

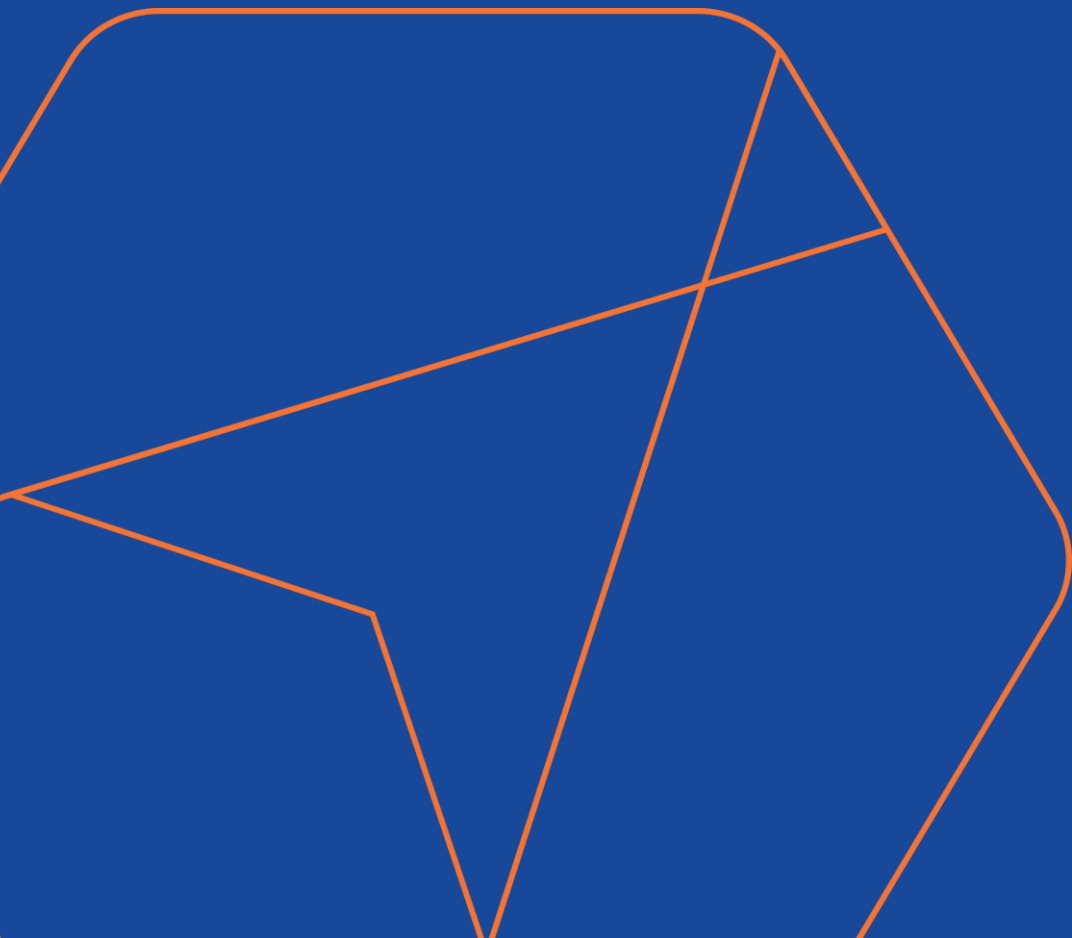
INNOVATIVE TECHNOLOGY

GROWTHLAB

Targeted expert support to help your business grow, innovate, and scale.

Guidelines

*G-TEC-009-01
14th July 2026*



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Definitions

For the purposes of these Guidelines, the following terms shall have the meanings assigned to them below:

Applicant means an undertaking submitting an application under the GrowthLab Scheme.

Beneficiary means an applicant whose application has been approved by MDIA under the Scheme and who receives consultancy support.

Consultancy Service means a defined area of advisory support provided under the Scheme, consisting of ten (10) hours of consultancy delivered by an assigned service provider.

Consultancy Streams means the broad categories of support offered under the Scheme, namely Legal Consultancy, Economic Consultancy, Management Consultancy, and Marketing Consultancy.

De Minimis Regulation means Commission 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, as may be amended from time to time.

DiHubMT means the European Digital Innovation Hub project operated by the Malta Digital Innovation Authority (MDIA), through which the Scheme is implemented.

Digital Maturity Assessment (DMA) means the assessment tool used by DiHubMT for the purposes of baseline analysis, monitoring, benchmarking, and reporting in line with its responsibilities as a European Digital Innovation Hub (EDIH).

Enterprise / Undertaking means any entity engaged in an economic activity, irrespective of its legal form.

Service Provider means an external expert or firm contracted by MDIA to deliver consultancy services under the Scheme.

State Aid means any advantage granted by MDIA to beneficiaries under the Scheme which falls within the scope of Article 107(1) of the Treaty on the Functioning of the European Union.

NACE Code means the statistical classification of economic activities in the European Community, as published by Eurostat.

SME Definitions¹

Micro Enterprise means an enterprise that:

- employs fewer than 10 persons; and
- has an annual turnover and/or annual balance sheet total not exceeding EUR 2 million.

Small Enterprise means an enterprise that:

- employs fewer than 50 persons; and
- has an annual turnover and/or annual balance sheet total not exceeding EUR 10 million.

Medium Enterprise means an enterprise that:

- employs fewer than 250 persons; and
- has either:
 - an annual turnover not exceeding EUR 50 million; or
 - an annual balance sheet total not exceeding EUR 43 million.

Small Mid-Cap Enterprise means an enterprise, as defined in Article 1 of Title I of the Annex to Commission Recommendation 2003/361/EC, which:

- employs fewer than 500 persons; and
- does not qualify as a Micro, Small or Medium-sized Enterprise as defined above.

Large Mid-Cap Enterprise means an enterprise, as defined in Article 1 of Title I of the Annex to Commission Recommendation 2003/361/EC, which:

- employs between 500 and 3,000 persons; and
- whose staff headcount is calculated in accordance with Articles 3, 4, 5, and 6 of Title I of the Annex to Commission Recommendation 2003/361/EC.

Single Undertaking means all enterprises having at least one (1) of the following relationships with each other:

¹ Commission Recommendation 2003/361/EC is available at:
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32003H0361>

- a) one enterprise has a majority of the shareholders' or members' voting rights in another enterprise;
- b) one enterprise has the right to appoint or remove a majority of the members of the administrative, management or supervisory body of another enterprise;
- c) one enterprise has the right to exercise a dominant influence over another enterprise pursuant to a contract entered into with that enterprise or pursuant to a provision in its memorandum or articles of association;
- d) one enterprise, which is a shareholder in or member of another enterprise, controls alone, pursuant to an agreement with other shareholders in or members of that enterprise, a majority of shareholders' or members' voting rights in that enterprise.

Enterprises having any of the relationships referred to in points (a) to (d) of the above through one or more other enterprises shall also be considered to be a single undertaking.

1. Introduction

The GrowthLab Scheme (the “Scheme”) is an initiative of the Malta Digital Innovation Authority (MDIA), implemented through DiHubMT, a project operated by MDIA aimed at supporting digital transformation, innovation, and capacity-building among enterprises.

Through DiHubMT, MDIA delivers targeted support measures designed to strengthen the digital and innovation capabilities of Maltese enterprises and to foster sustainable economic growth.

The GrowthLab Scheme provides technology-driven enterprises with access to targeted, one-to-one consultancy services intended to support the development of strategic, operational, legal, financial, and marketing capabilities, with a view to enhancing digital growth, innovation, and readiness for scaling.

These Guidelines set out the scope of the Scheme, eligibility requirements, application and assessment procedures, and the obligations of beneficiaries. They should be read carefully by all prospective applicants prior to submission of an application.

2. Scope of the Scheme

2.1 Nature of Support

Under the GrowthLab Scheme, eligible beneficiaries may receive structured consultancy support delivered on a one-to-one basis by service providers contracted by MDIA.

Each approved consultancy service (area) consists of ten (10) hours of consultancy support.

Eligible beneficiaries may be approved for up to two (2) consultancy services, subject to the objectives of the Scheme and MDIA approval.

Where two consultancy services are approved, the maximum total support available under the Scheme shall be twenty (20) hours.

The consultancy support is advisory in nature and is intended to provide structured guidance, analysis, recommendations, and practical direction aligned with the beneficiary's growth and innovation objectives.

The consultancy support provided under the GrowthLab Scheme is offered free of charge to eligible beneficiaries, in accordance with the applicable State aid rules, namely the *de minimis* Regulation².

2.2 Consultancy Streams

Consultancy support under the Scheme may be provided within the following streams:

- i. Legal Consultancy
- ii. Economic Consultancy
- iii. Management Consultancy
- iv. Marketing Consultancy

Applicants may request support in up to two (2) distinct consultancy services, selected from the consultancy streams listed above.

Each approved consultancy service shall consist of ten (10) hours of consultancy support.

Beneficiaries may not combine or aggregate consultancy hours within the same service area.

² https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202302831

The final allocation of consultancy services shall be subject to approval by MDIA and the availability of resources.

2.3 Areas of Consultancy Support

The consultancy support provided under the GrowthLab Scheme may cover a range of areas within the approved consultancy streams. The areas listed below are indicative and non-exhaustive and are provided for guidance purposes only.

2.3.1 Legal Consultancy

Support may include, but is not limited to:

- i. Corporate & Commercial Law – Governance, contracts, restructuring, and compliance.
- ii. Employment & ESG Law – Labour law compliance and sustainability considerations.
- iii. Competition & Fintech Law – Regulatory compliance in digital and financial services contexts.
- iv. Intellectual Property (IP) – Protection strategies for trademarks, patents, and content.
- v. M&A Advisory – Legal considerations for investment, exits, and due diligence.
- vi. Data Protection (GDPR) – Privacy compliance and risk mitigation.
- vii. Technology & IT Law – Licensing, platform terms, and digital service obligations.

2.3.2 Economic Consultancy

Support may include, but is not limited to:

- i. Feasibility & Viability Analysis – Assessment of business ideas, expansion plans, market demand, and ROI projections.
- ii. Financial Forecasting & Valuation – Revenue modelling, cost projections, and recognised valuation methods (e.g. DCF, multiples).
- iii. Funding & Investment Readiness – Identification of funding opportunities and assessment of preparedness.

- iv. Pricing & Competitive Benchmarking – Review of competitor pricing and pricing structures.
- v. Risk Assessment – Evaluation of financial risks and cash-flow vulnerabilities.
- vi. Market & Sector Intelligence – Industry trends and economic insights.
- vii. Policy Alignment – Guidance on EU and Maltese innovation and digitalisation priorities.

2.3.3 Management Consultancy

Support may include, but is not limited to:

- i. Business Model & Strategy Development – Refinement of value proposition and growth planning.
- ii. Operational Optimisation – Process review to improve efficiency and reduce costs.
- iii. Digital Readiness & Transformation – Planning for adoption of digital tools.
- iv. Leadership & Change Management – Organisational restructuring and transition support.
- v. Scaling & Growth Planning – Expansion strategies and governance models.
- vi. Project & Risk Management – Implementation frameworks and business continuity planning.
- vii. Human Capital Strategy – Workforce planning and capability development.

2.3.4 Marketing Consultancy

Support may include, but is not limited to:

- i. Marketing Strategy & Brand Positioning – Development of cohesive marketing plans.
- ii. Digital Marketing & Campaign Planning – SEO, SEM, social media, and paid digital strategy.
- iii. Content & Go-to-Market Strategy – Product or service launch planning.

- iv. Customer Journey & Segmentation – Mapping customer interactions and conversion optimisation.
- v. CRM & Email Marketing – Marketing automation optimisation.
- vi. Website & E-Commerce Optimisation – UX/UI advisory and performance improvements.
- vii. Analytics & KPI Tracking – Definition and monitoring of performance indicators.

2.4 Duration and Mode of Delivery

The approved consultancy support shall be delivered within a defined implementation period, as communicated by MDIA upon approval. The support may be delivered in person, online, or through a hybrid approach, as agreed between the beneficiary and the assigned service provider.

3. Eligibility

3.1 Eligible Applicants

Support under the GrowthLab Scheme is open to undertakings that meet the applicant eligibility requirements criteria set out below.

To be eligible, an applicant must:

- i. Be an undertaking legally established and registered in Malta, including:
 - a. A company or partnership registered under the Companies Act (Cap. 386 of the Laws of Malta); or
 - b. A self-employed person registered with Jobsplus.
- ii. Qualify as a Micro, Small, Medium, Small Mid-Cap and Large Mid-Cap enterprise, in accordance with applicable European Union definitions outlined in these Guidelines.
- iii. Be engaged in, or demonstrably pursuing, innovative and technology-driven activities falling within one of the eligible economic sectors listed below.

Eligible economic sectors are identified by reference to the following NACE³ codes:

NACE Division	Economic Sector
C26	Manufacture of Computer, electronic and optical products
C27	Manufacture of Electrical Equipment
C28	Manufacture of Machinery and equipment n.e.c.
J58.2	Software Publishing
K61	Telecommunication
K62	Computer programming, consultancy and related activities
K63	Computing infrastructure, data processing, hosting and other information service activities
N72	Scientific Research and Development

³ The NACE classification of economic activities in the European Community is based on the latest publication (Rev. 2.1), issued by Eurostat in 2025. The document is available at:

<https://ec.europa.eu/eurostat/documents/3859598/21633320/KS-GQ-24-007-EN-N.pdf>

MDIA reserves the right to approve assistance to undertakings whose primary economic activity does not fall strictly within the above NACE codes, provided that the applicant can demonstrate that its activities are innovative, technology-driven, and aligned with the objectives of the Scheme.

3.2 Ineligible Applicants

The following shall not be eligible for support under the Scheme:

- i. Undertakings that do not meet the eligibility requirements set out in these Guidelines;
- ii. Activities that fall outside the scope and objectives of the Scheme;
- iii. Undertakings that are subject to exclusion in accordance with the *de minimis* Regulation, including:
 - a. aid granted to undertakings active in the primary production of fishery and aquaculture products;
 - b. aid granted to undertakings active in the processing and marketing of fishery and aquaculture products, where the amount of the aid is fixed on the basis of price or quantity of products purchased or put on the market;
 - c. aid granted to undertakings active in the primary production of agricultural products;
 - d. aid granted to undertakings active in the processing and marketing of agricultural products, in one of the following cases:
 - i. where the amount of the aid is fixed on the basis of the price or quantity of such products purchased from primary producers or put on the market by the undertakings concerned;
 - ii. where the aid is conditional on being partly or entirely passed on to primary producers;
 - e. aid granted to export-related activities towards third countries or Member States, namely aid directly linked to the quantities exported, the establishment and operation of a distribution network or other current expenditure linked to the export activity;

- f. aid contingent upon the use of domestic goods and services over imported goods and services.

Where an undertaking is active in the sectors referred to in points (a), (b), (c) or (d) above, and is also active in one or more of the other sectors falling within the scope of the de minimis Regulation, or has other activities falling within the scope of the de minimis Regulation, the de minimis Regulation shall apply to aid granted in respect of the latter sectors or activities, provided that MDIA ensures, by relying on appropriate means such as separation of activities or separation of accounts, that the activities in the sectors excluded from the scope of this Regulation do not benefit from the de minimis aid granted in accordance with this Regulation.

4. Application Procedure

4.1 Submission of Applications

Applications under the Scheme shall be submitted through the designated application channel as specified by MDIA.

Applications under this Scheme shall be submitted by the Applicant's authorised representative, who must be duly authorised to act on behalf of the Applicant. The authorised representative shall be responsible for submitting the application and shall liaise with MDIA on behalf of the Applicant in respect of all matters relating to the application.

Only complete applications submitted in accordance with the instructions provided shall be considered.

4.1.1 Information and Documentation Required

Applicants shall be required to submit a complete application together with the documentation necessary to enable MDIA to verify eligibility, compliance, and alignment with the objectives of the Scheme.

The following documentation shall be submitted together with the application:

- i. De Minimis Declaration Form completed and signed by the applicant undertaking.

The declaration shall outline all *de minimis* aid applied for and/or received by the single undertaking over a period of three (3) years from the year of application from any granting authority, in accordance with applicable State aid rules.

- ii. Certificate of Registration, confirming that the applicant is a legally established and registered undertaking in Malta.

This shall consist of one of the following, as applicable:

- in the case of a company or partnership, a valid Company or Partnership Registration Certificate issued by the Malta Business Registry; or
- in the case of a self-employed person, a valid Jobsplus registration confirming registration as a self-employed economic activity.

- iii. Documentary evidence confirming the undertaking's registered NACE code, for the purpose of verifying that the NACE code declared in the application corresponds to the undertaking's official registration details.

Such evidence may be provided in the form of a valid VAT Registration Certificate clearly indicating the registered NACE code.

Where a VAT Registration Certificate is not available, applicants shall instead provide official confirmation of the NACE code issued by the National Statistics Office (NSO) Business Register, indicating the applicable four-digit NACE code (e.g. 11.11).

MDIA reserves the right to request additional information or documentation where necessary for the purpose of verifying the information provided in the application.

4.1.2 Application Timelines

The Scheme shall operate on a rolling call basis, subject to the availability of allocated consultancy hours.

MDIA reserves the right to close, suspend, or reopen the call at its discretion.

4.2 Assessment and Approval

4.2.1 Assessment Process

Applications shall be reviewed by MDIA to verify compliance with the eligibility requirements set out in these Guidelines and to confirm that the application has been duly completed and supported by all required information and documentation.

Applications that satisfy the eligibility requirements and are deemed complete shall be considered for approval.

4.2.2 Basis for Approval

The GrowthLab Scheme is designed as a non-competitive support measure. Accordingly, applications are not subject to a comparative scoring or ranking process.

Eligible and complete applications shall be approved, provided that the requested consultancy support is aligned with the scope and objectives of

the Scheme and subject to the availability of consultancy services and resources.

4.2.3 Availability of Resources and MDIA Discretion

Approval of applications under the Scheme remains subject to the availability of resources, including consultancy capacity within the respective service streams.

MDIA reserves the right to defer, conditionally approve, or reject an application where necessary, including in cases where:

- i. the application is incomplete or inconsistent;
- ii. the requested support falls outside the scope of the Scheme; or
- iii. the available resources have been exhausted.

MDIA shall not be bound to approve applications once the available resources under the Scheme have been fully allocated.

5. Obligations of Beneficiaries

5.1 Engagement and Participation

Approved beneficiaries shall be required to actively engage with the assigned service provider throughout the duration of the consultancy support, participate in scheduled consultancy sessions, and provide any information and documentation reasonably required to enable the effective delivery of the approved services.

5.2 Completion of Consultancy Support

Beneficiaries shall complete the approved consultancy services, each consisting of ten (10) hours, within the timeframe communicated by MDIA and shall formally acknowledge completion of the services received.

Failure to engage with consultancy support, complete the required documentation, or finalise the approved services within the allocated timeframe may result in the withdrawal of assistance.

5.3 Feedback and Reporting

Beneficiaries may be required to provide feedback on the consultancy support received and to participate in follow-up, monitoring, or evaluation activities conducted by MDIA for the purposes of programme assessment and continuous improvement.

6. State Aid Rules

The consultancy support provided under the GrowthLab Scheme constitutes State aid and is granted in accordance with the Commission Regulation (EU) 2023/2831 of 13 December 2023 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid.

The support is offered on a 100% discounted basis, meaning that approved beneficiaries are not required to make any financial contribution towards the cost of the consultancy services received.

For the purposes of State aid reporting, the estimated aid value of the consultancy support is approximately €1,000 per approved consultancy service, excluding VAT.

Where a beneficiary is approved for two (2) consultancy services, the estimated total aid value shall be approximately €2,000, excluding VAT.

Following MDIA's assessment and confirmation of eligibility, the Grant Agreement will specify the actual value of the consultancy services to be provided.

Aid shall be deemed to be granted upon formal approval of the application by MDIA.

The total amount of *de minimis* aid granted to a single undertaking shall not exceed the amount of €300,000 over any period of three years. This period is assessed on a rolling basis.

This maximum threshold would include all State Aid granted under this aid scheme and any other State Aid measure implemented in line with the *de minimis* rule including that received from any entity other than MDIA. Any *de minimis* aid received in excess of the established threshold will have to be recovered, with interest, from the undertaking receiving the aid.

Applicants are to submit a *de minimis* declaration indicating any other *de minimis* aid received and/or applied for during the previous three years. This will ensure that the total amount of *de minimis* aid granted to a single undertaking under the *de minimis* rule will not exceed the *de minimis* threshold over the applicable three-year period.

The rules on cumulation of aid as outlined in Article 5 of the *de minimis* Regulation will be respected. Furthermore, support under this Scheme is

made available on the basis that the beneficiary concerned has not benefited and will not benefit from any other grant or financial incentive of whatever nature applied for and/or utilised for the same scope as that subject of the support requested under this Scheme.

The MDIA reserves the right to share all relevant information related to the supported activities with other public entities to ensure that no other public funds were made available to the Beneficiary in respect of the same activity. Funding of the same nature from any other source of public funds is prohibited and will result in claw back (recovery) of funds. In line with the *de minimis* Regulation, records regarding *de minimis* aid shall be maintained for 10 years from the date on which the aid under the scheme is granted.

Publication in Central Register

In line with Article 6(1) of the *de minimis* Regulation, as of 1 January 2026, information on *de minimis* aid granted under this scheme shall be made publicly available in a central register.

The following information shall be made public:

- the identification of the beneficiary,
- the aid amount,
- the granting date,
- the aid instrument, and
- the sector involved on the basis of the statistical classification of economic activities in the Union ('NACE classification').

7. Liability

The MDIA and its contracted service providers shall not be liable for any loss, damage, expense or delay incurred or suffered by any Beneficiary (including, without limitation, consequential loss or damage) arising directly or in any way connected to the Scheme or any support or service offered under this Scheme.

8. Duration, Amendments and Termination of the Scheme

The Scheme shall remain in force until the allocated consultancy resources are exhausted or otherwise determined by MDIA.

MDIA reserves the right to amend, suspend, or terminate the Scheme or these Guidelines at any time, subject to applicable legal and regulatory requirements.

9. Data Protection and Confidentiality

All personal data submitted in the context of the Scheme shall be processed in accordance with applicable data protection legislation and the MDIA's Data Protection Policy, accessible on the MDIA's website.

Information provided by applicants and beneficiaries shall be treated as confidential, subject to any applicable legal disclosure obligations. Information disclosed to any relevant service provider in the course of delivery of the support under this Scheme shall remain confidential, subject to the provision by the service provider to the MDIA of consolidated overview aggregated reporting summarising support delivered, recurring themes, and key recommendations. For the avoidance of doubt, the specific support, advice or recommendations offered to any specific beneficiary shall not be identifiable from such reports, and any applicable professional secrecy or privilege, where applicable, shall be respected.

10. General Information

This scheme is co-funded by the European Union. Views and opinions expressed are those of the authors only and do not necessarily reflect those of the European Union or the European Commission. Neither the European Union nor the granting authority can be held responsible for any use that may be made of the information contained within this programme or related materials.

For further information or queries related to the GrowthLab Scheme, applicants are encouraged to contact the Malta Digital Innovation Authority (MDIA) through DiHubMT.

DiHubMT – Malta Digital Innovation Authority

Email: dihubmt@mdia.gov.mt / growthlab@mdia.gov.mt

11. Revision History

Revision No.	Issue Date	Description
1	14/07/2026	First issue.

ISSUE DATE
14/07/2026

G-TEC-009

Rev.1

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