

SEARCH BRIDGE BENEFIT CORPORATION

L. 208/2015

FINANCIAL YEAR 28.07.2025 — 31.12.2025

Sustainability Report.



First sustainability report of Search Bridge S.r.l. SB.
Impact report, pursuant to L. 208/2015 paragraphs 376-384.

A manifesto, before a reporting document.

Search Bridge was born on 28 July 2025 with a choice that was not mandatory, but necessary: to be a Benefit Corporation. We wrote it into our articles of association before we issued our first invoice, because we believe that the technology we are building — an intelligence infrastructure designed to make brands visible and accurately represented within artificial intelligence systems — requires an explicit ethical compass and a governance framework that makes it externally verifiable.

This is not a financial report in the classical sense. It is a constitutive exercise of just over five months, in which we laid the foundations: the 231 Compliance Model, the Code of Ethics, the launch of the ISO 27001 and ISO 9001 certification paths, the systematic adoption of the privacy-by-design principle, and the design of our AI ethics framework in view of the European AI Act entering into force.

The four common benefit purposes declared in our articles of association — privacy, ethical AI, cybersecurity, digital governance and the democratization of analytics — are not a marketing slogan. They are the way in which we have decided to build the company. This document describes them in the form in which we initiated them, without emphasis, and in the form in which we intend to measure them starting from 2026.

The pages that follow are our public commitment to continue in this direction.

Giulio Salvucci

FOUNDER · SOLE DIRECTOR · IMPACT OFFICER

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An innovative startup with a precise identity.

COMPANY NAME**Search Bridge S.r.l. SB****LEGAL STATUS****Innovative Startup (D.L. 179/2012)****DATE OF INCORPORATION****28 July 2025****REA REGISTRATION****BO-584315****LEGAL FORM****S.r.l. · Benefit Corporation****REGISTERED OFFICE****Via del Giacinto 32, 40133 Bologna · Italy****TAX CODE / VAT NO.****04313431209****SHARE CAPITAL****€ 10,000.00 fully paid-up****OUR MISSION**

To make brands visible, accurately represented and competitive within the ecosystem of search and commerce mediated by artificial intelligence.

OUR VISION

To build a European brand intelligence infrastructure that operates with data sovereignty, respect for privacy and algorithmic ethics as non-negotiable principles.

OUR VALUES

Algorithmic transparency — our models are explainable and auditable.

Data sovereignty — the customer's data belongs to the customer. Always.

Technical rigor — shortcuts in technology are not shortcuts in results.

Long-term sustainability — we build to last, not to cash out.

The Multi-Signal Intelligence platform.

Search Bridge is the AI Visibility-to-Revenue Platform that helps brands become visible, accurate and competitive within AI-powered search systems.

LAYER 01

Deep Tracking

Interrogates the AI knowledge graph to measure how the brand is perceived at entity level: quality, positioning, authoritativeness, distinctive values.

LAYER 02

Competitive Tracking

Measures the brand's visibility share against competitors on real strategic intents, not on generic keywords.

LAYER 03

Technical Tracking

Verifies whether AI systems can correctly crawl, parse and understand the brand's digital presence.

The three layers converge in a unified vector database that generates prioritized recommendations. The more the platform is used, the more brand-specific it becomes. This is the principle of the **Learning Loop**: intelligence that compounds over time and becomes proprietary and non-transferable.

Why Benefit Corporation, from day one.

We wrote it into Article 5 of our articles of association, before the notary, on the day of incorporation. It is not a subsequent upgrade, nor a response to market pressure: it is a legal identity chosen from the outset.

A CHOICE

Why we did it

The sector in which we operate — intelligence applied to AI systems — is still a market without consolidated rules. The legal form of the Benefit Corporation forces us to always balance the legitimate interest of shareholders with the pursuit of common benefit purposes. It is a statutory safeguard against drift.

AN OBLIGATION

What it imposes on us

The director must pursue, with equal diligence, both profit-making and common benefit purposes. Each year, they are required to draft an impact report, attached to the financial statements, evaluated against an external assessment standard, and made publicly available on the website.

"A Benefit Corporation is a company that integrates into its corporate purpose, in addition to its profit objectives, the aim of having a positive impact on society and the biosphere."

L. 28 DECEMBER 2015, N. 208 · PARAGRAPHS 376-384

Lean governance and clear accountability.

SHAREHOLDER STRUCTURE

Giulio Salvucci — 90% of capital

Founder, CEO, Sole Director

Federico Giacomello — 10% of capital

Co-founder, CFO

ADMINISTRATIVE BODY

The company is administered by a Sole Director, appointed for an indefinite term. The model is consistent with the early-stage phase and ensures rapid decision-making, accompanied by clear personal accountability.

IMPACT OFFICER

Pursuant to Article 5-bis of the articles of association, the Impact Officer is the Sole Director, Giulio Salvucci. He is responsible for the pursuit of common benefit purposes and the annual drafting of this report.

ACTIVE GOVERNANCE INSTRUMENTS

- Articles of association with common benefit purposes (Art. 5)
- Organisation, Management and Control Model pursuant to D.Lgs. 231/2001
- Corporate Code of Ethics published on the website
- Annual sustainability report (this document)
- External impact assessment system (under adoption)

Four commitments, all written in our articles.

Article 5 of the articles of association identifies four areas of common benefit that Search Bridge pursues in parallel with its profit-making purpose. These are the four pillars that structure this report.

01**Privacy &
data protection**

Privacy-by-design culture, GDPR, ongoing training on cross-border marketing data processing.

02**Ethical and
responsible technologies**

AI ethics by design, proactive compliance with the AI Act, transparent, fair and non-discriminatory algorithms.

03**Information
security**

Security standards aligned with the NIS2 Directive, promotion of cyber resilience with customers and partners.

04**Digital governance &
democratization**

Transparent governance models, digital inclusion, support for the digital transformation of Italian SMEs.

The following pages dedicate a specific chapter to each purpose: what we declared, what we have already done, what we intend to do in 2026.

Privacy & protection of personal data.

WHAT THE ARTICLES SAY

Promotion of a culture of privacy and personal data protection through the systematic implementation of privacy by design, the dissemination of GDPR best practices, and continuous training.

WHAT WE DID IN 2025

- Adoption of privacy by design across all product development processes from incorporation.
- Setup of the GDPR contractual template (DPA, GDPR Article 28 schedules).
- Knowledge Base architecture isolated by customer: no data shared between brands.
- Selection of cloud providers with European data residency.
- Appointment of a dedicated legal team (three professionals) for data compliance.

NON-NEGOTIABLE OPERATIONAL PRINCIPLES

Customer isolation

Every Knowledge Base, every analysis model is isolated. Customer data is never used to enrich the intelligence of another brand.

Processing minimization

We collect and process only the data necessary for service delivery, never more than the purpose justifies.

Operational right to erasure

Upon contract termination, the customer's personal data is returned or deleted as contractually agreed.

Ethical and responsible technologies.

WHAT THE ARTICLES SAY

Adoption of AI ethics by design principles in the development of marketing analytics algorithms and predictive systems, proactive compliance with the European AI Act, promotion of transparent, fair and non-discriminatory algorithms.

OUR APPROACH

AI ethics is not a layer applied at the end of development. It is an architectural choice that conditions what we measure, how we measure it, and what we choose not to measure. Our guiding principle is "**human-in-the-loop**": systems propose, people decide.

THE FOUR OPERATIONAL ETHICAL COMMITMENTS

01

Algorithmic transparency.

Every recommendation generated by the platform is explainable and reconstructible from the input signals.

02

Fairness and non-discrimination.

Our models do not profile natural persons. We work on brand entities and market signals, not on individuals.

03

Human-in-the-loop.

No fully autonomous automation makes decisions that impact the customer without human supervision.

04

Auditability.

Every algorithmic decision produces logs that allow it to be subsequently verified.

Information security and cyber resilience.

WHAT THE ARTICLES SAY

Implementation of security standards aligned with the NIS2 Directive, promotion of cyber resilience among customers and partners, responsible sharing of information on cyber threats.

TECHNICAL & ORGANIZATIONAL MEASURES

- Multi-factor authentication (MFA) on all privileged access.

- Centralized management of identities and account privileges.

- Advanced anti-malware solutions with continuous updates.

- Encryption of sensitive data in transit and at rest.

- Software Development Lifecycle process with security review.

- Perimeter control and protection against DoS/DDoS attacks.

TOWARDS ISO/IEC 27001 CERTIFICATION

We launched in 2025 the certification path for ISO/IEC 27001:2022 for our Information Security Management System. Certification is a 2026 target and represents the formal level of assurance for enterprise customers and investors.

ALIGNMENT WITH THE NIS2 DIRECTIVE

Although we are not currently directly subject to NIS2 obligations, we have chosen to adopt its principles as a reference framework for our cyber resilience. This choice positions us as a reliable supplier for enterprise customers who are directly subject to the obligations of the directive.

Digital governance & democratization.

WHAT THE ARTICLES SAY

Adoption of transparent and sustainable corporate governance models. Promotion of digital inclusion and accessibility of marketing analytics technologies. Support for the digital transformation of Italian SMEs through accessible tools.

THE PROBLEM WE WANT TO SOLVE

Brand intelligence technologies applied to AI are today accessible only to a narrow elite of large brands. Italian SMEs — which form the backbone of our productive fabric — risk being excluded from the AI commerce revolution. We want to change this trajectory.

OUR DEMOCRATIZATION LEVERS

SELECT Tier

Entry-level package designed for €10-50M companies, with an annual fee that is accessible even to mid-sized Italian businesses.

Public knowledge sharing

Publication of white papers and industry research that are freely accessible, even to non-customers.

Output transparency

The recommendations we produce are understandable by management, not only by technical staff.

Market education

Academic and outreach collaborations to bring GEO culture into the Italian educational system.

Privacy by design. The systematic approach.

More than a stated principle: it is the way we have built the platform. Seven operational rules that we apply to every new feature.

+ **User centrality:** systems are designed to serve the user, not the other way around.

01

Proactive, not reactive

Privacy risk is prevented at the design stage, not managed after the fact.

02

Privacy by default

The most protective settings are those active by default. The user does not need to enable them.

03

Privacy embedded in design

Data protection is an integral part of the platform's architecture, not an add-on.

04

Full functionality

Privacy and functionality are not a trade-off: both can be achieved.

05

End-to-end security

Data is protected throughout the entire lifecycle: collection, processing, retention, deletion.

06

Visibility & transparency

The processing activities carried out are documented, verifiable and communicated to data subjects.

ISO/IEC 27001:2022 Information security.

The ISO/IEC 27001:2022 standard is the international standard for information security management. It defines the requirements for establishing, implementing, maintaining and improving an Information Security Management System (ISMS).

WHY WE ARE PURSUING IT

- It is the benchmark expected by European enterprise customers.
- It provides formal assurance to institutional investors.
- It aligns our processes with international best practices.
- It represents a solid foundation for future SOC 2 certification.

PROJECT ROADMAP

2025	Q4	Launched · Gap analysis of the current positioning against the 93 controls of Annex A.
2026	Q1-Q2	Implementation of missing policies, staff training, definition of ISMS responsibilities.
2026	Q3	Internal audit and activation of the PDCA cycle (Plan-Do-Check-Act).
2026	Q4	Target · Certification audit with an accredited third-party body.

ISO 9001:2015

Quality management system.

The ISO 9001:2015 standard defines the requirements for a Quality Management System based on the process approach and the PDCA continuous improvement cycle.

WHAT IT MEANS FOR SEARCH BRIDGE

For an innovative startup delivering SaaS services in a scaling phase, ISO 9001 is not a bureaucratic stamp: it is the discipline that allows us to replicate the excellence of the first customer on the fiftieth. It is the operational infrastructure that makes growth possible without sacrificing quality.

THE AREAS WE ARE FORMALIZING

- **Customer onboarding process** — from signing to go-live, in a replicable way.
- **Module delivery process** — Brand Perception, Custom Modules, COMcierge.
- **Customer success process** — quarterly reviews, structured feedback management.
- **Complaints management** — registration, escalation, resolution and root cause analysis.
- **Satisfaction measurement** — NPS, CSAT, retention indicators.
- **Internal audits** — annual verification of process effectiveness.

Certification target: *second half of 2026, coordinated with the ISO 27001 process to optimize audit efforts.*

D.Lgs. 231/2001 & Code of Ethics.

WHAT WE HAVE ADOPTED

Search Bridge has equipped itself with an Organisation, Management and Control Model (MOG 231) pursuant to Legislative Decree of 8 June 2001, n. 231, and a Code of Ethics, published on the corporate website.

Both are explicitly referenced in our commercial contracts (Art. 10 of the standard clause "231 Clause and Benefit Corporation"), as an integral part of corporate governance and a tool for guiding conduct.

WHY WE DID IT IMMEDIATELY

A startup is not required to adopt the 231 Model in its first years of life. We did so anyway, for three reasons:

- 01** **It is a requirement expected by enterprise customers.**
 Banks, pharmaceutical companies and listed industrial groups require it from us as a precondition for signing.

- 02** **It protects shareholders and directors.**
 In a company that handles sensitive customer data, administrative liability of the entity is a real risk.

- 03** **It trains corporate culture from the start.**
 The more aspects you wait to structure, the harder it becomes to do so. We did it immediately.

CONTRACTUAL EXTRACT

"The Customer acknowledges that conduct contrary to the Code of Ethics, to the regulations set out in Legislative Decree 231/2001 and to the principles of the Benefit Corporation may constitute a breach of contract and entitle the adoption of consequent measures."

AI Act & European technological sovereignty.

EU Regulation 2024/1689 — the AI Act — is the first comprehensive regulatory framework on artificial intelligence in the world. It enters into force progressively between 2025 and 2027 and classifies AI systems based on risk level.

Search Bridge has decided to anticipate the requirements of the AI Act by adopting its principles as a reference framework already in the platform's development. This means: documented risk classification of our systems, transparency of algorithmic outputs, documented human oversight, logging of automated decisions.

OUR POSITIONING

We operate in a landscape where all the top-10 GEO platforms are US-based. Being an Italian company, GDPR-native, aligned with the AI Act and built on European technical architecture is a choice that makes ethical, regulatory and commercial sense.

100%

EUROPEAN
DATA RESIDENCY

GDPR

NATIVE BY
ARCHITECTURE

AI Act

ANTICIPATED
COMPLIANCE

Giving knowledge back to the education system.

The democratization of analytics — the fourth common benefit purpose of our articles of association — also means giving knowledge back to the education system. In 2025, founder Giulio Salvucci initiated two collaborations with the Bologna academic system, provided on a personal basis and without generating direct revenue for Search Bridge.

UNIVERSITY

University of Bologna

Active collaboration with the academic system of Alma Mater Studiorum in the area of applied research on GEO (Generative Engine Optimization), consumer behavior within AI-mediated search systems, and the impact of LLMs on purchasing choices.

The objective is to contribute to a peer-reviewed scientific publication in the field of AI-powered digital marketing, making proprietary Multi-Signal Intelligence data available to the academic world for research purposes.

BUSINESS SCHOOL

Bologna Business School

Collaboration with Bologna Business School for executive training on digital marketing, omnichannel strategy and AI applied to business, drawing on the founder's twenty-year experience gained in contexts such as YOOX NET-A-PORTER, Liu Jo and GEOX.

Classroom guest sessions are a form of giving back: they bring into master's and executive education classrooms the lived industry experience, contributing to training the digital decision-makers of the next generation.

For whom we create value.

The articles of association identify six categories of stakeholders — people, communities, territories and the environment, cultural and social assets and activities, entities and associations and other stakeholders. We have translated them operationally.

CUSTOMERS

European premium brands

Fashion, luxury, consulting and manufacturing companies that use Multi-Signal Intelligence to be visible in AI search.

PARTNERS

Consultants and system integrators

Engineering SpA, FairPlay Consulting, Le Village by Crédit Agricole, ART-ER, strategic agencies.

TEAM

People who work with us

Co-founders, heads of department, collaborators, external consultants. People bound by a shared Code of Ethics.

INVESTORS

Shareholders and institutional investors

Current shareholders and the future investors of the 2026 Seed round, also expected from the European venture world.

ACADEMIA

The world of research and education

UNIBO, Bologna Business School, research communities on GEO and AI applied to marketing.

TERRITORY

The Bologna ecosystem

Startup community, local suppliers, Chamber of Commerce, Emilia-Romagna Region, regional productive fabric.

How we will measure impact from 2026.

The Benefit Corporation law (Annex 4 of L. 208/2015) requires the use of an **external evaluation standard** to measure the impact generated. The standard must be comprehensive, articulated, credible, transparent and produced by an entity not controlled by the company.

Search Bridge has selected the **B Impact Assessment**, developed by B Lab, as its reference framework. It is the most widely used standard at international level, adopted by over 250,000 companies worldwide, and covers five evaluation areas: governance, workers, community, environment and customers.

THE 5 EVALUATION AREAS OF THE B IMPACT ASSESSMENT

01**Governance**

Mission, transparency, ethics, accountability of directors.

02**Workers**

Compensation, benefits, health, safety, training, engagement.

03**Community**

Diversity, inclusion, local economic impact, supplier diversity.

04**Environment**

Management of energy, emissions, waste, water, overall footprint.

05**Customers**

Product quality, data management, customer feedback, sales ethics.

First formal assessment: *first half of 2026, at the close of the first complete annual financial year. The score will serve as the baseline against which to measure improvements in subsequent years.*

What we initiated in 2025.

Five months of constitutive operations. No proclamations: only the steps we actually took, against the four common benefit purposes of the articles of association.

PURPOSE 01 · PRIVACY

Launch

- Customer-isolated Knowledge Base architecture.
- Standardized GDPR contractual template (DPA).
- Cloud selection with European data residency.
- Dedicated legal team for data compliance (3 professionals).

PURPOSE 02 · AI ETHICS

Launch

- Adoption of the "human-in-the-loop" principle in agentic products.
- Architecture for auditability of recommendations.
- Systematic inventory of AI systems in use.
- Mapping of applicable AI Act requirements.

PURPOSE 03 · CYBERSECURITY

Launch

- Launch of ISO/IEC 27001:2022 certification path (Q4 2025).
- MFA on all privileged access.
- SDLC with integrated security review.
- End-to-end encryption of sensitive data.

PURPOSE 04 · GOVERNANCE

Launch

- 231 Model and Code of Ethics adopted and published.
- Launch of ISO 9001:2015 certification path.
- Academic collaborations with UNIBO and BBS.
- Launch of SELECT tier for Italian SMBs.

Measurable commitments for the next year.

Pursuant to Article 5-bis of the articles of association and Annex 4 of L. 208/2015, we set out the specific objectives that the company intends to pursue in the following financial year.

PURPOSE	2026 OBJECTIVE	TARGET
Privacy	Complete the mapping of the Records of Processing Activities and activate monitoring of access to personal data.	Q2 2026
Privacy	Deliver at least 16 hours of GDPR and privacy-by-design training to each new team member.	Recurring
AI ethics	Publish the corporate AI Ethics Guidelines and formalize the review process for high-risk AI Act systems.	Q3 2026
Cybersecurity	Obtain ISO/IEC 27001:2022 certification with an accredited third-party body.	Q4 2026
Quality	Obtain ISO 9001:2015 certification with an accredited third-party body.	H2 2026
Governance	Complete the first formal B Impact Assessment and publish the results as a 2026 baseline.	H1 2026
Governance	Structure the team incentive plan (stock grants and Cat. B shares) with vesting aligned with common benefit purposes.	Q1 2026
Democratization	Consolidate academic collaborations with UNIBO and BBS and contribute to at least one peer-reviewed scientific publication.	Q3 2026

A responsibility with a name and a face.

FOUNDER · SOLE DIRECTOR · IMPACT OFFICER

Giulio Salvucci

Pursuant to Article 5-bis of the articles of association and L. 208/2015, the Impact Officer is the corporate figure entrusted with the functions and tasks aimed at pursuing the common benefit purposes.

It is their responsibility to balance the interests of shareholders with the pursuit of common benefit purposes, draft the annual impact report, publish it on the corporate website, and respond to stakeholders on the effective pursuit of the benefit purpose.

BACKGROUND OF THE OFFICER

Over twenty years of experience in the digital transformation of European premium brands: Global Digital & Omnichannel Director at GEOX, Global eBusiness Director at Liu Jo, Head of Mono-brand Service Teams at YOOX NET-A-PORTER GROUP (with responsibility for 30+ brand platforms such as Saint Laurent, Balenciaga, Bottega Veneta, Armani, Moncler).

Degree in Communication Sciences from the University of Bologna, Master's in Branding and Marketing from IULM Milan.

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A PROMISE

Be the answer.



This is the first sustainability report of Search Bridge. It will be followed by those of 2026, 2027, 2028. Each will tell not what we would like to be — but what we have concretely managed to do.

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