THE FINO PARTNERS

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Acceptable Use Policy

1 Purpose

The purpose of this Acceptable Use Policy is to define acceptable and unacceptable use of information technology resources at The Fino Partners. This policy is designed to protect client data, company systems, and business operations while supporting the delivery of offshore accounting, bookkeeping, tax preparation, and related services through a ***resource-based engagement model.***

Under this model, resources provided by The Fino Partners may be assigned on a dedicated or semi-dedicated basis to client teams and are expected to use systems and technology strictly in accordance with client instructions, contractual obligations, and internal security requirements.

2 Scope

This policy applies to all employees, contractors, consultants, interns, temporary staff, and any other authorized users engaged by The Fino Partners, including resources assigned to clients under a resource-based or staff-augmentation model.

It covers all company-owned, company-provided, company-approved, or client-provided systems, devices, applications, networks, cloud platforms, and communication tools accessed in the course of business, whether from office locations or remote work environments

3 General Use Expectations

Company and client systems are provided strictly for legitimate business purposes related to assigned client work. Users are expected to use these resources responsibly, ethically, and in a manner that reflects the professional standards expected by US CPA firms and accounting firms.

Limited personal use of company systems may be permitted only if it is minimal, does not interfere with assigned responsibilities, does not impact system performance, and does not violate security, confidentiality, or client-specific requirements applicable to assigned resources.

4 Professional and Lawful Conduct

Users must comply with all applicable laws, regulations, contractual obligations, and client instructions when using company or client systems. Systems must not be used for any illegal or unauthorized activities, including fraud, unauthorized access, copyright infringement, or violation of data protection requirements.

Users must not create, access, store, or transmit content that is offensive, discriminatory, harassing, threatening, or otherwise inappropriate in a professional work environment, whether on company systems or client-provided platforms.

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5 Use of Client Data and Systems

Client data must be accessed strictly on a ***need-to-know basis*** and only to perform assigned tasks approved by the client. Users must not access client information out of curiosity, convenience, or for any purpose outside the scope of their assigned role.

Client systems provided for service delivery must be used strictly in accordance with documented client instructions. Credentials provided by clients must remain confidential and must not be shared, reused across systems, or stored insecurely. Any deviation from client-approved usage is strictly prohibited.

6 Data Storage, Copying, and Transmission

Users must not copy, download, photograph, screen-record, or store client or company data outside approved systems or environments. Local storage of sensitive information on laptops, personal devices, or removable media is prohibited unless explicitly authorized by The Fino Partners and, where applicable, by the client.

Transmission of data must occur only through approved and secure communication channels designated by The Fino Partners or the client. Personal email accounts, messaging platforms, or unapproved file-sharing tools must not be used for business or client data.

7 Email, Messaging, and Internet Use

Company and client-approved email and communication tools must be used professionally and responsibly. Users must ensure that communications containing sensitive or confidential information are sent only to authorized recipients.

Internet access must be used primarily for business purposes related to assigned client work. Excessive personal browsing, streaming, gaming, or access to high-risk or malicious websites is not permitted. Users must remain vigilant against phishing, malware, and social engineering attempts and report suspicious activity immediately.

8 Remote Work and Home Environment Controls

When working remotely, users are responsible for ensuring that company and client systems are accessed only from secure and private locations. Work must not be performed in public places where screens, conversations, or documents can be observed by unauthorized individuals.

Home networks should be secured with passwords, and devices must be locked when unattended. Printing client data at home or storing physical copies of sensitive information is not permitted unless explicitly authorized.

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9 Device and Software Usage

Only company-approved devices and software may be used to access company or client systems unless client-approved exceptions apply. Users must not install unauthorized applications, tools, browser extensions, or plugins that could introduce security risks.

Security controls such as passwords, encryption, antivirus software, and system updates must not be disabled or bypassed. Any technical issues, device concerns, or suspected compromise must be reported promptly.

10 Monitoring and System Oversight

The Fino Partners reserves the right to monitor, log, and review system usage to ensure compliance with this policy, protect client data, and maintain operational security, subject to applicable laws and contractual obligations.

Monitoring may include access logs, usage patterns, and system activity. Users should not expect privacy when using company or client systems for business purposes.

11 Reporting Misuse, Violations, or Concerns

Users are required to report any actual or suspected misuse of systems, violations of this policy, client instructions, or security concerns immediately. Prompt reporting helps reduce risk to clients and the organization.

Failure to report known violations or risks may result in disciplinary action.

12 Consequences of Policy Violations

Any violation of this Acceptable Use Policy may result in disciplinary action, up to and including termination of employment or contractual engagement. Serious violations may also lead to legal action or contractual consequences, including client escalation.

13 Compliance with Client and Legal Requirements

All use of company and client systems must align with applicable laws and with the confidentiality, security, and acceptable-use requirements defined in contracts with US CPA firms, accounting firms, and other clients.

Where client-specific rules apply to assigned resources, those rules must be followed at all times.

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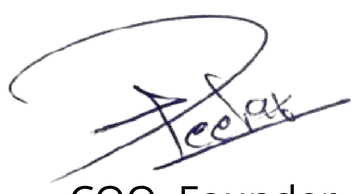
14 Policy Review and Updates

This policy will be reviewed periodically and updated as needed to reflect changes in service delivery models, business operations, technology, legal requirements, or client expectations.

For Fino Partners Group, Inc.

CEO, Founder

For Fino Partners Group, Inc.



COO, Founder