Donnelly Penman & Partners

Summary Disclosure Statement

Donnelly Penman & Partners (DPP) has developed a Business Continuity Plan on 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.

Contacting Us – If after a significant business disruption you are unable to contact us as you usually do at (313) 446-9900 try one of the following email addresses sschuster@donnellypenman.com or jdonnelly@donnellypenman.com. Depending on the severity of the disruption, you may be able to consult our website at www.donnellypenman.com for more instructions.

Our Business Continuity Plan — We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment and protecting the firm's books and records. 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 back up and recovery; mission critical systems; financial and operational assessments; alternative communications with employees, and regulators; alternate physical location of employees; critical supplier, contractor and bank; and regulatory reporting.

Varying Disruptions – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, 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 a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within the shortest time possible. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area and recover and resume business within the shortest time possible. In either situation, we plan to continue in business and notify you through our web site at www.donnellypenman.com how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will contact you.

For more information – If you have questions about our business continuity planning, you can contact us at (313) 446-9900 or sschuster@donnellypenman.com.