

Synovus Securities, Inc.
Business Continuity Statement

Synovus Securities, Inc., a wholly owned subsidiary of Synovus Financial Corp, has established a comprehensive plan for its response to business disruptions that result from natural and man-made emergencies. The firm's intent is to respond in a manner that prioritizes the immediate safety of our employees, preservation of the firm's property, and a quick recovery in order to meet the business needs of our clients. We recognize how heavily our clients rely on our systems and services; therefore, we are providing you this information on our business continuity plan.

SSI, as your broker/dealer, has an agreement with National Financial Services, LLC (NFS) in which NFS may provide trade execution, clearing, and other related services for your brokerage account. In connection with these services, NFS has provided us with a copy of their business continuity statement, in which they have outlined their contingency planning and business recovery. NFS will also provide each brokerage account holder with a copy of their business continuity statement at account opening.

SSI has pre-established contingency and disaster recovery plans. Components of these plans are tested periodically to ensure effectiveness. SSI and NFS consider contingency planning to be an iterative process, requiring ongoing review to assess various risks and appropriate responses. Therefore, our plans are subject to modification. Updated plans will be promptly posted on our website at www.synovus.com and are mailed to clients upon request.

SSI has developed plans that include the ability to recover from situations including, but not limited to, unplanned evacuations, power outages, and any facilities failures that may cause business interruptions. Plans are designed to account for business interruption of various lengths and scope and require that SSI is able to recover critical functions according to their time criticality. Key features of SSI's corporate disaster recovery planning include annual reviews of the following:

- Identification of all mission critical systems (and system backup and recovery for such systems)
- A review of the financial and operations risks
- Alternative communications to client and NFS
- Employee safety strategies and communications
- Systems and telecommunications accessibility
- Alternate physical site location and preparedness
- Critical supplier, contractor, bank and counter party impact

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 4 hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our web site www.synovus.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 funds and securities.

In addition to following the guidelines stated above, SSI's recovery plan also includes the following:

- **Employee Safety** – We conduct regular evacuation drills which are led by trained personnel.
- **Separate Sites** – SSI has additional offices and locations that can be utilized to backup certain trading and support functions. These sites can also provide backup for certain critical functions.
- **Designated Contingency Site** – There are pre-established, tested processes for rerouting of critical hotline numbers. In the event of a site outage, customers should experience minimal downtime in their ability to contact SSI. Our goal is to have recovery of systems within 4 hours.
- **Alternate Site Tests** – SSI conducts alternate test sites for critical functions annually.
- **Notification to Clients** – SSI will assess which means of communication are still available to us and use the means closest in speed and form (written and oral) to the means that we have used it in the past.
- **Regulatory Reporting** – SSI's business contingency plans are designed to ensure that, regardless of the length of an outage at a primary location, SSI's ability to continue to meet regulatory requirements, as mandated by the SEC and FINRA would not be impacted.
- **Communication with Regulators** – SSI will communicate with its regulatory authorities regarding the nature and extent of any significant outage at a primary location, as required by applicable law and regulation.
- **Access to Your Funds** – A site outage at SSI would not impact your ability to have access to your available funds. However, your ability to trade your available funds may be impacted by market events outside of SSI's control, such as when the market was closed following the September 11 tragedy. Annuity customers should contact the annuity company directly.

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