

## 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 based in Columbus, Georgia, with approximately \$32 billion in assets. Synovus provides commercial and retail banking, investment, and mortgage services through 249 branches 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/about-us/our-companies>).

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.



John D. Polosky  
Corporate BSA/AML Officer  
Synovus Financial Corp.

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