

SOC 1 REPORT

For

Fino Partners Group, Inc.

SOC 1 Report Fino Partners Group, Inc.

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1. Independent Service Auditor's Report

To the Management of **Fino Partners Group, Inc.** and Its User Entities

We have examined the accompanying description of **Fino Partners Group, Inc.'s** system for providing outsourced accounting, bookkeeping, tax support, and financial operations services to U.S.-based businesses and accounting firms (the "system"), as well as the suitability of the design and operating effectiveness of the controls stated in the system description.

The system description and the suitability of the design of controls were examined **as of January 7, 2026**. The operating effectiveness of the controls was examined **for the period January 1, 2025 to December 31, 2025**.

Management of Fino Partners Group, Inc. is responsible for preparing the system description and for the design and operating effectiveness of the controls to achieve the related control objectives stated in the system description. Our responsibility is to express an opinion on the fair presentation of the system description, the suitability of the design of the controls, and the operating effectiveness of the controls based on our examination.

We conducted our examination in accordance with **attestation standards established by the American Institute of Certified Public Accountants (AICPA)**. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether, in all material respects, the system description is fairly presented, the controls were suitably designed, and the controls operated effectively to achieve the related control objectives.

An examination of a service organization's system description and controls includes performing procedures to obtain evidence about the fair presentation of the description and the suitability and operating effectiveness of the controls. The procedures selected depend on the service auditor's judgment, including the assessment of risks that the system description is not fairly presented or that the controls were not suitably designed or did not operate effectively.

We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinions.

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Opinion on the Fair Presentation of the System Description

(As of January 7, 2026 – Type 1 & Type 2)

In our opinion, in all material respects, the accompanying system description fairly presents **Fino Partners Group, Inc.’s** system for providing outsourced accounting, bookkeeping, tax support, and financial operations services to user entities **as of January 7, 2026**.

Opinion on the Suitability of the Design of Controls

(As of January 7, 2026 – Type 1 & Type 2)

In our opinion, in all material respects, the controls described in the system description were **suitably designed as of January 7, 2026**, to provide reasonable assurance that the related control objectives would be achieved if the controls operated effectively.

Opinion on the Operating Effectiveness of Controls

(For the period January 1, 2025 to December 31, 2025 – Type 2 only)

In our opinion, in all material respects, the controls described in the system description **operated effectively throughout the period from January 1, 2025 to December 31, 2025**, to provide reasonable assurance that the related control objectives were achieved.

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2. Management's Assertion

Management of **Fino Partners Group, Inc.** is responsible for the accompanying description of the Company's system for providing outsourced accounting, bookkeeping, tax support, and financial operations services to U.S.-based businesses and accounting firms (the "system"), and for the design and operating effectiveness of the controls to achieve the related control objectives stated in the system description.

Assertion Regarding the Fair Presentation of the System

(As of January 7, 2026 – Type 1 & Type 2)

Management asserts that the accompanying system description **fairly presents, in all material respects**, Fino Partners Group, Inc.'s system for providing outsourced accounting, bookkeeping, tax support, and financial operations services **as of January 7, 2026**.

The criteria used in making this assertion were that the system description:

- Presents how the system was designed and implemented
- Includes the services provided and the system boundaries
- Identifies the components of the system, including infrastructure, software, people, procedures, and data
- Describes the control objectives and related controls relevant to user entities' Internal Control over Financial Reporting (ICFR)

Assertion Regarding the Suitability of the Design of Controls

(As of January 7, 2026 – Type 1 & Type 2)

Management asserts that the controls described in the system description were **suitably designed as of January 7, 2026**, to provide reasonable assurance that the related control objectives stated in the system description would be achieved **if the controls operated effectively**.

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Management further asserts that the controls were designed to address risks that could reasonably be expected to prevent the achievement of the control objectives relevant to user entities' **Internal Control over Financial Reporting (ICFR)**.

Assertion Regarding the Operating Effectiveness of Controls

(For the period January 1, 2025 to December 31, 2025 – Type 2 only)

Management asserts that the controls described in the system description **operated effectively throughout the period from January 1, 2025 to December 31, 2025**, to provide reasonable assurance that the related control objectives were achieved.

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3. Section III – System Description

System Description of Fino Partners Group, Inc.

(Applicable to SOC 1 Type 1 and SOC 1 Type 2)

3.1 Organization Overview

Nature of Business

Fino Partners Group, Inc. is a **Professional Services Organization** providing outsourced accounting, bookkeeping, tax support, and financial operations services to U.S.-based businesses and Certified Public Accounting (CPA) firms. Services are delivered remotely by qualified accounting and tax professionals using client-approved accounting platforms and secure information systems.

The organization performs services that support client financial reporting processes and may impact user entities' **Internal Control over Financial Reporting (ICFR)**.

Professional Services and Outsourced Accounting Model

Fino Partners Group, Inc. operates under an **outsourced professional services delivery model**, functioning as an offshore accounting and tax service provider. Engagement teams are assigned based on client requirements, service scope, and skill sets.

Services are performed within **client-owned accounting environments**, and financial data remains under client ownership at all times. The organization does not establish accounting policies, make final accounting judgments, or approve financial statements; such responsibilities remain with client management.

Work performed by engagement teams follows defined workflows and is subject to supervisory and management review.

Role as a Service Organization

Fino Partners Group, Inc. operates as a **service organization for purposes of SOC 1 reporting**, as it performs services that may impact the financial reporting processes of user entities.

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The system includes the people, processes, procedures, and information technology used to process financial data on behalf of clients. Controls within the system are designed to provide reasonable assurance that financial data is processed accurately, completely, and in accordance with client instructions.

3.2 Services Provided

Outsourced Accounting Services

Outsourced accounting services include general ledger support, journal entry processing, account reconciliations, and financial statement preparation support. Services are performed in accordance with client instructions and within client-approved accounting systems.

Bookkeeping Services

Bookkeeping services include transaction recording, classification of financial transactions, maintenance of supporting documentation, and reconciliation of accounts supporting client financial operations.

Tax Preparation and Tax Support Services

Tax preparation and tax support services include assistance with tax data compilation, preparation of supporting schedules, and coordination with client-designated tax professionals. Final tax filings, tax strategy decisions, and tax opinions remain the responsibility of client management or appointed tax advisors.

Financial Operations Support

Financial operations support services include assistance with accounts payable and accounts receivable processing, payroll data preparation (where applicable and client-authorized), and financial reporting support.

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3.3 Scope of the SOC 1 System

In-Scope Services Impacting ICFR

The SOC 1 system includes services and related controls that may impact user entities' **Internal Control over Financial Reporting (ICFR)**, including:

- Accounting and bookkeeping services affecting financial statement balances
- Financial data processing and reconciliations
- Financial reporting support and related schedules
- Tax data preparation support impacting financial disclosures
- Logical access to client accounting systems used for financial processing

Out-of-Scope Services

The following activities are excluded from the SOC 1 system:

- Client management decision-making and approval of accounting policies
- Final financial statement approval and issuance
- Tax planning, tax strategy decisions, and final tax filings
- Administrative, marketing, or other services not impacting ICFR

System Boundaries and Assumptions

The system boundary includes the people, processes, and technology used by Fino Partners Group, Inc. to deliver in-scope services. Client-owned systems, accounting policies, and financial reporting judgments are outside the system boundary.

The system description assumes that user entities have implemented appropriate **Complementary User Entity Controls (CUECs)**.

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3.4 Relevant Financial Records (SOC 1)

Types of Financial Data Processed

Relevant financial records processed during service delivery include:

- General ledger data
- Journal entries and supporting documentation
- Trial balances
- Accounts payable and accounts receivable records
- Bank and credit card statements
- Account reconciliations
- Payroll summaries (where applicable)
- Financial reports and supporting schedules
- Tax preparation documents and related data

Client Accounting Platforms and Systems

Financial records are accessed and processed exclusively within **client-approved accounting platforms** and secure document management systems. The organization does not host or maintain client accounting systems.

Client Ownership of Financial Records

All financial records remain the property of the client. Fino Partners Group, Inc. operates solely as a service provider and does not alter client accounting policies or financial reporting standards.

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3.5 Control Objectives (SOC 1)

The following control objectives are established to address risks relevant to user entities'

Internal Control over Financial Reporting (ICFR):

Accuracy of Financial Data Processing

Controls provide reasonable assurance that financial data is processed accurately and in accordance with client instructions.

Completeness of Transaction Recording

Controls provide reasonable assurance that financial transactions are recorded completely and without omission.

Authorization and Approval of Financial Activities

Controls provide reasonable assurance that financial processing activities are authorized and approved by appropriate personnel.

Protection and Integrity of Financial Data

Controls provide reasonable assurance that financial data is protected against unauthorized access, modification, or disclosure.

4. System Components

Components of the System

(Applicable to SOC 1 Type 1 and SOC 1 Type 2)

The system of **Fino Partners Group, Inc.** consists of the infrastructure, software, people, procedures, and data used to provide outsourced accounting, bookkeeping, tax support, and financial operations services that may impact user entities' **Internal Control over Financial Reporting (ICFR)**.

4.1 Infrastructure

Secure Network Environment

The organization maintains a secure network environment designed to support remote service delivery. Network controls are designed to restrict unauthorized access and protect client financial data processed during service delivery. Connectivity to internal systems and client environments is controlled through secure network configurations.

Cloud-Based Systems

Cloud-based systems are utilized to support operational activities, secure communication, and document management. These systems are approved by management and configured to support secure access and data protection requirements.

Remote Access Controls

Remote access to internal systems and client environments is permitted only through secure access methods. Access is restricted to authorized personnel based on role and engagement assignment and is subject to management approval.

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4.2 Software

Client-Approved Accounting Platforms

Accounting and financial processing activities are performed within **client-approved accounting platforms**. Fino Partners Group, Inc. does not host, own, or administer these platforms and accesses them solely for the purpose of providing contracted services.

Secure Document Management Systems

Secure document management systems are used to store, transmit, and manage client-provided documentation and workpapers. Access to these systems is restricted to authorized personnel and aligned with engagement responsibilities.

4.3 People

Engagement Team Structure

Engagement teams are assigned based on client requirements, service scope, and professional expertise. Team structures are designed to support appropriate supervision, review, and segregation of duties.

Roles and Responsibilities

Roles and responsibilities for personnel involved in service delivery are defined and communicated by management. Responsibilities include transaction processing, review, approval, and oversight activities as applicable to the engagement.

Segregation of Duties

Segregation of duties is designed within engagement teams to reduce the risk of errors or unauthorized activities. Where full segregation is not feasible due to team size, compensating controls such as management review are designed to mitigate associated risks.

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4.4 Procedures

Accounting and Bookkeeping Workflows

Documented workflows govern accounting and bookkeeping activities, including transaction processing, reconciliations, and financial data preparation. Workflows define task sequencing, documentation requirements, and review expectations.

Financial Review and Approval Processes

Financial outputs prepared by engagement teams are subject to supervisory or management review prior to delivery to clients. Review procedures are designed to identify errors, omissions, or inconsistencies.

Tax Data Processing Procedures

Tax-related data processing follows defined procedures for data collection, preparation, and review. Final tax filings, tax decisions, and tax opinions remain the responsibility of client management or designated tax professionals.

4.5 Data

Financial and Tax Data Handling

Financial and tax data is handled in accordance with internal policies and client requirements. Access to data is restricted to authorized personnel and limited to assigned engagements.

Data Retention and Disposal Practices

Data retention and disposal practices are governed by documented policies and client instructions. Financial and tax data is retained only for the duration required to support service delivery and is disposed of securely when no longer required.

5. Control Environment

Control Environment

(Applicable to SOC 1 Type 1 and SOC 1 Type 2)

The control environment of **Fino Partners Group, Inc.** reflects management's commitment to integrity, ethical values, and the establishment of internal controls designed to support the achievement of control objectives relevant to user entities' **Internal Control over Financial Reporting (ICFR)**.

5.1 Governance and Management Oversight

Organizational Structure

The organization maintains a defined organizational structure that establishes clear lines of responsibility and accountability for service delivery, information security, and financial data processing activities. Roles within the organization are structured to support appropriate supervision, review, and segregation of duties.

Management Responsibilities

Management is responsible for establishing, maintaining, and overseeing internal controls related to services that may impact client financial reporting processes. Management responsibilities include:

- Approving internal control policies and procedures
- Assigning roles and responsibilities for service delivery
- Providing oversight of engagement activities
- Monitoring compliance with internal control requirements

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5.2 Internal Control Policies

Fino Partners Group, Inc. has established formal internal control policies designed to govern information security, data protection, confidentiality, and ethical conduct. These policies are communicated to personnel and form the foundation for operational procedures supporting SOC 1 control objectives.

Information Security Policy

The Information Security Policy defines the organization's approach to protecting systems and data, including logical access controls, authentication requirements, endpoint security, network security, monitoring, and incident response processes.

Acceptable Use Policy

The Acceptable Use Policy defines employee responsibilities for the secure and appropriate use of company systems, devices, and networks. The policy restricts unauthorized software usage, external storage devices, and unapproved system access, and establishes requirements for password security and remote access.

Data Protection Policy

The Data Protection Policy establishes requirements for the classification, handling, storage, transmission, and disposal of sensitive financial and personal data. Access to client data is restricted to authorized personnel, and the storage of client data on personal or unauthorized devices is prohibited.

Confidentiality Policy

The Confidentiality Policy requires employees to protect client financial records and proprietary information. Employees are required to execute confidentiality agreements and are restricted from disclosing client information except for authorized business purposes.

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Code of Conduct Policy

The Code of Conduct Policy establishes expectations for ethical behavior, compliance with internal policies, and responsible system usage. Employees are required to report suspected security incidents, policy violations, or unethical behavior.

5.3 Risk Assessment Process

ICFR Risk Identification

Management identifies risks that could reasonably be expected to affect the accuracy, completeness, authorization, or integrity of financial data processed on behalf of clients. Risk identification considers the nature of services provided, system access, data handling practices, and engagement workflows.

Risk Mitigation Approach

Identified risks are addressed through the design of control activities, including access controls, segregation of duties, management review, documented procedures, and monitoring mechanisms. Controls are designed to mitigate ICFR-related risks and support the achievement of SOC 1 control objectives.

6. Control Activities (SOC 1)

Control Activities Relevant to ICFR

(Design assessed as of January 7, 2026; operating effectiveness tested for SOC 1 Type 2 for the period January 1, 2025 to December 31, 2025)

The control activities of **Fino Partners Group, Inc.** are designed to address risks related to the accuracy, completeness, authorization, and integrity of financial data processed on behalf of user entities and to support their **Internal Control over Financial Reporting (ICFR)**.

Logical Access Controls

Controls are designed to restrict access to systems and client environments to authorized personnel based on role and engagement assignment. Access provisioning requires management approval and is limited to the minimum level necessary to perform assigned duties. Access rights are designed to be reviewed periodically to confirm continued appropriateness.

Financial Processing Controls

Controls are designed to support accurate and complete financial processing in accordance with client instructions and defined workflows. These controls include procedures for transaction recording, account reconciliations, and preparation of financial reports and supporting schedules. Financial outputs are subject to supervisory or management review prior to delivery to clients.

Segregation of Duties

Controls are designed to segregate responsibilities for transaction processing, review, and approval to reduce the risk of errors or unauthorized activities. Where full segregation is not feasible due to team size or engagement structure, compensating controls—such as enhanced management review—are designed to mitigate associated risks.

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Change Management Controls

Controls are designed to manage changes affecting systems and access used in service delivery. Changes to internal configurations and access permissions require management approval. The organization does not implement changes within client-owned accounting platforms without client authorization. Audit trails within systems are designed to record user activity and changes to financial data.

7. Information and Communication

Information and Communication

(Applicable to SOC 1 Type 1 and SOC 1 Type 2)

The information and communication components of **Fino Partners Group, Inc.** are designed to support the identification, capture, and communication of information necessary to perform services that may impact user entities' **Internal Control over Financial Reporting (ICFR)**.

Secure Communication Channels

The organization has designed secure communication channels for the exchange of client instructions, financial information, workpapers, and deliverables. Approved communication methods include secure email, secure file-sharing platforms, and client-approved collaboration tools. The use of unauthorized communication channels for transmitting client financial data is restricted.

Client Instructions and Reporting

Client instructions related to accounting, bookkeeping, tax support, and financial operations services are documented and communicated to engagement teams through defined processes. Financial reports, supporting schedules, and other deliverables are communicated to clients in accordance with contractual requirements and established reporting procedures.

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Issue Escalation Procedures

Procedures are designed to escalate identified issues—such as data discrepancies, processing errors, or control concerns—to appropriate levels of management. Escalation procedures are intended to support timely resolution and, where necessary, communication with clients regarding identified issues.

8. Monitoring Controls

Monitoring Activities

(Applicable to SOC 1 Type 1 and SOC 1 Type 2)

The monitoring controls of **Fino Partners Group, Inc.** are designed to support management's oversight of internal controls relevant to services that may impact user entities' **Internal Control over Financial Reporting (ICFR)**.

Management Review Controls

Management has designed review controls to evaluate the accuracy, completeness, and appropriateness of work outputs prepared by engagement teams. Reviews are intended to identify errors, omissions, or deviations from documented procedures prior to delivery to clients.

Ongoing Oversight of Engagement Activities

Management provides ongoing oversight of engagement activities through defined supervisory structures, reporting lines, and review responsibilities. Oversight activities are designed to support compliance with internal policies, client instructions, and control objectives.

Issue Identification and Resolution

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Processes are designed to identify, document, and address issues related to financial processing, data integrity, or control execution. Identified issues are escalated to appropriate management personnel and addressed in accordance with established procedures.

9. Complementary User Entity Controls

Complementary User Entity Controls (CUECs)

(Applicable to SOC 1 Type 1 and SOC 1 Type 2)

Certain control objectives described in this report assume that user entities implement and maintain specific controls within their own environments. The achievement of the control objectives by **Fino Partners Group, Inc.** may depend, in part, on the effective operation of these **Complementary User Entity Controls (CUECs)**.

Client Responsibilities for ICFR

User entities are responsible for establishing and maintaining internal controls over financial reporting, including:

- Defining and maintaining accounting policies and procedures
- Ensuring the accuracy and completeness of financial data provided to the service organization
- Approving accounting judgments, financial statements, and financial disclosures

User entities retain ultimate responsibility for their **Internal Control over Financial Reporting (ICFR)**.

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Client System Access Controls

User entities are responsible for administering and monitoring access to their own accounting systems and applications, including:

- Granting, modifying, and revoking user access
- Assigning appropriate role-based permissions
- Periodically reviewing user access for appropriateness

The organization's controls assume that access to client-owned systems is properly restricted and maintained by user entities.

Client Review and Approval Responsibilities

User entities are responsible for reviewing and approving financial reports, reconciliations, tax filings, and other deliverables prepared by Fino Partners Group, Inc. prior to use in financial reporting. This includes identifying and resolving errors, discrepancies, or omissions identified during review.

10. Other Information

Other Information Provided by the Service Organization

(Not Covered by the Service Auditor's Opinion)

The information contained in this section is provided by **Fino Partners Group, Inc.** and is **not a part of the service auditor's examination**. Accordingly, the service auditor does not express an opinion or provide any assurance on this information.

This section may include additional background information regarding the organization's operations, service delivery practices, or administrative matters that are not directly related to the control objectives relevant to user entities' **Internal Control over Financial Reporting (ICFR)**.

The inclusion of this information is intended solely to provide general context and should not be relied upon by user entities or their auditors for purposes of assessing the design or operating effectiveness of internal controls.

11. Tests of Controls and Results

Tests of Controls and Results

(SOC 1 Type 2 Only – Operating Effectiveness)

This section presents the service auditor’s tests of controls and the results thereof for controls described in the system description of **Fino Partners Group, Inc.**. The tests were performed to evaluate whether the controls operated effectively throughout the period **January 1, 2025 to December 31, 2025**, to achieve the related control objectives.

Description of Tests of Controls

The service auditor performed tests of controls to obtain evidence regarding the operating effectiveness of controls relevant to user entities’ **Internal Control over Financial Reporting (ICFR)**. Testing procedures were selected based on the nature of the control, associated risks, and the frequency of control execution.

Tests of controls included, but were not limited to, the following procedures:

- Inquiry of personnel responsible for performing the control
- Observation of control execution
- Inspection of documentation evidencing control performance
- Re-performance of selected control activities, where applicable

Controls tested included logical access controls, financial processing controls, segregation of duties, change management controls, and monitoring controls as described in Sections 6 through 8 of this report.

Sampling methodologies and sample sizes were determined by the service auditor and varied based on the frequency and nature of the controls.

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Results of Tests of Controls

The results of the service auditor's tests of controls are presented below. For each control tested, the service auditor indicates whether the control operated effectively throughout the period.

Summary of Test Results

- Controls were tested for operating effectiveness for the period **January 1, 2025 to December 31, 2025**
- Testing covered key controls relevant to ICFR
- Results are reported for each control tested

Except as noted in the **Identified Exceptions and Management Responses** section below, the controls tested were found to have **operated effectively** throughout the period.

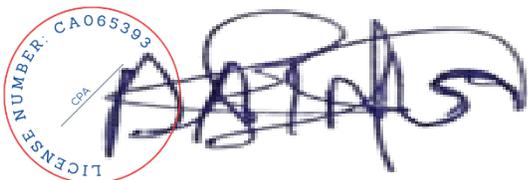
Identified Exceptions and Management Responses

Where exceptions were identified during testing, the service auditor documented the nature of the exception and its impact on the related control objective. Management provided responses describing corrective actions taken or planned, where applicable.

If no exceptions were identified, this section may state:

"No exceptions were identified during the testing of controls for the period January 1, 2025 to December 31, 2025."

DAT TIEN NGO CERTIFIED PUBLIC ACCOUNTANT

A circular red stamp with the text "LICENSE NUMBER: CA065393" and "CPA" is overlaid on a handwritten signature in blue ink.

License Number: CA065393

datngocpa@gmail.com

Date: January 7, 2026