

EUnita | EU Grant Advisory & Consultancy

CodeSupply Open Call #1

Open Call Analysis

Programme	Call position	Deadline
Horizon Europe · NGI / Open Internet Stack · CodeSupply (GA 101298846) · NLnet Foundation	First CodeSupply open call · FSTP · open	3 November 2026, 12:00 CET

Prepared 6 October 2026 | Public and general analysis | Source status checked on this date

Decision in brief: CONDITIONAL GO for European open source developers, maintainers and SMEs working on software package metadata, provenance or SBOM tooling. Up to €50,000 per first proposal with no co-financing rule stated, but €400,000 in total for all open calls and payment only after verified milestones. HOLD for proprietary security products.

1 Executive summary

CodeSupply is a €3,000,000 Horizon Europe research and innovation action, coordinated by NLnet Foundation with AboutCode Europe, the Edsger Institute and Universidad Rey Juan Carlos, that is building an open source, federated and digitally sovereign database of software package metadata to strengthen supply-chain security. It runs from 1 June 2026 under topic HORIZON-CL4-2025-03-HUMAN-16 and reserves €400,000 for open calls to third parties. [S1, S6, S7]

The first open call opened on 3 September 2026 and closes on 3 November 2026 at 12:00 CET. It funds auxiliary research and development: better metadata on package origin, licensing, vulnerabilities and quality, democratic access to that data, and the tools, integrations, user experience and infrastructure work around it. A first proposal may request €5,000 to €50,000; the per-proposal maximum is €60,000, open only to those who have completed a smaller CodeSupply, Restack or NGI Zero project, and no grantee may receive more than €60,000 from CodeSupply in total. [S1, S2, S4]

Access is unusually open: individuals, informal groups and organisations of any type may apply alone, without a legal entity or consortium, through a short plain-text form. The deciding conditions are a clear European dimension, research and development as the primary objective, and full open source release of every funded output. Payment follows verified milestones and nothing is paid up front. [S2, S3, S4, S5]

EUnita's reading: CONDITIONAL GO for European open source developers, maintainers and SMEs already working on package metadata, SBOM or provenance tooling, who can release the work openly and pre-finance the first milestone. It is not a route for proprietary security vendors, and the €400,000 reserve — eight grants at the first-proposal maximum — makes it a small, competitive pot. [S1, S2, S4]

2 Call at a glance

Parameter	Verified position	Practical reading
Operator	NLnet Foundation (Stichting NLnet, Netherlands), coordinator of CodeSupply	NLnet runs the call, the review and the contract; consortium partners are excluded from applying
EU basis	Horizon Europe GA 101298846; HORIZON-CL4-2025-03-HUMAN-16 (RIA); 1 June 2026 – 31 May 2029 on CORDIS	Cascade funding from an EU research and innovation action, not a direct EU grant
Call	First CodeSupply call	Further calls expected until the budget is allocated, expected early 2027
Status	Open on 6 October 2026	28 days remain to the deadline
Opening	3 September 2026	Window of 61 days
Deadline	3 November 2026, 12:00 CET (noon, Brussels time)	Submit days early; the form is long enough to need a drafting cycle
Grant, first proposal	€5,000 to €50,000	Request what the work needs, not the ceiling
Per-proposal maximum	€60,000, only after completing a smaller CodeSupply, Restack or NGI Zero project	Previous NGI Zero or Restack grantees can go above €50,000
Lifetime cap	€60,000 per third party over CodeSupply's lifetime	A first grant of €50,000 leaves only €10,000 for any later CodeSupply grant
Open-call budget	€400,000 for all open calls	Eight grants at €50,000; more if requests are smaller
Co-financing	No co-financing rule stated; grant equals the amount necessary to achieve key objectives	Overhead generally ineligible; 25% cap when allowed
Payment	Milestone-based; not paid up front	Cash only after each verified milestone
Duration	12 months by default; exceptions possible	Plan within 12 months unless there is a clear reason
Applicants	Individuals, informal groups, organisations of any type; no legal entity needed	Consortium members, NLnet-invested companies and review-committee members excluded
Geography	EU and Horizon Europe associated countries prioritised; others only exceptionally	Romania eligible
Consortium	None required	One applicant signs the MoU
TRL	Not stated	Research and development must be the primary objective
Submission	Online form at nlnet.nl/propose, CodeSupply fund, English plain text	Generative AI use must be disclosed
Decision time	Three to five months from the deadline	Indicatively February to early April 2027

Official basis: S1 (call page), S2 (Guide for Applicants), S3 (eligibility), S4 (FAQ), S5 (proposal form), S7 (CORDIS fact sheet). The decision window is EUnita's arithmetic from the FAQ's three-to-five-month estimate, not an official date.

3 What the grant funds and what it does not

Funded	Not funded
Research and design and development of free and open source software and open hardware [S3]	Work whose primary objective is not research and development [S2]
Publishing current, correct and comprehensive package metadata on origin, licensing, vulnerabilities and quality [S1]	Results not released in full under a recognised open source licence [S2]
Mechanisms for scalable, democratic access to metadata data sets, and frameworks for new data sets [S1]	Technology usable only with an individual closed source application [S4]
Auxiliary tools, user experience, integrations into FOSS applications and open standards, key infrastructure [S1]	Sponsorship of general events, even if topically aligned [S4]
Formal security proofs, security audits and documentation for researchers, developers and users [S3]	Work done before official selection [S4]
Standardisation activities, including standards-body membership fees [S3]	Facilities and administrative costs, except in exceptional circumstances (capped at 25%) [S4]
Participation in technical and community events such as hackathons, IETF and W3C meetings [S3]	Tightly coupled proposals designed to bypass the size caps [S4]
Project management and infrastructure costs [S3]	AI-generated projects or proposals [S5, S9]

Business implication: this is money for the open work itself, not for a company's product. An SME can keep a commercial offer — hosting, support, consulting or proprietary add-ons — as long as the funded component is fully open, self-contained and does not depend on closed technology. Budget the work as tasks, effort and a stated rate; overhead will usually be struck out. [S2, S4, S5]

4 Programme and evaluator logic

CodeSupply is part of the Open Internet Stack, a European Commission initiative building on the Next Generation Internet to create a resilient operational stack of strategic technology commons. The project's own objective is to aggregate software metadata through universal identifiers and provide correct, trusted and verified information across programming ecosystems, addressing fragmentation in supply-chain security and compliance. [S1, S7]

The open calls are explicitly for auxiliary projects: the call page invites applicants to add capabilities to the software being developed elsewhere within CodeSupply, build auxiliary tools, work on user experience, develop integrations into FOSS applications and open standards, or improve key infrastructure. The consortium's two largest technical partners are AboutCode Europe, which backs a FOSS initiative on package origin, licensing and provenance, and the Edsger Institute, which specialises in declarative and reproducible hosting stacks. [S1, S2, S6, S7]

Reviewers judge three things: technical merit, strategic relevance to a strong and efficient Open Internet Stack, and value for money. Relevance and impact carry 40%, so the strongest proposals show plainly how their output makes supply-chain metadata more correct, more complete or more usable for the people who depend on it, and how it connects to the wider stack rather than duplicating it. The proposal form reinforces this by asking applicants to compare their work with existing and historical efforts and to say whether they considered contributing to those instead. [S2, S5]

5 Calendar and action points

When	Official or indicative event	Action
1 June 2026	CodeSupply programme starts (official) [S2, S7]	None
3 September 2026	First open call opens (official) [S1]	None
6–13 October 2026	Indicative: fit and eligibility check	One-sentence fit test, European dimension, licence audit, fund choice (CodeSupply or Restack)
14–27 October 2026	Indicative: drafting	Write the form in plain English; build task, effort and rate budget; plan milestones
28 October–2 November 2026	Indicative: review and submit	Final read, AI declaration, submit
3 November 2026, 12:00 CET	Deadline (official) [S1, S5]	Hard cut-off
November 2026 onwards	First-stage scoring; second-stage clarifying questions for those above 5.0/7 (official process, dates not stated) [S2]	Answer questions quickly and revise the plan
February to early April 2027	Indicative decision, three to five months after the deadline [S4]	Prepare milestone plan for the MoU
After selection	MoU signed; work eligible only from official selection [S2, S4]	Start work; report publicly every two months under the sample MoU [S8]
Early 2027	Budget expected to be fully allocated; further calls until then (official expectation) [S2]	Consider a follow-up proposal only within the €60,000 lifetime cap
Six months after planned end	Last date to claim payments under the sample MoU [S8]	Close all milestones in time
30 May 2029	Programme end per NLnet (31 May 2029 per CORDIS) [S2, S7]	All work must fit inside this

6 Funding, eligible costs and cash flow

Budget or payment item	Call rule	Decision implication
Grant amount	Amount necessary to achieve the key objectives; €5,000 to €50,000 for a first proposal [S2, S5]	Over-asking hurts value for money, which is 30% of the score
Larger grants	Above €50,000 only after a completed CodeSupply, Restack or NGI Zero project; maximum €60,000 per proposal [S2]	First-time applicants are capped at €50,000
Lifetime cap	€60,000 per third party over CodeSupply's lifetime [S2, S4]	Plan the first grant with any follow-up in mind
Co-financing	Not stated in the call documents checked on 6 October 2026	No own contribution is required by any rule seen, but cash flow still needs bridging
Overhead	Generally ineligible; 25% maximum in exceptional circumstances [S4]	Price effort and direct expenses, not overhead
Adjustments	Amounts adjusted for ineligible costs and for activities CodeSupply recommends; final sum fixed in the MoU, which the grantee may decline before signing [S2]	The offered amount can differ from the request
Payment model	Not paid up front; payment request after each milestone [S4]	Make the first milestone early and modest
Payment mechanics	Donations become final once milestones are verified; paid by wire transfer [S8]	Keep evidence of each deliverable ready
Claim deadline	Up to six months after the project's proposed end (sample MoU) [S8]	Late milestones risk losing money
Security audit	Projects above €50,000 may be audited; parts of payment may depend on the result [S2]	Relevant only to follow-up grantees
Tax	Grant is a donation; grantee pays any taxes and informs authorities where required [S4, S8]	Romanian applicants should confirm treatment with their accountant

Cash-flow reading: with no pre-financing and a decision three to five months after 3 November, the team works unpaid until the first verified milestone. A €40,000 grant split into four milestones means carrying roughly €10,000 of effort before the first payment. [S4, S8]

7 Strands and geography

There are no strands or lots: CodeSupply is a single thematic fund with one evaluation track. NLnet's form also offers Restack, the broader Open Internet Stack fund with the same 3 November 2026 deadline and the same €5,000 to €50,000 range for first proposals; applicants choose one fund per proposal, and the FAQ explains how to resubmit to the correct fund if the wrong one was chosen. [S1, S4, S5, S10]

Geography is decided by priority rather than exclusion. Applicants from the EU and Horizon Europe associated countries are prioritised when quality is comparable; Romania qualifies as an EU Member State. Others may be funded only with exceptional quality, unique expertise and a clear European dimension. The proposal form states that NLnet's EU-supported funds usually expect applicants to be mostly from Horizon Europe-eligible countries. No country exclusions or security restrictions are stated in the documents checked. [S3, S4, S5]

Romanian angle: this is not a co-funded partnership call. There is no Romanian national funder, co-financing route or UEFISCDI role; the grant comes directly from NLnet under the EU grant agreement. [S1, S2, S7]

8 Applicant and partner eligibility

Gate	Official condition	Evidence or decision to prepare
Fit with CodeSupply	In line with the goals of CodeSupply and the call [S2]	One sentence linking the work to package metadata
Primary objective	Research and development [S2]	Show the R&D content, not deployment or marketing
European dimension	Clear European dimension; knock-out criterion [S2, S4]	Name team members in the EU or associated countries
Language	Proposals in English [S2, S5]	Plain English, own words
Open source	All software and hardware under a recognised open source licence in its entirety; scientific outcomes open access [S2]	Choose the licence; audit dependencies
Applicant type	No categorical exclusions; no legal entity needed [S3, S4]	Decide whether an individual or an organisation applies
Geography	EU and associated countries prioritised; others only exceptionally [S3]	Romanian applicants meet the priority rule
Conflicts	Consortium entities and their paid staff, NLnet-invested companies, review-committee members, reviewers' close family excluded; guide also lists Commons Caretakers [S2]	Confirm no employment or investment link
Prior grants	Above €50,000 only after a completed smaller CodeSupply, Restack or NGI Zero project; €60,000 lifetime cap [S2]	List previous NLnet or NGI grants in the funding field
Multiple proposals	Allowed but discouraged; must be independent; no splitting to bypass caps [S4]	Submit one strong proposal
Generative AI	Use must be disclosed; AI-generated proposals not wanted [S5, S9]	Keep a prompt log if any AI is used

9 Application package and portal sequence

Sequence	Control point
1. Choose the fund	Select CodeSupply, not Restack or the general call, on nlnet.nl/propose [S5]
2. Contact and applicant details	Name or pseudonym, email, phone, applicant type, organisation, country of residence; OpenPGP key optional [S5]
3. Project basics	Title, website or repositories, summary of up to 1,000 characters [S5]
4. Money	Requested amount and budget explanation of up to 4,000 characters with tasks, effort, rate and expenses [S5]
5. Substance	Comparison with other efforts, technical challenges, ecosystem and users, experience, other funding [S5]
6. AI declaration	State whether generative AI was used; if yes, model, purpose, prompts and outputs [S5, S9]
7. Attachments	Optional, up to 50 MB; NLnet says they are unnecessary [S5]
8. Submit	Before 12:00 CET on 3 November 2026; mistakes can be fixed by resubmitting while the call is open [S4, S5]

10 Proposal content and limits

Field	Limit	What it must achieve
Summary	1,000 characters	What will exist at the end, for whom, under which licence [S5]
Budget and effort	4,000 characters	Tasks, effort, rate and expenses that justify the amount [S5]
Comparison with existing efforts	4,000 characters	What is new, and why not contribute to an existing project [S5]
Technical challenges	4,000 characters	Credible risks and how they will be handled [S5]
Ecosystem	2,000 characters	Dependencies, main users and how they will be engaged [S5]
Relevant experience	2,000 characters	Why this team, with links to prior work [S5]
Other funding	1,000 characters	Past or current funding, including NLnet or NGI grants [S5]
AI disclosure	8,000 characters or file	Model, purpose, prompts and outputs if used [S5]

NLnet asks for answers in plain English and in the applicant's own words, and says spelling and grammar do not matter, only the ideas. The form is short, which makes every field count: the comparison and ecosystem answers carry most of the relevance argument, and the budget field carries value for money. [S5]

11 Evaluation and selection

Criterion	Maximum	Threshold	What to prove
Technical excellence / feasibility	30% weight	Not stated separately	The team can build it, and the plan is realistic [S2]
Relevance / impact / strategic potential	40% weight	Not stated separately	Lasting improvement to supply-chain metadata and the Open Internet Stack [S2]
Cost effectiveness / value for money	30% weight	Not stated separately	The amount matches the work and its likely effect [S2]
Weighted total	7	Above 5.0 to pass to the second stage	Balanced strength across all three [S2]

Selection runs in three steps. The first stage checks eligibility against the knock-out criteria and scores the three criteria. In the second stage reviewers assess strategic projects for lasting impact, may ask clarifying questions — on differentiators, complicating factors, claims, collaboration, budget, sustainability and upstream projects — and calculate new ratings on the revised plan; projects are then ranked and a cut-off set by quality and remaining budget. Finally, an independent review committee checks eligibility and budgetary efficiency, with at least two members reviewing each project. Reviews are carried out by professional staff without economic interest. [S2]

12 Legal, IP, data and ethics

All software and hardware produced must be released in its entirety under a recognised open source licence, and scientific outcomes must be published as open access. Copyright holders may offer additional proprietary licences alongside the free licence, and the funded project may sit within a commercial environment provided it does not depend on closed technology. Patents must be disclosed; they do not disqualify a project if they do not obstruct the open contribution. [S2, S4]

The grant is a charitable donation under a Memorandum of Understanding, not an employment agreement or business contract. Applicants may stay anonymous until the grant is awarded; after that NLnet needs their identity for compliance but need not publish it. Minors may apply, with guardian consent required before negotiations. [S4, S8]

NLnet's Generative AI policy allows AI tools in preparing applications only with disclosure and a prompt provenance log; in funded work, outputs must be publishable under open licences, must not be passed off as human effort, and substantive AI use must be disclosed publicly. Non-compliance can lead to rejection or termination. [S9]

13 Contracting, implementation and reporting

After selection, NLnet and the grantee sign a Memorandum of Understanding that fixes the amount and annexes the project plan with milestones and amounts per task; the main MoU text prevails over the annex. The grantee may decline the offered amount before signing. Only work after official selection is covered. [S2, S4, S8]

Payment requests follow each milestone; donations become final once milestones or agreed partial deliveries are verified, and are paid by wire transfer. Under the sample MoU the grantee reports progress publicly every two months and keeps a public status page, and may claim payments up to six months after the project's proposed end. If the project fails to complete its goals, the only stated consequence in the sample is termination of the MoU. [S4, S8]

Changes during implementation are discussed with the NLnet contact person. Selected projects can draw on support services, including accessibility and security audits, licensing advice, mentoring, packaging and standards engagement. Projects above €50,000 may face an independent security audit at the end. [S2, S4]

14 Best-fit applicant profiles

- **Strong fit:** a European maintainer of an open source tool that generates, cleans or consumes package metadata — licensing, origin, vulnerabilities, quality — with a defined 12-month improvement.
- **Strong fit:** a small European software company that can release a metadata integration or data-access component as fully open source while selling support or hosting around it.
- **Strong fit:** a university or research group working on software provenance, reproducible builds or package ecosystems, with an open source output.
- **Good fit:** a previous NGI Zero or Restack grantee extending earlier work into supply-chain metadata, eligible for up to €60,000.
- **Weak fit:** a cybersecurity SME selling a proprietary SBOM, scanning or compliance product.
- **Weak fit:** a general open source project with no link to package metadata, better placed in Restack.
- Not eligible: CodeSupply consortium entities and their paid staff, or companies NLnet has invested in.

For a Romanian applicant, the decisive questions are whether the work is genuinely open source and research-led, and whether the team can carry the cost until the first milestone. [S2, S3, S4]

15 Strategic application angles

Lead with the metadata gap. Name the ecosystem, the data field that is missing or wrong, and the users who suffer from it; then show how the output feeds CodeSupply's shared database or makes its data more usable. Relevance is 40% of the score, and the call page explicitly invites contributions to the software developed elsewhere within CodeSupply. [S1, S2]

Answer the comparison question honestly. NLnet asks what is new and whether you considered contributing to existing projects; a proposal that improves an existing open tool can outscore a new one that duplicates it. [S5]

Size for value, not the ceiling. With €400,000 for all open calls, a well-justified €20,000 to €35,000 request may read as better value than €50,000; this is EUnita's judgement, not an official rule. Remember the €60,000 lifetime cap if a follow-up is likely. [S2]

Use CodeSupply as a step. A completed NLnet project is the stated precondition for larger NLnet grants, and the open source track record it builds is useful in later Horizon Europe consortia. [S2]

16 Risks and decision blockers

Risk	Why it matters	Mitigation
Small pot	€400,000 for all open calls; eight grants at €50,000 [S1, S2]	Ask for what is needed; submit in this round
Knock-out criteria	European dimension and R&D focus are checked before scoring [S2, S4]	Name European team members; describe R&D content
Score threshold	Weighted total must exceed 5.0/7 [S2]	Balance relevance, feasibility and value
No pre-financing	Payment only after verified milestones [S4, S8]	Early first milestone; bridge cash
Slow decision	Three to five months from the deadline; no work funded before selection [S4]	Plan the start for 2027
Licence conflict	All output must be fully open and not depend on closed technology [S2, S4]	Audit dependencies before writing
Wrong fund	Restack shares the deadline and form [S5, S10]	Choose the fund deliberately
AI policy	Undisclosed AI use can mean rejection or termination [S9]	Write in own words; keep a log if AI is used
Tax	Grant is a donation; grantee pays taxes [S4, S8]	Confirm Romanian treatment before signing
Claim deadline	Claims up to six months after planned end [S8]	Track milestones against the MoU

17 EUnita opportunity scorecard

Provisional public-market score: 63/100. This is EUnita's commercial and delivery assessment of the call, not an official evaluator score or applicant success forecast. The call is easy to enter and fairly generous per euro of effort, but small, narrow and short of time.

Dimension	Score / 20	Rationale
Funding value	11	Up to €50,000 with no co-financing rule stated, but small in absolute terms and paid in arrears
Access and fit	12	Open to individuals and any organisation, Romania prioritised; narrow thematic scope and strict open source rule
Strategic value	13	Entry to NLnet's funding ladder and the Open Internet Stack community; useful track record for later Horizon Europe work
Delivery burden	17	Short plain-text form, no consortium, no legal entity; milestone reporting is light
Timing and competition	10	28 days left; €400,000 across all calls; NLnet funds attract strong FOSS applicants
Total	63 / 100	Worth applying for the right open source team; not a fit for proprietary vendors

18 Official sources and document availability

The links below are the official source set used for this analysis. URLs are printed in full so they can be checked; all were checked on 6 October 2026.

S1 NLnet Foundation — CodeSupply call page (first call, deadline 3 November 2026)
https://nlnet.nl/codesupply/

S2 NLnet Foundation — CodeSupply Guide for Applicants
https://nlnet.nl/codesupply/guideforapplicants

S3 NLnet Foundation — CodeSupply eligibility page
https://nlnet.nl/codesupply/eligibility/

S4 NLnet Foundation — CodeSupply FAQ
https://nlnet.nl/codesupply/faq/

S5 NLnet Foundation — online proposal form (fund selection: CodeSupply)
https://nlnet.nl/propose/

S6 NLnet Foundation — CodeSupply background and consortium page
https://nlnet.nl/codesupply/background/

S7 CORDIS — CodeSupply project fact sheet, grant agreement 101298846
https://cordis.europa.eu/project/id/101298846

S8 NLnet Foundation — sample Memorandum of Understanding (PDF)
https://nlnet.nl/foundation/request/sample_MoU.pdf

S9 NLnet Foundation — Generative AI policy
https://nlnet.nl/foundation/policies/generativeAI/

S10 NGI — Open Calls overview (lists CodeSupply and Restack, same deadline)
https://ngi.eu/opencalls/

S11 NLnet Foundation — news item of 31 January 2026 on Restack and CodeSupply
https://nlnet.nl/news/2026/20260131-restack.html

Checked but not found as standalone public files: no call text PDF, versioned guide or application template is published — the call page, guide, eligibility page, FAQ and online form are web pages without version numbers. The EU Funding & Tenders Portal listing (competitive call 48401785) was checked but its content could not be read on 6 October 2026, so it was not used. No CodeSupply-specific MoU was found; the NLnet sample MoU is generic.

19 Final verdict

CONDITIONAL GO. Apply if three conditions hold: the work clearly improves software package metadata or access to it, the team has a European dimension through its people, and every output will be released in full under a recognised open source licence. Add a fourth for companies: the cash to carry the work until the first verified milestone. Ask for what the work needs within €5,000 to €50,000, write the form yourselves, and submit before 12:00 CET on 3 November 2026. HOLD for proprietary security vendors and for projects that fit Restack better. [S1, S2, S4, S5]

20 How EUnita can help

EUnita can check fit and eligibility against the CodeSupply rules, help choose between CodeSupply and Restack, challenge the draft against the three weighted criteria, structure a credible task, effort and milestone budget, and review the final text before submission. Because NLnet asks applicants to answer in their own words, EUnita's role is advisory and editorial, not ghost-writing. After selection, EUnita can help plan milestones for the MoU and track payment claims, and advise on larger follow-on funding. Each assignment would be scoped to the applicant's verified facts and the current official documents.

21 Contact

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