

SEARCH BRIDGE BENEFIT CORPORATION

L. 208/2015

GOVERNANCE DOCUMENT

Code of Ethics.



The manifesto of conduct of Search Bridge S.r.l. SB. Integral part of the Organisation, Management and Control Model pursuant to D.Lgs. 231/2001. Binding on all those who act in the name of or on behalf of the company.

VERSION

1.1

APPROVED

15 December 2025

LATEST UPDATE

23 May 2026

APPROVED BY

Sole Director

PUBLISHED

searchbridge.ai

SCOPE

All Recipients

BOLOGNA · ITALY

BE THE ANSWER.

What's in this document.

The Code of Ethics of Search Bridge S.r.l. SB sets out the principles, values and rules of conduct binding on anyone who acts in the name of or on behalf of the company. It is an integral part of the Organisation, Management and Control Model pursuant to D.Lgs. 231/2001 and is referenced in commercial contracts.

IDENTITY

Italian Benefit Corporation

Search Bridge is an Italian benefit corporation operating in AI visibility, incorporated on 28 July 2025 and registered as an innovative startup.

SCOPE

All Recipients

The Code applies to directors, shareholders, employees, collaborators, consultants, suppliers and partners.

PRINCIPLES

Eight Founding Values

Legality, integrity, transparency, confidentiality, impartiality, diligence, responsibility and protection of the individual.

SPECIFIC AREAS

High-Risk Domains

Privacy by design, AI ethics by design, cybersecurity, anti-money laundering, anti-discrimination, conflicts of interest.

WHISTLEBLOWING

Protected Reporting

Dedicated channel (etica@searchbridge.ai) with whistleblower protection pursuant to D.Lgs. 24/2023.

SANCTIONS

Consequences for Breach

Violations constitute contractual breach and may result in disciplinary measures, contract termination and damages claims.

Why this Code exists.

Search Bridge S.r.l. SB (hereinafter "Search Bridge" or "the Company") is an Italian benefit corporation operating in a sector — intelligence applied to artificial intelligence systems — in which the formal rules of the market are still largely to be written. Building a solid company in a market without consolidated rules requires an explicit ethical compass, set out in black and white, shared with those who work with us and externally verifiable.

This Code of Ethics is that compass. It defines the principles that guide every decision we make, the conduct we commit to maintain towards the people we deal with, and the operational rules we apply in the areas where risks are highest: privacy, information security, artificial intelligence, conflicts of interest, anti-corruption and protection of the individual.

The Code is an integral part of the Organisation, Management and Control Model (MOG) adopted pursuant to Legislative Decree of 8 June 2001, n. 231, and complements the provisions of the articles of association, in particular Article 5 which identifies the Company's common benefit purposes. It is a living document: it is updated when the evolution of the Company or the regulatory context requires it.

PRINCIPAL REGULATORY REFERENCES

L. 28 December 2015, n. 208 (paragraphs 376-384, Benefit Corporations) · D.Lgs. 8 June 2001, n. 231 (Administrative liability of entities) · EU Regulation 2016/679 (GDPR) · EU Regulation 2024/1689 (AI Act) · EU Directive 2022/2555 (NIS2) · D.Lgs. 24/2023 (Whistleblowing) · Articles of association of Search Bridge S.r.l. SB.

Who we are and why we are a benefit corporation.

Search Bridge S.r.l. SB is the AI Visibility-to-Revenue Platform that helps brands become visible, accurate and competitive within AI-powered search systems. Our proprietary technology, known as **Multi-Signal Intelligence**, analyses how AI perceives and represents brands through three convergent tracking layers — Deep, Competitive and Technical — generating prioritised recommendations to improve our clients' AI Visibility.

Legal form and identification data

The Company is incorporated as a Benefit Corporation pursuant to L. 28 December 2015, n. 208, paragraphs 376-384, and is registered as an innovative startup pursuant to D.L. 179/2012, conv. L. 221/2012. Its registered office is at Via del Giacinto 32, 40133 Bologna, Italy. Tax code and VAT number 04313431209. REA registration BO-584315. Share capital of 10,000 euros fully paid-up.

The four common benefit purposes

Article 5 of the articles of association identifies four common benefit purposes that the Company pursues in parallel with its profit-making purpose. This entire Code of Ethics descends from, and operationally implements, these four purposes.

- 01** **Promotion of a culture of privacy and personal data protection**, through the systematic adoption of privacy by design, the dissemination of GDPR best practices and ongoing staff training.
- 02** **Development of ethical and responsible technologies**, with AI ethics by design principles, proactive compliance with the European AI Act and the promotion of transparent, fair and non-discriminatory algorithms.
- 03** **Strengthening of information security**, with standards aligned with the NIS2 Directive, promotion of cyber resilience among customers and partners and responsible sharing of threat information.
- 04** **Responsible digital governance and democratisation of analytics**, through transparent governance models, support for digital inclusion and support for the digital transformation of Italian SMEs.

The Impact Officer

Pursuant to Article 5-bis of the articles of association, an Impact Officer is appointed, identified as the Sole Director, who is responsible for pursuing the common benefit purposes, drafting the annual impact report and making it publicly available. The Impact Officer is also the guarantor of the correct application of this Code of Ethics.

To whom this Code applies.

This Code of Ethics applies, without exception and with the same intensity, to the following subjects (hereinafter "Recipients"):

- **Corporate bodies** — sole director, shareholders, any future directors, statutory auditors and auditors.

- **Employees and internal collaborators** — anyone connected to the Company by an employment relationship, para-subordinate or ongoing collaboration relationship.

- **Consultants and professionals** — subjects providing professional services to the Company on an ongoing or occasional basis.

- **Suppliers and commercial partners** — suppliers of goods and services, technology partners, resellers, distributors, agents and any stable commercial counterparty.

- **Interns, trainees and collaborators in training.**

- Anyone who, occasionally or permanently, acts in the name of, on behalf of or in the interest of the Company.

The Code is expressly referenced in employment contracts, supply contracts, commercial contracts and all agreements that the Company enters into with third parties. Knowledge and acceptance of it is a necessary condition for establishing and continuing any relationship with Search Bridge.

Publication and dissemination

The Code is permanently published on the Search Bridge institutional website at searchbridge.ai/codice-etico, is delivered to each new collaborator at the start of the relationship, and is the subject of periodic training sessions organised by the Company.

Eight principles that guide every decision we make.

The principles that follow are the foundation of our conduct. They are not statements of intent: they are binding rules that take precedence over any commercial or short-term interest. When a principle conflicts with a business objective, the principle prevails.

4.1 Legality

Search Bridge operates in full compliance with Italian, European Union and other national laws of all countries in which it carries out its activities. No business need — not even the achievement of a strategic objective — can justify the violation of a law or regulation. Recipients are required to know and apply the regulations governing their activities and to seek clarification in case of doubt.

4.2 Honesty and integrity

Honesty and integrity are prerequisites, not additional virtues. In their dealings with customers, suppliers, colleagues, authorities and any other counterparty, Recipients act with loyalty, refuse any form of deceptive conduct and honour the commitments they make. They refrain from conduct that, even if formally lawful, contradicts the spirit of the Code or compromises the Company's reputation.

4.3 Transparency

Transparency is particularly critical for Search Bridge because we operate on algorithms that influence our customers' business decisions. For this reason, the information we produce — metrics, recommendations, algorithmic decisions — must be understandable, reconstructible and verifiable by those who receive it. Each Recipient is required to communicate clearly, completely and promptly, avoiding reticence, ambiguity and formulations that may be misleading.

4.4 Confidentiality

Recipients are required to protect confidential information of the Company, customers, suppliers and third parties of which they become aware in the exercise of their functions. The obligation of confidentiality covers commercial, technological, organisational, financial, personal and any other non-public information. The obligation persists even after the relationship with the Company has ended.

4.5 Impartiality

Search Bridge does not discriminate on the basis of age, gender, gender identity, sexual orientation, physical condition, ethnicity, religion, political opinions, economic condition or any other personal characteristic. Decisions — hiring, promotions, supplier selection, commercial conditions — are made on the basis of objective, professional and merit-based criteria.

4.6 Professional diligence

Each Recipient carries out their activities with the professional diligence required by their role, applying their skills accurately and keeping them up to date. Diligence includes the duty to promptly report errors, risks and critical issues identified, even when these do not directly concern their own responsibilities.

4.7 Responsibility

Each Recipient is personally responsible for the decisions they make in the exercise of their functions and for compliance with this Code. Individual responsibility is accompanied by the Company's collective responsibility, which is committed to creating the conditions — organisational, training-related and technological — for everyone to act correctly.

4.8 Protection of the individual

Search Bridge protects the physical, moral and cultural integrity of the people with whom it interacts. It guarantees working conditions that respect individual dignity and safe environments. It actively promotes the wellbeing and work-life balance of its collaborators. It combats every form of mobbing, harassment and abuse.

PRINCIPLE OF PRECEDENCE

When any of these eight principles enters into conflict with a commercial objective, a deadline, a request from a counterparty or any other short-term interest, **the principle prevails**. This is not a rhetorical statement: it is the operational rule that the Company applies and against which the conduct of its Recipients is measured.

Privacy by design. Without exceptions.

The protection of personal data is not for us a regulatory compliance requirement: it is a common benefit purpose declared in our articles of association and an operational precondition of our activity. Search Bridge applies the principle of privacy by design to all its processes and products, in compliance with EU Regulation 2016/679 (GDPR) and the relevant national implementation laws.

5.1 The seven operational rules of privacy by design

We formally adopt the seven principles of privacy by design and apply them to every new feature before it is released:

- 01 **Proactive, not reactive** — privacy risk is prevented at the design stage, not managed after the incident.

- 02 **Privacy by default** — the most protective settings are active by default. The user does not need to enable them.

- 03 **Privacy embedded in design** — data protection is an integral part of the architecture, not a subsequent 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 and transparency** — the processing carried out is documented, verifiable and communicated to data subjects.

- 07 **User centrality** — systems are designed to serve the user, not the other way around.

5.2 Non-negotiable operational principles

In addition to the seven principles above, Search Bridge undertakes to respect three operational rules that are a constitutive part of its technical architecture:

CUSTOMER ISOLATION

Every Knowledge Base, every analysis model and every vector database used by the Search Bridge platform is **isolated by customer**. The data of one brand is never used to enrich, train or influence the intelligence of another brand, not even in aggregated or anonymised form, except with explicit contractual authorisation from the customer.

PROCESSING MINIMISATION

Search Bridge collects and processes exclusively the data necessary for service delivery. Never more than the purpose justifies. Data that is not strictly necessary is not collected, even if technically available.

OPERATIONAL RIGHT TO ERASURE

Upon contract termination, the customer's personal data is returned or deleted as contractually agreed, subject to the retention obligations imposed by law. Deletion is effective, not logical.

5.3 Roles and responsibilities

In relations with customers, pursuant to Article 28 GDPR, Search Bridge acts as **Data Processor**, while the customer retains the qualification of **Data Controller**. The relationship is formalised in a Data Processing Agreement (DPA) attached to each contract. Processing activities carried out as Data Controller (e.g. management of relationships with employees, suppliers, prospects) are documented in the Records of Processing Activities maintained by the Company.

5.4 Obligations of Recipients

— Process personal data exclusively within the scope of their duties and for authorised purposes.

— Do not share credentials to access systems that process personal data.

— Promptly report to the privacy contact every incident, even if suspected, of personal data breach.

AI ethics is an architectural choice.

The entire activity of Search Bridge is based on the use of artificial intelligence systems. For this reason, AI ethics cannot be for us 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. We anticipate the requirements of EU Regulation 2024/1689 (AI Act) and adopt its principles as an operational reference.

6.1 The four operational ethical commitments

- 01 Algorithmic transparency** — Every recommendation generated by our platform is explainable and reconstructible from the input signals. Our algorithms are not opaque black boxes: the customer has the right to know how each output was generated.

- 02 Fairness and non-discrimination** — Our models do not profile natural persons. We work on brand entities and market signals, not on individuals. When we train models, we verify that they do not produce systematically unfavourable output for specific categories.

- 03 Human-in-the-loop** — No fully autonomous automation makes decisions that impact the customer without human supervision. Systems propose, people decide. This principle is non-negotiable, even when it would compromise operational efficiency.

- 04 Auditability** — Every algorithmic decision produces logs that allow it to be subsequently verified. Our platform is designed to be audited by third parties and competent authorities, also for past time intervals.

6.2 Risk classification

Search Bridge maintains an inventory of the AI systems in use, classifies their risk level according to the criteria established by the AI Act (unacceptable, high, limited, minimal risk) and documents their use cases. Systems classified as "high-risk" are subject to an ethics review process before release into production.

6.3 Use of third-party models

When Search Bridge uses artificial intelligence models supplied by third parties (e.g. commercial LLMs), it verifies that the supplier guarantees ethical standards compatible with this Code, assesses the risks of leakage of customer information and adopts technical measures to prevent customer data from being used for training the supplier's models without explicit authorisation.

6.4 Communication about the technology

In commercial and technical communication, Search Bridge undertakes to describe its technologies accurately, clearly distinguishing between current capabilities and future roadmap, between documented results and projections, between functionalities that are our exclusive responsibility and functionalities dependent on third-party suppliers. We reject every form of technological overclaim, even when practised by competitors.

NO OVERCLAIM POLICY

The credibility of Search Bridge in an emerging market depends on the accuracy of what we communicate. The principle of "**under-promise, over-deliver**" applies to every communication that leaves the Company: commercial proposals, press releases, social media posts, conference talks, demos. If we cannot demonstrate it, we do not claim it.

RULE OF THUMB

Before any external claim about our technology, three questions: (a) **Is it currently available, or roadmap?** (b) **Have we documented evidence of it?** (c) **Does it depend on our exclusive capabilities, or on third-party suppliers?** The answer to each question must be explicit in the communication.

Security is not a constraint. It is an enabler.

Information security is one of the four common benefit purposes declared in our articles of association. We adopt as our reference framework the principles of EU Directive 2022/2555 (NIS2) and have launched the ISO/IEC 27001:2022 certification path, with the objective of obtaining it by the fourth quarter of 2026.

7.1 Technical and organisational measures adopted

- Mandatory multi-factor authentication (MFA) on all privileged access.
- Centralised management of identities and privileges, with the principle of least privilege.
- Encryption of sensitive data in transit and at rest.
- Advanced anti-malware solutions, with continuous updates and active monitoring.
- Software Development Lifecycle (SDLC) with integrated security review.
- Periodic data backups, with regular verification of restore capability.
- Perimeter control and protection against DoS and DDoS attacks.
- Logging and monitoring of security events, with archiving compliant with regulations.
- Documented incident response and business continuity procedures.

7.2 Obligations of Recipients on security

- Use exclusively the devices and software authorised by the Company.
- Do not share credentials to access corporate systems.
- Adopt strong passwords updated according to corporate policies.
- Immediately report every incident or suspected incident to the security contact.
- Do not connect personal devices to the corporate network without authorisation.
- Attend periodic security awareness training.
- Adopt prudent conduct against phishing, social engineering and other attack vectors.

7.3 Cyber resilience towards customers and partners

How we treat those around us.

The articles of association identify as stakeholders the people, communities, territories and the environment, cultural and social assets and activities, entities and associations and other stakeholders. The sections that follow operationally articulate the conduct that the Company undertakes towards each category.

8.1 Customers

Customers are at the centre of our activity. Towards them we commit to:

- Provide quality services, compliant with what is contractually agreed, without misleading claims about the platform's capabilities.
- Guarantee total confidentiality of the information and data received, with architectural isolation by customer.
- Communicate transparently any limitations, errors, downtime and incidents.
- Respect the customer's freedom to end the contractual relationship at expiry, without undeclared lock-in practices.
- Return or delete the customer's data upon termination of the relationship, as contractually agreed.
- Maintain pricing and commercial conditions consistent with the value actually delivered.

8.2 Collaborators and working environment

The people who work with Search Bridge are the Company's primary asset. We commit to creating a working environment characterised by:

- Respect for individual dignity and protection of physical and moral integrity.
- Equal opportunities in selection, promotion, remuneration and assignments.
- Work-life balance, with flexibility policies where compatible with operational needs.
- Professional growth, through continuous training, mentoring and development opportunities.
- Workplace safety, in compliance with D.Lgs. 81/2008.
- Zero tolerance towards mobbing, harassment, discrimination and bullying conduct.

8.3 Suppliers and partners

The selection of suppliers and partners is guided by criteria of professionalism, reliability, sustainability and ethical alignment. We commit to:

- Select suppliers through transparent procedures, based on objective and documented criteria.

- Transmit this Code of Ethics to strategic suppliers and require their formal acceptance.

- Pay what has been agreed within the agreed terms.

- Prefer, on equal terms, suppliers who adopt environmental and social standards aligned with our values.

- Refuse relationships with suppliers involved in serious violations of ethical or legal standards.

8.4 Shareholders and investors

In relations with shareholders and future investors, Search Bridge guarantees:

- Complete, accurate and timely information on the economic, asset and financial situation.

- Transparency on development prospects and material risks.

- Equal treatment between shareholders in the same category.

- Annual impact reporting (Sustainability Report) and progress on common benefit purposes.

- Rejection of any practice of market abuse, insider trading or market manipulation.

8.5 Competitors

Search Bridge competes on the basis of the quality and innovation of its product and services. We commit not to use information acquired unlawfully about competitors, not to denigrate them publicly, and not to engage in unfair conduct such as predatory pricing or abuse of dominant position. We recognise that fair competition is a value for the market and for customers.

8.6 Public Administration and authorities

Relations with the Italian, European and other countries' Public Administration, with supervisory authorities and with regulators are guided by maximum transparency, cooperation and correctness. It is expressly prohibited to offer or promise, directly or indirectly, money, goods, services or other benefits to public officials, public service officers or their family members, even outside a contractual relationship or administrative procedure.

8.7 Community and territory

Search Bridge is based in Bologna and considers the local community a relevant stakeholder. We actively support the startup ecosystem, collaborate with academic and research institutions (in particular with the University of Bologna and Bologna Business School), participate in training and outreach initiatives and contribute, within our possibilities, to initiatives of general interest.

09 · CONFLICTS OF INTEREST

When private and corporate interests touch.

A conflict of interest arises when a Recipient is called upon to make decisions in the interest of the Company but at the same time has a personal, family or financial interest potentially in conflict. Conflicts of interest are not in themselves unlawful, but must be declared and managed.

9.1 Disclosure obligation

Each Recipient is required to communicate in writing to the Sole Director, as soon as possible and in any case without delay, every situation of conflict of interest, even potential. The situations that must be communicated include, by way of example:

- Economic stakes or roles in customer, supplier, partner or competitor companies.

- Close family or personal relationships with employees or directors of commercial counterparties.

- External professional engagements that may compete with the Company's activity or take significant time away from it.

- Business opportunities learned of in the exercise of corporate functions and potentially exploitable on a personal basis.

9.2 Conflict management

Upon receipt of the communication, the Sole Director assesses the situation and adopts the necessary measures. Possible measures include: abstention of the Recipient from the conflicting decision, cessation of the external activity in conflict, communication of the conflict to relevant counterparties, separation of activities. The decision is documented in writing.

Zero tolerance towards any form of corruption.

Search Bridge refuses every form of corruption, active or passive, both towards public subjects and towards private subjects. The refusal is unconditional and admits no exceptions, not even when corruption is practised by competitors or is "tolerated" by the local context in which we operate.

10.1 Express prohibitions

Every Recipient is prohibited from:

- Offering, promising or paying sums of money, goods, services or other benefits to public officials, public service officers or their family members, for the purpose of obtaining undue advantages for the Company or for themselves.
- Offering or accepting gifts, hospitality or benefits which, by value or frequency, may be perceived as a tool of influence in business decisions.
- Making undocumented cash payments or payments destined for subjects other than the formal contractual counterparty.
- Opening or maintaining current accounts at institutions located in non-cooperative jurisdictions for tax and anti-money laundering purposes.
- Operating with counterparties whose beneficial ownership or operational existence cannot be verified.

10.2 Gifts and hospitality — Guidelines

GENERAL RULE

Gifts and hospitality are permitted only if: (a) of modest value, (b) consistent with the commercial customs of the context, (c) not aimed at obtaining or reciprocating preferential treatment, (d) not in conflict with this Code or with the policies of the receiving subject. **Cash gifts, in any form and of any amount, are in any case prohibited.**

In case of doubt about the qualification of a gift or hospitality, the Recipient is required to consult the Sole Director in advance. Gifts received that exceed modest value must be communicated and, where possible, returned.

10.3 Anti-money laundering

Search Bridge undertakes not to be, even unknowingly, an instrument for laundering money derived from

documented and recorded. Commercial counterparties are subject to adequate customer due diligence proportionate to the materiality of the relationship.

11 · DIVERSITY, INCLUSION, NON-DISCRIMINATION

The people we are, beyond the roles we hold.

Search Bridge promotes a working environment in which people can express their talent regardless of personal characteristics that have no relevance to professional performance. Diversity is considered a value: different points of view, different experiences and different backgrounds make a company's decisions better.

11.1 Principles

- Equal opportunities in selection, remuneration, training and career progression.
- Evaluation criteria based on competencies, results and potential, not on personal characteristics.
- Zero tolerance towards any form of discrimination based on age, gender, gender identity, sexual orientation, physical condition, ethnicity, religion, political opinions, economic condition or other personal characteristics.
- Active promotion of gender equality and female representation, including in technical and leadership roles.
- Working environment free from harassment, mobbing and bullying conduct.

11.2 Reporting discriminatory episodes

Recipients who are victims or witnesses of discrimination, harassment or mobbing are encouraged to report them through the channels indicated in section 14. The Company treats every report with maximum confidentiality, conducts the necessary investigations and adopts disciplinary measures proportionate to the seriousness of the episode.

Protection of tangible and intangible assets.

For Search Bridge, the principal value resides in intangible assets: the platform's code, proprietary algorithms, know-how, the accumulated knowledge base and customer data. The protection of these assets is the responsibility of each Recipient.

12.1 Use of corporate tools

- Corporate tools (laptops, telephones, accounts, software) are intended exclusively for professional activities in the Company's interest.
- Personal use, if permitted, must be occasional, not significant and never in conflict with corporate policies.
- Installation of unauthorised software on corporate devices is prohibited.
- Use of corporate resources for activities in conflict with the Company's interests is prohibited.

12.2 Intellectual property

The intellectual property generated by Recipients in the exercise of their functions — software code, algorithms, technical documentation, marketing materials, research, datasets, proprietary methodologies — belongs exclusively to Search Bridge, subject to the moral rights of the author. Recipients undertake to promptly communicate to the Company every potentially patentable or protectable invention or work of intellect and to sign the documentation necessary to perfect Search Bridge's rights.

12.3 Respect for third-party intellectual property

Reciprocally, Search Bridge respects the intellectual property of third parties. It is prohibited to use, reproduce or distribute software, content or materials covered by the rights of others without the necessary licence. It is prohibited to use confidential information of previous employers or third parties, unless it is in the public domain or its use is authorised by the holder.

12.4 Trade secrets and know-how

Search Bridge's know-how includes, in particular, the architecture of the Multi-Signal Intelligence platform, the prompting and tracking methodologies, the Custom Modules developed for customers, the internal knowledge bases and the results of GEO research. Unauthorised disclosure of these elements constitutes a serious violation of the Code and exposes the person responsible to the consequences provided by law and contracts.

What we say, and to whom we say it.

Search Bridge is a young company in an emerging market. The communications we produce — on the website, on social media, in industry publications, in press releases — influence the perception of the Company by customers, partners, investors and potential collaborators. For this reason, we apply principles of rigour and accuracy to every external communication.

13.1 Communication principles

- **Accuracy** — We distinguish between current capabilities and future roadmap, between documented results and projections.

- **Verifiability** — The data we publish is supported by verifiable sources or explicitly identified as estimates.

- **Balance** — We do not denigrate competitors or attribute to them undocumented weaknesses.

- **Respect** — We do not use images, data or references relating to identified persons without their consent.

- **Consistency** — We maintain consistency between what we say externally and what we do internally.

13.2 Social media policy

Recipients who use social media in a personal capacity are free to express their own opinions, on the understanding that they:

- Do not speak on behalf of Search Bridge without explicit authorisation.

- When referring to their role in the company, clarify that their opinions are personal and do not represent the Company's position.

- Do not share confidential information, customer data, technical details of the platform or unauthorised internal material.

- Refrain from conduct that may damage the reputation of the Company or third parties (customers, partners, competitors, identified persons).

13.3 Official spokespeople

Official communications (interviews, press releases, statements to investors and authorities) are the responsibility of the Sole Director or persons expressly delegated by him. Media requests are directed to the Company's communications contact.

How to report violations of this Code.

Search Bridge believes that the ability to surface internal critical issues is an indicator of organisational health. For this reason, we have established a dedicated channel through which anyone may report, in good faith, violations of this Code, of the 231 Model, of laws and regulations.

14.1 Reporting channels

- **Primary channel** — Dedicated email address: etica@searchbridge.ai
- **Alternative channel** — Whistleblowing platform accessible from the company website, which guarantees the possibility of anonymous reporting and encryption of content.
- **Postal channel** — Letter in sealed envelope addressed to the Impact Officer, Via del Giacinto 32, 40133 Bologna, marked "CONFIDENTIAL — WHISTLEBLOWING REPORT".

14.2 Whistleblower protection

In compliance with D.Lgs. 24/2023, Search Bridge guarantees to the good-faith whistleblower:

- Confidentiality of identity, subject to legal obligations.
- Protection from any form of direct or indirect retaliation (dismissal, demotion, exclusion, economic retaliation, mobbing).
- Right to be informed of the outcome of the investigation within reasonable times.
- Possibility to refer to the National Anti-Corruption Authority (ANAC) or to the judicial authority in cases provided by law.

14.3 What to report and what not to report

May be the subject of reporting: unlawful conduct pursuant to D.Lgs. 231/2001, violations of this Code of Ethics, violations of laws or regulations, vexatious conduct, facts that may cause damage to the Company or its stakeholders. The following do not constitute whistleblowing: personal grievances, union-related disputes or individual claims within the employment relationship, for which specific channels are provided.

14.4 Falsehoods and bad-faith reports

Reports made in bad faith, with awareness of the falsity of the content or for the purpose of harming the reported person, constitute a violation of the Code of Ethics and may result in disciplinary measures and civil and criminal liability of the reporter.

How the Code is applied and what happens if breached.

15.1 Relationship with the 231 Model

This Code of Ethics is an integral and inseparable part of the Organisation, Management and Control Model adopted by Search Bridge pursuant to Legislative Decree of 8 June 2001, n. 231. The purposes of the Code are coordinated with those of the Model: to prevent the commission of offences of relevance to the Company and to disseminate a corporate culture oriented towards legality and ethics.

15.2 Oversight of the Code

Oversight of the application of this Code is entrusted to the Impact Officer, identified as the Sole Director. His functions in this matter include:

- Promoting knowledge of the Code among all Recipients.
- Receiving and investigating reports of possible violations.
- Proposing the necessary corrective measures.
- Periodically updating the Code in line with regulatory and organisational developments.
- Annually reporting, in the impact report attached to the financial statements, the status of application of the Code.

15.3 Measures for violations

Violations of the Code of Ethics are assessed on a case-by-case basis and may result in measures proportionate to the seriousness of the conduct, recidivism and impact on third parties:

- **For employees and internal collaborators:** disciplinary measures in compliance with the Workers' Statute and applicable national collective bargaining agreement (CCNL), up to termination of the employment relationship for just cause in the most serious cases.
- **For suppliers and commercial partners:** contract termination, exclusion from future commercial relationships, claim for damages.
- **For corporate bodies:** measures adopted by the competent body according to the articles of association, up to removal from office for serious violations.
- **For consultants and service providers:** contract termination and claim for damages.

Sanctions are adopted in compliance with the principle of adversarial procedure: the subject of a possible measure is always informed of the charges and has the right to present their position before the final decision.

STANDARD CONTRACTUAL EXTRACT

"The Customer acknowledges that conduct contrary to the Code of Ethics, to the regulations set out in D.Lgs. 231/2001 and to the principles of the Benefit Corporation may constitute a breach of contract and entitle the adoption of consequent measures, including termination of the Contract and any related claim for damages."

CLAUSE INCLUDED IN ALL SEARCH BRIDGE COMMERCIAL AGREEMENTS

Approval, updates and contacts.

16.1 Approval

This Code of Ethics was approved by the Sole Director of Search Bridge S.r.l. SB on 15 December 2025. The currently effective version is 1.1, approved on 23 May 2026.

16.2 Updates

The Code is subject to periodic review, indicatively on an annual basis, and to extraordinary review in the event of:

- Significant regulatory changes (e.g. developments in D.Lgs. 231/2001, AI Act, NIS2, GDPR).
- Significant changes in the organisation, activity or corporate structure.
- Adherence to new international standards (e.g. completion of ISO 27001, completion of B Impact Assessment).
- Findings from audits, supervisory checks or reports highlighting the need for adjustments.

16.3 Version history

VERSION	DATE	MAIN CHANGES
1.0	15 December 2025	First approval of the Code of Ethics, contextual to the adoption of the 231 Model.
1.1	23 May 2026	Update of the AI Ethics section in line with AI Act developments, expansion of the cybersecurity section, alignment with the 2025 Sustainability Report.

16.4 Contacts

For requests for clarification on the Code of Ethics, reports of violations or suggestions for updates:

- **Email ethics and reports:** etica@searchbridge.ai

CORPORATE CONTACTS

Corporate PEC: searchbridgesrl@pec.it

Registered office: Search Bridge S.r.l. SB, Via del Giacinto 32, 40133 Bologna, Italy

Institutional website: searchbridge.ai

16.5 Publication

This Code is made public through:

- Permanent publication on the institutional website at searchbridge.ai/codice-etico.
- Attachment to the 231 Model and reference in commercial and employment contracts.
- Delivery to each new collaborator at the start of the relationship.
- Periodic training sessions organised by the Company.

A LIVING DOCUMENT

This Code is not a static reference, but an operational tool that we maintain and evolve. Each Recipient is invited to contribute to its improvement by reporting ambiguities, omissions, situations not adequately addressed or suggestions of any kind through the official channels.

Frequently asked questions on the Code of Ethics.

Q What is the Search Bridge Code of Ethics?

A The Code of Ethics is the document that defines the principles, values and rules of conduct that guide the activities of Search Bridge S.r.l. SB. It is an integral part of the Organisation, Management and Control Model adopted pursuant to D.Lgs. 231/2001 and is binding on directors, shareholders, employees, collaborators, consultants, suppliers and partners.

Q To whom does the Search Bridge Code of Ethics apply?

A The Code of Ethics applies to the sole director, the shareholders, the employees, collaborators of any kind, consultants, suppliers, commercial partners and all subjects who, directly or indirectly, act in the name of or on behalf of Search Bridge.

Q Is Search Bridge a benefit corporation?

A Yes. Search Bridge S.r.l. SB is incorporated as a Benefit Corporation pursuant to L. 28 December 2015, n. 208 (paragraphs 376-384). The articles of association identify four common benefit purposes that the company pursues in parallel with its profit-making purpose: promotion of a culture of privacy, development of ethical and responsible technologies, strengthening of information security and responsible digital governance.

Q How can violations of the Code of Ethics be reported?

A Violations can be reported by writing to etica@searchbridge.ai or through the dedicated whistleblowing channel accessible from the company website. Search Bridge guarantees confidentiality of the whistleblower's identity and protects the good-faith whistleblower from any form of retaliation, in compliance with D.Lgs. 24/2023.

Q What does "AI ethics by design" mean for Search Bridge?

A It means that ethical principles are embedded in the platform's architecture from the design stage, not added afterwards. Search Bridge adopts four operational commitments: algorithmic transparency (every recommendation is explainable), fairness and

Q

A non-discrimination (models do not profile natural persons), human-in-the-loop (no fully autonomous automation) and auditability (every algorithmic decision is verifiable).

Q Is Search Bridge ISO 27001 certified?

A Search Bridge launched the ISO/IEC 27001:2022 certification path in the fourth quarter of 2025, with the objective of obtaining certification by the fourth quarter of 2026 with an accredited third-party body. The company has simultaneously launched the path for ISO 9001:2015 certification for the quality management system.

Q Can a customer's data be used to improve models used with other customers?

A No. Every Knowledge Base, every analysis model and every vector database used by the Search Bridge platform is isolated by customer. The data of one brand is never used to enrich, train or influence the intelligence of another brand, not even in aggregated or anonymised form, except with explicit contractual authorisation from the customer.

Q May I accept a gift from a customer or supplier?

A Only if of modest value, consistent with the commercial customs of the context, not aimed at obtaining or reciprocating preferential treatment, and not in conflict with the policies of the parties involved. Cash gifts, in any form, are always prohibited. In case of doubt, it is necessary to consult the Sole Director before accepting.

Q What should I do if I witness conduct contrary to the Code of Ethics?

A Make a report through one of the channels indicated in section 14: dedicated email, whistleblowing platform or postal channel. The report may be made on a confidential basis. Anyone who reports in good faith is protected from any form of retaliation pursuant to D.Lgs. 24/2023.

Terms and definitions.

— AI Act

EU Regulation 2024/1689 of the European Parliament and Council on artificial intelligence. Establishes a harmonised regulatory framework for the development, placing on the market and use of AI systems in the European Union.

— AI Visibility

Measure of the presence, accuracy and quality of a brand's representation within the responses generated by artificial intelligence systems (ChatGPT, Google AI, Perplexity, Gemini, Claude, etc.). It is the outcome that the Search Bridge platform helps customers improve.

— B Impact Assessment

International impact assessment standard developed by B Lab, used as the impact measurement framework for the Company pursuant to Annex 4 of L. 208/2015.

— Code of Ethics

This document. Structured set of principles, values and rules of conduct that guide the actions of the Company and its Recipients.

— Custom Module

Analysis module of the Search Bridge platform configured bespoke for a specific customer, based on KPIs and dimensions relevant to its business.

— Data Processing Agreement (DPA)

Contractual agreement governing the processing of personal data between Data Controller and Data Processor pursuant to Article 28 GDPR.

— Recipients

All subjects bound by the Code of Ethics: corporate bodies, employees, collaborators, consultants, suppliers, partners and anyone acting in the name of or on behalf of the Company.

— GDPR

General Data Protection Regulation (EU Regulation 2016/679), the European regulatory framework for personal data protection.

— GEO (Generative Engine Optimization)

The discipline of optimising a brand's presence within AI-powered generative search systems. It is the professional practice that Search Bridge carries out for its customers.

— Knowledge Base

Structured set of proprietary information relating to a specific customer, accumulated and enriched over time by the Search Bridge platform and isolated by customer.

— 231 Model

Organisation, Management and Control Model adopted pursuant to D.Lgs. 8 June 2001, n. 231, aimed at preventing the commission of offences that may give rise to the administrative liability of the entity.

— Multi-Signal Intelligence

Proprietary technology of Search Bridge that integrates three convergent tracking layers (Deep, Competitive, Technical) to generate AI Visibility improvement recommendations.

— NIS2

EU Directive 2022/2555 on the security of network and information systems, which establishes cybersecurity standards for public and private entities operating in strategic sectors.

— Impact Officer

Corporate figure provided for by Article 5-bis of the articles of association, in charge of pursuing the common benefit purposes and drafting the annual impact report. In Search Bridge this role is held by the Sole Director.

— Benefit Corporation

Legal form provided by L. 28 December 2015, n. 208, paragraphs 376-384. 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.

— Whistleblowing

Procedure for reporting unlawful conduct, irregularities or violations of the Code of Ethics by those operating within the organisation, governed by D.Lgs. 24/2023.

REGISTERED OFFICE

Via del Giacinto 32
40133 Bologna · Italy
VAT 04313431209
REA BO-584315
Share capital € 10,000.00 fully paid-up

PEC: searchbridgesrl@pec.it

GOVERNANCE

[Code of Ethics](#)
[Sustainability Report](#)
[Privacy Policy](#)
[Whistleblowing](#)

CONTACTS

etica@searchbridge.ai
info@searchbridge.ai
searchbridge.ai