

Anti-Money Laundering Program Certification

Pinnacle Financial Partners, Inc.¹ and its subsidiaries, including Pinnacle Bank, Pinnacle Bank (a TN banking corporation) DBA Synovus Bank, and Synovus Trust Company, NA, (collectively, “Pinnacle”) 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.

Pinnacle 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. Pinnacle Financial Partners 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.
- A **Risk Assessment** that evaluates the inherent and residual risks associated with Synovus’ operations, clients, and products.
- **Policies and Procedures** that set enterprise-wide standards and controls 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.
- **Customer Due Diligence** includes understanding the nature and purpose of customer relationships to develop a customer risk profile; and conducting ongoing monitoring to identify and report suspicious transactions and, on a risk basis, to maintain and update customer information including information on the beneficial owners of legal entity customers.

Pinnacle’s AML program depends on the commitment of senior management, the skill of its corporate BSA/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

¹ **Pinnacle Financial Partners, Inc.** (NYSE: “PNFP”) is a financial services company based in Atlanta, GA, with approximately \$116 billion in assets. Pinnacle provides commercial and consumer banking, wealth management, treasury management, and mortgage services through offices in Alabama, Georgia, Florida, Tennessee, North Carolina, South Carolina, Virginia, Maryland, and Washington D.C.

within Pinnacle have written policies and procedures consistent with the corporate AML Policies, including large currency transaction reporting, sanctions, 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, sanctions compliance, and reporting pertaining to money laundering and terrorist financing.

Additional information on Pinnacle may be accessed via the Internet at www.pnfp.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 firm website(s).

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

Stephanie N. Wise

Stephanie N. Wise
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Bank Secrecy Act Officer
Pinnacle Financial Partners, Inc.

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