

## EmBRACE 2<sup>nd</sup> Call for MSEs

### QUESTIONS & ANSWERS

The aim of this document is to provide general guidance on the implementation of the EmBRACE project, and should be read in combination with:

#### - Guidelines for MSEs as Final Recipients

1.1. **Question:** Can a flat-rate trade business (flat-rate craft; sole proprietorship subject to lump sum taxation) apply for the Public call for micro and small entrepreneurs within the EmBRACE project?

1.1. **Answer:** Crafts are acceptable if they are eligible according to the given eligibility criteria in the Guidelines for MSEs as Final Recipients with regards to professional and financial background.

1.2. **Question:** The partnership proposal we are considering includes 2 IT companies, one from Croatia and the other from Bosnia and Herzegovina, both of which formally meet all the conditions set out in Article 2.2 of the SME Guidelines.

However, these are companies owned by 2 brothers, one residing in Croatia, the other in Bosnia and Herzegovina, and they have direct cooperation in regular business on programming, where the Croatian partner develops and delivers software to the German market, and the Bosnian partner directs most of its programming resources to the same subject of joint development.

Question: does the cooperation of such 2 partners (who intend to apply for the public call together with a completely independent Montenegrin partner) represent effective cooperation on a new joint project, or does it represent a conflict of interest?

1.2. **Answer:** In case they meet all the conditions prescribed in point 2. Guidelines for MSEs as Final Recipients 2nd Call, the above partnership proposal is acceptable regardless of the blood relationship of the company owners. We emphasize that in case the companies are partner or affiliated companies, they cannot be approved beneficiaries within the same Small Project. Also, a conflict of interest in terms of relationship would relate to the procurement procedures, and not to the partnership in the project itself.

We note that the review of the documentation, as well as the eligibility of the partnership and costs, will be carried out and determined during the evaluation of the project application.

1.3. **Question:** I have one question, please. In the call *Guidelines for MSEs as Final Recipients 2nd Call "EmBRACE"*, you stated that the eligible programme area is Zagreb County. We have a partner with whom we would like to start a project, but their headquarters is located in the City of Zagreb. Is this company eligible under the terms of this call?

1.3. **Answer:** According to the *Guidelines for MSEs as Final Recipients 2nd Call “EmBRACE” (Enhancing MSEs sustainaBle gRowth And CompEtitiveness)*, Interreg VI-A IPA Croatia – Bosnia and Herzegovina – Montenegro 2021–2027 Programme, each small project applicant must have its headquarters or a branch and must have been operating in the programme area for at least one year prior to the date of submission of the small project application.

In Chapter 2.2.2 *Geographic eligibility rules*, it is stated that Zagreb County is one of the eligible programme areas, while the City of Zagreb is not an eligible area.

1.4. **Question:** Please provide additional clarification. Is a partner who reported a negative business result in the last year (2024) eligible?

1.4. **Answer:** In the document *“Guidelines for MSEs as Final Recipients – 2nd Call ‘EmBRACE’ (Enhancing MSEs sustainaBle gRowth And CompEtitiveness)”* within the *Interreg VI-A IPA Croatia – Bosnia and Herzegovina – Montenegro 2021–2027* programme, Chapter 2.2.3 Professional and financial background states:

“FR’s equity is positive for the last closed business year for seat and/or branch in the Programme area.”

While Chapter 3.6 Exclusion criteria states:

“FRs cannot receive funding if one or more of the following cases apply to them:

Their business is in a difficult situation (according to COMMISSION REGULATION (EU) No 651/2014 of 17 June 2014).”

This means that a negative business result in the last year by itself does not automatically exclude the partner’s eligibility, provided that:

- the partner still has positive equity for the last closed business year, and
- the company is not an undertaking in difficulty within the meaning of Commission Regulation (EU) No 651/2014.

If the negative result causes the equity to become negative or the company meets the criteria of an “undertaking in difficulty,” the partner is not eligible.

1.5. **Question:**

- Could you please clarify what specific roles partners from Croatia and Montenegro can have in the project proposal in the case where the applicant company is from Bosnia and Herzegovina?
- Is it necessary for the partners from Croatia/Montenegro to operate in the same business sector as the company from Bosnia and Herzegovina, or is it sufficient that they are

connected through a joint activity/innovation, even if their business activities are not identical?

- How is the project lead usually defined – does it have to be a company from Croatia (an EU Member State), or can it be a company from Bosnia and Herzegovina with a partner from Croatia?
- Are the following types of activities allowed: a company from Bosnia and Herzegovina (construction/investment) + a company from Croatia (services/IT) + possibly a company from Montenegro (logistics/marketing) – if together they develop an innovative service for the construction sector to be applied in the cross-border area?
- How is the allocation of funds between partners and countries defined – is it divided equally, approximately 33% (for three partners) or 50% (for two partners)?

#### 1.5. Answer:

- EmBRACE (Enhancing MSEs sustainaBle gRowth And CompEtitiveness) is a pilot project that finances cooperation between micro and small enterprises in the cross-border area of Croatia – Bosnia and Herzegovina – Montenegro under the Interreg VI-A IPA Programme Croatia – Bosnia and Herzegovina – Montenegro 2021–2027, aiming to improve the competitiveness of micro and small enterprises (MSEs).

The Final Recipients (FRs) are micro and small enterprises, and each Small Project (SP) must consist of at least two (2) Final Recipients from different countries participating in the Programme area, with one partner required to be from an EU Member State (Croatia). It is important to note that cooperation among partners from all three (3) countries in the Programme area is awarded an additional 5 points. The maximum number of Final Recipients per project is three (3) partners.

- Within the Small Projects, the emphasis is on cooperation among micro and small enterprises in the cross-border area of Croatia – Bosnia and Herzegovina – Montenegro. It is not required that partners operate in identical sectors; however, eligible business cooperation activities within the SP should belong to NACE codes representing the target economic sectors of the EmBRACE project, as listed in Chapter 3.7 “Eligible activities” of the *Guidelines for MSEs as Final Recipients – 2nd Call*.

- The EmBRACE project does not define a main project lead, and all partners must equally participate in project implementation (e.g., during the implementation phase, each partner submits its own periodic report, and after certification, the approved funds are transferred directly to each partner’s account).

However, through the EmBRACE platform (<https://cbchb.eu/application/>), a single project application is submitted on behalf of the entire project, and any designated person may submit it.

- We are not able to provide information on the eligibility of specific cases or project ideas, but we note that eligible business cooperation activities within the SP should belong to NACE codes representing the target economic sectors of the EmBRACE project, as listed in Chapter 3.7 “Eligible activities” of the *Guidelines for MSEs as Final Recipients – 2nd Call*.

Furthermore, Chapter 3 “Cooperation criteria” defines the acceptable forms of cooperation within Small Projects:

**MARKET DEVELOPMENT:** Finding a new market for an existing product — an already developed product, technology or service will be placed on a new market (the partner country’s market or a third one), made possible through this cooperation. In this case, one of the FRs is the owner of the product, and the other provides access to the new market (in its own or third country). – This is **CONDITIONALLY ELIGIBLE** if entering the new market does not simultaneously reduce market presence in the FR’s existing markets but increases total sales.

**PRODUCT DEVELOPMENT:** Introduction of a new product to an existing market — a new product, technology or service will be developed for a market where one of the FRs is already present. In this case, both FRs co-develop the product to be placed on one of their existing markets. In this type of cooperation, the product know-how represents the added value of cooperation. This is **ELIGIBLE** for funding under the EmBRACE project.

**DIVERSIFICATION:** Development of a new product for a new market — both the developed product, technology or service, and the newly accessed market are new. This represents the most advanced level of cooperation, which may include several modalities: one (or more) of the FRs develop the product, while the other FR(s) provide access to the new market, which may be in partner or third countries. This level of cooperation intensity may require the participation of more than two FRs. This is **THE MOST PREFERABLY ELIGIBLE** form for funding under the EmBRACE project.

If a new product/technology/service is developed, FRs are required to sign an agreement detailing the distribution of ownership over the service/product/technology.

- In Chapter 2.5 “Small Project size”, the minimum criterion concerning the budget distribution among partners is defined as:  
“The minimum amount of the budget of each FR in the SP is 20% of the total EU project budget.”  
Furthermore, in the Evaluation Manual, Chapter 2.5 “Content Evaluation” defines the number of points that can be awarded depending on the ratio of budget distribution among partners.

No	Evaluation question	Sub-questions for evaluation	Score	Section in SPA form
C4	Budget		0/4/8	

C4.1	To what extent is the small project budget proportionate to the project activities and results?	<p>The project budget is proportionate to the proposed work plan, project outputs/deliverables and project's contribution to Programme indicators.</p> <p><b>if SP consist of two (2) FRs:</b></p> <ul style="list-style-type: none"> <li>- 0 points if one FR has 70 – 80 % and other FR has 20 – 30 % of the total EU contribution</li> <li>- 4 points if one FR has 60 – 70 % and other FR has 30 – 40 % of the total EU contribution</li> <li>- 8 points if both FRs are within 40 – 60 % of the total EU contribution</li> </ul> <p><b>if SP consist of three (3) FRs:</b></p> <ul style="list-style-type: none"> <li>- 0 points if one FR has more than 50 % and other FRs have 20 – 25 % of the total EU contribution</li> <li>- 4 points if one FR has 40 – 50 % and other FRs have 25 – 30 % of the total EU contribution</li> <li>- 8 points if all FRs are within 30 – 40 % of the total EU contribution</li> </ul>		D and E with budget in Excell
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1.6. **Question:** We are preparing an application for the *EmBRACE – Support for Micro and Small Enterprises* call, aiming to expand our digital loyalty platform to Croatia and Montenegro.

While reviewing the project documentation on the official website (<https://cbchb.eu/cbc-cro-bih-mne/embrace/>), I noticed that some materials mention the criterion that the applicant “must employ at least one employee in its last closed business year in the Programme area.”

Could you please confirm whether this is:

1. A **mandatory eligibility condition** (i.e. applicants without registered employees are automatically ineligible), or
2. A **recommended criterion** that can be interpreted more flexibly for micro-enterprises working with external collaborators or subcontractors?

We are a micro-enterprise legally registered since 2022, actively operating and financially solvent, but currently without full-time employees (working through contracted collaborators). I would greatly appreciate your guidance on whether such a company structure is acceptable under the eligibility rules.

1.6. **Answer:** Thank you for your inquiry.

According to the Guidelines for Applicants one of the basic eligibility criteria states that:

“FRs must employ at least one employee in its last closed business year in the Programme area.”

This means that the Final Recipient (micro or small enterprise) must have had at least one registered employee during the year 2024. Therefore, applicants without employees in that period unfortunately do not meet the eligibility criteria and are not eligible to apply under this call.

1.7. **Question:** Kindly requesting clarification regarding the subject tender.

According to Regulation (EC) No. 178/2002, wine is considered a food product, and the guidelines for applicants also classify wine as a food product.

According to EU Regulation (EU) 1308/2013, wine is defined as an agricultural product within the common organization of the market for agricultural products.

**QUESTION: Considering the list of eligible and ineligible activities and list of NACE codes, are activities related to wine production eligible under the subject call for proposals?**

1.7. **Answer:** As stated in *Guidelines for MSEs as Final Recipients 2nd Call* (3.7. Eligible activities), eligible activities of SP business cooperation should belong to the following NACE codes<sup>2</sup> representing the target economic sectors of EmBRACE:

\*(See: [NACE Rev. 2](#) Statistical classification of economic activities in the European Community, Eurostat, European Communities, 2008.)

C – Manufacturing (10 - 33);

D – Electricity, gas, steam and air conditioning supply (35);

E – Water supply; sewerage; waste management and remediation activities (36 - 39);

F – Construction (41 - 43);

G – Wholesale and retail trade, repair of motor vehicles and motorcycles – only one of the FRs can be granted to implement these types of activities within a single SP (45 - 47);

H – Transportation and storage (49 - 53);

I – Accommodation and food service activities – excluding extension and quality improvement of accommodation capacities, focusing on quality service development to be stipulated on call level (55 - 56);

J – Information and communication (58 - 63);

M – Professional, scientific and technical activities (69 - 75);

N – Administrative and support service activities, only the following activities:

- Employment activities (78),
- Travel agency, tour operator reservation service and related activities (79),

S – Security and investigation activities (80);

P – Education (85);

Q – Human health and social work activities (86 - 88);

R – Arts, entertainment and recreation, only the following activities:

- Creative, arts and entertainment activities (90),
- Libraries, archives, museums and other cultural activities (91),
- Sports activities and amusement and recreation activities (93).

All eligible activities of each FR should belong to any of the above-listed NACE codes. Activities outside these NACE codes are ineligible.

Please note that the review of documentation, as well as the eligibility of final recipients, partnerships etc., will be carried out and determined during the evaluation of the project application.

1.8. **Question:** By reviewing the map of the included municipalities, cities, and regions, we have noticed that the call covers the border area with the City of Visoko (Visoko is exactly on the border of the included regions – Kakanj, Zenica, Busovača – while Visoko itself is excluded). In view of the above, we are interested in applying for the project, but we would first like to confirm whether we are eligible to apply even though the City of Visoko is not included in the geographical area covered by the open call, considering that our company is headquartered in Visoko.

1.8. **Answer:** Thank you for your inquiry and interest in the 2nd Call for Entrepreneurs within the EmBRACE project.

The programme area includes 12 counties on the Croatian side, Brčko District and 109 municipalities on the side of Bosnia and Herzegovina, as well as 10 municipalities on the Montenegrin side.

Unfortunately, the City of Visoko is not part of the programme area, and therefore an applicant with its headquarters in the City of Visoko is not eligible for co-financing under the EmBRACE project.

Furthermore, in section 2.1 Partnership requirements of the Guidelines for MSEs as Final Recipients – 2nd Call, page 9, it is stated:

“Each SP Applicant should have its seat (headquarters) or its branch and should operate in the Programme area for at least one year prior to the date of Small Project application submission.”



**1.9. Question:** We have a question related to the ongoing 2nd EmBRACE call. Given that we are based in the Municipality of Ilidža (Canton of Sarajevo), can we apply for the mentioned invitation?

**1.9. Answer:**

Unfortunately, the municipality of Ilidža (Sarajevo Canton) is not within the eligible programming area of the EmBRACE project.

The programming area covers the border area between Croatia, Bosnia and Herzegovina and Montenegro and includes 12 counties on the Croatian side, the Brčko District of Bosnia and Herzegovina and 109 municipalities/cities on the Bosnian side and 12 municipalities on the Montenegrin side of the border.

The 109 municipalities/cities on the Bosnian side, in addition to the Brčko District, include:

**BOSNIA AND  
HERZEGOVINA**

**Brčko District of Bosnia and Herzegovina and 109 municipalities:** Bijeljina, Teočak, Ugljevik, Lopare, Tuzla, Lukavac, Čelić, Srebrenik, Petrovo, Gračanica, Doboj Istok, Gradačac, Pelagićevo, Donji Žabar, Orašje, Domaljevac-Šamac, Šamac, Modriča, Vukosavlje, Odžak, Brod, Srebrenica, Bratunac, Milići, Han-Pijesak, Vlasenica, Kladanj, Šekovići, Kalesija, Osmaci, Zvornik, Banovići, Živinice, Sapna, Prnjavor, Srbac, Laktaši, Čelinac, Kotor Varoš, Kneževo, Dobretići, Šipovo, Jajce, Jezero, Mrkonjić Grad, Banja Luka, Gradiška, Kozarska Dubica, Prijedor, Oštra Luka, Sanski Most, Ključ, Ribnik, Glamoč, Bosansko Grahovo, Drvar, Istočni Drvar, Petrovac, Bosanski Petrovac, Bosanska Krupa, Krupa na Uni, Novi Grad, Kostajnica, Bužim, Velika Kladuša, Cazin, Bihać, Doboj, Derventa, Prozor/Rama, Konjic, Nevesinje, Gacko, Bileća, Trebinje, Ravno, Ljubinje, Berkovići, Mostar, Jablanica, Kupres, Kupres (RS), Tomislavgrad, Posušje, Široki Brijeg, Čitluk, Stolac, Neum, Čapljina, Ljubuški, Grude, Livno, Istočni Mostar, Doboj Jug, Kakanj, Maglaj, Tešanj, Usora, Zavidovići, Zenica, Žepče, Bugojno, Busovača, Donji Vakuf, Gornji Vakuf-Uskoplje, Novi Travnik, Travnik, Vitez, Teslić.

**1.10. Question:**

I would like to ask for clarification: is it possible for the applicant company, during the duration of the call, to register for an eligible activity in which it would implement the project (the company has been operating for more than one year in the program area), **before submitting the application to the call?**

Is it acceptable to register **after the call has been announced?**

**1.10. Answer:**

Eligible SP business cooperation activities should belong to NACE codes that represent the targeted economic sectors within the framework of the EmBRACE project, and are listed in *Chapter 3.7. Eligible activities* in the [Guidelines for MSEs as Final Recipients 2nd Call](#).

Also, in *Chapter 2.1. Partnership requirements* [Guidelines for MSEs as Final Recipients 2nd Call](#) page 9, it is stated: **Each SP Applicant should have its seat (headquarters) or its branch and should operate in the Programme area for at least one year prior to date of Small Project application submission.**



It is important that you are registered for the activity, and as an MSE that you have been operating for more than a year.

**1.11. Question:**

We are planning to purchase software licenses; are only permanent and annual licenses acceptable, or can the subject of the purchase also be three-year software licenses (from manufacturers who do not offer permanent ones) that are depreciated together with the IT equipment on which they will be installed?

**1.11. Answer:**

- Three-year licenses are also acceptable, but with the note that the cost of using them is acceptable only for the period of implementation of the Small Project. Also, the licenses should be entered in the List of Fixed Assets.
- Equipment is acceptable in its entirety, and is not depreciated.

**1.12. Question:**

Does each individual purchase of an annual license of commercial software have to be stated as an individual item in the project budget if it is delivered by download from the manufacturer (such as Adobe Acrobat and ChatGPT), or can they be consolidated in their offer by a company that will configure them and integrate them with other software, and upon delivery will attach the manufacturer's documentation from which the end user is visible?

**1.12. Answer:**

- If the entrepreneur purchases a license directly from the license provider (supplier), who charges him for it (and issues an invoice), then these must be listed individually in the Small Project Budget. If he would subcontract a supplier who does configuration and integration and would also purchase licenses "through him", then this should be requested in the Request for Proposal (or Purchase Order, depending on the procurement procedure; with the license cost stated), stated in the supplier's offer (i.e. Contracted) but also described as part of the project budget item relating to the configuration and integration service, and of course there must be evidence (be visible) that the user has paid this cost (and recorded in assets).

**1.13. Question:**

If all 3 partners in the project have the same programs and IT equipment, can the same supplier's offer be submitted with an additional specification that specifies the separation by partner, or must each partner submit its own offer?

**1.13. Answer:**

- Each partner submits Bids for the costs incurred in its Project, which means that each partner should also carry out its "own" (that is, separate) procurement procedure, which must be transparent and without potential conflicts of interest. Also, Shared costs are not allowed within the EmBRACE project.

- Perhaps it would be good to list the costs of IT equipment and licenses (software) as separate items in the Budget if you are not sure that they will be procured from the same supplier (in one procurement procedure), in this way the problems of potential separation of procurement would be avoided if the items were procured separately.

**1.14. Question:**

Please tell me which counties belong to the border area?

**1.14. Answer:**

In the paragraph 2.2.2. of [Guidelines for MSEs as Final Recipients 2nd Call](#) you can find the list of eligible counties within the Programme area:

2.2.2. Geographic eligibility rules The Programme area is relatively large and heterogeneous in geographical terms and other socioeconomic factors that result in certain distinctions in various micro-regions (e.g., north and south of Bosnia and Herzegovina or Croatia), whose areas of interest are different, but the Programme has ensured all key areas are present in the intervention logic in order to meet all expectations. The Programme area covers the territory of border areas between Croatia, Bosnia and Herzegovina, and Montenegro. Calculated in numbers, the Programme area covers 12 counties on the Croatian side, Brčko District of Bosnia and Herzegovina and 109 municipalities/cities on the side of Bosnia and Herzegovina and 12 municipalities on the side of the Montenegrin border.

PROGRAMME AREA	
<b>CROATIA</b>	<b>12 counties:</b> Brod-Posavina County, Vukovar-Srijem County, Karlovac County, Sisak-Moslavina County, Lika-Senj County, Zadar County, Šibenik-Knin County, Split-Dalmatia County, Dubrovnik-Neretva County, Bjelovar-Bilogora County, Požega-Slavonia County, Zagreb County.
<b>BOSNIA AND HERZEGOVINA</b>	<b>Brčko District of Bosnia and Herzegovina and 109 municipalities:</b> Bijeljina, Teočak, Ugljevik, Lopare, Tuzla, Lukavac, Čelić, Srebrenik, Petrovo, Gračanica, Doboј Istok, Gradačac, Pelagićevo, Donji Žabar, Orašje, Domaljevac-Šamac, Šamac, Modriča, Vukosavlje, Odžak, Brod, Srebrenica, Bratunac, Milići, Han-Pijesak, Vlasenica, Kladanj, Šekovići, Kalesija, Osmaci, Zvornik, Banovići, Živinice, Sapna, Prnjavor, Srbac, Laktaši, Čelinac, Kotor Varoš, Kneževo, Dobretići, Šipovo, Jajce, Jezero, Mrkonjić Grad, Banja Luka, Gradiška, Kozarska Dubica, Prijedor, Oštra Luka, Sanski Most, Ključ, Ribnik, Glamoč, Bosansko Grahovo, Drvar, Istočni Drvar, Petrovac, Bosanski Petrovac, Bosanska Krupa, Krupa na Uni, Novi Grad, Kostajnica, Bužim, Velika Kladuša, Cazin, Bihać, Doboј, Derventa, Prozor/Rama, Konjic, Nevesinje, Gacko, Bileća, Trebinje, Ravno, Ljubinje, Berkovići, Mostar, Jablanica, Kupres, Kupres (RS), Tomislavgrad, Posušje, Široki Brijeg, Čitluk, Stolac, Neum, Čapljina, Ljubuški, Grude, Livno, Istočni Mostar, Doboј Jug, Kakanj, Maglaj, Tešanj, Usora, Zavidovići, Zenica, Žepče, Bugojno, Busovača, Donji Vakuf, Gornji Vakuf-Uskoplje, Novi Travnik, Travnik, Vitez, Teslić.
<b>MONTENEGRO</b>	<b>12 municipalities:</b> Herceg Novi, Kotor, Tivat, Budva, Bar, Ulcinj, Cetinje, Danilovgrad, Nikšić, Podgorica, Tuzi, Zeta.

**1.15. Question:**

Can the costs of external services include the costs of online advertising and marketing services on the market?

Can the costs of external services relate to project management and project visibility services, and up to what percentage or absolute amount?

**1.15. Answer:**

As stipulated in the [Guidelines for Applicants](#) in Chapter 3.8. Eligibility of costs by final recipients (pp. 19-24), under point 3.8.5. External expertise and services (pp. 22-23) are accepted:

*"Costs related to publicity, promotion and communication: development of IT systems and websites, modifications and updates; promotion, communication, publicity or information, participation in promotional events (e.g. registration fees);*

*The category "external expertise and services" includes costs paid on the basis of contracts or written agreements and against invoices or requests for reimbursement to external experts and service providers, subcontracted to carry out specific tasks or activities directly linked to the implementation of the SP. In order to verify the costs during the SP application, the Financial Advisors (FAs) will have to submit to the SPA:*

- *For costs between EUR 2,500.00 and EUR 20,000.00 (excluding VAT), the FAs must submit 1 pro-forma (non-binding) offer.*
- *For costs over EUR 20,000.00 (excluding VAT), the FAs must submit 3 pro-forma (non-binding) offers."*

1. Can the costs of external services include the costs of online advertising and marketing services in the market? - In relation to the above, the cost of online advertising and marketing services related to project activities (promotion of new products/services/technologies/processes resulting from project activities) is eligible. Online advertising and marketing services related to "regular business" are not eligible.

2. Can the costs of external services relate to project management services and visibility of the project and up to what amount in % or absolute amount? –

Yes. As stated in point 3.8.5. External expertise and services (page 23) include: *"Services related to the administration and management of the SP: collection of expenditure documents, maintenance of files, public procurement activities at the level of financial statements."*

The Programme decided to use different Simplified Cost Options (SCOs) for specific cost categories to ensure an easy reporting process, swift money flow, and proper validation of expenditures:

Cost category	Form of reimbursement
Staff costs	20 % flat rate of direct costs (real costs)
Office and administrative costs	15 % flat rate of staff costs
Travel and accommodation costs	15% flat rate of staff costs
External expertise and services costs	Real costs
Equipment costs	Real costs
Costs of infrastructure and works	Real costs

External expertise and services costs, and/ or Equipment costs and/ or Costs of infrastructure and works have to be used in the SP budget. External expertise and services costs, and/ or Equipment costs and/ or Costs of infrastructure and works cost categories have to be used for the purpose of SP activity implementation!

Please read the [Guidelines for Applicants](#) carefully to familiarize yourself with all the eligibility conditions of the EmBRACE Call - applicants, activities and costs, as well as the types of costs and the form of reimbursement.

#### 1.16. Question:

If our total project costs exceed EUR 235,294, what should be entered in the table?

The total estimated cost of the equipment is EUR 250,000.

Should we include in the Excel table only the part of the equipment cost (approx. EUR 185,150) that corresponds to the calculation ensuring an EU contribution of EUR 200,000 (so that the total in the last row equals EUR 200,000), while attaching offers showing higher amounts?

I am referring to the budget at the level of 3 partners, including project preparation costs of EUR 1,500 per partner.

It is clear that the difference in cost will be covered by the partners.

#### 1.16. Answer:

Thank you for your inquiry.

When completing the Project Budget Table, please ensure that the total amount of EU funds at the overall project level **does not exceed EUR 200,000**, as otherwise the project would not be eligible for co-financing (see the *exclusion criterion 3.8* in Annex II).

If the total amount of EU co-financing, based on the submitted offers and including staff, administration, travel, and preparation costs, exceeds EUR 200,000, it is necessary to adjust (reduce) the relevant budget items in the categories of equipment/external services/infrastructure (depending on the type of costs applied for) so that the total EU co-financing remains within the maximum eligible limit of EUR 200,000. However, it is important to note that any cost difference must be covered by the Final Recipient from its own funds.

The offers should be submitted for the actual amounts received. Please note that the offers must not be older than 30 days from the date of project application submission, and that each partner must provide offers corresponding to their part of the project budget.

#### 1.17. Question:

It is stated in the Guidelines for Applicants:

G – Wholesale and retail trade; repair of motor vehicles and motorcycles – only one of the Final Recipients (FRs) can be granted to implement these types of activities within a single Small Project (SP) (45–47).

What exactly does this mean?

If one partner from Bosnia and Herzegovina operates in the manufacturing industry and purchases laboratory equipment related to its production, which will result in a new service for laboratory testing and new products based on it, we have envisaged that two partners from Croatia and Montenegro would offer and sell this new service and these new products.

According to the mentioned definition, does this mean that one of the partners would be excluded from selling the above?

#### 1.17. Answer:

Regarding your inquiry on the interpretation of the restriction stated in the *Guidelines for MSEs as Final Recipients*, in the part referring to activities under Section G – *Wholesale and retail trade; repair of motor vehicles and motorcycles (NACE 45–47)*, we would like to clarify the following:

The provision stating that **“only one of the Final Recipients (FRs) can be granted to implement these types of activities within a single Small Project (SP)”** means that within a single project, only one partner may have a registered and project-funded activity which, according to the national classification, falls under NACE Section G (45–47).

The purpose of this provision is to limit the number of partners whose activities are purely commercial in nature, as the primary goal of the Programme is to support the development of new products, services, and innovations within the Programme area, rather than to finance trading activities.

#### 1.18. Question:

We kindly ask for your clarification on the following questions:

1. Are private adult education institutions eligible applicants and partners?  
According to Commission Regulation (EU) No 651/2014, Annex I, *“an enterprise is considered to be any entity engaged in an economic activity, irrespective of its legal form.”*  
Following this definition, we consider that adult education institutions which, according to the number of employees and financial thresholds, fall within the category of micro or small

enterprises, could be eligible applicants or partners.

Please confirm.

2. Can applicants that are affiliated companies of an enterprise which has already received a grant under the 1st EmBRACE call apply under this call?

1.18. **Answer:**

Thank you for your inquiry. Please find below the answers to your questions:

1. Private adult education institutions may be eligible as applicants or partners if they:

- carry out an economic activity,
- fall within the category of micro or small enterprises according to Regulation (EU) No 651/2014,
- operate within the programme area and meet the conditions set out in the *Guidelines for MSEs as Final Recipients (2nd Call)*.

2. Final Recipients who received support under the 1st EmBRACE Call are not eligible under the 2nd Call. However, an affiliated company of such beneficiaries **may be eligible as an applicant in the 2nd Call, provided that it:**

- has not itself received support under the 1st Call,
- proposes new and distinct activities and costs,
- maintains the status of a micro or small enterprise and fulfils all other conditions defined in the *Guidelines for MSEs as Final Recipients (2nd Call)*, and
- there is no overlap with the previously funded project.

1.19. **Question:**

Regarding the scoring, item C4.1. It states:

if the SP consists of three (3) FRs:

- 0 points if one FR has more than 50% and the other FRs have 20–25% of the total EU contribution
- 4 points if one FR has 40–50% and the other FRs have 25–30% of the total EU contribution
- 8 points if all FRs are within 30–40% of the total EU contribution

Does this distribution mean that each partner must have at least 20% share in the entire project? If it were less, would the project be considered ineligible?

1.19. **Answer:**

In the *Guidelines for MSEs as Final Recipients*, Chapter 2.5 *Small Project size*, the minimum share of the budget that each Final Recipient must have is defined as follows:

“The minimum amount of the budget of each FR in the SP is 20% of the total EU project budget.”

This means that the project would not be eligible if one of the Final Recipients has a budget smaller than 20% of the total EU contribution.

Regarding the scoring, projects with a more balanced distribution of the budget are awarded a higher number of points, as specified in criterion C4.1.

#### 1.20. **Question:**

##### **1. Interpretation of the “equity positive” condition**

The documentation states that the Final Recipient must have positive equity in the last closed financial year.

Please confirm whether this condition refers exclusively to the *equity* (capital) as shown in the balance sheet, or whether it is based solely on the *financial result* (profit/loss).

##### **2. Possibility of VAT exemption for the FR from Montenegro**

The partner from Montenegro indicated that, in certain EU-funded projects, there is a possibility of VAT exemption.

We kindly request clarification on the following:

- Is there a possibility of VAT exemption under the EmBRACE call?
- Does HAMAG-BICRO or the relevant programme authority issue any document/decision that the Montenegrin partner could use to apply for VAT exemption in their country, given that this is an EU-funded project?

##### **3. Procurement and offers – common suppliers**

If all three partners plan to purchase the same equipment or software from the same supplier:

- Is it permitted to use a single offer that clearly separates the items per partner,
- Or does each partner have to conduct a completely separate procurement procedure and obtain an individual offer, even if the supplier is the same?

(We are aware that shared costs are not allowed, but we would like to confirm the correct procedure in the case of the same supplier.)

##### **4. Positive equity and negative financial result**

If a company has a negative financial result in the last financial year, but its equity remains positive – is such a Final Recipient still eligible?

If a company has a positive financial result in the last financial year, but its equity remains negative because it is a young company still developing its business – is such a Final Recipient still eligible?

#### 1.20. **Answer:**

Thank you for your inquiry. Please find below the answers to your questions:



**1. Interpretation of the “equity positive” condition**

The condition “FR’s equity is positive for the last closed business year for seat and/or branch in the Programme area” refers to *capital and reserves*.

**2. Possibility of VAT exemption for the FR from Montenegro**

VAT must be included in the final offer price, except in the case of business entities that, according to the law, are not within the VAT system (which must be stated).

According to the *GfA*, page 24:

**3.9. Value Added Tax (VAT)**

Value Added Tax (VAT) is an eligible expenditure and must be planned in the SP budget.

In line with Article 64 of the CPR, VAT shall not be supported by the Programme, except:

- For operations with a total cost below EUR 5,000,000.00 (including VAT);
- For operations with a total cost of at least EUR 5,000,000.00 (including VAT) where VAT is non-recoverable under national legislation;
- For SPFs and investments made by FRs in the context of SPFs.

In those cases, VAT is eligible if:

- It is established that it is borne by the FR;
- It is clearly identified in the invoice.

HAMAG-BICRO does not issue any type of document for VAT exemption.

**3. Procurement and offers – common suppliers**

Each partner must conduct a completely separate procurement procedure and obtain an individual offer, even if the offers are requested from the same supplier.

**4. Positive equity and negative financial result**

If a company has a negative financial result in the last financial year, but its capital and reserves remain positive, the Final Recipient is eligible (provided that all other eligibility criteria are met).

A partner whose capital and reserves are negative is *not eligible*.

**1.21. Question:**

I am contacting you on behalf of a consortium of small and medium-sized enterprises from Croatia, Bosnia and Herzegovina, and Montenegro regarding the open call.

**Q1:** In the list of eligible areas, Zagreb County is mentioned. Does this include the City of Zagreb?

**Q2:** The call is for small and medium-sized enterprises. For our AI project, it is necessary to include providers who do not fall into this category. Is this a disqualifying criterion? Note: the provider is a partner in the consortium.

**Q3:** If the answer to Q2 is yes – is it possible to use a provider’s branch office as a partner?

**1.21. Answer:**

Thank you for your inquiry. Please find below the answers to your questions.

**A1:** The City of Zagreb is not an eligible Programme area, whereas Zagreb County is.

**A2:** The EmBRACE call is targeted at micro and small enterprises. Medium-sized enterprises are **not eligible** within the EmBRACE project.

In the document *Guidelines for MSEs as Final Recipients*, Section 2.2 *Eligibility of partners*, it is stated:

\*"According to 651/2014/EU Regulation, Annex 1, micro and small enterprises may all be recipients of the EmBRACE project.

Classification of enterprises:

- Micro enterprise ( $\leq 10$  employees and annual turnover  $\leq$  EUR 2 million, or balance sheet  $\leq$  EUR 2 million);
- Small enterprise (10–49 employees and annual turnover  $>$  EUR 2 million  $\leq$  EUR 10 million or balance sheet  $>$  EUR 2 million –  $\leq$  EUR 10 million)."

Additionally, the basic eligibility criteria include the following requirements:

*"Basic eligibility criteria for FRs are as follows (examined by company register extracts/company annual financial reports):*

- *FR (and/or its owner company holding more than 50% of ownership rights over the FR, and/or its linked enterprises through a natural person, cumulatively) must be a micro or small enterprise (MSE);*
- *FRs must have at least one closed business year for the seat and/or branch in the Programme area;*
- *FRs must employ at least one employee in their last closed business year in the Programme area;*
- *FR's equity must be positive for the last closed business year for the seat and/or branch in the Programme area."*

Final Recipients (FRs) who do not meet these eligibility criteria are **not eligible** under the EmBRACE project.

**A3:** Each applicant (Final Recipient in the project) must have its seat or branch registered in the Programme area:

*"Each SP Applicant should have its seat (headquarters) or its branch and should operate in the Programme area for at least one year prior to the date of Small Project application submission."*

#### 1.22. Question:

When reviewing the legal status, it was explained that a Small enterprise is one that has between 10 and 49 employees and an annual turnover above two million or up to and including ten million euros.

Is a Small enterprise also considered to be a company that has more than 10 employees but has an annual turnover below 2 million euros?

**1.22. Answer:**

Thank you for your inquiry.

Eligible users within the EmBRACE project must fall into the category of micro and small enterprises. Potential Final Recipients must be autonomous enterprises and must not exceed the upper limits (49 employees, annual turnover or balance sheet total greater than 10 million EUR).

In other words, if your enterprise does not exceed these thresholds, it is an eligible applicant for the second EmBRACE call (provided that all other eligibility criteria are also met).

It is very important to emphasize that this classification includes all your partner or linked enterprises, if any.

**1.23. Question:**

We are reaching out with a few questions regarding the application for the second call through the Embrace project. We need the answers in order to properly plan our activities and budget:

1. Is it allowed to procure goods (physical products) from China? Without going into the project initiative itself, these products are part of the overall ecosystem we are developing, and we would like to know whether we can purchase these products from China through suppliers (planned procurement), i.e., whether there are any restrictions on goods originating from China (if they meet all requirements, standards, certificates, etc.). There is a significant price difference between European and Chinese suppliers, which is important for our budget planning.
2. Is it realistic to plan for the project to start on May 1st, 2026? It was stated that after December 15th, 2025 (the submission deadline), around three months are needed for the evaluation and the entire procedure. Therefore, can the activities that follow (contract signing and similar steps) be completed by April 30th, 2026 (assuming the project partners are efficient)?

**1.23. Answer:**

Thank you for your inquiry. Please find the answers to your questions below:

1. There are no restrictions within the EmBRACE project regarding the procurement of goods from China.  
When conducting procurement, it is important to follow the procedure for requesting offers depending on the value of the procurement (1 offer for procurement amounts between EUR 2,500 and EUR 20,000, and 3 offers for amounts starting from EUR 20,000).  
It is also important to note that equipment purchased before the date of submission of the project proposal is not eligible. Please refer to the *Guidelines for MSEs as Final Recipients*, section **3.8 Eligibility of costs of Final Recipients**:  
*Eligible costs must fulfil all the following criteria as listed below:*  
*(b) they incurred during the eligibility period of the SP, i.e. starting from the date when the SP*

*application is officially submitted until the end of the SP's implementation, with the exception of preparation costs.*

For more information on procurement procedures, please refer to the *Procurement Guidelines*.

2. Regarding the start of project implementation, it is realistic for the project to begin on 1 May 2026. We would like to note that the contract signing for the second call is planned as a formal award ceremony, to which all final recipients will be invited, and the date of the ceremony will also be the official contract signing date. However, during the pre-contracting phase, the EmBRACE project team will, if necessary, redefine the project start date together with the final recipients.

During the preparation of the project application, it is most important to keep in mind that the project must be completed no later than:

3.1. Project duration

*The duration of the Small Projects is 6–12 months and must be completed by the end of August 2027 at the latest.*

**1.24. Question:**

I am reaching out to kindly ask how we can find partners for the EmBRACE cross-border cooperation public call.

I would kindly ask you, if possible, to let me know how we can find a partner who would be interested in participating in the project.

**1.24. Answer:**

Thank you for your interest in participating in the 2nd call for small projects within the EmBRACE project.

You can find partners on the EmBRACE platform: <https://cbchb.eu/cbc-cro-bih-mne/embrace/partners/>

If you wish to browse entrepreneurs who have already submitted their cooperation offers, you do not need to register on the EmBRACE platform. However, if you want to submit your own information on the platform, then registration is required.

It is not mandatory to look for partners through the platform—you may apply to the project with an already established partnership.

**1.25. Question:**

For the purpose of proper interpretation of the call conditions for the “Enhancing MSEs Sustainable Growth and Competitiveness (EmBRACE)” project, we kindly request additional clarification regarding the eligibility of the applicant.

Namely, during 2024, the competent inspection authority conducted a supervision and issued a report and misdemeanor orders concerning an alleged obligation to register commercial activity under the Trade Act. The company has filed an appeal, as according to the decision of the competent ministry from 2021, the company is not required to register the trade for the relevant activity, which is the basis of the submitted appeal. The procedure is still ongoing, and the company continues to operate without any restrictions in its business operations.

With regard to the proposed project, the company would participate as a partner in the development of an innovative solution, with all project activities taking place exclusively within the field of education and the arts, entertainment, and recreation sector.

For accurate interpretation of the call criteria, we kindly request your confirmation whether the aforementioned company can be considered an eligible partner under this call.

**1.25. Answer:**

Thank you for your inquiry and your interest in participating in the 2nd call for small projects under the EmBRACE programme.

Regarding your question about the eligibility of the company from Montenegro, we provide the following clarification:

The eligibility of applicants and partners is defined in the *Guidelines for MSEs as Final Recipients* for the 2nd call. A company can be considered eligible if it meets all mandatory criteria, including, but not limited to:

- classification as a micro or small enterprise according to EU Regulation 651/2014;
- a registered office or branch in the programme area for at least one closed financial year prior to submitting the application;
- at least one employee in the last closed financial year in the programme area;
- positive capital for the last closed financial year;
- compliance with all other conditions set out in the call documentation.

Regarding the eligibility of the registered activity, it must correspond to one of the eligible NACE activities (see p. 18 of the *Guidelines for MSEs as Final Recipients*) and the detailed list of NACE codes (from p. 61).

We also note that the GfA document (p. 17) specifies cases in which final recipients cannot receive funds, for example, if they are in bankruptcy, liquidation, in the process of business closure, or if their operations are under court administration. Since, according to your description, this concerns

an inspection procedure that does not restrict the company's operations and does not constitute any of the aforementioned cases, such a procedure does not affect the company's eligibility under this call.

Based on the information provided and assuming that all mandatory eligibility criteria from the GfA are met, the company can be considered a potentially eligible partner for this call.

The final eligibility check is conducted during the administrative and eligibility check after the project application is submitted.

#### 1.26. Question:

First of all, we would like to thank you for all the information you shared during the EmBRACE workshop.

There has been an unverified claim in some parts of the public that funds under the second call have already been pre-allocated to specific entities.

Believing this is not the case, we would like to submit three innovative projects that would significantly improve the productivity and technological processes in our manufacturing facility:

We kindly ask you to confirm whether the call is open on equal terms for all applicants and whether applications for the types of projects listed above are considered eligible under this call.

#### 1.26. Answer:

EmBRACE (Enhancing MSEs sustainaBle gRowth And CompEtitiveness) is a pilot project that supports cooperation among micro and small enterprises (MSEs) in the cross-border area of Croatia – Bosnia and Herzegovina – Montenegro under the Interreg VI-A IPA Croatia – Bosnia and Herzegovina – Montenegro Programme 2021–2027, aiming to improve the competitiveness of MSEs.

Calls for entrepreneurs within the EmBRACE project are open to all applicants who meet the eligibility criteria; there are no pre-defined beneficiaries or funds reserved for specific entities. Each project proposal is assessed solely based on formal and professional criteria through administrative checks, eligibility verification, and evaluation of the quality of the proposed project (see the [Evaluation Manual](#) and corresponding Annexes).

Each partner within a Small Project can be considered eligible if it meets all mandatory criteria, including, but not limited to:

- Classification as a micro or small enterprise according to EU Regulation 651/2014;
- Registered seat or branch in the Programme area for at least one closed business year prior to submission of the application;
- At least one employee in the last closed business year in the Programme area;

- Positive equity in the last closed business year;
- Compliance with all other conditions set out in the call documentation.

Regarding the eligibility of activities, the enterprise's activity must correspond to one of the eligible NACE codes (see page 18 of the *Guidelines for MSEs as Final Recipients*) and the detailed list of NACE codes (from page 61). Please note that each Final Recipient can only participate in one Small Project.

The documentation for the second call is available at: <https://cbchb.eu/cbc-cro-bih-mne/embrace/project-documentation/>

- Detailed information on the second call can be found in the *Guidelines for MSEs as Final Recipients*;
- Frequently Asked Questions and answers from the first call are available in the [2nd call Q&A](#);
- Examples of contracted Small Projects from the 1st call are available at: <https://cbchb.eu/cbc-cro-bih-mne/embrace/small-projects/>.

The second call for entrepreneurs is open from 1 October to 15 December 2025.

If you meet the eligibility criteria outlined above, we encourage you to seize this opportunity, form an eligible partnership, and submit one of your innovative projects under the EmBRACE second call.

#### 1.27. Question:

I am writing to request clarification regarding the interpretation of *de minimis* limits in relation to the eligibility criteria set out in the Guidelines for MSEs as Final Recipients, specifically Section 2.6 "Operation state aid," which states: "The maximum amount of aid granted to a single recipient should not exceed 300,000.00 EUR over a period of three fiscal years."

Our question concerns whether certain types of support that our company has received should be counted toward this *de minimis* ceiling.

Our company operates as an entity of the innovation infrastructure. In 2023 and 2024, our organization received financial contributions amounting to approximately EUR 1 million under the Law on Incentive Measures for the Development of Research and Innovation. Under this national legal framework, companies are allowed to redirect funds that would otherwise be paid as corporate income tax toward supporting innovative organizations, including our company. These contributions were therefore not provided as conventional grants or subsidies, but as tax-based minimis incentive measures defined specifically for fostering research, innovation, and ecosystem development.

To ensure full compliance, we kindly ask for your official confirmation or guidance on whether this type of national-level innovation support should be included when assessing the three-year EUR 300,000 *de minimis* threshold for the current project call.



Thank you very much in advance for your assistance. We are ready to provide any additional documentation or clarifications if needed.

**1.27. Answer:**

Within the framework of the EmBRACE 2nd Call, all applicants are required, in the **De minimis declaration form**, which is an integral part of the FR Statement and Small Project Application, to report all de minimis aid received during the previous three fiscal years. This requirement stems from Regulation (EU) 2023/2831 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid, which defines the thresholds and rules for de minimis aid and requires record-keeping and written notification to the recipient regarding the de minimis character of the aid.

The SPFB is not competent to provide legal interpretation or to determine whether a specific national support or tax measure constitutes de minimis aid or another form of state aid. Therefore, applicants/recipients should contact the body that granted the support to obtain an official confirmation regarding the nature of the received aid.

It is important to note that de minimis aid cannot be cumulated with any other state aid.

**1.28. Question:**

We would like to participate in the second call under the EmBRACE programme, but we have one important concern.

Our company, is classified as a micro enterprise according to national accounting criteria. We have 25 employees and a total revenue of EUR 1.2 million for the year 2024.

In the document *Guidelines for MSEs as Final Recipients – 2nd Call “EmBRACE”*, under section 2.2. Eligibility of partners – 2.2.1. Legal status, enterprise classification is defined according to different criteria. Because of this, we are not certain whether our company can be considered eligible under the rules of the call.

Our question is:

Are we allowed to apply for this call, and could the above-mentioned classification be a factor that automatically excludes us from the selection process?

**1.28. Answer:**

Thank you for your inquiry and your interest in the 2nd Call within the EmBRACE SPF project.

Within the EmBRACE project, eligible applicants are micro and small enterprises classified according to the definition from Regulation 651/2014/EU, Annex 1:

- **Micro enterprise** ( $\leq 10$  employees and annual turnover  $\leq$  EUR 2 million, or balance sheet  $\leq$  EUR 2 million);

- **Small enterprise** (10–49 employees and annual turnover > EUR 2 million and ≤ EUR 10 million, or balance sheet > EUR 2 million and ≤ EUR 10 million).

Potential final recipients must be autonomous enterprises and must not exceed the upper thresholds (49 employees, annual turnover or total balance sheet greater than EUR 10 million).

In other words, if your enterprise does not exceed these thresholds, it is an eligible applicant for the second EmBRACE call (provided that all other eligibility criteria are also met).

It is very important to emphasize that this classification includes all your partner or linked enterprises, if any.

#### 1.29. Question:

Does it affect the points who among the partners bears, for example, 40% and who 60% of the costs, or does the lead partner from Croatia have to bear a larger/smaller share?

#### 1.29. Answer:

The allocation of points among partners is not conditioned by the country of the Final recipient. A higher score is awarded to a project that has a more balanced budget distribution among partners.

The only budget-related requirement is defined in the *Guidelines for Applicants*, Chapter 2.5, *Small Project size*: 'The minimum amount of the budget of each FR in the SP is 20% of the total EU project budget.'

#### 1.30. Question:

Can a company based in Zagreb be a partner in the application process for Embrace?

In the guidelines, under section 2.2.2 Geographic eligibility rules, Zagreb County is listed in the PROGRAMME AREA table for CROATIA.

Could you please clarify whether this means that a company registered with the Commercial Court in Zagreb and headquartered in the City of Zagreb can be a project partner (provided that it meets all other eligibility criteria of the call)?"

#### 1.30. Answer:

According to the Guidelines for MSEs as Final Recipients – 2nd Call “EmBRACE” (Enhancing MSEs sustainaBle gRowth And CompEtitiveness), Interreg VI-A IPA Croatia – Bosnia and Herzegovina – Montenegro 2021–2027 Programme, each small project applicant must have its registered office or branch and must have been operating in the Programme area for at least one year prior to the submission date of the small project application.

In Chapter 2.2.2 Geographic eligibility rules, it is specified that Zagreb County is one of the eligible Programme areas, while the City of Zagreb is not an eligible area.

### 1.31. Question:

Can you kindly tell us whether a sole entrepreneur (one-person business) — registered legally as an individual entrepreneur and not as an LLC — can fall under: small and medium-sized enterprises (SMEs) stipulated in 651/2014/EU Regulation, Annex 1?

### 1.31. Answer:

One-person businesses are eligible if they meet the given eligibility criteria in 2.2. Eligibility of partners - [Guidelines for MSEs as Final Recipients 2nd Call](#).

Basic eligibility criteria for FRs are as follows (examined by company register extracts/company annual financial reports):

- FR (and/or its owner company having more than 50% of ownership rights over the FRs, and/or its linked enterprises through a natural person, cumulatively) is a MSE (micro and small sized enterprise)
- FRs must have at least one closed business year for seat and/ or branch in the Programme area
- FRs must employ at least one employee in its last closed business year in the Programme area (it is eligible that the owner is the only employee in his own business)
- FR's equity is positive for the last closed business year for seat and/ or branch in the Programme area

### 1.32. Question:

If one partner invests in paving the external warehouse space where the other partner's products will be stored, is this an acceptable cost and can his infrastructure cost then be up to 10% of his share of the budget or 10% of the total project value if the other partners do not have any infrastructure investments? Is it acceptable for him to invest in a forklift for handling the partner's new products and racks for the warehouse?

### 1.32. Answer:

As stipulated in point 3.8.7. Infrastructure and works in the Guidelines for MSEs as Final Recipients 2nd Call, Infrastructure and works are eligible costs on a real cost basis comprising the following activities:

- Reconstruction, renovation of buildings, works and infrastructure – these costs comprise expenditure related to works needed for the alteration, reconstruction, expansion of a used building

- These costs are only considered eligible if they are directly linked to the SP and are proven to be essential for its effective implementation
- Small scale infrastructure – up to 10% of total budget per FR – for infrastructure works up to 10% of the total budget of the Final Recipient who will bear that cost, not the total budget of the small project, is eligible

All investments in equipment (forklift, shelving), as well as infrastructure works must be directly linked to the project activities and necessary for the (effective) implementation of the project. Please note that the eligibility of costs will be carried out and determined during the evaluation of the project application.

### 1.33. Question:

Regarding application for 2nd call, we would kindly ask for clarification on following:

1. Are sole proprietors (obrt in BiH) and entrepreneurs (preduzetnik in Montenegro) eligible to apply for the project?

### 1.33. Answer

One-person businesses (obrt, preduzetnik) are eligible if they meet the given eligibility criteria listed in 2.2. Eligibility of partners in the document [Guidelines for MSEs as Final Recipients 2nd Call](#).

Basic eligibility criteria for FRs are as follows (examined by company register extracts/company annual financial reports):

1. FR (and/or its owner company having more than 50% of ownership rights over the FRs, and/or its linked enterprises through a natural person, cumulatively) is a MSE (micro and small sized enterprise)
2. FRs must have at least one closed business year for seat and/ or branch in the Programme area
3. FRs must employ at least one employee in its last closed business year in the Programme area (it is eligible that the owner is the only employee in his own business, but must not be employed elsewhere)
4. FR's equity is positive for the last closed business year for seat and/or branch in the Programme area

### 1.34. Question:

We have offers for equipment from Germany, Serbia and Croatia. Since the applicant is from the Republic of Croatia, the Croatian offer includes VAT. However, there is no VAT on the offers from the two countries of Germany and Serbia, because it is calculated only at the time of entry, i.e. customs clearance of goods. Are these two offers valid?

**1.34. Answer:**

They are valid, but in order for costs (such as VAT, delivery of purchased equipment, etc.) to be eligible for co-financing, they must be included in the budget.

**1.35. Question:**

Does the threshold of EUR 20,000 for 3 pro-forma offers apply including VAT or excluding VAT? Considering the different VAT rates in the participating countries, it should be without VAT, but I would like to be sure.

**1.35. Answer:**

Thank you for your inquiry.

According to the Guidelines for MSEs as Final Recipients, it is stated that the offers must be submitted excluding VAT:

“In order to verify the costs during the SP application, the FRs will be required to submit with the SPA:

- For costs between EUR 2,500.00 to EUR 20,000.00 (excluding VAT), FRs must submit 1 pro-forma (non-binding) offer.
- For costs over EUR 20,000.00 (excluding VAT), FRs must submit 3 pro-forma (non-binding) offers.”

**1.36. Question:**

During the implementation of the project (if it is approved), does the beneficiary pay their own funds first, and then you reimburse them based on the reports?

Or does it work in a way that you transfer the funds, and the beneficiary spends them in accordance with the Contract?

**1.36. Answer:**

The final recipient is obliged to pay all costs incurred during the project that are in line with the approved budget.

After that, up to 85% of the eligible costs (the EU co-financing share) is claimed by the final recipient through periodic reports submitted every 4 months.

**1.37. Question:**

I kindly request clarification regarding Annex IV – Statement on Conflict of Interest and Confidentiality. During the workshop, the signing of the statements was mentioned; however, the Guidelines for Applicants do not specify that applicants are required to complete or sign this document.

Please confirm whether Annex IV is to be completed exclusively by evaluators and members of the evaluation/selection process, or whether it is also required from applicants under the EmBRACE 2nd Call.

**1.37. Answer:**

ANNEX IV Declaration confirming the absence of any conflict of interest is a mandatory part of the call documentation and is therefore published together with the other documents; however, this document is signed by the evaluators, members of the Project Selection Committee, and the project team, not by the applicants.

**1.38. Question:**

Our project partner is a flat-tax craft business (obrt s paušalnim oporezivanjem) from Croatia that is not in the VAT system. One of the required documents for partner application is:

Employment contract – proof of employment of 1 employee – for each partner.

The owner of the craft is self-employed full-time and therefore does not have an employment contract (with himself). What can we submit as proof that he has 1 employee / that he is that one employee?

It is also required to submit:

Annual financial statement for the previous year – for each financial report, with confirmation of receipt.

A flat-tax craft business (from the Republic of Croatia) that is not in the VAT system does not prepare annual financial statements. Is it sufficient to submit the POSD form (Report on Flat-Rate Income from Self-Employment Activities) for the previous year?

**1.38. Answer:**

Regarding the first question related to proof of employment, the applicant must provide an employment contract or pay slip that demonstrates the wage cost. If such a document does not exist, the applicant is not eligible under the relevant criterion.

It is acceptable if the owner of a sole proprietorship is also the only employee working full-time in that business and pays contributions for themselves. In this case (when there is no employment contract), proof is provided through an extract from HZMO or a JOPPD form.

Regarding the financial report for sole proprietors under flat-rate taxation, it is sufficient to submit the POSD form (Report on flat-rate income from self-employment) for the previous year.

### 1.39. Question:

Can a partner in the project be a medium-sized enterprise, or do all participants in the project have to be micro or small enterprises?

### 1.39. Answer:

According to the *Guidelines for MSEs as Final Recipients – 2nd Call*, all partners in the project must be micro and/or small enterprises; medium-sized enterprises are not eligible.

Chapter 2.2. Eligibility of partners, 2.2.1. Legal status, page 9:

According to Regulation 651/2014/EU, Annex 1, micro and small enterprises may be recipients of the EmBRACE project.

Classification of enterprises:

- Micro enterprise ( $\leq 10$  employees and annual turnover  $\leq$  EUR 2 million, or balance sheet  $\leq$  EUR 2 million);
- Small enterprise (10–49 employees and annual turnover  $>$  EUR 2 million and  $\leq$  EUR 10 million, or balance sheet  $>$  EUR 2 million and  $\leq$  EUR 10 million).

### 1.40. Question:

I kindly ask you to clarify/send me the exact list of documents that the applicant must submit when applying to the second EmBRACE programme call.

### 1.40. Answer:

In Chapter 4. *Application procedure – Guidelines for MSEs as Final Recipients*, p. \_\_, the mandatory documentation is listed:

#### The following documents will be requested when applying:

1. **Small Project Application (SPA) form** (completely filled in English in MS Word, signed, stamped, and scanned in PDF format) – filled in jointly. In case of any discrepancy between the Word and PDF versions of the SPA, the PDF version shall prevail.
2. **Small project budget** (filled in English in MS Excel) – filled in jointly.



3. **Joint Statement** (filled in, signed, stamped, and scanned in PDF format) – for each FR.
4. **De minimis declaration** (filled in, signed, stamped, and scanned in PDF format) – for each FR.
5. **Tax Administration Certificate** (not older than 30 days) – for each FR.

In Bosnia and Herzegovina, the administration of taxes is divided between different levels of government:

- **Indirect taxes** (such as Value Added Tax – VAT) are administered at the state level by the Indirect Taxation Authority of Bosnia and Herzegovina (Uprava za indirektno oporezivanje Bosne i Hercegovine).
  - **Direct taxes and social security contributions** (including corporate income tax, personal income tax, and various contributions) are administered at the entity level.
- Please refer to the documentation for details for partners from Bosnia and Herzegovina.

6. **Company register extract** (Croatia; Bosnia and Herzegovina; Register of Business Entities of the Republika Srpska in Bosnia and Herzegovina; Montenegro) – for each FR.
7. **Pro-forma offers for external expertise and services costs and equipment costs** (not older than 30 days) – for each FR.
  - For costs between EUR 2,500 and EUR 20,000 (excluding VAT), FRs must submit **1** pro-forma (non-binding) offer.
  - For costs exceeding EUR 20,000 (excluding VAT), FRs must submit **3** pro-forma (non-binding) offers.
8. **In case of small-scale infrastructure costs:** FRs must submit, together with the SPA, a proof of legal interest (proof of ownership or lease contract), as well as a technical description with pro-forma offers for the planned works, in accordance with national laws and regulations of each country, if the SP includes small-scale infrastructure costs (not older than 30 days) – for each FR.
9. **Employment contract** – proof of employment of 1 employee – for each FR.
10. **Annual financial report for the previous year** – for each FR, accompanied by a confirmation of receipt.
  - For Final Recipients from Montenegro, instead of the confirmation of receipt for the Annual Financial Report for the previous year, it is acceptable to provide the registration number (*Broj iskaza*) assigned upon submission of the Annual Financial Report.

We note that the project application in Word + PDF format, as well as the project budget table, are joint documents for all partners, while each partner must obtain all other listed documents individually for their own company.

Also, the [platform](#) through which you submit the project application guides you through the sections in which you must upload the required documentation.

#### **1.41. Questions:**

#### **1.41. Answers:**

##### **Are crafts eligible as final recipient?**

Crafts (and flat-rate crafts) are eligible for funding if they meet the conditions set out in point 2.2. Eligibility of partners in the Guidelines for MSEs as Final Recipients 2nd Call, and the main criteria are:

- they must be independent entrepreneurs, as set out in Article 3 of Annex 1 to Commission Regulation 651/2014/EU
- they must be registered or have a branch of the company within the area defined by the Croatia - Bosnia and Herzegovina - Montenegro Programme at least one year before the date of submission of the application for the Small Project Proposal
- they must have at least one closed business year for the headquarters and/or branch in the programme area;
- they must have at least one employee in the last closed business year
- they must have a positive closed last business year

##### **Can a partner be a flat-rate craft?**

Yes, if it meets the above criteria.

##### **In the case of a craft partner from BiH, what financial documentation is required for the application?**

The list of required documentation for application can be found in point 4. Application procedure in the Guidelines for MSEs as Final Recipients 2nd Call.

##### **In the case of a flat-rate business partner, how does he submit proof of employment - if he is an entrepreneur to a natural person who does not necessarily have an employment contract?**

It is eligible that the owner is the only employed person in his own craft (not with another employer) and that he pays the contributions himself. If he does not have an employment contract and does not pay a salary, he can prove this with documentation in accordance with national legislation or regulations (in Croatia, for example, the JOPPD form or an extract from the HZMO).

#### **1.42. Questions:**

#### **1.42. Answers:**

We are contacting you on behalf of all three companies with a few questions regarding the application rules:

**Does the equipment to be purchased have to be new, or can it be used?**

In accordance with what was stated in point 3.7. Eligible activities (Guidelines for MSEs as Final Recipients 2nd Call), the equipment to be purchased must be new.

**Is it possible to register one machine as part of the procurement, but also several machines that together form one technological unit - with the condition that the total value does not exceed the maximum allowed amount from the fund?**

It's possible.

**The documentation states that the total amount of the procurement must be between 20,000 and 200,000 EUR.**

**Please clarify:**

- **does this amount refer to the total value of the joint project of the three companies or can each company within the partnership apply individually with a procurement within that range?**

As stated in point 2.5. Small Project size (Guidelines for MSEs as Final Recipients 2nd Call), the total amount of EU co-financing per small project cannot be less than 20,000.00 EUR and cannot exceed 200,000.00 EUR regardless of the number of partners in the project.

**Also, do the values have to be approximately the same for all partners or can the distribution be different (e.g. 45,000 / 45,000 / 45,000 EUR or another ratio)?**

In accordance with Table 5, criterion C4.1. (Evaluation manual 2nd Call), a project with a more even budget distribution is evaluated with a higher number of points.

**When we apply for the project, can the total value exceed EUR 200,000, assuming that your financing covers up to 85% of the project's value, i.e. up to a maximum of EUR 200,000, while all the amount above that is covered by our participation?**

The total value of a small project can exceed EUR 200,000.00. As stated in point 2.5. Small Project size (Guidelines for MSEs as Final Recipients 2nd Call), the total amount of EU co-financing per small project cannot exceed EUR 200,000.00, and the rest of the costs are borne by each partner.

**We have seen that for the procurement of equipment whose value is over EUR 20,000, three offers from different suppliers must be submitted. Additional information please:**

- **do the offers have to be of approximately the same value**

As stated in the Procurement Guidelines for the Final Recipients under EmBRACE project, the end user is obliged to send an inquiry to 3 different suppliers, and it depends on the supplier whether they will make an offer or not and what price they will quote for the requested procurement item.

**• who makes the final decision on the selection of the offer – your institution or us as applicants?**

Each end user of a small project independently carries out procurement procedures.

**• is it mandatory to choose the most favorable offer or is there a possibility to choose another offer with an explanation?**

Answered in the question above.

**If the funds are approved and the project is realized, please clarify what obligations we have after implementation? In addition to the well-known obligation that the acquired equipment must not be sold within three years, we are interested in:**

- whether there are additional requirements regarding reporting, submitting evidence of equipment use or other administrative obligations,**
- whether periodic evaluations or monitoring activities are carried out by your institution,**
- and what procedure follows after the completion of the procurement itself and the implementation of the activity?**

Reporting on the activities carried out, along with the submission of supporting documentation, is done every 4 months. All documentation related to the reporting and implementation of the small project as part of the 2nd Call of the EmBRACE project will be sent in a timely manner to all End Users with whom the contract is concluded and publicly available on the project's website. On this link you can study the implementation documentation as part of the 1st Call (Documentation for the implementation and reporting of Small Projects – 1st Call).

**1.43. Question:**

Is the procurement of the necessary material for the creation of the pilot project included in the cost of equipment?

**1.43. Answer:**

HAMAG-BICRO cannot give prior opinions on the eligibility of costs, which will be checked during the review of the project application. However, we would like to emphasize once again that all eligible types of equipment costs are as stated in point 3.8.6. Equipment (Guidelines for MSEs as Final Recipients 2nd Call):

Purchase of new equipment is eligible only if the items are essential and directly related to the implementation of the SP, and if they are listed in the approved SP budget.

All equipment shall be other than those covered by the expenditures of cost categories 'Office and administration' and 'Infrastructure and works' and are necessary and shall exclusively be used for SP implementation, having a clear contribution to the achievement of the SP's objectives.

**Equipment shall be distinguished according to its purpose:**

• Content-related / thematic equipment, directly linked to (or forming part of) the SP outputs or deliverables which will be used by FRs and target groups in line with the SP objectives. Thematic equipment may be also linked to the 'Investment and works' budget line. Purchase of the following types of equipment is eligible costs on real cost basis:

1. IT hardware and software (clear SP relevance is necessary)
2. Furniture and fittings
3. Laboratory equipment
4. Machines and instruments
5. Tools or devices

**6. Other specific equipment needed for the SP**

• Equipment for general (office) use, such as computers, office furniture etc. which is used for the daily work of the SP staff and which is not already included under 'Office and administration'.

**1.44. Question:**

The basic eligibility criteria for final recipients of the emBRACE call for proposals state:

• Final recipients must employ at least one employee in their last closed business year in the programme area;

Does this mean that my last closed year for my business is 2024 and that I am required to have one employee in that year or that I had to employ one additional person in that year?

**1.44. Answer:**

This means that FR must have at least one employee in 2024 (and not hire an additional person during that year).

**1.45. Question:**

Our bosnian partner has solar plants that are selling electricity back to the grid and are generating income, this income is aided by the state in the form of the preferential electricity purchase price.

Does this qualify to be noted on the Declaration on de minimis aid for Final Recipients?

We emphasize there is no legal document stating this state aid is of de minimis category.

#### 1.45. Answer:

Within the framework of the EmBRACE 2nd Call, all applicants are required, in the *De minimis* declaration form, which is an integral part of the FR Statement and Small Project Application, to report all *de minimis* aid received during the previous three fiscal years.

This requirement stems from Regulation (EU) 2023/2831 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to *de minimis* aid, which defines the thresholds and rules for *de minimis* aid and requires record-keeping and written notification to the recipient regarding *the de minimis* character of the aid.

The SPFB is not competent to provide legal interpretation or to determine whether a specific support/aid constitutes *de minimis aid* or another form of state aid.

If you are not certain whether the previously granted support constitutes *de minimis* aid, we recommend that you contact the authority that awarded the support. Only the aid provider is competent to confirm the legal basis of the support and to issue the relevant documentation. The SPFB cannot presume that the support was granted as *de minimis* unless this is explicitly stated in the award decision or in another appropriate official document.

It is important to note that *de minimis* aid cannot be cumulated with any other state aid.

#### 1.46. Question:

We kindly request an official clarification regarding the eligibility of a potential partner from Bosnia and Herzegovina.

The organisation in question is a small enterprise that meets all formal eligibility criteria (number of employees, at least one closed financial year, positive equity). However, its ownership structure includes:

- one shareholder that is a **public body** in Bosnia and Herzegovina, and
- another shareholder that is a **legal entity registered in the European Union**, whose founding entity is also a **public body**.

Given that both owners have the status of public institutions (and that there are no private individuals or private commercial companies within the ownership structure), we kindly request confirmation of the following:

**Can such an enterprise, whose shareholders are public institutions rather than commercial companies, be considered an eligible small enterprise (SME) within the 2nd EmBRACE Call, provided that it meets all other eligibility criteria?**

Furthermore, should the enterprise be considered eligible, we kindly ask for guidance on the following:

**How should the Joint Statement (Annex X) be correctly completed in the section regarding ownership structure, when the shareholders are public institutions?**

In particular, we would like to clarify whether such owners should be listed in the matrix, and if so, how they should be classified (for example, as “public body”, “non-commercial entity”, or another appropriate category).

This clarification is essential to ensure that the SME status is determined correctly and that the application fully complies with the programme eligibility rules.

**1.46. Answer:**

Thank you for your inquiry.

Please note that the definition of micro and small-sized enterprises (MSEs) in the context of the EmBRACE programme follows **EU Regulation 651/2014, Annex 1**, which sets criteria based on number of employees, turnover, balance sheet total, and ownership/control structures.

As a Small Project Fund Beneficiary (SPFB), we cannot provide a legal interpretation regarding whether a specific ownership structure qualifies as a small-sized enterprises. We kindly suggest that you consult [EU Regulation 651/2014](#), Annex 1 (Articles 1- 3 of the Regulation) directly to assess how the rules apply to your specific ownership structure and circumstances.

Please also note that the **Joint Statement** is an integral part of the application and must be submitted together with your project proposal. All owners of the enterprise, including public authorities or other institutions, must be listed accurately when completing the document.

The eligibility of each applicant will be assessed during project evaluation based on the documentation provided and the applicable rules.

**1.47. Question:**

Dear Sir/Madame,



for the purpose of applying for the grant we are obliged to present non-binding offers for any equipment expenses. Is it acceptable to change the supplier but still procure the same equipment with the same technical specifications during the implementation of the project?

**1.47. Answer:**

It is acceptable to change the supplier but still procure the same equipment with the same technical specifications during the implementation of the project.

**1.48. Question:**

In cooperation with a company from Split, we planned to apply jointly, however, our company is based in the municipality of Kreševo, which is not listed in the list of border areas included in the program. Please clarify:

is there a basis for application if the headquarters of the company is not on the list of acceptable border posts, or are such applications considered automatically inadmissible?

Thank you in advance for the information.

**1.48. Answer:**

The geographical eligibility conditions are set out in point 2.2.2. Geographic eligibility rules (Guidelines for MSEs as Final Recipients 2nd Call) which lists the municipalities belonging to the programme area. A final beneficiary based in the municipality of Kreševo is automatically considered ineligible for funding.

**1.49. Question:**

Dear Sir/Madam,

Is it acceptable to invest in a prototype of an engine for refrigeration systems, which would eliminate freon from use?

The company would hire experts in mechanical engineering, electronics and other necessary professions to develop the prototype. If they have the funds, they would start producing it themselves after purchasing the plant.

If another production company shows interest in it, is it possible to sell the prototype?

Let me note that the company is currently engaged in installing refrigeration systems for large centers.

**1.49. Answer:**

Please check the eligibility businesses and activities listed in point 3.7. Eligible activities (Guidelines for MSEs as Final Recipients 2nd Call):

Eligible activities of SP business cooperation should belong to the following NACE codes<sup>2</sup> representing the target economic sectors of EmBRACE:

C – Manufacturing (10 - 33);

D – Electricity, gas, steam and air conditioning supply (35);

E – Water supply; sewerage; waste management and remediation activities (36 - 39);

F – Construction (41 - 43);

G – Wholesale and retail trade, repair of motor vehicles and motorcycles – only one of the FRs can be granted to implement these types of activities within a single SP (45 - 47);

H – Transportation and storage (49 - 53);

I – Accommodation and food service activities – excluding extension and quality improvement of accommodation capacities, focusing on quality service development to be stipulated on call level (55-56);

J – Information and communication (58 - 63);

M – Professional, scientific and technical activities (69 - 75);

N – Administrative and support service activities, only the following activities:

- Employment activities (78),
- Travel agency, tour operator reservation service and related activities (79),

S – Security and investigation activities (80);

P – Education (85);

Q – Human health and social work activities (86 - 88);

R – Arts, entertainment and recreation, only the following activities:

- Creative, arts and entertainment activities (90),
- Libraries, archives, museums and other cultural activities (91),
- Sports activities and amusement and recreation activities (93).

All eligible activities of each FR should belong to any of the above-listed NACE codes. Activities outside these NACE codes are ineligible. See: NACE Rev. 2 Statistical classification of economic activities in the European Community, Eurostat, European Communities, 2008.

Independently eligible activities of cooperating SPs supported within the EmBRACE project:

- Development and adaptation of business models, products, services and processes, fostering development of local MSEs with a strong focus on introducing product or process innovation.
- Enhancing MSEs cross-border business cooperation.
- Development of new technology, service or product.
- Purchase of new equipment for the sake of joint technology, service and product development.
- Purchase of new equipment for the sake of moving materials, packaging and storage in the phase of joint technology, service and product development (purchase of vehicles is prohibited).
- Activities for entering new markets of jointly developed technology, service and product:
- Appearance at events, fairs, business meetings and international project development
- workshops organized outside the Program area;
- Organization of business seminars, workshops and conferences;
- International market surveys;
- Development or upgrading of marketing tools and materials in foreign language (design, layout, elaboration);
- Marketing actions targeting markets outside the Program area.
- External expertise for the sake of developing joint technology, service and product.
- Supporting local MSEs to face challenges related to their size, limited resources (such as skills and finance) or industry and market conditions.
- Improving the capacity of micro and small entrepreneurs regarding marketing, branding, ebusiness, competitiveness including education and training in entrepreneurship skills.
- Developing and supporting existing business networks of SMEs in applying ICT (purchase and installation of new hardware and software equipment (except for general office use)), innovation and new technologies to develop and promote common products for local cross-border and international market.
- **Implementing joint pilot actions to introduce products and new business solutions and/or process innovation**

Also, according to point 4.4. Indicators, the indicator RCO 84 - Pilot actions developed jointly and implemented in projects is listed, which includes:

Pilot actions test novel or adapted solutions in Program area. They focus on jointly demonstrating and implementing novel approaches in regions for the benefit of key stakeholders and/or adapting existing approaches in different regions for further uptake. The indicator counts the pilot actions developed jointly and implemented by supported projects.

A pilot action should:

- Have an experimental or demonstrative character. The scope of a jointly developed pilot action could be to test, evaluate and/or demonstrate novel and/or adapted procedures, processes, instruments, tools, services, and/or practices. Have a clearly defined scope and aims that are achievable during a project lifetime (e.g., location, duration, size, etc.);
- Be jointly designed, implemented, evaluated, communicated on and taken up by project partners
- Have a clear territorial element with partners cooperating transnationally
- **Should not only be developed, but also implemented by the end of the project, with the implementation of the pilot action being finalized by the end of the project.**

Please note that the eligibility of costs and project activities will be determined after the project application has been reviewed.

#### 1.50. Question:

I am reaching out to request some clarification regarding the completion of the Joint Statement Excel document.

I have a specific situation that I would like guidance on:

- The applicant is Company A, which is 100% owned by an individual.
- This individual also owns 50% of Company B, where their spouse serves as the Executive Director.

My questions are:

Should Company B be considered a *linked company* (and therefore its details filled in Table 2), or a *partner company* (to be included in Table 4)? In the *Linked Persons* section, should the spouse of the owner, who is the Executive Director in Company B, be included?

#### 1.50. Answer:

Please note that the classification of enterprises as autonomous, partner or linked companies follows [EU Regulation 651/2014, Annex 1](#).

As the SPFB, we are not authorised to interpret or determine the relationship between enterprises. Applicants are responsible for assessing their ownership and control structure in line with the Regulation.

To determine whether Company B should be reported as a partner or linked enterprise in your case, we kindly recommend consulting Articles 1, 2 and 3 of Annex 1 EU Regulation 651/2014 and to identify persons that should be listed in the “Linked Persons” section of the Joint statement, please note that it refers to their share of capital or voting rights in the applicant company.

The Joint Statement must be completed based on this assessment, and final eligibility will be verified during project evaluation.

#### 1.51. Question:

Dear/s,

Given that I am preparing an application for applying for the second call for entrepreneurs within the EmBRACE project, I would like some clarifications:

When fulfilling the budget, for example laptops/computers that have different characteristics and purposes, do I treat them as one budget item or separate them? Also, the acquisition of camera lenses, which may or may not have the same characteristics, do they go under one item or do I separate them?

And when are the project evaluation results expected?

#### 1.51. Answer:

If the procurement is related and there are Bidders on the market who can offer all procurement items, it is recommended to consolidate the procurement into one procedure, including the budget line (to avoid splitting procurements that should be subject to a “higher” procedure). Please note that the eligibility of costs and budget items will be determined during the review of the entire project application.

Regarding the deadline for the evaluation of project applications, this is described in point 2.1 Selection process (Evaluation manual):

*“... The deadline for the entire evaluation process is **90 calendar days** after respective cut-off date. The SPFB will then inspect and collect the evaluation results and provide a list of small project applications (ANNEX V List of SPAs in this document). The SPFB is entitled to contact the evaluators in case any evaluation irregularities are observed. **Within 105 calendar days after the cut-off date, a Selection Committee (SC) session will be organised.** The SC is responsible for the selection of the SPAs. The applicants will be informed about the decision of the SC within 30 calendar days after the meeting.”*

**1.52. Question:**

I would like to request confirmation that Osijek-Baranja County is not included in the EmBRace II call

**1.52. Answer:**

Thank you for your inquiry.

According to the Guidelines for MSEs as Final Recipients, page 10 lists the counties included in the Programme area. In Croatia, these are the following counties:

*12 counties: Brod-Posavina County, Vukovar-Srijem County, Karlovac County, Sisak-Moslavina County, Lika-Senj County, Zadar County, Šibenik-Knin County, Split-Dalmatia County, Dubrovnik-Neretva County, Bjelovar-Bilogora County, Požega-Slavonia County, Zagreb County.*

Therefore, Osijek-Baranja County is not an eligible area under the 2nd EmBRACE call.

**1.53. Question:**

we kindly request clarification on the following points:

1. Is it necessary, at the project application stage, to submit the CVs of project team members and employment contracts for the staff who will be involved in the project?
2. Are we required to provide the list of personnel who will participate in the project (free-format document) already at the time of submitting the project application?
3. If the offer shows prices without VAT, and the Final Recipient (FR) is a VAT payer in their country, are we allowed to independently calculate and add VAT to the amount in the budget table?
4. When completing the application forms, should we use the company name in English or the original official name of the company (e.g. "XY d.o.o." or should it be written as "XY LTD")?

**1.53. Answer:**

Thank you for your inquiry. Please find below the requested clarifications regarding the 2nd EmBRACE Call:

1. In the 2nd EmBRACE Call, applicants are not required to submit the CVs of project team members at the application stage. It is only mandatory to provide proof of employment (an employment contract) for at least one employed worker in the company, as evidence that the MSE meets the employment requirement for 2024.
2. No, the decision on the project team is submitted only if the project is selected for funding. This information is provided through the first project report.

3. VAT is eligible cost for all final recipients and must be indicated in the budget. If the offers you receive do not include VAT, you may add it yourselves so that VAT is reflected in the project budget and can later be claimed during project implementation.
4. If you have an official company name in English, you may use the English version. If not, you may keep the company name in Croatian. The application forms must be completed in English; however, this refers to the content of the forms and does not necessarily require translating the company's official legal name.

**1.54. Question:**

partners are developing joint solution new for both of their organizations, as stated they are required to sign partnership agreement, is this document to be formed freely or is there a template available? What does

Also, will each FR sign separate subsidy contract?

Lastly, when filling in Joint statements in table 3 the bosnian partner cannot enter valid tax number since their ID consists of 13 characters and not 11 or 8 as stated per the comment in the cell, should we enter the number by hand? Also most of the cells containing annual turnover or total assets are in currency kuna, are we allowed to change that format to eur?

**1.54. Answer:**

The Partnership Agreement is submitted only if the project is proposed for funding (after Selection Committee decision). A template of the Agreement exists and will be provided to all Final Recipients during the pre-contracting phase.

Yes, each Final Recipient will sign a separate subsidy contract with the SPFB. Although the project is joint, each FR is contracted individually for its share of the budget and responsibilities.

The Bosnian partner may enter their tax identification number manually. It is important that the number entered is accurate and corresponds to the official national system.

Currency format – It is acceptable to convert the fields from HRK to EUR, as the column headers indicate that “Total annual turnover” and “Total annual balance sheet” should be presented in EUR.

**1.55. Question:**

I kindly request confirmation that the company XX is not an eligible partner under this programme (criterion: territory).

I need this confirmation due to a request from top management.

**1.55. Answer:**



The project team cannot assess or confirm the eligibility of a specific enterprise under the EmBRACE Call. This can only be determined through the formal evaluation process, based on a review of the full project application and all submitted supporting documents.

However, we would like to highlight that the basic eligibility criteria that all project partners must meet are listed in the *Guidelines for MSEs as Final Recipients*, on page 12:

“Basic eligibility criteria for FRs are as follows (examined by company register extracts/company annual financial reports):

- The FR (and/or its owner company having more than 50% of ownership rights over the FRs, and/or its linked enterprises through a natural person, cumulatively) is an MSE (micro and small sized enterprise);
- FRs must have at least one closed business year for the seat and/or branch in the Programme area;
- FRs must employ at least one employee in its last closed business year in the Programme area;
- The FR's equity is positive for the last closed business year for the seat and/or branch in the Programme area.”

We recommend consulting the *Evaluation Manual* and the related eligibility assessment questions provided in Annex 2 for detailed guidance on eligibility conditions.

### 1.56. Question:

In the process of preparing our project application for the 2nd EmBRACE Call, we kindly request clarification on the following questions:

1. Since the project focuses on the development of an innovative technology/service/product, is there any prescribed requirement regarding the Technology Readiness Level (TRL)? Specifically:
  - Which TRL range is allowed within the project?
  - Does the innovation need to be at a minimum TRL at the time of application, or is TRL progression assessed exclusively through project activities?
2. The following activities are listed in the Guidelines as independently eligible activities of cooperating SPs. Could you please confirm whether these activities are mandatory to include in the project?
 

*Independently eligible activities of cooperating SPs supported within the EmBRACE project:*

  - Development and adaptation of business models, products, services and processes, fostering development of local MSEs with a strong focus on introducing product or process innovation.
  - Enhancing MSEs cross-border business cooperation.
  - Development of new technology, service or product.
  - Purchase of new equipment for the sake of joint technology, service and product development.

- Purchase of new equipment for the sake of moving materials, packaging and storing in the phase of joint technology, service and product development (purchase of vehicles is prohibited).
  - Activities for entering new markets of jointly developed technology, service and product:
    - Appearance at events, fairs, business meetings and international project development workshops organised outside the Programme area;
    - Organisation of business seminars, workshops and conferences;
    - International market surveys;
    - Development or upgrading of marketing tools and materials in a foreign language (design, layout, elaboration);
    - Marketing actions targeting markets outside the Programme area.
  - External expertise for the sake of developing joint technology, service and product.
  - Supporting local MSEs to face challenges related to their size, limited resources (such as skills and finance) or industry and market conditions.
  - Improving the capacity of micro and small entrepreneurs regarding marketing, branding, e-business, competitiveness, including education and training in entrepreneurship skills.
  - Developing and supporting existing business networks of SMEs in applying ICT (purchase and installation of new hardware and software equipment, except for general office use), innovation and new technologies to develop and promote common products for local cross-border and international market.
  - Implementing joint pilot actions to introduce product and new business solutions and/or process innovations.
3. If the above activities are mandatory, is it permissible to combine several activities into one, or must each activity be presented separately?
  4. Are the following activities considered eligible within the Call: project management and communication/visibility?
  5. In the section of the application form where activities must be described (*PART D – Workplan*), specifically in the subchapter “*Describe the activities within the workplan*”, the character limit is only 1,500 characters for describing all activities. Are we expected to copy this box multiple times and submit a separate description for each activity, or should all activities be summarised within the single provided box?
  6. In some parts of the Guidelines, the term “*Work packages*” is used. Are we required to structure the project using work packages in the application form?

#### 1.56. Answer:

Thank you for your questions related to the preparation of your project application for the 2nd EmBRACE Call. Please find the clarifications below:

1. Technology Readiness Level (TRL) - [The Guidelines for Applicants](#) do not define or require any specific Technology Readiness Level (TRL) for proposed innovations. There is no minimum TRL required at the time of application, and TRL progression is not assessed as a formal criterion.
2. No, it is not mandatory to include all of the listed activities. They represent independently eligible options, and each project should select only those activities that are relevant and necessary for achieving its specific objectives and results.
3. Activities may be grouped and combined within a logical structure. Applicants are not required to present each eligible activity separately, as long as all planned actions are clearly described within the work plan. The essential requirement is that the activity plan remains coherent and feasible.
4. Yes, project management and communication/visibility activities are considered eligible within the Call. According to Chapter 3.8 “Eligibility of costs of Final Recipients” in the GfA, under “External expertise and services,” costs related to **publicity, promotion, and communication**—such as IT systems and website development, promotion, communication, publicity or information, and participation in promotional events (e.g., registration fees)—are eligible. Additionally, under the same category, **services related to SP administration and management**—including collection of expenditure documents, maintenance of files, and public procurement activities at the FR level—are also eligible.
5. All activities should be summarised within the single provided box of 1,500 characters. It is not required to copy the box multiple times for each activity. Applicants should provide a concise and clear overview of all planned activities, highlighting their purpose, main steps, and expected results, while staying within the character limit. The focus should be on presenting a coherent and integrated workplan rather than detailed descriptions for each individual activity.
6. No, it is not mandatory to structure the project using “work packages” in the application form. The term is used in the Guidelines for clarity and reference purposes, but applicants should focus on clearly describing all planned activities, their objectives, main steps, and expected results within the provided sections of the form. A coherent and well-structured workplan is required, but it does not need to be divided into formal work packages.

### 1.57. Question:

Is the purchase of a forklift for a stone-cutting company considered an eligible project cost?

The forklift is needed for the transport of large stone blocks.

### 1.57. Answer:

According to the Guidelines for Applicants (GfA), Chapter 3.7 – Eligible Activities, the following is stated:

“Purchase of new equipment for the sake of moving materials, packaging and storing in the phase of joint technology, service and product development (purchase of vehicles is prohibited).”

Therefore, the purchase of new equipment for the purpose of moving materials, packaging, and storing during the joint development of technology, services, or products is listed as an eligible activity. The Guidelines explicitly prohibit the purchase of vehicles intended for transport on public roads; however, forklifts used exclusively within industrial facilities, warehouses, or work sites can be classified as equipment/machinery.

Consequently, the purchase of a forklift for internal or on-site handling of stone within the project premises can be considered an eligible cost under the EmBRACE 2nd Call, provided that its use is clearly justified as necessary for the effective implementation of the project.

Please note that the final eligibility of this cost will be determined during the evaluation of your project application. It is recommended to clearly indicate in the activity description and budget the purpose and manner of using the forklift so that evaluators can confirm its direct link to the project.

**1.58. Question:**

In the case of a self-employed craft, is a certificate from HZMO containing the information registered in the central records sufficient proof of employment?

If not, what kind of proof is required for the owner of a self-employed craft who works full-time in their own business?

**1.58. Answer:**

Thank you for your inquiry.

The applicant must provide an employment contract or payslip demonstrating the incurred wage costs. If such a document does not exist, the applicant is not eligible under this criterion.

However, it is acceptable if the owner of a self-employed craft is the only employee working full-time in their business and pays contributions for themselves. In this case, when no employment contract exists, proof can be provided through an extract from HZMO or a JOPPD form.

**1.59. Question:**

I saw that the deadline for submitting the application is December 15, but it doesn't say the exact time. Is it midnight on the 14th of December or some other time?

**1.59. Answer:**

The deadline for submitting the project application is December 15th 2025, by 11:59 p.m., i.e. by the end of that day.

**1.60. Question:**

Dear EmBRACE team,

Kindly provide clarification for following questions:

- a) Can the country that develops the product also use its own market for placement and testing?
- b) Could you please clarify "third countries/markets? Can we at this stage include and suggest third countries or should we focus only on EmBRACE countries?
- c) Annex-VII-Small-project-application-form\_2nd-Call - C.1.3. Criteria for cooperation - do we have to opt for one only?

**1.60. Answer:**

Please find the answers below:

- a) As stated in 3. Cooperation criteria of [Guidelines for MSEs as Final Recipients 2nd Call](#):

According to the Ansoff matrix the following levels of business cooperation intensity may be identified concerning the SPs (from the lowest to the highest intensity):

**PENETRATION: Placing existing product, technology, or service to existing markets** of FRs, without entering into each other's market or third markets. Provision of only promotional intervention that may result a better knowledge about the product, technology, or service on the existing markets.  
– This is **INELIGIBLE** for granting from EmBRACE project

**MARKET DEVELOPMENT: Finding a new market to an existing product:** an already developed product, technology or service will be placed on a new market (the partner country's market or a third one), which can be made possible through this cooperation. In this case one of the FRs is the owner of the product, the other one provides an access to the new market (in its own or third country). – This is **CONDITIONALLY ELIGIBLE** if entering the new market does not mean parallelly reduction of market presence in the FR's existing markets but increase in total selling.

**PRODUCT DEVELOPMENT: Introduction of a new product to an existing market:** a new product, technology or service will be developed to a market where one of the FRs are already present. In this case both FRs are co-developers of the product that will be placed on one of their existing markets. In this type of cooperation, the product know-how represents the added value of cooperation. This is **ELIGIBLE** for granting from EmBRACE project.

DIVERSIFICATION: **Development of a new product to a new market:** both the developed product, technology or service and the gained market are new. This represents the most advanced level of cooperation that may involve several modality options: one (or more) of the FRs do the product development, other FR(s) give the access to the new market which may be in the partner countries or in third countries. This is the level of cooperation intensity where cooperation of more than two FRs may be necessary. This is the MOST PREFEREABLY ELIGIBLE for granting from the EmBRACE project.

- b) As stated above, " *This represents the most advanced level of cooperation that may involve several modality options: one (or more) of the FRs do the product development, other FR(s) give the access to the new market which may be in the partner countries or in third countries. ", third countries are countries outside EmBRACE area.*
- c) You can opt for both criteria.

#### 1.61. Question:

I am attaching your IDB, VAT number, Court Decision for the establishment of a limited liability company, Federal Bureau of Statistics number.

Which of the above, or some other document, is required to be attached to the project?

Another question, is there a deadline by which the company must be established in order to meet the criteria for participation in this project?

I would also like to ask whether it is necessary to attach both certificates of settled obligations towards direct and indirect taxes at this stage of applying for the project?

#### 1.61. Answer:

Below are the answers to your questions:

1. As stated in point 4 of the Application procedure in the Guidelines for MSEs as Final Recipients 2nd Call:

The following documents will be requested when applying:

1. Small Project Application form (completely filled in English in MS Word, signed, stamped and scanned in pdf format) – filled in jointly. In case there is a discrepancy between the SPA for in Word and pdf, the pdf version shall prevail.
2. Small project budget (filled in English in MS Excel) – filled in jointly
3. Joint Statement (filled in, signed, stamped and scanned in pdf format) – for each FR
4. De minimis declaration (filled in, signed, stamped and scanned in pdf format) – for each FR

5. Tax Administration Certificate (not older than 30 days) – for each FR

In Bosnia and Herzegovina, the administration of taxes is divided between different levels of government:

- Indirect taxes (such as Value Added Tax – VAT) are administered at the state level by the Indirect Taxation Authority of Bosnia and Herzegovina.

Herzegovina).

- Direct taxes and social security contributions (including corporate income tax, personal income tax, and various contributions) are administered at the entity level.

Federation of Bosnia and Herzegovina (FBiH):

Final recipients based in the Federation of BiH are required to submit the following two certificates:

a) A certificate issued by the Indirect Taxation Authority of Bosnia and Herzegovina, confirming that all obligations related to indirect taxes (VAT) have been settled.

b) A certificate issued by the Federal Ministry of Finance / Tax Administration of the Federation of BiH or relevant cantonal tax administration branch office according to the place of registration of

the legal entity, confirming that all obligations related to direct taxes and social contributions have been fulfilled.

6. Company register extract (Croatia; Bosnia and Herzegovina; Register of Business Entities of the Republika Srpska in Bosnia and Herzegovina, Montenegro) – for each FR

7. Pro-forma offers for external expertise and services costs and equipment costs (not older than 30 days) – for each FR

8. In case of small-scale infrastructure costs: FRs will be required to submit with the SPA the proof of legal interest (proof of ownership or lease contract) and submit a technical description with pro-forma

offers of the planned works according to the national laws and acts for each country if SP includes small scale infrastructure costs (not older than 30 days) – for each FR

9. Employment contract - proof of employment of 1 employee – for each FR

10. Annual financial report for the previous year – for each FR, accompanied by the confirmation of receipt.



2. If you meant the period How long must a company exist as an economic entity before submitting a project application, and in order to be an acceptable applicant, the above is defined in 2.2.3. Professional and financial background Guidelines for MSEs as Final Recipients 2nd Call:

Basic eligibility criteria for FRs are as follows (examined by company register extracts/company annual financial reports):

- FR (and/or its owner company having more than 50% of ownership rights over the FRs, and/or its linked enterprises through a natural person, cumulatively) is a MSE (micro and small sized enterprise);
- FRs must have at least one closed business year for seat and/or branch in the Program area;
- FRs must employ at least one employee in its last closed business year in the Program area;
- FR's equity is positive for the last closed business year for seat and/or branch in the Program area.

3. The answer is the same as under 1.

#### **1.62. Question:**

We kindly request clarification regarding the following situation:

If two project partners intend to use the same external consultant service (e.g., project management support), is it acceptable to submit one offer addressed to both partners and allocate the total service amount between their individual project budgets?

Or is it necessary in this case to obtain two separate offers, each addressed to one partner, with the service amount divided proportionally?

Thank you in advance for your response.

#### **1.62. Answer:**

Each partner submits offers for the costs in its Project, which means that each partner should also carry out its "own" (that is, separate) procurement procedure, which must be transparent and without potential conflicts of interest. Also, Shared costs are not allowed within the EmBRACE project, as stated in the [Evaluation manual for 2nd Call](#), 1.5. Ineligible costs of the Small Project.

#### **1.63. Question:**

I want to check three more things:

Point 6. Is it okay for us to submit the Court Decision on the opening of a company from 2023 for FBiH?

Point 9. Is the employment contract sufficient and/or the tax return for FBiH?

In case of using META and Google ads in our project in the amount of more than EUR 2000, how can we deliver Pro Forma Offers to you?

**1.63. Answer:**

Dear Sir/Madam,

The extract from the court register and the employment contract are prescribed under points 6 and 9 of the list of documents required for application.

If it is not possible to obtain a quote from the supplier for the service, you can provide a screenshot of the cost calculation with the offered price of the service. Please note that for amounts up to EUR 2,500.00, it is not necessary to submit a quote.

**1.64. Question:**

Dear Sir,

Is the statement number eg xxxxx/2024 (in the upper right corner) in the document

STATEMENT ON THE OVERALL RESULT /SUCCESS BALANCE SHEET/

in the period from 01.01.2024. until 31.12.2024. year

the information you are looking for?

**1.64. Answer:**

Dear Sir,

If the question refers to a partner from Montenegro, point 4 of the Application procedure in the Guidelines for MSEs as Final Recipients 2nd Call states:

For Final Recipients from Montenegro, instead of the confirmation of the receipt for the Annual financial report for the previous year, it is acceptable to provide the registration number (Broj iskaza) provided to them upon submission of the Annual Financial Report.

**1.65. Question:**

We are currently preparing a project proposal for the EmBRACE 2nd Call and kindly request clarification on the following points:

1. According to the Guidelines for Applicants, for costs exceeding EUR 20,000 three offers must be collected.  
Could you please clarify whether this threshold refers to:
  - the value of an individual item within a procurement offer, or
  - the total value of the entire procurement (i.e., the overall offer exceeding EUR 20,000)?
2. If the requirement refers to the total value of the procurement, do all three offers need to include identical items and specifications?  
How should applicants proceed in cases where suppliers structure their offers differently and it is not possible to obtain fully comparable quotations?
3. How should we proceed in situations where it is not feasible to obtain three comparable offers, for example when the project involves the procurement of highly specialized equipment that is configured according to the needs of each Final Recipient and can realistically be supplied by only one manufacturer, meaning it is not possible to receive three offers with matching technical specifications?
4. Do offers need to be submitted in English, or is it acceptable that some offers are provided in Croatian (or the original local language)?

We kindly ask for your guidance so that we can ensure full compliance with the procurement requirements of the Call.

**1.65. Answer:**

Dear Madame,

Please find answers to your questions below:

1. For costs of one entire procurement procedure (one budget line) that exceeds 20.000,00 EUR (excluding VAT), FRs must submit 3 pro-forma (non-binding) offers.
2. As stated in the [Procurement Guidelines for the Final Recipients under EmBRACE project](#) "FR is obliged to describe the subject of procurement in a clear manner, enabling tenderers to submit offers that fully reflect the needs of FR for the stated subject of procurement, as well as the comparability of the offers in relation to the requirements FR has set."
3. In that case, Final recipients will have to prove that only one manufacturer can match the required technical specifications. And as stated in the [Procurement Guidelines for the Final Recipients under EmBRACE project](#): "If only one (1) valid offer is received, the FR can conclude procurement procedure and sign Contract or a purchase order with that one supplier."

4. As stated in 4. Application procedure of [Guidelines for MSEs as Final Recipients 2nd Call](#) " *The application and mandatory annexes (statements/declarations) have to be written in English, while the accompanying documentation (other documentation) can be either in English or in national languages and scripts, but HAMAG-BICRO reserves the right to request an authorized translation into English from applicants if something will not be understandable should the documentation be sent in national language or script.*"

**1.66. Question:**

Dear Sir/Madam,

I would like to ask for information regarding the submission of mandatory documentation for the EmBrace2 call.

Namely, under point 9 it states:

"Employment contract - proof of employment of 1 employee – for each FR"

The accountant believes that by law this is confidential information that may not be submitted for the purpose of the competition.

Please confirm whether this is insisted on, or whether it is possible to satisfy the criterion with some other evidence (e.g. the AFI shows that the company has 10 employees in 2024.)

Thanks in advance for your response

**1.66. Answer:**

Dear Sir,

Point 4 of the Application procedure in the Guidelines for MSEs as Final Recipients 2nd Call prescribes the mandatory documentation for submitting a project proposal:

The following documents will be requested when applying:

1. Small Project Application form (completely filled in English in MS Word, signed, stamped and scanned in pdf format) – filled in jointly. In case there is a discrepancy between the SPA for in Word and pdf, the pdf

version shall prevail.

2. Small project budget (filled in English in MS Excel) – filled in jointly

3. Joint Statement (filled in, signed, stamped and scanned in pdf format) – for each FR

4. De minimis declaration (filled in, signed, stamped and scanned in pdf format) – for each FR

5. Tax Administration Certificate (not older than 30 days) – for each FR

In Bosnia and Herzegovina, the administration of taxes is divided between different levels of government:

- Indirect taxes (such as Value Added Tax – VAT) are administered at the state level by the Indirect Taxation Authority of Bosnia and Herzegovina.
- Direct taxes and social security contributions (including corporate income tax, personal income tax, and various contributions) are administered at the entity level.

Federation of Bosnia and Herzegovina (FBiH):

Final recipients based in the Federation of BiH are required to submit the following two certificates:

- a) A certificate issued by the Indirect Taxation Authority of Bosnia and Herzegovina, confirming that all obligations related to indirect taxes (VAT) have been settled.
- b) A certificate issued by the Federal Ministry of Finance / Tax Administration of the Federation of BiH or relevant cantonal tax administration branch office according to the place of registration of the legal entity, confirming that all obligations related to direct taxes and social contributions have been fulfilled.

6. Company register extract (Croatia; Bosnia and Herzegovina; Register of Business Entities of the Republika Srpska in Bosnia and Herzegovina, Montenegro) – for each FR

7. Pro-forma offers for external expertise and services costs and equipment costs (not older than 30 days) – for each FR

8. In case of small-scale infrastructure costs: FRs will be required to submit with the SPA the proof of legal interest (proof of ownership or lease contract) and submit a technical description with pro-forma offers of the planned works according to the national laws and acts for each country if SP includes small scale infrastructure costs (not older than 30 days) – for each FR

9. Employment contract - proof of employment of 1 employee – for each FR

10. Annual financial report for the previous year – for each FR, accompanied by the confirmation of receipt

Therefore, both documents are mandatory.

**1.67. Question:**

Dear Sir/Madam,

Can own co-financing exceed the prescribed 15% and, if so, is it permissible to adjust the formula in the cost estimate table – specifically, the part where the total cost per partner is multiplied by the share of EU co-financing (85%) and own co-financing (15%)? And is it possible to change the formulas in the table in general so that they correspond to the actual situation (referring to the lower part of the table where the total amounts are).

**1.67. Answer:**

Dear Sir/Madam,

Your own co-financing can be more than 15%, but you do not intervene in the budget table. The table always states the ratio 85:15 and you enter up to the maximum allowed amount of co-financing. In order not to exceed this amount, you enter up to this amount in the table, and you submit the bid in full, which makes it clear that you will cover the difference.

**1.68. Question:**

Dear,

I would like to ask for clarification regarding the submission of offers for royalties (external services) in project applications.

The project plans to develop two new products for a new market (two new plays). Since the exact list of all actors who will be hired is not yet known at the time of application, is it acceptable to submit an offer for the royalties of one actor, multiplied by the planned number of actors per play, as a representative calculation of the cost for this external service?

Also, for existing plays that will be adapted and marketed to a new market, where all actors are paid the same unit price, is it sufficient to submit 2–3 representative offers for royalties (external services)?

**1.68. Answer:**

Dear,

According to the [Guidelines for MSEs as Final Recipients 2nd Call](#), point 3.5. Procurement rules, it is clarified which pro-forma offers you are required to submit, depending on the amount of the cost.

All costs in the budget are defined by the offers received with the application.

Note: offers must not be older than 30 days from the date of submission of the project application.

During the project implementation itself, you are required to carry out the procurement procedure according to the instructions in the Procurement Guidelines for the Final Recipients under the EmBRACE project.

**1.69. Question:**

Respected

At the info day in Ljubuski, we received information that actually as soon as we hand over the project, we can possibly start with the planned procurement of equipment. That is, that this proof of payment will be recognized if we go through this invitation. I want to ask you if I understood correctly and if after submitting the tender documents to the portal, we can proceed with the procurement of equipment and whether this proof of payment will be recognized if we go through with the 2nd invitation..

Thanks in advance

**1.69. Answer:**

Dear,

The above is acceptable according to the [Guidelines for MSEs as Final Recipients 2nd Call](#), chapter 3.8. Eligibility of costs of Final Recipients:

Eligible costs must fulfill all the following criteria as listed below: a) they are incurred by the FR and paid solely by the FR, with the exception of costs calculated as lump sums and flat rates; b) they incurred during the eligibility period of the SP, i.e. starting from the date when the SP application is officially submitted until the end of the SP's implementation, with the exception of preparation costs;

**1.70. Question:**

I would also like answers to the following questions:

1. Do the annual financial statements for 2024 for the Montenegrin partner have to be signed and stamped by the competent authority or is it sufficient to submit the balance sheet and RDG with the statement number indicated?
2. Do applicants have to prove their own co-financing share at the application stage or will this be at the contracting stage?

**1.70. Answer:**

Dear Sir,

1. in point 4 of the Application procedure in the Guidelines for MSEs as Final Recipients 2nd Call it is stated: For Final Recipients from Montenegro, instead of the confirmation of receipt for Annual financial report for the previous year, it is acceptable to provide the registration number (Number of statements) provided to them upon submission of the Annual Financial Report.



2. It is not necessary to prove the share of own financing.

In point 2.4.3. Own contribution Guidelines for MSEs as Final Recipients 2nd Call stated: Each FR should provide a minimum of 15% of the total eligible expenditure as its own contribution. Own resources can be composed of any kind of financial resources (e.g. money in the bank account, a bank loan and other fund donors) with the exception of grants requested from the EU or from National co-financing resources. Co-financing from other sources of funds (e.g. bank loan, other donors) of own participation in a SP is allowed (min. 15%).

Also in point 2.5. Small Project size is stated: The project works based on the reimbursement principle, which means that FRs have to pre-finance their activities and the amounts paid are reimbursed after the submission and evaluation of the project progress reports.

**1.71. Question:**

Dear,

in the case of development of a new product/technology/service, Final Recipients are required to sign an agreement clearly defining the distribution of ownership of the developed service/product/technology, we kindly ask for clarification on the following:

Are applicants required to submit this agreement already at the project application stage, or is it sufficient to prepare and sign the agreement during the pre-contracting phase or at the beginning of project implementation, should the project be approved for funding?

Thank you in advance for your clarification.

**1.71. Answer:**

Dear,

in the case of development of a new product/technology/service, the required agreement is to be signed under the fulfil conditions for approval phase, before a contract is offered. That is only if a SP Proposal is selected for funding.

**1.72. Question:**

A company is purchasing a specific machine, for which it can only get a quote from one supplier/manufacture, who it knows produces the exact machine it needs. Is it enough for two other suppliers of similar machines to state that they cannot quote for the specified machine because they do not have it in their range or must quote for a machine with similar specifications?

**1.72. Answer:**

When purchasing, you must adhere to the procurement rules prescribed in the [Guidelines for MSEs as Final Recipients 2nd Call](#), point 3.5. Procurement rules.

Also in the manual [Procurement Guidelines for FRs 2nd Call](#) it is stated: If only one (1) valid offer is received, the FR can conclude procurement procedure and sign Contract or a purchase order with that one supplier. To all the potential tenderers the same e-mails with the same information must be sent on the same date.

**1.73. Question:**

Dear,

regarding Section E.1.1.1 “Travel and accommodation costs” of the application form, we kindly ask for clarification on the following:

Are travel and accommodation costs related to project activities carried out within the Programme area (Croatia–Bosnia and Herzegovina–Montenegro) eligible under this budget line, or is this section intended exclusively for travel and accommodation costs incurred outside the Programme area?

Furthermore, if the project foresees only travel and accommodation within the Programme area and no activities outside the Programme area, is it acceptable to indicate EUR 0.00 under the field “Total budget for activities to be implemented outside the Programme area”, while still reporting travel and accommodation costs within the Programme area in the relevant budget lines?

Thank you in advance for your clarification.

**1.73. Answer:**

Dear,

In section E 1.1.1. “Travel and accommodation costs” the trips foreseen by the project are entered, as prescribed in the [Guidelines for MSEs as Final Recipients 2nd Call](#), point 3.8.4. *Travel and accommodation costs*.

If your project does not have any travel costs outside the programme area, you can enter 0,00 in that part.

**1.74. Question:**

Dear all,

We tried to upload documents, however, among the mandatory fields (with an asterisk) is the field SPA the proof of Upload legal interest \*.

This field is filled in only in case we have minor infrastructure works, which we do not have, and the system does not allow us to submit the application there without completing the documentation.

Can you help us?

**1.74. Answer:**

Dear Sir,

If you do not have infrastructure works as part of the small project you are applying for, you can upload an empty ZIP/RAR folder in that field.