2025 IDI Resolution Plan

Public Section

June 25, 2025

The information being submitted is confidential commercial, financial and other business information. Public disclosure of this proprietary business information could cause substantial competitive harm to Synchrony Financial and Synchrony Bank or their affiliates (collectively "Synchrony"). Accordingly, Synchrony requests that this information be treated as confidential and exempt from disclosure pursuant to 5 U.S.C. § 552 ("FOIA"). If the FDIC should determine preliminarily to make available to the public under FOIA any part of this Confidential Section, Synchrony requests that the FDIC inform Synchrony prior to doing so sufficiently in advance of any such disclosure to provide us with a reasonable opportunity to further substantiate, supplement or revise our request for confidential treatment of the Confidential Section. In addition, if any part of the Confidential Section or any related materials are the subject of a request or demand for disclosure by any governmental agency, Congressional office or committee, court or grand jury, or any other person or entity, Synchrony requests that the FDIC notify us sufficiently in advance of making such disclosure so that we may pursue any appropriate remedies.

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I.A. Introduction and Business Overview

The Federal Deposit Insurance Corporation ("FDIC") adopted the final rule (the "IDI Rule") that establishes the requirements for an insured depository institution (an "IDI") with $100 billion or more in total assets to submit a resolution plan (the "Plan") to the FDIC. Per the IDI Rule, Covered Insured Depository Institutions (CIDI) with $100B or more in total assets, which are not affiliated with U.S. Global Systemically Important Banks (G-SIBs) will make full submission triennially, with interim supplements in off years. The Plan should enable the FDIC to resolve the CIDI in the event of its insolvency under the Federal Deposit Insurance Act (the "FDI Act") in a manner that ensures that depositors receive timely access to their insured deposits upon the institution's failure, maximizes the net present value return from the sale or disposition of its assets, and minimizes the amount of any loss realized by the creditors while minimizing losses to the Deposit Insurance Fund (the "DIF") in resolution in accordance with Sections 11 and 13 of the FDI Act, 12 U.S.C. 1821 and 1823.

As an insured depository institution with assets in excess of $100 billion, Synchrony Bank[1] (the "Bank") has developed this Plan to fulfill the requirements of the IDI Rule, 12 CFR Part 360, and the Frequently Asked Questions (FAQs) published by the FDIC in April 2025.

The Bank, a wholly owned subsidiary of Synchrony Financial ("SYF"), was formed in 1988 as an Ohio state-chartered limited purpose credit card bank and was converted to a federally chartered savings association in 2003. Synchrony is one of the premier consumer financial services companies in the United States.

The Bank provides a range of credit products through programs established with a diverse group of national and regional retailers, local merchants, manufacturers, buying groups, industry associations and healthcare service providers, which together are referred to as our "partners."

The Bank's offerings include private label, dual, co-brand and general-purpose credit cards, as well as short- and long-term installment loans and consumer banking products. As of, and for the year ended December 31, 2024, the Bank and its subsidiaries had $111.9 billion of total assets and net income of $2.4 billion.

The Plan was developed to provide the FDIC with various strategies to resolve the Bank under the FDI Act in the unlikely event that the Bank were to fail. The relatively simple legal entity structure, limited geographic footprint, simple product suite, absence of

[1] *Throughout this Public Section, the following naming conventions are used: "Synchrony Financial" or "SYF" refers to Synchrony Financial and all of its subsidiaries, including Synchrony Bank; "Bank" refers to Synchrony Bank and its subsidiaries; and*

trading activity, straightforward funding model, and direct contractual relationships for operational interconnections between the Bank and Material Entities, all contribute to a relatively low level of resolvability risk and help to mitigate any potential challenges in resolution. Additionally, the Plan also demonstrates how the Bank can be resolved in a manner that substantially mitigates the risk that the failure of the Bank would have on financial stability in the United States. Unless otherwise indicated, information in this Public Section is provided as of, and for the year ended December 31, 2024.

I.B. Names of Material Entities

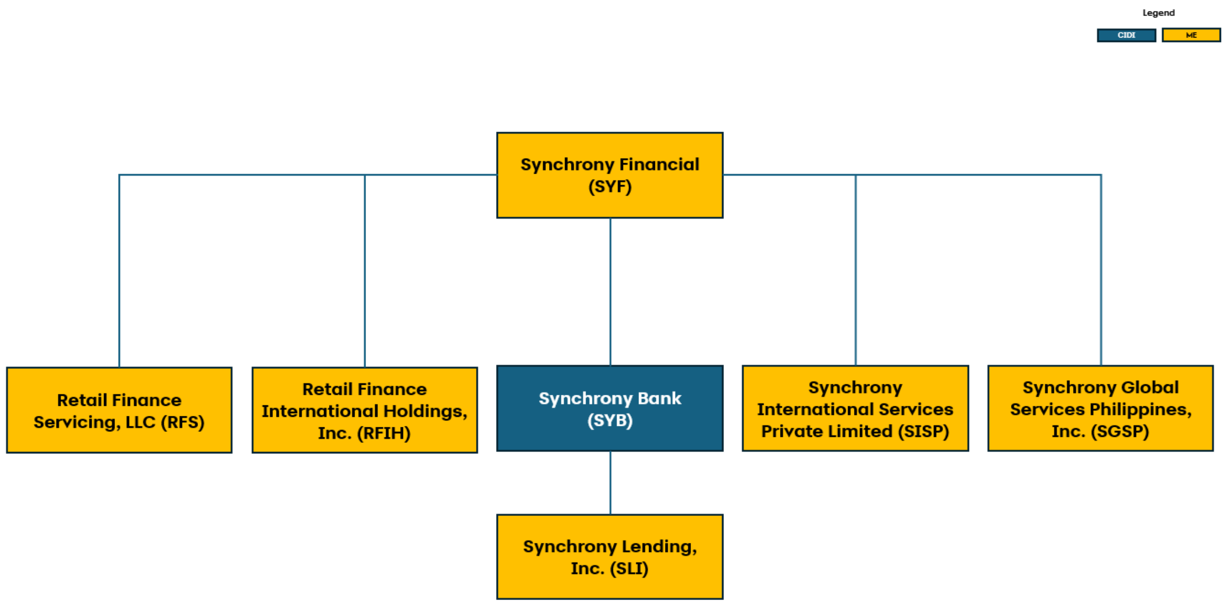
Under the IDI Rule, a Material Entity (“ME”) is a company, a domestic branch, or a foreign branch as defined in 12 U.S.C. 1813(o) that is significant to the activities of a critical service or core business line and includes all insured depository institutions that are subsidiaries or affiliates of the Bank.

For Resolution Planning purposes, critical services are defined as services and operations, including shared and outsourced services, that are necessary to continue the day-to-day operations of the CIDI, to support the execution of the identified strategy, and includes all services and operations that are necessary to continue any critical operation conducted by the CIDI. Under the IDI Rule, Core business lines (CBLs) are those business lines of the CIDI, including associated operations, services, functions, and support, that, in the view of the CIDI, upon failure would result in a material loss of revenue, profit, or franchise value of the CIDI.

The Bank is the CIDI under the IDI rule and provides consumer financing and depository products and services. The seven legal entities below have been designated as MEs for resolution planning purposes, in accordance with the IDI Rule and following a methodology based on both qualitative and quantitative criteria. The seven Material Entities (MEs), including the Bank, account for approximately 95.0% of Synchrony Financial consolidated assets and 96.0% of its net interest income after retailer share arrangements.

The exhibit below provides an overview of the legal entity structure of the Bank as well as the MEs:

Exhibit I.B-1: Material Legal Entity Structure



I.B.1. Synchrony Financial (SYF)

Synchrony was incorporated in 2003 in Delaware. SYF's corporate headquarters and principal executive offices are located in Stamford, CT. SYF is the top-tier parent holding company for Synchrony's business, engaged solely in owning and managing its subsidiaries and investments. It also incurs debt and raises capital to fund its subsidiaries' operations and to serve as a source of strength for the Bank.

I.B.2. Synchrony Bank (SYB)

The Bank, a wholly owned subsidiary of SYF, was formed in 1988 as an Ohio state-chartered limited purpose credit card bank and was converted to a federally chartered savings association in 2003. The Bank's home office is located at 170 Election Road, Suite 125, Draper, Utah.

I.B.3. Retail Finance International Holdings, Inc. (RFIH)

RFIH is a holding company for certain non-US entities. RFIH was incorporated in 2013 in Delaware and maintains its primary place of business at Draper, UT. RFIH holds a small portfolio of fixed assets as well as the majority of third-party supplier agreements and real estate leases. RFIH also holds investments in entities and projects designed primarily to promote community welfare and development, including affordable residential housing in low- and moderate-income communities. RFIH incurs allocable expenses and holds no receivables.

I.B.4. Synchrony Global Services Philippines, Inc. (SGSP)

SGSP is a servicing entity that was incorporated in 2006 in the Philippines and provides operations to the Bank and its subsidiaries, including collections and operations.

I.B.5. Synchrony International Services Private Limited (SISP)

SISP is a servicing entity that was organized in 2008 in India and is located in Hyderabad, India. SISP provides services to the Bank and its subsidiaries, including collections, compliance, finance, internal audit, information technology, marketing, operations, and risk-related services.

I.B.6. Retail Finance Servicing, LLC (RFS)

RFS was incorporated in 2013 in Delaware and maintains its primary place of business at Draper, UT. RFS holds a small portfolio of fixed assets as well as processing, technology, and servicing contracts with non-affiliated third parties.

I.B.7. Synchrony Lending, Inc. (SLI)

SLI is a holding company for certain non-bank securitization entities and purchases participated assets from Synchrony Bank. SLI is incorporated in Delaware and maintains its primary place of business at Draper, UT. SLI also sells assets to an on-bank securitization entity. As of December 31, 2024, SLI holds a total of $36.9B of assets. SLI holds no full-time employees (FTEs).

I.B.8. Interconnectedness of MEs

Synchrony Financial primarily conducts business operations through the Bank, and the Bank is the employer of all of Synchrony Financial personnel based in the U.S.

While a majority of operations are conducted by Bank personnel, the Bank does receive certain services from affiliates. Through the affiliate service model, subsidiary affiliates contract with Synchrony to provide services between entities. The Bank maintains a master service agreement with Synchrony. Synchrony, in turn, has servicing agreements with its subsidiaries, which include MEs that provide services supporting Bank operations. The Bank does not contract directly with any other MEs for services except Synchrony.

I.C. Description of Core Business Lines

Core business lines (CBLs) are those business lines of the CIDI, including associated operations, services, functions, and support, that, in the view of the CIDI, upon failure would result in a material loss of revenue, profit, or franchise value of the CIDI.

The Bank has designated both of its business lines as CBLs, in accordance with the IDI Rule and following a methodology based on both qualitative and quantitative criteria.

I.C.1. Credit

This CBL offers and issues credit products to consumers and small businesses. Credit is the most significant business line of the Bank when evaluating the contribution of the business line to key measures of financial performance and financial condition. Credit comprises the vast majority of assets for the Bank and is the primary driver of revenue.

The Bank provides credit products to consumers located primarily in the United States through programs established with a diverse group of partners, including national and regional retailers, local merchants, manufacturers, buying groups, industry associations, and healthcare service providers.

Through its sales platforms, the Bank offers three principal types of credit products: credit cards, commercial credit products and consumer installment loans. The Bank also offers the Payment Security program, which is a debt cancellation product. The Bank's credit card products are loans extended through open-ended revolving credit card accounts. Substantially all of the Bank's credit card business is in the United States. The Bank offers these credit products through five sales platforms:

> **I.C.1.a. Home and Auto:** Through this platform the Bank provides comprehensive payments and financing solutions with integrated in-store and digital experiences through a broad network of partners and merchants providing home and automotive merchandise and services, as well as Synchrony Car Care network and Synchrony HOME credit card offerings. Home & Auto accounted for $5.8 billion, or 27%, of Synchrony Financial's total interest and fees on loans for the year ended December 31, 2024.

I.C.1.b. Digital: Through this platform, the Bank delivers end-to-end payment and financing solutions paired with integrated digital experiences, primarily serving partners and merchants who engage with their customers through digital channels. Additionally, the Bank collaborates with its partners to expand digital relationships into in-person commerce. Beyond partner-specific products, the platform also offers a Synchrony-branded general-purpose credit card. For the year ended December 31, 2024, digital channels contributed $6.3 billion, representing 29% of Synchrony Financial's total interest and fees on loans.

I.C.1.c. Diversified & Value: Through this platform the Bank provides comprehensive payments and financing solutions with integrated in-store and digital experiences through large retail partners who deliver everyday value to consumers shopping for daily needs or important life moments. Diversified & Value accounted for $4.8 billion, or 22%, of Synchrony Financial's total interest and fees on loans for the year ended December 31, 2024.

I.C.1.d. Health & Wellness: Through this platform the Bank provides comprehensive healthcare payments and financing solutions, through a network of providers and health related retail locations, for those seeking health and wellness care for themselves, their families, and their pets, and includes Synchrony Financial's CareCredit brand, as well as partners such as Walgreens. Health & Wellness accounted for $3.7 billion, or 17%, of Synchrony Financial's total interest and fees on loans for the year ended December 31, 2024.

Through this platform the Bank offers customers a CareCredit-branded private label credit card that may be used across a network of CareCredit providers, a CareCredit Dual Card offering, access to installment loans at select providers and Walgreens private label and Dual Cards.

I.C.1.e. Lifestyle: Through this platform the Bank provides comprehensive payments and financing solutions with integrated in-store and digital experiences through partners and merchants who offer merchandise in power sports, outdoor power equipment, and other industries such as sporting goods, apparel, jewelry, and music. Through this sales platform the Bank creates customized credit programs for national and regional retailers, manufacturers, and industry associations. Credit extended in this platform, other than for apparel and sporting goods retail partners, is primarily promotional financing. Lifestyle accounted for $1.1 billion, or 5%, of Synchrony Financial's total interest and fees on loans for the year ended December 31, 2024.

I.C.2. Direct Banking

This CBL offers a range of FDIC-insured deposit products to its customers. The Bank obtains deposits directly from retail, affinity relationships and commercial customers ("direct deposits") or through third-party brokerage firms that offer FDIC-insured deposit products to their customers ("brokered deposits").

On December 31, 2024, Synchrony Bank had $83.9 billion in deposits, comprised of $72.3 billion of direct deposits and $9.7 billion of brokered deposits. On December 31, 2024, deposits represented 90% of total funding sources.

The following exhibit provides a summary of relationships between the Bank, MEs, and the CBLs:

Exhibit I.C-2 : CIDI and Material Entities Relevant to CBLs

Covered Insured Depository Institution	Credit	Direct Banking
SYB Synchrony Bank	✓	✓
Material Entity	**Credit**	**Direct Banking**
SYF Synchrony Financial Parent Entity	✓	✓
RFIH Retail Finance International Holdings, Inc.	✓	✓
RFS Retail Finance Servicing, LLC	✓	✓
SGSP Synchrony Global Services Philippines, Inc	✓	✓
SISP Synchrony International Services Private Limited	✓	✓
SLI Synchrony Lending, Inc.	✓	N/A

These CBLs have been identified solely for resolution planning purposes and the disclosures may differ from the periodic reports filed with the Securities and Exchange Commission ("SEC").

I.D. Consolidated Financial Information Regarding Assets, Liabilities, Capital, and Major Funding Sources

The following exhibit summarizes the consolidated financial position for Synchrony Bank as of December 31, 2024.

Exhibit I.D-1: Consolidated Statement of Financial Position for Synchrony Bank and Subsidiaries.

($ in millions)	Synchrony Bank Consolidated	
Assets		
Cash and equivalents	$	13,490
Intercompany Deposits	$	—
Debt securities	$	3,042
Loan receivables:		
Total loan receivables	$	100,453
Less: Allowance for credit losses	$	(10,512)
Loan receivables, net	$	89,941
Goodwill	$	489
Intangible assets, net	$	311
Other assets	$	4,629
Intercompany Segregated Deposit	$	—
Intercompany Due from affiliates	$	37
Investment in Subsidiary	$	—
Total assets	**$**	**111,939**
Liabilities and Equity		
Deposits:		
Interest-bearing deposit accounts	$	81,664
Interest-bearing intercompany deposits	$	1,830
Non-interest-bearing deposit accounts	$	398
Total deposits	$	83,892
Borrowings:		
Borrowings of consolidated securitization entities	$	6,192
Senior and subordinated unsecured notes	$	2,246
Total borrowings	$	8,438
Accrued Expenses and Other Liabilities	$	4,854
Intercompany Due to affiliates	$	772
Total liabilities	**$**	**97,956**
Preferred Stock	$	—
Common Stock	$	1
Additional paid-in capital	$	6,165
Accumulated other comprehensive income (loss)	$	(21)
Retained Earnings	$	7,838
Treasury stock	$	—
Total Equity	**$**	**13,983**
Total liabilities and equity	**$**	**111,939**

I.D.1. Capital Management

The Bank views capital strength as a fundamental element of a strong bank. The Bank seeks to manage capital to a level and composition sufficient to support the risks of our business, meet regulatory requirements, adhere to rating agency targets, and support future business growth. The level, composition and utilization of capital are influenced by changes in the economic environment, strategic initiatives, and legislative and regulatory developments.

On December 31, 2024, the Bank met all applicable requirements to be deemed well-capitalized pursuant to OCC regulations and for purposes of the Federal Deposit Insurance Act. The following table sets forth the composition of the Bank's capital ratios calculated under the Basel III Standardized Approach rules on December 31, 2024, and also reflects the applicable CECL regulatory capital transition adjustment for each period.

Exhibit I.D-2 : Synchrony Bank's Consolidated Regulatory Capital Ratios

Synchrony Bank	Actual		Minimum to be well-capitalized under prompt corrective action provisions	
On December 31, 2024($ in millions)	**Amount**	**Ratio(a)**	**Amount**	**Ratio**
Total risk-based capital	$ 15,917	15.8 %	$ 10,046	10.0 %
Tier 1 risk-based capital	$ 13,806	13.7 %	$ 8,037	8.0 %
Tier 1 leverage	$ 13,806	12.4 %	$ 5,582	5.0 %
Common equity Tier 1 Capital	$ 13,806	13.7 %	$ 6,530	6.5 %

Note (a): Capital ratios are calculated based on the Basel III Standardized Approach rules, subject to applicable transition provisions, on December 31, 2024.

The Bank's primary sources of capital have been earnings generated by the Bank and equity capital contributed by its parent company, Synchrony.

I.D.2. Funding

The Bank maintains a strong focus on funding and liquidity. The Bank's funding and liquidity policies are designed to ensure that the Bank has the resources to support daily operations, business growth, credit ratings and regulatory and policy requirements, in a cost effective and prudent manner through expected and unexpected market environments.

The Bank's primary funding sources include income generated from operations, deposits (both direct and brokered), securitized financings and senior and subordinated unsecured notes.

Deposits are obtained directly from retail, affinity relationships and commercial customers ("direct deposits") or through third-party brokerage firms that offer the Bank's deposits to their customers ("brokered deposits").

Direct deposits are primarily from retail customers and include a range of FDIC-insured deposit products, including certificates of deposit, IRAs, money market accounts, savings accounts, sweep and affinity deposits.

Brokered deposits are primarily from retail customers of large brokerage firms. Brokered deposits primarily consist of certificates of deposit that bear interest at a fixed rate.

I.E. Description of Derivative and Hedging Activities

The Bank does not engage in capital markets activities such as proprietary trading, underwriting, or making markets in securities or derivatives. Rather than using derivatives to manage its aggregate interest rate risk profile, the Bank seeks to match the interest rate repricing characteristics of its assets and liabilities. Historically, the Bank has not used interest rate derivative contracts to manage interest rate risk; however, it may choose to do so in the future.

I.F. List of PCS Service Providers

The Bank maintains access to payment, clearing, and settlement systems in order to carry out numerous business functions, including, but not limited to, execution of fund transfers, daily settlement with merchants and clients, management of securitization trust operations, and management of depositor accounts. For access to these systems, the Bank utilizes services provided by multiple correspondent banks which have direct memberships in the relevant payment, clearing, and settlement systems.

The Bank has indirect access to the following systems via correspondent banking arrangements: the Automated Clearing House ("ACH"), the Depository Trust Company ("DTC"), and the Society for Worldwide Interbank Financial Telecommunications ("SWIFT"). The Bank maintains direct access to the FedWire Funds Service ("Fedwire") via an agreement with the Federal Reserve. Additionally, for the Credit CBL, the Bank has agreements with payment networks, such as Mastercard, Visa and Discover, that outline various services which include: routing of transactions through the networks; processing settlement records for facilitating payments to merchants; stand-in credit authorizations through the network; and use of branding and trademarks. The Bank also subscribes to additional services from the networks such as token service provider for customers who make use of digital token services like Apple Pay or Google Pay.

The exhibit below lists the Bank's membership with material payment, clearing, and settlement systems.

Exhibit I.F-1 : List of Memberships in Material Payments, Clearing, and Settlement Systems

Payment, Clearing, Settlement System	Description	Access
Fedwire	Fedwire is a real-time gross settlement system generally used to make large-value, time-critical payments. Depository institutions and certain other financial institutions that hold an account with the Federal Reserve are eligible to participate in the Fedwire Funds Services.	Direct Membership
ACH	The ACH system is a nationwide network through which depository institutions send each other batches of electronic credit and debit transfers.	Indirect Access
DTC	DTC, a subsidiary of The Depository Trust & Clearing Corporation, is a central securities depository and securities settlement system for eligible securities including equities, corporate bonds, and municipal bonds, as well as money market instruments such as commercial paper.	Indirect Access
SWIFT	SWIFT provides a network that enables financial institutions worldwide to send and receive information about financial transactions in a secure, standardized, and reliable environment.	Indirect Access
Visa	Visa is an open-loop payments network that transfers transaction data and manages payment flow between financial institutions for credit card and debit card transactions.	Direct Membership
Mastercard	Mastercard is a global payments network that links issuing banks and acquirer banks to facilitate processing of credit card and debit card transactions.	Direct Membership
Discover	The Discover Network processes transactions for credit and debit cards and provides payment transaction processing and settlement services.	Direct Membership

I.G. Description of Foreign Operations

The Bank itself does not have foreign operations. However, certain servicing activities for the Bank are provided by Synchrony subsidiaries in India and the Philippines, as described above in Section I.B.

I.H. Identities of Material Supervisory Authorities

The Bank is a federally chartered savings association. As such, the Bank is subject to regulation, supervision, and examination by the Office of the Comptroller of the Currency of the U.S. Treasury (the "OCC"), which is its primary regulator, and is also subject to the supervision of the Consumer Financial Protection Bureau (the "CFPB"). In addition, the Bank, as an insured depository institution, is supervised by the FDIC.

As a savings and loan holding company and financial holding company, Synchrony is subject to regulation, supervision, and examination by the Federal Reserve Board.

I.I. Identities of the Principal Officers

The following exhibit shows information regarding the Board of Directors of the Bank as of December 31, 2024.

Exhibit I.I-1 : Bank Board of Directors

Name	Title
Daniel Colao	Synchrony Bank Director
Arthur Coviello, Jr.	Synchrony Bank Director
Brian Doubles	Synchrony Bank Director
Roy Guthrie	Synchrony Bank Director
Jonathan Mothner	Synchrony Bank Director
Jeffrey Naylor	Synchrony Bank Director
Laurel Richie	Synchrony Bank Director
Brian Wenzel	Synchrony Bank Director
Ellen Zane	Synchrony Bank Director

The following exhibit shows information regarding the executive officers of the Bank as of December 31, 2024.

Exhibit I.I-2 : Bank Principal Officers

Name	Title
Brian Doubles	President & CEO, Synchrony Financial
Michael Bopp	Executive Vice President & Chief Growth Officer
DJ Casto	Executive Vice President & Chief Human Resources Officer
Brian Wenzel	Executive Vice President & Chief Financial Officer
Alberto Casellas	Executive Vice President & Chief Executive Officer, Health and Wellness
Max Axler	Executive Vice President & Chief Credit Officer
Bart Schaller	Executive Vice President & Chief Executive Officer, Digital
Carol Juel	Executive Vice President & Chief Technology and Operating Officer
Curtis Howse	Executive Vice President & Chief Executive Officer, Home & Auto
Dana Randell	Executive Vice President & Chief Audit Executive
Darrell Owens	Executive Vice President & Chief Executive Officer, Lifestyle
Jonathan Mothner	Executive Vice President & Chief Risk and Legal Officer
Maran Nalluswami	Executive Vice President & Chief Strategy and Business Development officer
Susan Bishop	Executive Vice President & Chief Corporate Affairs officer
Courtney Gentlemen	Executive Vice President & Chief Executive Officer, Diversified and Value

I.J. Description of the Corporate Governance Structure and Processes Related to Resolution Planning

Resolution planning is embedded within the Bank's governance framework, involving key governing bodies throughout the development process. Ultimate responsibility for reviewing and approving the Resolution Plan lies with the Bank's Board of Directors (the "Board"). Oversight of the Recovery and Resolution Planning process is primarily managed by the Capital Management Committee ("CMC"), while the Risk Committee of the Board serves as the principal body responsible for reviewing the Plan before its final approval by the Board.

The Recovery and Resolution Planning Team ("RRP Team") is a dedicated team under the Capital Planning & Stress Testing team, reporting to the Senior Vice President, Capital Planning & Stress Testing. The RRP Team is responsible for the coordination of company-wide activities related to the development, maintenance, approval, and filing of the Plan, including partnering with business function subject matter experts ("SMEs") to develop the Plan.

The Recovery and Resolution Planning Working Groups ("RRP Working Groups") include cross-functional SMEs responsible for providing strategic guidance over resolution planning, including the development of the Plan. The Groups include representatives from Finance, Treasury, Legal, Business Development, Operations, Controllership, Sourcing, IT, Human Resources, and other functional groups on an as-needed basis.

The Resolution Planning governance framework, which is documented in the internal Resolution Planning Policy (the Policy), ensures that resolution planning is integrated into the Bank's corporate governance structure and process. The Policy establishes the objectives and minimum requirements to be followed by the Bank with regard to the Bank's resolution planning activities, which are consistent with regulatory expectations. The Policy establishes the roles and responsibilities of the RRP Team, RRP Working Groups, CMC, Risk Committee of the Board, and the Board. The Policy was reviewed and approved by the CMC.

The Risk Committee of the Board reviewed and approved the Plan and recommended the Plan to the Board for approval on May 12, 2025. The Bank's Board reviewed and approved the Plan on May 12, 2025.

I.K. Description of Material Management Information Systems

The Bank utilizes management information systems ("MIS") to run day-to-day operations and to gather relevant information to generate reporting that is used by management to make informed decisions regarding the operations and overall management of the Bank.

The Information Technology function has practices and processes in place to govern the definition, implementation, and operation of MIS. Additionally, the Bank has implemented a Business Continuity Management and Disaster Recovery Program ("BCM/DR Program") that fosters the continued operation of critical business processes in the event of a service disruption. The BCM/DR Program specifically focuses on minimizing the likelihood of business disruptions and their impact, timely resumption of operations following a business disruption, and preserving stakeholder confidence, as well as Synchrony Financial's and the Bank's reputation.

The Bank has extensive reporting capabilities that allow for the generation of key reports using existing MIS on a frequent and as-needed basis during the normal course of business and in a resolution scenario. The Bank leveraged its MIS infrastructure to gather all of the financial and operational information needed for preparation of the Plan. As required by the IDI Rule, the Plan describes the MIS associated with risk management, accounting, and financial and regulatory reporting.

I.L. Description of Identified Resolution Strategy

The Bank has developed strategies for the sale or disposition of the Bank and the Bank's deposit franchise, business lines and assets (individually, a "Resolution Strategy," and collectively, "Resolution Strategies") in accordance with the requirements of the IDI Rule.

In the event of its failure, the Bank would be subject to the FDIC receivership process. The Plan includes Resolution Strategies that are intended to achieve maximum value for the receivership, incur the least cost to the DIF, ensure depositors' access to their funds in a timely manner and effect a resolution that is least disruptive to other stakeholders. Under the Plan, the FDIC may establish a Bridge Bank (the "Bridge Bank") once the Bank is placed into receivership. The Bridge Bank is established to restore depositors confidence and to allow the FDIC additional time to market the Bridge Bank's assets and find one or more appropriate buyers.

The Resolution Strategy options include:

1. Whole Bank Purchase and Assumption (P&A): This option considers FDIC selling the Bank in its entirety, including all core business lines (CBLs) and material assets, through a purchase and assumption transaction to a single third-party purchaser.
2. Multiple Acquirer Strategy with private asset sales ("Private Sale MAS"): Under this strategy, the Bridge Bank would continue business operations during the process of marketing and selling the Bridge Bank's assets to multiple third-party acquirers over a period of time.

The FDI Act requires that any resolution of a failing IDI must be the least costly to the DIF of all possible methods. In accordance with the 2024 IDI rule (Final Rule) and the FAQs released in April 2025, the Plan focuses on the operational information most relevant for the FDIC to (1) resolve the Bank through a weekend sale or (2) operate the Bank for a short period of time while rapidly marketing the Bank.

The proceeds realized from the execution of each strategy would be allocated by the FDIC in order of priority in conformance with 12 USC §1821(d)(11), including the priority in payment of receiver administrative expenses.

Any actions or losses reflected in the Plan do not reflect a view of the actual risk characteristics of Synchrony Financial or the Bank, but rather represent a hypothetical scenario developed solely for purposes of complying with the requirements of the 2024 IDI Rule (Final Rule) and the 2025 FAQs for the Resolution Plan.

I.M. Conclusion

Synchrony's 2025 IDI Resolution Plan underscores its commitment to ensuring compliance with the Federal Deposit Insurance Corporation's IDI Rule while safeguarding financial stability in the unlikely event of insolvency of Synchrony Bank. By leveraging its straightforward legal entity structure, clear operational interconnectedness, robust governance frameworks, and mitigation strategies, Synchrony Bank demonstrates its capacity to be resolved in a manner that minimizes disruption to depositors, creditors, and the broader financial system.

Through the identification of material entities and core business lines, effective capital management practices, and sound funding mechanisms, Synchrony Bank has developed a comprehensive framework to support an efficient resolution. The outlined Resolution Strategies, including the Whole Bank Purchase and Assumption, and Multiple Acquirer Strategy, offer practical pathways to ensuring timely depositor access and reducing potential costs to the Deposit Insurance Fund (DIF). Additionally, Synchrony Bank's comprehensive MIS infrastructure and Business Continuity/Disaster Recovery Program reinforce its operational resilience.

Ultimately, Synchrony Bank's Resolution Plan reflects its proactive approach to risk management, its adherence to regulatory requirements, and its dedication to maintaining depositor confidence and financial stability—even under adverse circumstances. By preparing for these scenarios, Synchrony Bank not only complies with the FDIC's regulations but also fortifies its position as a responsible and resilient financial institution.