

1.1.2026

Production incentive for audiovisual industry

Table of Contents

1 Funding decision and its terms and conditions	2
2 Publicity of the funding decision.....	2
3 Accountable project leader	2
4 Production coordinator	3
5 Reporting.....	3
6 Auditor's report	4
7 Payment of funding	4
8 Monitoring of costs and project accounting.....	5
9 Eligibility of costs	5
10 Procurement procedures	6
11 Declared salaries	6
12 Working time monitoring	7
13 Indirect personnel costs.....	7
14 Purchased services costs.....	7
15 Purchases from other companies in the same group and associated companies	8
15.1 Business Finland's definition of a related party	8
15.2 Project accounting and cost reporting of an associated company	8
16 Other costs	9
17 Other public funding	9
18 Monitoring the effectiveness of funding	9
19 Changes to the project	10
20 Reassignment and approval of corporate reorganization	10
21 Beneficiary's disclosure obligation	10
22 Right of inspection	10
23 Discontinuation of payment.....	11
24 Repayment of funding	11
25 Clawback of funding	12
25.1 Clawback obligation	12
25.2 Discretionary clawback.....	12
25.3 Interest.....	12
25.4 Penalty interest.....	13
25.5 Moderation of grant clawback.....	13
25.6 Clawback time limit	13
26 Right of offsetting	13
27 Misuse.....	13
28 Order of application.....	13
29 Legal basis	13

1.1.2026

1 Funding decision and its terms and conditions

The funding decision enters into force at the time of decision-making.

However, the implementation of the decision and the legal effects based on it will only begin when:

1. the conditions set for the decision to enter into force have been met, and
2. the beneficiary has confirmed the decision and these conditions.

The funding decision will lapse if the conditions set for the decision to enter into force are not met within the deadline set. A separate decision will be made on the lapse.

The beneficiary must confirm receipt of the funding decision and these funding terms and conditions in accordance with the instructions. The confirmation will also include the beneficiary's account number to which the funding will be paid. Funding cannot be paid until the funding decision, and its conditions have been confirmed as received. The recipient of the decision must be authorized to sign for the organization.

These terms and conditions for funding are part of the funding decision, and compliance with them is the prerequisite for payment of the funding.

The funding granted under this funding decision is state aid authorized on the basis of the General Block Exemption Regulation (Commission Regulation (EU) No 651/014 declaring certain categories of aid compatible with the internal market in the application of Articles 107 and 108 of the Treaty; OJL187 26 June 2014, p. 1).

These funding terms and conditions are issued under section 11 (3 and 4) of the Act on Discretionary Government Transfers (688/2001).

2 Publicity of the funding decision

The following information will be public: the beneficiary's name, business ID, size, domicile, sector, register number of the funding decision, form of financing, granting date, the amount of funding granted and the amount paid. The State Treasury publishes public information about state grants in the service for publication and use of state grant information (Tutkivastuksia.fi).

When the beneficiary disseminates information about the production (hereinafter project) or its results, it must disclose that Business Finland has provided funding for the project. Instructions on how to credit Business Finland are available on the Business Finland's website.

The Funding Agency may need information from other authorities and funders for the payment and supervision of funding. Provisions on the exchange of information between authorities are laid down in the Act on the Customer Information System for Business Services (293/2017) and the Act on Discretionary Government Grants. Provisions on the disclosure of trade secrets are laid down in the Act on the Openness of Government Activities (621/1999).

A beneficiary with operations in Finland must submit their annual statements, including appendices, for publication in the Finnish Patent and Registration Office, as laid down by law.

In accordance with the Copyright Act, an unencrypted DCP or original material in the best other available form and copies of a film's advertising and other information material must be stored in the National Audiovisual Institute within three months of completion of the film.

3 Accountable project leader

The beneficiary authorizes an accountable project leader who is in an employment relationship with the beneficiary or holds a position of responsibility in the company. A person disqualified from the practice of commercial activities cannot act as the accountable project leader. The accountable

1.1.2026

leader monitors the implementation of the project referred to in the funding decision and is responsible for ensuring that

- project accounting has been arranged in accordance with these funding terms and conditions
- working time monitoring has been arranged in accordance with the terms and conditions, where required
- the decision and its terms and conditions are reviewed with financial management/an accounting firm and that the decision and terms and conditions have been sent to the auditor for information
- the persons that have been chosen to manage the project's issues in the online service have access rights to the project (this does not apply to foreign beneficiaries.)

If the accountable project leader changes, the beneficiary must submit an application for a change of accountable leader during the project or 10 years after the payment of the last installment or as long as the loan capital remains. Changes to the contact details of the responsible person must also be reported to the Funding Agency.

4 Production coordinator

If the beneficiary is a foreign company, the Funding Agency requires that the beneficiary concludes a written service contract with a production coordinator who has a Finnish business ID. In that agreement, the beneficiary must also oblige the production coordinator to comply with these funding terms and conditions, excluding the purchases from other companies in the same group or associated companies in section 15.

In the contract, the foreign company must agree that the Funding Agency will disclose all documentation related to the funding decision to the production coordinator as well.

Both the beneficiary and the production coordinator must keep accounting records according to these funding terms and conditions. The contract must include a clause that obliges the production coordinator to keep a record of the production costs for project accounting purposes (cost breakdown in a specific format) and to prepare an auditor's report of the actual costs. The agreement must also include a section in which the production coordinator commits that Business Finland also has the right to audit the production coordinator's operations and accounting records in accordance with section 22.

The production coordinator hires employees, acquires services for the beneficiary, and pays wages and salaries and the invoices of service providers. The coordinator charges the beneficiary for the paid salaries, invoices and the coordinator's own fee. The coordinator prepares and maintains a cost specification, as instructed by the Funding Agency. The beneficiary and the production coordinator agree on the terms of payment and payment schedules. The Funding Agency will not provide the funding if the cost breakdown and auditor's report are not submitted to the Funding Agency within the specified time frame.

The beneficiary is fully responsible to the Funding Agency for the correct use of the government grant and compliance with these terms and conditions, also with regard to the production coordinator.

5 Reporting

Beneficiaries in Finland

The beneficiary's accountable project leader reports on the project's progress using the Business Finland's online service. The costs allocated to the project are also declared online. A cost breakdown in a specific format and an auditor's report must be appended to the cost statement submitted online.

1.1.2026

Foreign beneficiaries

If the beneficiary is a foreign company, the production coordinator submits a cost breakdown and an auditor's report to the beneficiary. The beneficiary reports to the Funding Agency in accordance with the instructions.

Upon request, the Funding Agency must be provided with additional information if required for project monitoring. Additional information may include copies of receipts, invoice itemizations and the selection criteria for purchased services.

The beneficiary must declare all project costs at the latest in the final report. If it is necessary to make changes between the cost categories in the cost estimate, the beneficiary must apply to change the cost estimate in the online service. No new project costs can be presented after the approval of the final report.

6 Auditor's report

As part of each report, the beneficiary must submit an auditor's report on all the production costs incurred in Finland, prepared by an independent Finnish auditor. The auditor does not need to audit the content of other costs referred to in section Other costs, nor take a stand on eligible other costs. The Funding Agency has the right to demand a larger sample size for the inspection, for example if the auditor's report contains a large number of observations. A standard report template can be found on the Business Finland website.

If the beneficiary is a foreign company, the auditor prepares an auditor's report on the costs paid by the production coordinator and the payments made to the coordinator by the beneficiary. The production coordinator submits the auditor's report to the beneficiary, who then delivers it, appended to the report, to the Funding Agency.

Reasonable costs arising from the auditor's report prepared by the project auditor can be accepted as direct project costs. If the billed and paid costs incurred by the audit are not included in the project costs confirmed by the auditor, copies of the invoice of the audit costs and receipt/bank statement must be submitted to the Funding Agency.

The Funding Agency has the right to deliver the auditor's report to other authorities for the purpose of monitoring the use of funding.

7 Payment of funding

The Funding Agency will pay the funding based on the approved report submitted on time. The funding will be paid at the maximum funding percentage stated in the funding decision. The final report submitted after the deadline according to the reporting schedule will not be processed and the funding will not be paid. The final funding instalment must be applied for in connection with the final reporting. After this, funding applied for will no longer be paid.

A minimum of 10 per cent of the funding granted for the project will only be paid after the approval of the final report. The final instalment will be paid if the project has accumulated an adequate amount of eligible costs.

Entitlement to the granted funding or part of it will lapse if the beneficiary does not submit the requested reports or further information by the due date specified in the funding decision or separately notified by the Funding Agency. Funding Agency may order any funding already provided to be repaid immediately, with interest.

Funding will not be provided if the production does not meet the minimum requirements of the funding decision. The minimum requirements are stated on Business Finland's website, too. The incentive may be for a maximum of 80 percent of the total production budget. If the production is carried out at a cost lower than the cost estimate, the beneficiary must confirm that the costs submitted for approval for the production do not exceed 80 percent of the total production costs.

1.1.2026

Minimum spending in Finland:

- a) Feature film: 500,000 e
- b) Documentary film: 500,000 e
- c) Serial fiction and animation: 500,000 e

Minimum overall budget for the production:

- a) Feature film: 2,500,000 e
- b) Documentary film: 650,000 e
- c) Serial fiction and animation: 11,500 e/minute

8 Monitoring of costs and project accounting

The beneficiary, and in the case of foreign beneficiaries, the production coordinator must also arrange accounting so that the costs arising from the production can be itemized and their connection with the accounting and the reported costs can be verified.

If the beneficiary simultaneously has underway a Business Finland-funded project whose funding terms and conditions require working time monitoring, all those persons working in both projects must keep records on their working time on an hourly basis. For more information, see Section 12 Working time monitoring.

Costs incurred from the auditor's report may be incurred and may be paid after the project has ended.

Project accounting and all documents related to the implementation and costs of the project, as well as other material necessary for the supervision and auditing of the project, must be retained for at least ten years from the date of the last payment for the project. Project material includes, for example, expense and payment receipts, procurement documents, personally kept working time records with confirmation notes where required, and salary specifications submitted as appendices to the report.

The Funding Agency has the right to reject costs if the project accounting has not been organized in accordance with these terms and conditions or cannot be considered reliable.

9 Eligibility of costs

Eligible costs include costs directly incurred from the production of an audiovisual work, including pre- and post-production, in Finland. Costs incurred in Finland from actions taken to make the work more accessible to disabled persons are also eligible.

In order for the project to be approved for owners' salaries (see section 11) or interest costs (see section 15), they must already be declared in the funding application. The costs must be mentioned in the specific conditions of the funding decision.

Costs that are not directly related to the production, such as marketing and distribution costs, financing costs and the cost of legal services, are not eligible costs.

A production incentive can only be granted for activities that are implemented after submitting a funding application. The costs must be

- fully paid for before the auditor checks them, and they are declared to the Funding Agency
- entered in the accounts of the beneficiary or the production coordinator
- in the net amount and exclusive of VAT
- incurred from the production in Finland during the duration of the production.

The estimate of costs in Finland appended to the funding decision determines the production's maximum amount of individual eligible costs. The Funding Agency has the right not to accept costs presented by the beneficiary if their relevance to the production is not clearly substantiated.

1.1.2026

The costs are finally accepted for a project only in conjunction with the final accounting statement.

The costs must be based on the corresponding expenditure payment records. This does not apply to computational costs allocated to the project. The expenses must be fully paid in money by the beneficiary when they are reported to the Funding Agency. Procurements may not be paid by loans issued by the recipient of the payment. An invoice for work performed during the project may be paid after the project end date but before the costs are reported to the Funding Agency.

To ensure the effectiveness of the funding, only procurements and work ordered or agreed upon in writing after submitting the funding application are approved for the project. In exceptional cases, the procurement ordered for the implementation of the project before submitting the funding application can only be accepted if the order or contract contains a clause stipulating that the procurement will be canceled if the funding decision is negative. Even then, the costs are only eligible from the date of submission of the funding application at the earliest.

10 Procurement procedures

In all procurements, the beneficiary must ensure that the bidders, subcontractors, or their beneficiaries are not subject to sanctions imposed by the European Union or the United Nations (UN), or decisions to freeze assets imposed by the Finnish authorities.

When the beneficiary is a public procurement unit or the funding provided by the Funding Agency or other public funding covers more than 50 per cent of the project costs, the beneficiary must observe the provisions of the Act on Public Procurement and Concession Contracts (1397/2016). When the total value of the procurement is at least 60,000 euros, the procurement must be tendered as a public procurement. When a procurement must be put out to tender, the HILMA number or the criteria for direct award are indicated in the reporting.

The Act on Public Procurement is not applied to procurements for the audiovisual industry in the case of purchasing, development, production or co-production procurements of program material made by providers of the services.

If a public procurement unit has made a procurement in violation of the procurement provisions, the purchase price is not an eligible cost for the project.

11 Declared salaries

The salaries paid to employees paying taxes to Finland for work done in Finland are subject to approval by the Funding Agency. These include the salaries subject to withholding tax for persons who participated in the production, without holiday pay, sick pay and holiday bonus.

If the remuneration paid is classified as trade income and not as salary, the beneficiary must declare it under "Purchased services" in the cost statement. Utilization rights (compensation for presentation rights) are declared as they are accounted for, either as salaries or purchased services.

The salaries of the beneficiary and the owners of its associated companies may be approved at a maximum of EUR 100,000 per production on a case-by-case basis. The work assigned to the production must be artistically responsible work (director, scriptwriter, composer, photographer, audio engineer). The maximum amount may also include the owner-producer's salaries. An owner is considered to be a person who, alone or with a close circle, directly or indirectly owns more than 20 percent of the company. If the ownership of the company decreases to 20 percent or less during the project's duration, the ownership will be treated in accordance with the share ownership at the closing stage for the entire project. If the ownership increases to more than 20 percent during the project's implementation period, the interest is considered to have been valid for the entire project.

1.1.2026

12 Working time monitoring

If the beneficiary simultaneously has underway a Business Finland-funded project whose funding terms and conditions require working time monitoring, each person working on the project must keep hourly working time monitoring of the work they do on the project for the duration of the project. The hours worked must be allocated monthly to the days on which the work was done. Working time monitoring made after the salary specification submitted in connection with the reporting is not accepted. Working time monitoring also applies to persons who are paid work compensation. If the beneficiary's working time monitoring system does not enable tracking of project working time, the beneficiary must track project working time, for example in Excel. An example of hourly tracking can be found on the Business Finland website. Due to the confidentiality of salary information, the salary specification cannot be downloaded for viewing from the service like the other documents.

If the Working Hours Act does not apply to the person or the working hours have not been defined for the person in writing, the Funding Agency uses an estimate of 10 h/day or 215 h/month as the total working time. Such persons are, for example, the CEO and other management as well as shareholders.

The accountable project leader or the employee's supervisor must approve the working hours at least on a monthly basis. The CEO or the accountable project leader cannot confirm their own working hours. Confirmation must be verifiable afterwards.

The Funding Agency has the right to refuse approval of the salaries in whole or in part if the working time monitoring has not been in compliance with the above terms and conditions or cannot be regarded as reliable.

The material related to working time monitoring, hourly monitoring reports and verified monthly summaries must be kept for a period of ten years after the payment of the last project funding instalment.

13 Indirect personnel costs

A percentage of the salaries paid for effective working hours and approved for the project that is laid out in the project cost estimate (max. 50%) can be accepted as indirect personnel costs. If a person is not paid holiday pay, the indirect personnel cost may be a maximum of 30 per cent.

Indirect personnel costs include

- midweek holidays, holiday pay, sick pay, leave pay and holiday bonus
- social security costs
- other employment costs, including normal staff training, fringe benefits and protective clothing.

14 Purchased services costs

Services purchased from third parties can be accepted in accordance with the project plan and invoicing.

Eligible costs include any costs incurred in Finland from the purchase of goods and services, transport costs and accommodation costs, and the cost of facilities and equipment leased for production purposes, from companies paying taxes to Finland. Other leasing-related expenditure (administrative, funding and other comparable expenditure) is not considered eligible costs. If the abovementioned expenditure cannot be itemized, a maximum of 50 per cent of the total expenditure incurred to the project from a lease agreement can be accepted as project costs.

1.1.2026

If the remuneration paid for the work takes the form of a fee rather than a salary, it should be specified in Purchased services. Remunerations referring to a license or the acquisition of options are not acceptable costs.

The acquisition cost of PCs, mobile phones and other equipment included in the overhead cannot be included in purchases. Imputed costs, for example, from the use of own equipment, are included in other costs.

The costs arising from auditing the project costs can be included in the purchased services.

Purchased services are itemized in an appendix in a specified format, available on the Business Finland's website.

15 Purchases from other companies in the same group and associated companies

The Funding Agency may approve purchases from group companies and associated companies as project costs in accordance with these funding terms and conditions. Group companies refer to companies belonging to the same group. Associated companies are companies, regardless of their legal form, between which there is an affiliation as defined in these terms and conditions.

15.1 Business Finland's definition of a related party

A related party refers to a situation in which another company or a person affiliated with that company can influence the beneficiary's procurement decisions. Companies are associated companies of each other, for example, when one of the following interests exists between them:

- Interest based on control
 - One company can exercise control over another company, or
 - The same individual can exercise control over both companies
- Interest based on ownership
 - At least 20% of the entire share capital or equivalent equity of another company is directly or indirectly owned or controlled by the other company, or
 - Companies whose share capital or equivalent equity is directly or indirectly owned or controlled by the same individual
- Interest based on the position or function of an individual
 - The same individual acts in both companies in any of the following roles:
 - member/deputy member of the board
 - person responsible for the company or holder of the right of representation or power of attorney
 - employee of the company
 - financier or guarantor of the company
- Interest based on family membership or close relationship
 - The individual acts in the company in any of the roles mentioned in section 3 and his/her family member or close relative also acts in any of the above-mentioned roles in another company. A family member refers to a spouse or common-law partner living in the same household, one's own child and one's spouse's child. A close relative is considered to include a grandchild, sibling, parent, grandparent and similar relatives on the spouse's side.

15.2 Project accounting and cost reporting of an associated company

In order for the costs of the group and associated companies to be eligible, the group and associated companies must also comply with these funding terms and conditions. The beneficiary must ensure that the group companies and associated companies arrange project accounting and working time monitoring in a manner that is in accordance with these terms and conditions.

1.1.2026

The group companies and associated companies must provide the beneficiary with an invoice for the services purchased for the project. The Funding Agency may accept costs incurred by the seller for providing the service and paid by the beneficiary. Group-internal administrative costs and items paid as administrative fees are not eligible project costs.

The Funding Agency will accept the paid purchased services without profit. In order to demonstrate the non-profit nature of the services, the group companies and associated companies must also provide the Funding Agency with a separate project cost statement of the costs arising from the project.

Costs are declared using the same cost breakdown for the audiovisual industry that the beneficiary uses for specifying costs. In addition to the cost breakdown, the group or associated company must submit an auditor's report on the costs of the group or associated company.

The beneficiary must submit the cost specification of the group companies and associated companies and, as part of each report, an auditor's report detailing the costs of the group company. The auditor's report must be prepared by an independent auditor. The report template is available on the Business Finland's website. The Funding Agency may in exceptional circumstances accept purchased services without a separate cost breakdown even from associated or group companies.

In addition to direct project costs, indirect personnel costs and other overheads connected with salaries are also eligible costs (see section 9). A maximum of 50 per cent of the salaries allocated to the project are accepted as indirect personnel costs. Other costs may be accepted, at the maximum, 20 per cent of the total of salaries and purchase services.

16 Other costs

The maximum amount of other costs accepted by the Funding Agency is 20 per cent of the eligible costs referred to in sections Salaries and Purchased services. Other costs include, for example, travel expenses (tickets, daily allowances, kilometer allowances, parking costs and fuels), copyright royalties (Teosto), imputed costs and overheads. These costs need not be reported to the Funding Agency, nor do they need to be included in the beneficiary's project accounting.

17 Other public funding

The combined total amount of public funding in audiovisual productions may not exceed 50 per cent of eligible costs. The combined total amount of funding that the project receives from the Funding Agency and other providers of public funding may not exceed the project's maximum limit for public funding. If necessary, the Funding Agency will reduce its own contribution to the same eligible costs to ensure that the maximum amount is not exceeded.

Details of all other public funding (from the state, municipalities and other public organizations or foundations) must be provided when reporting of the project. Funding granted by the European Union must also be reported.

If any changes have been made to the financing plan during the cost period, an updated plan must be submitted at the time of the report.

18 Monitoring the effectiveness of funding

The Funding Agency monitors the impact of funding. Upon request, the Funding Agency must be provided with a report on services relating to the use of the disbursement for three years after the completion of the project.

1.1.2026

19 Changes to the project

The beneficiary must obtain the Funding Agency's consent for project changes. Consent must be sought from the Funding Agency in writing in advance / before the change if the project's progress deviates from the plan:

- significant changes to the plan
- changes to the financing plan
- changes to the schedule
- changes to the cost categories
- significant changes to the division of rights
- changing the final reporting date
- changing the accountable project leader.

The beneficiary must immediately notify the Funding Agency of other significant changes to the project, for example if there are changes to key personnel resources.

A positive amendment decision can only be made if the beneficiary has fulfilled their registration, declaration, and payment obligations in relation to taxes or other legal obligations.

A change in the beneficiary's bank account is reported using form Y1 available on the website.

20 Reassignment and approval of corporate reorganization

As a rule, a funding decision may not be transferred to a third party.

The beneficiary must notify the Funding Agency in advance if it undertakes significant business changes or reorganization activities (such as a sale of a share majority, merger, division).

21 Beneficiary's disclosure obligation

The beneficiary must provide the Funding Agency with accurate and sufficient information for the payment of funding and for monitoring the compliance with the terms and conditions.

The beneficiary must inform the Funding Agency without delay of any change affecting the realization of the intended use of the funding or of any other change affecting the use of the funding.

22 Right of inspection

Innovation Funding Agency Business Finland, the National Audit Office, the European Commission and the European Court of Auditors have the right to audit the finances and operations of the beneficiary as required for the payment of the funding and supervision of its use.

The audits can be performed by other authorities or auditors authorized by the Funding Agency to carry out the task. An external expert may, at the Funding Agency's request, assist in the performance of the audit.

Right of inspection will remain in effect for a period of ten years from the payment of the last project instalment. Project documents and other materials necessary for project monitoring and auditing must be stored for at least the same period of time.

The beneficiary should assist with the inspection and provide the needed information for the inspector without compensation.

1.1.2026

The auditor has the right to seize any material subject to audit, if auditing so requires. A written record must be drawn up of any seizure of materials during an audit. The record must state the purpose of seizing the material and what has been seized. The seized material must be returned without delay when it is no longer needed for the audit.

The auditor has, to the extent required by the audit, the right to enter the premises managed or used by the beneficiary. This applies to the business, storage and other similar premises used for practicing a profession or a business, as well as other areas relevant to the granting of the funding and the supervision of its use. Audits may not be carried out in premises covered by domestic peace.

23 Discontinuation of payment

Innovation Funding Agency Business Finland may order the temporary discontinuation of the payment of the funding on following grounds:

1. The Funding Agency has reasons to suspect that the beneficiary does not provide the Funding Agency with correct or adequate information or uses the funding in a manner that is in violation of the funding decision.
2. The grounds on which the funding was granted have essentially changed. Such changes include situations where
 - a) the beneficiary deviates from the project plan without a written authorization granted by the Funding Agency
 - b) there is a substantial deterioration in the beneficiary's financial position in relation to the anticipated trend
 - c) the beneficiary loses its equity in full
 - d) the beneficiary initiates reorganization proceedings
 - e) the beneficiary neglects its registration, notification, or payment obligations related to taxes or other regulatory obligations
 - f) the beneficiary has outstanding debt to the State or the institutions of the European Union arising from their payment or recovery decisions or orders
 - g) the beneficiary has recovery decisions with which it has failed to comply
 - h) the beneficiary has failed to adhere to the repayment obligations concerning the loans granted by Business Finland
 - i) the beneficiary does not provide sufficient information about the owners or beneficiaries so that the Funding Agency can take measures related to knowing your customer
 - j) the beneficiary does not provide the Funding Agency with sufficient information regarding the providers, subcontractors, or their beneficiaries, so that the Funding Agency can make sure that these actors are not subject to sanctions imposed by the European Union or the United Nations (UN), or decisions to freeze assets imposed by the Finnish authorities
 - k) the beneficiary has not appointed an accountable leader for the project who is employed by the beneficiary or has a position of responsibility in the organization.
3. The payment of funding must be discontinued under European Union legislation.

If the grounds for the discontinuation are not corrected within the time specified in the decision to interrupt funding, Innovation Funding Agency Business Finland has the right to discontinue payment of the funding and to claw back the funding already paid in whole or in part.

24 Repayment of funding

The beneficiary must, without delay, repay any funding or part thereof received through error, in excess or manifestly without cause. Grants of less than 100 euros need not be repaid.

The beneficiary must contact the Funding Agency before the repayment of funding.

1.1.2026

25 Clawback of funding

Innovation Funding Agency Business Finland may claw back any funding already paid if the beneficiary and/or production coordinator violates against these terms and conditions.

25.1 Clawback obligation

Innovation Funding Agency Business Finland will order the discontinuation of the payment of funding and the clawback of funding already paid if the beneficiary has

1. failed to return funding or part thereof that must be repaid under section Repayment of funding
2. used the funding for a purpose essentially different from that for which it was granted
3. provided false or misleading information about a matter that has been essential to the granting of the funding, its amount or terms and conditions
4. otherwise essentially violated the provisions concerning the use of the funding or these terms and conditions in a manner comparable to paragraphs 1-3.

25.2 Discretionary clawback

Innovation Funding Agency Business Finland has the right to order the discontinuation of the payment of funding and the clawback of funding or part thereof already paid if

- false or misleading information has been provided for the purpose of payment of funding or supervision thereof, information has been concealed, the provision of information has been refused or the information requested by Innovation Funding Agency has not been provided by the specified date
- the beneficiary has directly or indirectly made funds or financial resources available or usable by natural persons, legal entities, entities or bodies on the embargo list or close to them
- the beneficiary has not complied with the terms and conditions for funding
- the beneficiary has not informed the Funding Agency without delay of any change affecting the realization of the intended use of the funding or of any other change affecting the use of the funding
- the funding has not been used in compliance with the funding decision
- the beneficiary has not been able to demonstrate how the project plan has been implemented or what the results have been
- the beneficiary has refused to assist in the project audit
- the beneficiary has terminated the project for which the funding was granted, reduced or altered it substantially or transferred it to another party
- the beneficiary has been subjected to recovery proceedings, placed into liquidation or bankruptcy, or made subject to restructuring proceedings
- the beneficiary or its representative has been convicted of an offence or ordered to pay penalties, in accordance with section 22 of the Act amending the Act on Discretionary Government Transfers
- the clawback of funding is required under European Union legislation
- the beneficiary otherwise acts in a manner comparable to the matters in this section. This is considered to be the case, for example, if the beneficiary neglects registration, notification or payment obligations related to taxes or other statutory obligations.

25.3 Interest

The beneficiary must pay interest on the amount to be repaid or clawed back. The interest rate is determined from the date of payment of the funding until the Funding Agency has the information available to make a decision. It is calculated as an annual interest to which three percentage points are added. The annual interest is determined in accordance with section 3(2) of the Interest Act (633/1982).

1.1.2026

25.4 Penalty interest

If the beneficiary has not paid the amount to be repaid by the due date set by the Funding Agency, an annual penalty interest must be paid on the outstanding balance of the loan. For the period after the due date, the penalty interest is in accordance with the interest rate referred to in section 4(1) of the Interest Act (633/1982).

25.5 Moderation of grant clawback

Innovation Funding Agency Business Finland may decide that a part of the sum to be repaid or clawed back, and any interest or penalty interest on it, will not be clawed back if repayment full is unreasonable in light of the financial standing and circumstances of the beneficiary or in relation to the type of property acquired with the grant or in relation to the procedure on which the clawback is based or because of a change in circumstances. For an extremely weighty reason, Innovation Funding Agency may decide to totally waive the sum to be repaid or clawed back, or the interest or penalty interest on it.

25.6 Clawback time limit

The grant and interest or penalty interest on it will not be clawed back if ten years have elapsed from the remission of the final instalment of funding for the project.

26 Right of offsetting

The funding to be repaid or clawed back and the interest on it may be deducted from the other funding provided to the beneficiary.

27 Misuse

If, during the course of the project, there is reason to suspect that the beneficiary or a person acting on the beneficiary's behalf has committed a criminal offence under the Criminal Code (19 December 1889), with the Funding Agency as the injured party, the Funding Agency will take the required action in the matter.

28 Order of application

In the event of a conflict between the funding decision and appendices to it, the following order of application will apply:

1. Funding decision and any special terms and conditions thereof
2. Funding terms and conditions
3. Cost estimate
4. Production plan
5. Funding application and the appendices to it
6. Any other documents relevant to the funding decision

29 Legal basis

- Annual state budget
- Act on Discretionary Government Transfers (688/2001)
- Act on General Conditions for Aid Granted to Economic Activities (429/2016)
- Government Decree on Incentive for Audiovisual Productions in 2024 -2026 (1203/2023)
- Copyright Act (404/1961)