

PENROD FINANCIAL GROUP

BUSINESS CONTINUITY PLANNING (BCP)

Penrod Financial Services, Inc dba Penrod Financial Group (“Penrod” the “Company” or “Firm”) is registered with the Securities and Exchange Commission (“SEC”) as a broker-dealer and is a member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). The Company has a limited and restricted business model and conducts business solely in mutual fund securities as well as effects accommodation transfers (trades). The Company only accepts unsolicited orders of securities. As a provider of such services and pursuant to Rule 15c3-3(k)(2)(ii), the Company serves as an introducing broker, clears all transactions with and for customers on a fully disclosed basis with a clearing broker or dealer, and promptly transmits all customer funds and securities to the clearing broker or dealer which carries all of the accounts of such customers and maintains and preserves such books and records pertaining thereto pursuant to the requirements of Rule 17a-3 and 17a-4, as are customarily made and kept by a clearing broker or dealer.

Penrod has developed a Business Continuity Plan with respect to how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan. For additional information in connection with our policies and procedures please contact us.

Contacting Us – The Company has a limited and restricted business model and conducts business solely in mutual fund securities as well as effects accommodation transfers (trades). The Company only accepts unsolicited orders of securities. As a provider of such services and pursuant to Rule 15c3-3(k)(2)(ii), the Company serves as an introducing broker, clears all transactions with and for customers on a fully disclosed basis with a clearing broker or dealer, and promptly transmits all customer funds and securities to the clearing broker or dealer which carries all of the accounts of such customers and maintains and preserves such books and records pertaining thereto pursuant to the requirements of Rule 17a-3 and 17a-4, as are customarily made and kept by a clearing broker or dealer. If after a significant business disruption, you cannot contact us as you usually do at 574 State Hwy 248, Suite 5, Branson, MO 65616, 417-334-3455, you should go to our website at www.penrodfinancialgroup.com.

Our Business Continuity Plan – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our financial advisors, employees and property, making a financial and operational assessment, protecting the firm’s books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. Our business continuity plan addresses: data backup and recovery; all mission critical systems; operational assessments; alternative communications with customers, financial advisors, employees, and regulators; alternate physical location of employees; critical supplier impact; regulatory reporting; and assuring our customers prompt access to their securities if we are unable to continue our business.

Customers’ Access to Funds and Securities - Penrod does not maintain custody of customers’ funds or securities. Customers’ funds or securities are maintained at our clearing firm, B.B. Graham & Co, Inc. who clears through RBC Clearing, and legal custodians of the respective mutual fund companies, etc. To this end, our clearing firm, RBC, holds electronic copies of our important records in a geographically separate area. While every emergency situation poses unique problems based on external factors, such as time of day and the severity of the disruption, we have been advised by our clearing firm that its objective is to restore its own operations and be able to complete existing transactions and accept new transactions and payments as soon as practicable. Your orders and requests for funds and securities could be delayed during this period. To contact RBC in the event that Penrod or B.B. Graham & Co. Inc. is not accessible, the following number has been provided, 612-371-7830.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In either situation, we plan to continue in business and notify you through our website www.penrodfinancialgroup.com. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer’s prompt access to their trade entry and account information.

Emergency Contact Persons - In accordance with FINRA 4370(c)(4), our firm’s emergency contact persons are: Donald R. Penrod, President and General Principal, as well as Aaron M. Penrod, Vice President and Municipal General Principal. These names will be updated in the event of a material change, and our Executive Representative will review them within 17 business days of the end of each quarter.

For more information – If you have questions about our business continuity planning, you can contact us at 417-334-3455.