a dialogue to fine-tune technical or financial aspects of the project and may require extra information. It may also include adjustments to the proposal to address the recommendations of the Selection Committee or other concerns.

The Grant Agreement shall be signed between the Calouste Gulbenkian Foundation and the Lead Applicant on behalf of the consortium. The Lead Applicant will be responsible for:

- ensuring that the funding provided is distributed in accordance with the terms of the Grant Agreement; and
- procuring that all partners also comply with the terms of the Grant Agreement.

Other members of the consortium shall mandate the Lead Applicant with the powers to sign the Grant Agreement.

EMIF reserves the right to require any or all members of the consortium to also enter the Grant Agreement directly.

Portuguese law governs all agreements and the place of jurisdiction for any disputes is Lisbon.

4.6. Form of Grant and Funding Rate

The grant will be defined by applying a funding rate of 100% to the eligible costs actually incurred and declared by the beneficiary, up to a maximum of €150 000.

The estimated budget of the action/project must be attached to the Application Form. It must be drawn up in euros.

Applicants are not required to provide matching funds. However, applicants may still take part in this Call if their project budget exceeds the requested grant amount, as long as they commit to covering the costs exceeding the requested grant amount out of their

own resources. The estimated budget of the action/project can only exceed by 30% the requested grant amount.

4.7. Eligible Costs

Eligible costs shall meet all the following conditions:

- They are incurred by the beneficiary and are necessary for the implementation of the action/project which is the subject of the grant.
- They are incurred during the duration of the action/project. The period of eligibility of costs will start as specified in the Grant Agreement. If a beneficiary can demonstrate the need to start the action/project before the agreement is signed, the costs eligibility period may start before that signature. Under no circumstances can the eligibility period start before the date of submission of the grant application.
- They are indicated in the estimated budget of the action/project.
- They are identifiable and verifiable, in particular being recorded in the accounting records of the beneficiaries and determined according to the applicable accounting standards of the country where the beneficiary is established.
- They comply with the requirements of applicable tax and social legislation.
- They are reasonable, justified, and comply with the principle of sound financial management, in particular regarding economy and efficiency.
- The beneficiary's internal accounting and auditing procedures must permit direct reconciliation of the costs and revenue declared in respect of the action/project with the corresponding accounting statements and supporting documents.

Both direct and indirect costs are eligible.

Eligible direct costs

The eligible direct costs for the action/project are the costs which are identifiable as specific costs directly linked to the performance of the action/project and which can therefore be booked to it directly, such as:

- i. the costs of personnel (including actual salaries, social security contributions and other statutory costs) working under an employment contract with the beneficiary or an equivalent appointing act and assigned to the action/project, provided that these costs are in line with the beneficiary's usual policy on remuneration. The costs of natural persons working under a contract with a beneficiary other than an employment contract or who are seconded to the beneficiary by a third party against payment may also be included under such personnel costs, provided that the costs are not significantly different from the costs of staff performing similar tasks under an employment contract with the beneficiary and that the result of the work belongs to the beneficiary;
- ii. the costs of travel and related subsistence allowances, provided that these costs are in line with the beneficiary's usual practices on travel;
- iii. the depreciation costs of equipment or other assets (new or second-hand) as recorded in the beneficiary's accounting statements, including the costs of renting or leasing equipment or other assets. Only the portion of the equipment's depreciation, rental or lease costs corresponding to the implementation period and the rate of actual use for the purposes of the action/project may be taken into account when determining the eligible costs. By way of exception, the total cost of the purchase of equipment may be eligible if this is justified by the nature of the action/project and the context of the use of the equipment or assets;
- iv. costs of consumables and supplies, provided that they are directly assigned to the action/project;

- v. costs arising directly from requirements imposed by the Grant Agreement (e.g., dissemination of information, specific evaluation of the action/project, translations, reproduction);
- vi. costs derived from subcontracts, provided that the subcontracting contract is awarded to the tender offering the best value for money or the lowest price (as appropriate), avoiding conflicts of interest;
- vii. duties, taxes and charges paid by the beneficiary, notably value-added tax (VAT) if not refundable.

Eligible indirect costs

The eligible indirect costs (overheads) are costs that are not directly linked to the action/project implementation and therefore cannot be attributed directly to it.

A flat-rate amount of a maximum of 7% of the total eligible direct costs of the action/project, excluding direct costs of subcontracting, is eligible as indirect costs, representing the beneficiaries' general administrative costs which can be regarded as chargeable to the action/project.

The following costs are considered ineligible:

- i. return on capital and dividends paid by a beneficiary
- ii. debt and debt service charges
- iii. provisions for losses or debts
- iv. interest owed
- v. doubtful debts
- vi. exchange losses
- vii. contributions in kind from third parties

- viii. excessive or reckless expenditure
- ix. deductible VAT.

The total eligible costs of the action/project are the consolidated total eligible costs accepted by the EMIF Unit and reflected in the Grant Agreement. The total amount paid to the beneficiaries by EMIF may in no circumstances exceed the maximum amount of the grant as indicated in the Grant Agreement.

The revenue generated by the action/project, if any, reported on the date on which the request for payment of the balance is drawn up will be deducted from the actual eligible costs of the action/project.

EMIF's Management Committee may reduce the maximum amount of the grant if the action/project has not been implemented properly (i.e., if it has not been implemented or has been implemented poorly, partially or late), or if another obligation under the Grant Agreement has been breached. The amount of the reduction will be proportionate to the degree to which the action/project has been implemented improperly or to the seriousness of the breach.

5. Reporting and Payment Arrangements

5.1. Reporting

The interim report shall be submitted 6 months after the project's beginning or when the expenditure attains 40% of total eligible costs, whichever occurs first, and shall contain activity and financial information regarding the development of the project thus far.

A final meeting marking the end-date of the project shall take place, to which EMIF representatives must be invited to attend, with a presentation of the main results, outcomes, and lessons learned.

The final report shall be submitted within 2 months after project completion and shall contain activity and financial information regarding the full development of the project.

The EMIF Unit may request clarifications and further documents before making a decision regarding the acceptance of the final report for purposes of payment of the final instalment. Payments will be made within 2 weeks after the final report approval.

The interim and final financial reports shall be presented with the same budget headings as in the approved budget. A list of expenses/invoices/receipts shall accompany this report to justify the spent amounts.

The financial report shall preferably be accompanied by a statement of an external auditor certifying that the expenditure is real and incurred in accordance with the Grant Agreement, such certification plus the list of expenses is accepted as sufficient proof of expenditure to justify the payment. Otherwise, a sample of proof of expenses shall be requested by the EMIF Unit.

An external evaluation shall be submitted with the final report. Eligible costs of the external evaluation shall be considered under “Cost arising directly from requirements imposed by the Grant Agreement”.

A follow-up report is due within 6 months after the project completion.

Templates for the interim, final, and follow-up reports will be provided on EMIF’s website.

Specific audits may be commissioned, notably in case of suspected fraud or mismanagement of the funds provided by EMIF.

5.2. Payment Arrangements

Payments of grants shall be made in instalments and are conditional to the submission and approval of interim and final reports.

Payments will be put into effect as follows:

- 40% of the grant amount, upon signature of the Grant Agreement;
- 30% of the grant amount, upon receipt and approval of the interim technical and financial report;
- A balance payment of up to 30% of the grant amount, upon receipt and approval of the final technical and financial report.;

A pre-financing guarantee for up to the same amount as the pre-financing may be requested, in order to limit the financial risks linked to the pre-financing payment. The financial guarantee, in euro, shall be provided by an approved bank or financial institution established in one of the eligible European countries. The guarantee shall be released as the pre-financing is cleared against the payment of the balance, in accordance with the conditions laid down in the Grant Agreement.

As an alternative to requesting a guarantee on pre-financing, the EMIF Unit may decide to split the payment of pre-financing into several instalments which, in total, shall not exceed 40% of the grant amount.

Payments will be made once the EMIF Unit is satisfied with the documentation and financial information provided by the grantees.

6. Budget

The allocation for this Call is €1 000 000.

7. Publicity & IPRs

Applicants retain ownership of their intellectual property rights in the application and any subsequent information or materials provided as part of the application process (hereafter, “Application Materials”), as well as in the content or other intangible assets resulting from the activities.

By submitting an application, applicants agree that any Application Materials provided to EMIF pursuant to this Call may be used by EMIF:

- i. to assess their application;
- ii. if the application is successful, to provide funding under the Grant Agreement and to assess ongoing compliance with the terms and conditions thereof; and
- iii. in any relevant publicity, including at events, in speeches, in annual reports, through social media and any other medium, online or offline.

Relevant publicity includes the use of aggregated data showing how EMIF funding has been awarded (e.g., by project type, industry sector and location), and project-specific information (e.g., the names and location of applicants, the funds awarded and a description of the project and/or project title). Applicants grant EMIF the right to use their trade names, trademarks, logos and other distinctive brand features for these specific purposes.

By signing the Grant Agreement, beneficiaries agree to provide CGF and EUI, EMIF's promoters, non-exclusive, transferrable and royalty-free license on all copyrighted material produced throughout the project for the purposes of enabling them to populate their websites (and/or affiliated websites) with relevant content as a result of the activities for which the grant is used so to disseminate findings and raise public awareness.

Moreover, beneficiaries are required to acknowledge EMIF's contribution in all publications or in conjunction with activities for which the grant is used, including by giving prominence to EMIF's name and emblem.

Applicants must warrant that they have obtained and will maintain all necessary agreements, releases, licences, and approvals to execute the project and to disclose the Application Materials to EMIF for the purposes set out in this Call, and that the execution of the project and provision of the Application Materials to EMIF will not infringe any third-party rights or entail a breach of any confidentiality obligations.

Applicants agree to indemnify EMIF against any liabilities, costs, claims, losses, damages or expenses (including reasonable legal fees) suffered or incurred in relation to a claim from a third party that the application or the use or reproduction of any Application Materials infringes or misappropriates any third-party rights.

8. Processing of Personal Data

If processing of grant applications under this Call involve the recording and processing of personal data (such as your name, address and CV), such data will be processed only for the purposes of evaluating the submitted proposal and in accordance with Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and

on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

9. Contacts

Questions and requests for clarification may be sent to info@emifund.eu with a reference to the Call's title: Investigations into the Dynamics of Disinformation.