



AENAON

**Ex-Ante cybersecurity Federated Digital Twin-based Cyber Range and
managed security services for offshore wind farms**

Annex 7

Version 1.0

OWNERSHIP AND CONTROL DECLARATION

OPEN CALL 1

JULY 2026

This document is published in the context of and for the objectives of the AENAON project. AENAON is funded by the European Union under the DIGITAL Europe Programme, Grant Agreement No. 101249723. Views and opinions expressed are, however, those of the author(s) only and do not necessarily reflect those of the European Union or the European Cybersecurity Competence Centre. Neither the European Union nor the granting authority can be held responsible for them.

Instructions for Applicants

This declaration must be completed separately by each participating legal entity, including the lead applicant/coordinator and every consortium partner. It supports the assessment of compliance with the ownership-and-control requirements applicable to the AENAON Open Call and the relevant DIGITAL Europe Programme conditions.

The information must describe the applicant's current direct and indirect ownership and control structure. Where the entity is part of a group, provide sufficient information to identify the full chain of ownership and any person or entity capable of exercising decisive influence.

All information must be complete, accurate and supported by appropriate evidence. AENAON may request additional documents or clarifications during eligibility checks, contract preparation, implementation, or audit.

Submission requirements

- Complete all mandatory fields and mark non-applicable items clearly as "N/A".
- Attach an ownership chart where the structure cannot be presented clearly in the tables.
- Provide recent official evidence, such as a company-register extract, articles of association, shareholder register, beneficial-ownership record or equivalent documentation.
- Disclose any direct or indirect ownership, control, veto, appointment, financing or other decisive-influence rights involving entities or persons established outside eligible countries.
- Notify AENAON without undue delay of any material change occurring before contracting or during the funded action.
- Submit the signed declaration in PDF format through the official submission portal.

The final Open Call Notice, the '**AENAON Open Call 1 – List of Eligible Countries**,' the Guidelines for Applicants, the Sub-Grant Agreement and applicable EU and DIGITAL Europe Programme rules prevail in the event of inconsistency.

Important: Country-of-establishment eligibility and ownership-and-control compliance are separate requirements. Completion of this Annex does not replace the requirement that the declaring legal entity must itself be established in a country included in the definitive '**AENAON Open Call 1 – List of Eligible Countries**.' For consortium applications, if any participating legal entity is established in an ineligible country, the entire proposal will be declared ineligible and will not proceed to quality evaluation.

1. Proposal and legal-entity identification

Open Call round	Open Call 1
Proposal acronym	[Insert]
Full proposal title	[Insert]
Legal name of declaring entity	[Insert]
Short name	[Insert]
Role in proposal	[Lead applicant / consortium partner / single applicant]
Country of establishment	[Insert]
Registered address	[Insert]
Legal form	[Insert]
Registration number	[Insert]
PIC or equivalent identifier	[Insert, where applicable]
VAT number	[Insert, where applicable]
Website	[Insert]
Authorised representative	[Name, position and contact details]

2. Direct ownership

List every shareholder, member or owner holding a direct ownership interest or voting right in the declaring entity. Include interests below 25% where they are associated with special rights, coordinated action or another form of influence.

Owner / shareholder	Country	Legal or natural person	Ownership %	Voting rights %	Special rights / influence
[Insert]	[Insert]	[Insert]	[]%	[]%	[Insert / None]
[Insert]	[Insert]	[Insert]	[]%	[]%	[Insert / None]
[Insert]	[Insert]	[Insert]	[]%	[]%	[Insert / None]

All direct ownership and voting interests must be disclosed where they amount to 25% or more. Interests below 25% must also be disclosed where they are linked to special rights, coordinated action, veto rights, appointment rights or any other mechanism capable of conferring control or decisive influence.

3. Indirect ownership and ownership chain

Identify all intermediate entities through which the declaring entity is owned, directly or indirectly, up to the ultimate parent entity and ultimate beneficial owner(s). Attach a group or ownership chart where necessary.

Entity / person	Relationship in ownership chain	Country	Direct or indirect share	Ultimate beneficial owner or ultimate controlling person?	Evidence reference
[Insert]	[Insert]	[Insert]	[]%	[Yes/No]	[Insert]
[Insert]	[Insert]	[Insert]	[]%	[Yes/No]	[Insert]
[Insert]	[Insert]	[Insert]	[]%	[Yes/No]	[Insert]

4. Control and decisive influence

Control may arise through ownership, voting rights, contractual arrangements, financing, appointment or removal rights, veto rights, access to sensitive assets or information, or any other mechanism enabling decisive influence over strategic decisions.

Question	Yes	No	Explanation / supporting reference
Is the declaring entity directly or indirectly controlled by another legal entity or natural person?	[]	[]	[Insert or N/A]
Does any person or entity have the right to appoint or remove a majority of the administrative, management or supervisory body?	[]	[]	[Insert or N/A]
Does any person or entity hold veto, consent or reserved-matter rights over strategic, technical, financial, security or operational decisions?	[]	[]	[Insert or N/A]
Does any financing, licensing, supply, service, shareholder or other agreement confer decisive influence over the declaring entity?	[]	[]	[Insert or N/A]
Is the declaring entity acting jointly or in coordination with other shareholders or persons in a manner that may create control?	[]	[]	[Insert or N/A]
Can any external person or entity obtain privileged access to sensitive project information, technology, infrastructure or results through ownership or control rights?	[]	[]	[Insert or N/A]

5. Ownership and control involving non-eligible countries

The disclosure of ownership, control or influence involving a non-eligible-country person or entity does not automatically determine the outcome of the assessment. AENAON will assess the disclosed circumstances against the applicable Open Call conditions and may require clarification, supporting evidence, safeguards or mitigation measures.

Provide full details where any direct or indirect owner, ultimate beneficial owner, parent entity, controller or person exercising decisive influence is established, resident or controlled outside the countries included in the definitive 'AENAON Open Call 1 – List of Eligible Countries.'

Question	Yes	No	Explanation / supporting reference
Is any direct or indirect owner, parent entity, ultimate beneficial owner, controller or person exercising decisive influence established or resident outside a country included in the definitive 'AENAON Open Call 1 – List of Eligible Countries'?	☐	☐	[Insert or N/A]
Is any public authority, state-owned entity or state-linked actor outside an eligible country able to exercise ownership, control or decisive influence?	☐	☐	[Insert or N/A]
Could any non-eligible-country person or entity require access to project information, results, systems or assets?	☐	☐	[Insert or N/A]
Are there legal, contractual or governance obligations that could require transfer or disclosure of sensitive information outside eligible countries?	☐	☐	[Insert or N/A]

5.1 Details and safeguards

Relevant person / entity	Country	Nature of ownership or control	Potential risk	Safeguard / mitigation	Supporting evidence
[Insert / N/A]	[Insert]	[Insert]	[Insert]	[Insert]	[Insert]
[Insert / N/A]	[Insert]	[Insert]	[Insert]	[Insert]	[Insert]

6. Governance and management

List the members of the governing, administrative, management and supervisory bodies and identify who has authority over strategic, technical, financial and security-sensitive decisions.

Name	Position / body	Country / nationality	Appointed by	Decision rights	External affiliation	State-owned, state-controlled or appointed by a public authority?	Explanation / supporting reference
[Insert]	[Insert]	[Insert]	[Insert]	[Insert]	[Insert / None]	[Yes / No]	[Explanation / supporting reference]
[Insert]	[Insert]	[Insert]	[Insert]	[Insert]	[Insert / None]	[Yes / No]	[Explanation / supporting reference]
[Insert]	[Insert]	[Insert]	[Insert]	[Insert]	[Insert / None]	[Yes / No]	[Explanation / supporting reference]

7. Security, autonomy and access safeguards

Question	Yes	No	Explanation / supporting reference
Does the declaring entity retain autonomous control over the personnel, systems, data, intellectual property and resources required to implement the proposed action?	☐	☐	[Insert or N/A]
Can the declaring entity prevent unauthorised access to sensitive AENAON information, platform components, vulnerabilities, operational data and results?	☐	☐	[Insert or N/A]
Are access rights granted according to role, need-to-know and least-privilege principles?	☐	☐	[Insert or N/A]
Are contractual, organisational and technical measures in place to prevent unauthorised transfer of sensitive information or technology?	☐	☐	[Insert or N/A]
Can the declaring entity comply with restrictions or mitigation measures imposed as a condition of eligibility or contracting?	☐	☐	[Insert or N/A]

Can any parent company, affiliated entity, external service provider, subcontractor or other third party obtain access to sensitive AENAON information, systems, technology or results through the declaring entity's corporate or contractual arrangements?	[]	[]	[Insert or N/A]
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Any 'No' answer to a safeguard question, or any "Yes" answer indicating external access or influence, must be explained and accompanied by proposed mitigation measures.

8. Supporting documentation

Indicate the evidence attached to this declaration. Documents may be requested in certified or updated form during the Open Call process.

Document	Attached?	Date / reference	Comments
Recent company-register extract	[Yes/No]	[Insert]	[Insert]
Articles of association / statutes	[Yes/No]	[Insert]	[Insert]
Shareholder or member register	[Yes/No]	[Insert]	[Insert]
Ultimate beneficial ownership evidence	[Yes/No]	[Insert]	[Insert]
Group / ownership chart	[Yes/No]	[Insert]	[Insert]
Relevant shareholder, financing or control agreements	[Yes/No/N/A]	[Insert]	[Insert]
Other supporting evidence	[Yes/No/N/A]	[Insert]	[Insert]

9. Declaration and undertaking

The undersigned, acting as the authorised representative of the declaring legal entity, declares that:

- The information and supporting documentation provided in this declaration are complete, accurate, current and not misleading.
- The ownership, control and governance structure of the declaring entity has been fully disclosed, including all material direct and indirect interests and rights of decisive influence.
- The declaring entity meets, or will meet before contracting, the ownership-and-control conditions specified in the final AENAON Open Call documentation and applicable DIGITAL Europe Programme rules.
- The declaring entity will cooperate with any ownership-and-control assessment and will provide additional information or evidence requested by AENAON or the competent authorities.
- The declaring entity accepts that eligibility or funding may be subject to proportionate safeguards, mitigation measures or contractual conditions.
- The declaring entity will notify AENAON in writing without undue delay, and before the change takes effect where reasonably possible, of any actual or proposed change in ownership, control, governance, voting rights, beneficial ownership or decisive influence occurring before contracting or during the funded action.
- AENAON may reassess eligibility and may impose safeguards, suspend contracting or implementation, terminate the Sub-Grant Agreement or recover funding where the revised ownership-and-control situation is incompatible with the applicable conditions.
- The declaring entity understands that false, incomplete or misleading information may result in rejection, withdrawal of the award, termination, recovery of funds and other applicable consequences.
- The declaring entity confirms that it has disclosed all direct and indirect ownership, control, beneficial ownership, governance, financing, veto, appointment, access and decisive-influence arrangements relevant to the assessment.
- The declaring entity understands that ownership-and-control compliance is a continuing requirement and must be maintained throughout contract preparation and implementation of the funded action.
- The declaring entity confirms that country-of-establishment eligibility and ownership-and-control compliance are separate requirements and that completion of this Annex does not constitute confirmation of country eligibility.

10. Authorised signature

Legal name of entity	[Insert]
Name of authorised representative	[Insert]
Position / authority	[Insert]
Place	[Insert]
Date	[Insert]
Signature	[Insert signature or approved electronic signature]

Annex to the declaration - Additional explanation

Use this page to provide explanations, ownership charts, details of special rights, safeguards or references to supporting documentation. Add pages only where necessary.
