

## Synovus Financial Corp Anti-Money Laundering Program Certification

Synovus Financial Corp<sup>1</sup> and its subsidiaries, including Synovus Bank and Synovus Trust Company, NA, hereby certify to its compliance with the requirements of the United States' anti-money laundering and anti-terrorist financing (hereafter referred to as "AML") regulations.

Synovus Financial Corp is fully committed to conducting business and operations in compliance with the AML laws and regulations including but not limited to, the Bank Secrecy Act (BSA), the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA PATRIOT) Act, and the Office of Foreign Asset Control (OFAC) regulations. Synovus Financial Corp and its subsidiaries have adopted an AML program that follows these essential elements:

- **AML Governance** is characterized by the designation of a BSA Officer, responsible for maintaining senior management commitment, establishing enterprise wide AML compliance processes and for developing and directing enterprise wide AML strategy.
- **Policies and Procedures** that set enterprise wide standards pertaining to the detection and appropriate reporting of money laundering and terrorist financing.
- **Training and Communication** to promote awareness and support a risk based AML compliance program.
- **Audit and Testing** that provide independent evaluation of the AML program and validates and tests the effectiveness of AML processes and procedures.

Synovus' AML program depends on the commitment of senior management, the skill of its corporate AML Compliance Department, bank, subsidiaries and business unit's BSA/AML compliance managers, corporate partners and front line team members to ensure effective procedures are implemented and followed. Bank, subsidiaries and business units within Synovus have written policies and procedures consistent with the corporate AML Policies, including large currency transaction reporting, OFAC, customer identification verification, customer due diligence, account monitoring, training and overall AML program compliance assessment. Automated monitoring systems are utilized to manage AML suspicious activity detection and reporting pertaining to money laundering and terrorist financing.

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<sup>1</sup> Synovus Financial Corp (NYSE: "SNV") is a financial services company and a registered bank holding company headquartered in Columbus, Georgia. We provide integrated financial services including commercial and retail banking, financial management, insurance and mortgage services to our customers through 28 locally-branded banking divisions of our wholly-owned subsidiary bank, Synovus Bank, and other offices in Georgia, Alabama, South Carolina, Florida and Tennessee.

Additional information on Synovus may be accessed via the Internet at [www.synovus.com](http://www.synovus.com). General information including, members of management, assets, locations of operations, financial centers, products, and services can be located in the Company Information section of the website (<https://www.synovus.com/?id=5>).

Any changes to this document will be given by publication on the Synovus website. Financial institutions using this document should periodically review the Synovus website to receive updated information. Synovus will not otherwise give notice of any changes to this document.

A handwritten signature in blue ink, appearing to read "Sue J Kimes-Nelson". The signature is fluid and cursive, with a large initial "S" and "N".

Sue J Kimes-Nelson  
Corporate Bank Secrecy Act/ Anti-Money Laundering Officer  
Synovus Financial Corp

Executed on the 08<sup>th</sup> day of June, 2017