Silvan Foundation Corporation

www.silvanfoundation.org | info@silvanfoundation.org | 800.414.7112

Silvan Green Bonds	
Total Aggregate Offering	Unlimited
Term	Multiple: specified by investor at secure.silvanfoundation.org
Interest Rate	Multiple: specified by investor at secure.silvanfoundation.org
Minimum Investment	\$100 USD
Status	Senior Debt. All Silvan Foundation assets are collateral.
Last Update	9.1.21

This prospectus is only for the use of Accredited Investors only.

This prospectus does not constitute an offer, or a solicitation of an offer, to sell to any person in any state or any other political jurisdiction in which such offer or solicitation may not lawfully be made.

Silvan Foundation Corporation ("Issuer" or "Silvan") is a 501(c)(3) non-stock corporation. Silvan's mailing address is 5753 Highway 85 N #3218 Crestview Florida 32536. The Issuer may from time to time issue Silvan Green Bonds ("Bond" or "Bonds"), the proceeds of which will support Silvan's mission of environmental preservation. The Issuer will use proceeds of the Bonds for the Issuer's program of land acquisition for preservation, general financing activities, or to make any other investments which are considered to be minimally impactful to the environment. The Issuer has not set a date for termination of this offering. Bonds will be available directly from the Issuer. The Bonds are subject to certain risks. Investors are cautioned not to rely on any information not expressly set forth in this prospectus, and any related application, listing, or pricing supplement. Investors are advised to read this prospectus, and any related application, online listing, or pricing supplement, carefully prior to making any decision to purchase a Bond. No person has been authorized to give any information, or to make any representation in connection with this offering, other than those contained in this prospectus, and if given or made, such information or representation must not be relied upon as having been made by the Issuer. There is not expected to be any secondary market in the Bonds. The Bonds may not be transferred or resold except as permitted by applicable federal and state securities laws. The Bonds are not and will not be insured or guaranteed by the Federal Deposit Insurance Company ("FDIC"), the Securities Investment Protection Corporation ("SIPC"), or any other government agency. This offering is being made pursuant to an exemption from registration under Rule 506(c) of Regulation D.

Table of Contents

Master Disclosures	4
Offering Summary	5
Risk Factors	5
Risks Associated with the Bonds and the Offering	5
Risks Associated with the Use of Proceeds	7
Risks Associated With the Issuer	7
Forward-Looking Statements	10
What is Impact Investing?	11
What are Silvan Green Bonds?	11
Seniority / Security	11
Who Can Invest in the Bonds?	11
Uniform Gifts to Minors Act ("UGMA")	11
How to Invest / Purchase Methods	11
Interest Accrual and Payments	11
Increasing an Investment in the Bonds	12
Early Redemption	12
Survivor's Option	12
Minimum Investment Amount	14
Tax Considerations	14
Financial Reporting	16
Use of Proceeds	16
Institutional Grants	16
Legal Matters	16
Changes to Personal Information	17
Taxpayer ID	17
Indemnification of Directors, Officers, and Employees	17
Exempt Activities	18
Fiscal Year	18

Master Disclosures

THE BONDS ARE BEING OFFERED UNDER AN EXEMPTION FROM FEDERAL REGISTRATION PURSUANT TO RULE 506(c) OF REGULATION D. THE SECURITIES AND EXCHANGE COMMISSION HAS NOT MADE AN INDEPENDENT DETERMINATION THAT THE BONDS ARE EXEMPT FROM REGISTRATION UNDER THE SECURITIES ACT, OR THAT THE ISSUER IS EXEMPT FROM REGISTRATION AS AN "INVESTMENT COMPANY" UNDER THE INVESTMENT COMPANY ACT. THESE SECURITIES MAY EITHER BE REGISTERED OR EXEMPT FROM REGISTRATION IN THE VARIOUS STATES OR JURISDICTIONS IN WHICH THEY ARE OFFERED OR SOLD BY THE ISSUER. THIS PROSPECTUS HAS BEEN FILED WITH THE SECURITIES ADMINISTRATORS IN SUCH STATES OR JURISDICTIONS THAT REQUIRE IT FOR REGISTRATION OR EXEMPTION. THIS OFFERING CIRCULAR HAS NOT BEEN FILED WITH THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION. THESE SECURITIES HAVE NOT BEEN RECOMMENDED BY ANY FEDERAL OR STATE SECURITIES COMMISSION OR REGULATORY AUTHORITY. FURTHERMORE, THE FOREGOING AUTHORITIES HAVE NOT DETERMINED THE ACCURACY, ADEQUACY, TRUTHFULNESS, OR COMPLETENESS OF THIS DOCUMENT AND HAVE NOT PASSED UPON THE MERIT OR VALUE OF THESE SECURITIES, OR APPROVED, DISAPPROVED OR ENDORSED THE OFFERING. ANY REPRESENTATION TO THE CONTRARY IS A CRIMINAL OFFENSE. IN MAKING AN INVESTMENT DECISION INVESTORS MUST RELY ON THEIR OWN EXAMINATION OF THE ISSUER AND THE TERMS OF THE OFFERING, INCLUDING THE MERITS AND RISKS THESE SECURITIES ARE SUBJECT TO RESTRICTIONS TRANSFERABILITY AND RESALE AND MAY NOT BE TRANSFERRED OR RESOLD EXCEPT AS PERMITTED UNDER THE SECURITIES ACT OF 1933. AS AMENDED, AND THE APPLICABLE STATE SECURITIES LAWS, PURSUANT TO REGISTRATION OR EXEMPTION THEREFROM. INVESTORS SHOULD BE AWARE THAT THEY MAY BE REQUIRED TO BEAR THE FINANCIAL RISKS OF THIS INVESTMENT FOR AN INDEFINITE PERIOD OF TIME. NEITHER THE BONDS NOR THE ADEQUACY OF THIS PROSPECTUS HAVE BEEN APPROVED, DISAPPROVED, OR PASSED ON BY THE SECURITIES AND EXCHANGE COMMISSION, OR ANY STATE SECURITIES COMMISSION OR ANY OTHER REGULATORY BODY. THIS PROSPECTUS DOES NOT CONSTITUTE AN OFFER BY A BROKER-DEALER IN ANY STATE WHERE SAID BROKER-DEALER DOES NOT HAVE THE APPROPRIATE LICENSURE AND QUALIFICATION TO ACT AS A BROKER-DEALER. FEDERAL LAWS, OR STATE SECURITIES LAWS WITH RESPECT TO CERTAIN STATES, MAY AFFECT THE ISSUER'S ABILITY TO CONTINUE TO SELL BONDS, AND MAY LIMIT THEIR FEATURES.

Offering Summary

This section summarizes the legal and financial terms of Silvan Green Bonds ("Bond" or "Bonds") issued by the Silvan Foundation Corporation ("Silvan" or "Issuer") that are described in more detail in the section entitled "Description of the Bonds". Final terms of any particular Bond will be determined at the time of sale and will be contained in the accompanying application, online listing, or pricing supplement relating to the Bonds. The terms in that application, online listing, or pricing supplement may vary from, and supersede, the terms contained in this prospectus. Before an investor decides to purchase a Bond, the investor should read the more detailed information appearing elsewhere in this prospectus and in the accompanying application, online listing, or pricing supplement.

Risk Factors

Investment in a Bond involves certain risks. Potential investors should carefully consider the risks described below and the other information contained in this prospectus before deciding whether to purchase Bonds.

Risks Associated with the Bonds and the Offering

The Issuer is offering the Bonds on a best-effort sales basis and there is no minimum sales requirement. A low sales volume will not prompt cancellation of the offering or cause the Issuer to refund Bond purchases to existing Bondholders. No assurance can be given as to the principal amount of Bonds that will be sold and whether the proceeds will be sufficient to accomplish the purposes of the offering.

Payment of principal and interest will depend upon the financial condition of the Issuer. There is a risk that defaulted or delinquent investments may result in insufficient liquidity or assets to satisfy all outstanding Bonds. The loans the Issuer makes may not be repaid in a timely manner or ever. The Issuer relies, in part, upon donations, easements, and its endowment to fund the repayment of principal and payment of interest on the Bonds. The Bonds are not deposits or obligations of, or guaranteed or endorsed by, any bank, and are not insured by any federal or state agency, including the FDIC and SIPC. Further, no sinking fund or other similar deposit have been or will be established by the Issuer to provide for the repayment of the Bonds. Therefore, the relative risk level may be higher for the Bonds than for other securities.

Bonds are sold at fixed rates for the duration of a Bond. Interest rates offered for subsequent Bonds may change at the Issuer's discretion. Should commercial rates rise, the Issuer is not legally obligated to pay a higher interest rate on a Bond prior to its maturity. In general, interest rates are subject to significant fluctuations depending upon various economic and market factors over which the Issuer has no control and which could affect the Issuer's ability to repay the Bonds.

At various points in this prospectus the Issuer describes its policies and procedures, such as its lending policy. These descriptions are intended to help investors understand the Issuer's current

operations. The Issuer, however, reserves the right to change its policies and procedures at any time.

If the original interest rate is not offered at the time of reinvestment, renewed Bonds may be assigned a lower rate.

There is not expected to be any secondary market in the Bonds. The nature of this program does not afford the opportunity of a public or secondary market. Consequently, the purchase of a Bond should be viewed as an investment to be held to maturity.

No insurance or guarantee of the Bonds will be provided by any government agency or instrumentality, by any affiliate of the Issuer, by any insurance company, or by any other person or entity.

Bondholders have no ability to remove or replace the Issuer's directors or committee members or to participate in the management or control of the Issuer. Under the bylaws of the Issuer, Bondholders have no ability to remove or replace directors or committee members. In addition, Bondholders do not have any right to participate in the management or control of the Issuer or any right or authority to act for or bind the Issuer.

Under existing laws (including, without limitation, the Federal Bankruptcy Code), the remedies specified by the Issuer's loan agreements and collateral documents (if any) may not be readily available or may be limited. Furthermore, the laws of a particular jurisdiction may change or make it impractical or impossible to enforce specific covenants in the loan agreements and collateral documents (if any). In addition, the Issuer's legal and contractual remedies, including those specified in its loan agreements and collateral documents (if any), typically require judicial actions, which are often subject to discretion and delay. A court may refuse to order the specific performance of the covenants contained in the loan agreements and collateral documents.

There is risk that an Issuer counterparty may not perform. It is possible one or more of these counterparties could engage in fraud or otherwise not perform under their agreements with the Issuer. In addition, it is possible that these counterparties may terminate their contracts with the Issuer prior to the contracts' expiration. In such a case, the Issuer would need to engage new counterparties, who may not offer the same services as these counterparties.

The Issuer, and its vendors, rely on technology and technology-related services. The majority of the Issuer's records are stored and processed electronically, including records of its Bonds receivable and Bonds payable. The Issuer relies to a certain extent upon third party vendors for providing hardware, software, and services for processing, storing, and delivering information. The Issuer's electronic records include confidential Bondholder information and proprietary information regarding the Issuer's operations. Electronic processing, storage, and delivery has inherent risks such as the potential for hardware failure, virus or malware infection, input or programming errors, inability to access data when needed, permanent loss of data, and/or unauthorized access to data or theft of data. While the Issuer and its vendors take measures to protect against these risks, it is possible that these measures will not be completely effective

and that there may be other risks that have not been identified because they are different or unknown or that may emerge in the future. If the Issuer were to experience large scale data inaccuracy, inability to access data for an extended time period, permanent loss of data, data breach, failure of its vendors to perform as contracted, or other significant issues regarding data, it could adversely affect all aspects of the Issuer's operations.

There is risk that the federal, state, and local income tax results of holding Bonds may not match an investor's expectations. Additionally, there is always a risk that changes may be made in the tax laws, which could have an adverse effect on ownership of Bonds. (See "Tax Considerations" below for a more detailed discussion).

No independent counsel has been retained to represent investors. All investors are encouraged to consult with their legal and tax advisors prior to making an investment in the Bonds.

Risks Associated with the Use of Proceeds

The Issuer has a considerable degree of discretion in utilizing the Bond proceeds. There can be no assurance that losses in the Issuer's investments will not occur. If a substantial portion of the Issuer's repayment obligations under the Bonds were to come due in a limited period of time or if the maturities of the Bonds are not staggered, the Issuer's ability to repay Bonds that come due during any given period could be adversely impacted. The Bonds may be sold with maturities of any duration. The Issuer is not obligated to limit the amount of debt that may mature in any given year or period.

The investments the Issuer may make with its liquid assets will involve a degree of risk and the value of these investments may decline. A portion of the Issuer's liquid assets are invested in readily marketable securities and subject to various degrees of market risks that may result in losses, including loss of the full amount invested, if the market value of those investments declines.

Unlike other securities available to investors that are referred to as "bonds," the Bonds being offered by Silvan do not have many of the protective features that may be typical of securities referred to as bonds. For example, there is no trust indenture or credit enhancement.

Risks Associated With the Issuer

Bondholders may be adversely affected by a change by the Issuer in its current operations or existence. The Issuer is not obligated to continue offering the Bonds or to continue its current operations or existence as a not-for-profit entity. Any such change in its operations or status could negatively impact its ability to repay the Bonds. As of the date of this prospectus, however, the Issuer has no plans to discontinue this offering of the Bonds, the Issuer's lending program as described in this prospectus, or the maintenance of the Issuer's not-for-profit status.

The Issuer is dependent upon the continued services of certain key personnel. The Executive Officer or any member of the senior management team could leave the Issuer at any time, leaving a temporary vacancy in a key position. The Issuer tries to ensure a depth of management such that a departure will not impede the Issuer's functioning. However, there can

be no assurance of continuity in the Issuer's key personnel. The Issuer does not maintain key person insurance.

There are risks associated with borrowing by the Issuer. The Issuer may borrow funds on a short-term basis for liquidity and cash management. The preferred method of such borrowing is through a line of credit, overdraft facility or other unsecured facility provided by a financial institution. It may be necessary to provide security in order to arrange such a line of credit. The currency of such borrowings is to be U.S. dollars.

Holders of Bonds are subject to risk associated with bankruptcy or insolvency of the Issuer. If the Issuer or another affiliated company seeks relief under bankruptcy or related laws, a bankruptcy court could attempt to consolidate its assets into the bankruptcy estate, possibly resulting in delayed or reduced payments to Bondholders.

There is no independent custodian for the Bonds. The Issuer serves as the custodian for the Bonds, which exposes the Issuer to fiduciary risks and related claims. Although unlikely, if a claim like this were made and upheld, the Issuer's financial condition may be negatively affected.

From time to time, the Issuer may become involved in litigation in the ordinary course of its activities. Litigation can be time consuming and costly, and there can be no assurance that the Issuer will not become involved in litigation that could have an adverse impact on its activities or financial condition. The Issuer has taken legal steps to be a separately incorporated and a separate legal entity apart from its affiliates and, as such, the Issuer should not be liable for claims made against them or other affiliated organizations. It is possible, however, that in the event of claims against the Issuer's affiliated organizations, the claimants might contend that the Issuer is also liable. Such claims, if upheld by the courts, could negatively affect the Issuer's financial condition.

It is the Issuer's view that this offering of Bonds is exempt from registration under the federal securities laws, and from state securities laws in several of the states in which the Issuer is offering the Bonds. If it is determined that the Bonds are not exempt from federal and/or state securities laws, the Issuer may be required to make rescission offers and/or be subject to other penalties for which the Issuer may not have the funds available to repay Bondholders in such states. The offering described in this prospectus is being made in reliance upon exemptions from registration provided by Section 3(a)(4) of the Securities Act, Section 3(c)(10) of the Investment Company Act, and exemptions from registration of securities provided by the laws of certain states in which the Bonds are offered. Reliance on these exemptions does not, however, constitute a representation or guarantee that such exemptions are indeed available. The Issuer may seek to qualify, register, or otherwise obtain authorization for the offering in certain other states where the Issuer believes such qualification, registration or other authorization is required. In addition, the Issuer has no obligation, and does not intend, to register the Bonds for resale. There is no trading market for the Bonds at present and no trading market is expected to develop in the future. Investors should therefore consider the Bonds as an investment to be held until maturity. If for any reason the offering is deemed not to qualify for exemption from

registration under the applicable securities exemptions (and if no other exemption from registration is available), and the offering is not registered with the applicable federal or state authorities, the sale of the Bonds will be deemed to have been made in violation of the applicable laws requiring registration. As a remedy for such a violation, penalties and fines may be assessed against the Issuer, and Bondholders will typically have the right to rescind their purchase and to have their purchase price returned, together with interest at statutorily prescribed rates. If Bondholders request the return of their investment, funds may not be available for that purpose and the Issuer may be unable to repay all Bondholders in those states. Any refunds made would also reduce funds available for the Issuer's operations. A significant number of requests for rescission could leave the Issuer without funds sufficient to respond to rescission requests or to successfully proceed with the Issuer's activities.

Changes in federal and state securities laws could negatively impact the sale of, and/or the ability to repay amounts owed on, the Bonds, specifically as related to securities offered and sold by nonprofit charitable organizations. Pursuant to current federal and state exemptions relating to certain securities offered and sold by nonprofit charitable organizations, the Bonds will not be registered with the Securities and Exchange Commission and may not be registered with any state securities regulatory body in certain states. Federal and state securities laws are subject to change and frequently do change. Future changes in federal or state laws, rules, or regulations regarding the sale of securities by charitable or other nonprofit organizations may make it more costly and difficult for the Issuer to offer and adversely affect its ability to sell the Bonds. Such an occurrence could result in a decrease in the amount of Bonds the Issuer sells, which could affect the Issuer's operations and its ability to meet its obligations under the Bonds. If the Issuer does not continue to qualify its Bonds in any particular state, Bondholders in that state may not be able to reinvest at maturity.

There is limited regulatory oversight with respect to the Issuer. The Issuer does not intend to register as an investment company under the Investment Company Act. Accordingly, the provisions of the Investment Company Act, which, among other matters, require investment companies to have a majority of disinterested directors, will not apply. In addition, the Bonds are being offered under an exemption from federal registration pursuant to Section 3(a)(4) of the Securities Act. As such, this prospectus will not be submitted to or reviewed by the Securities and Exchange Commission.

A change in the Issuer's operations, nonprofit or tax-exempt status could have a negative impact on its ability to repay its obligations under the Bonds. Federal and Florida state authorities have determined that the Issuer is exempt from federal and state taxation on the basis of its charitable purpose. This determination rests upon a number of conditions and assumptions that must continue to be met on an ongoing basis. If the Issuer fails to comply with any of these conditions or assumptions, the Issuer could lose its nonprofit, tax-exempt status and be subjected to federal and/or state taxation. In addition, the Issuer is not obligated to continue its current operations or existence as a nonprofit entity. If the Issuer became subject to federal or state taxation, this could negatively impact its financial viability and cash flow, and its ability to sell Bonds pursuant to exemptions for nonprofit charitable securities, all of which could ultimately negatively impact its ability to meet its obligations under the Bonds.

Changes in the regulations to which the Issuer is subject, including those related to its lending activities, could have an adverse impact on the Issuer's operations and its ability to make payments on the Bonds. The Issuer is not currently subject to regulation as a bank, but some of its operations are subject to regulation by federal, state and local governmental authorities. Although the Issuer believes that its activities are in compliance in all material respects with applicable local, state and federal laws, rules and regulations, there can be no assurance that this is the case or that more restrictive laws, rules and regulations governing the Issuer's lending activities will not be adopted in the future which could make compliance much more difficult or expensive, restrict its ability to originate loans, further limit or restrict the amount of interest and other charges earned under loans the Issuer originates, or otherwise adversely affect the Issuer's operations or prospects, which could adversely affect its ability to operate and to make payments under the Bonds and potentially lead to the termination of the offering or termination, winding-up or liquidation of the Issuer.

Forward-Looking Statements

This prospectus contains forward-looking statements, and additional written or oral forward-looking statements may be made by the Issuer from time to time. The words "believe," "expect," "intend," "anticipate," "estimate," "project," and similar expressions identify forward-looking statements, which speak only as of the date the statement was made. Forward-looking statements are inherently subject to risks and uncertainties, some of which cannot be predicted or quantified. Future events and actual results could differ materially from those set forth in, contemplated by, or underlying the forward-looking statements. Statements in this prospectus, including those contained in the section entitled "Risk Factors", describe some factors, among others, that could contribute to or cause such differences. Further, no independent examiner has passed on the reasonableness of our forward-looking projections.

INVESTORS ARE ENCOURAGED TO CONSIDER THE CONCEPT OF INVESTMENT DIVERSIFICATION WHEN DETERMINING THE AMOUNT OF BONDS THAT WOULD BE APPROPRIATE FOR THEM IN RELATION TO THEIR OVERALL INVESTMENT PORTFOLIO AND PERSONAL FINANCIAL NEEDS.

DESCRIPTION OF THE BONDS

What is Impact Investing?

Impact investing (also known as community investing) finances socially, economically, and/or environmentally beneficial organizations that generally cannot attract efficient financing through traditional market mechanisms. Impact investing provides an alternative source of capital and a more efficient way to channel funds to these organizations. It is a method of investing focused on generating both some financial return and a positive social and environmental impact. Long term, it is intended to create a mainstream financial mechanism for the general public to invest in these opportunities.

What are Silvan Green Bonds?

Silvan's offering of the Silvan Green Bonds are designed to preserve nature. The Bonds provide a fixed rate of interest to Bondholders for the term of the Bond as set forth on our website, and the terms on which the Bonds are offered are updated quarterly.

Seniority / Security

The Bonds are senior to any other Silvan obligation. The Bonds are not, and will not become, subordinate to any other indebtedness of the Issuer.

Who Can Invest in the Bonds?

Accredited Investors only as specified by the SEC at the time of purchase.

Uniform Gifts to Minors Act ("UGMA")

For Bond purchases subject to the Uniform Gifts to Minors Act, the Bondholder will act as custodian, and agree that all payments from the Bond (including a return of the principal amount invested in the Bond) belong to the minor and that the Bondholder will only use them for the minor's benefit – even after the Bond has reached maturity / been redeemed.

Transfer on Death Accounts

Transfer on Death (TOD), or Payable on Death (POD) accounts may not invest in the Bonds.

How to Invest / Purchase Methods

The Bonds are available for purchase on our website at www.silvanfoundation.org. Interest rates are fixed at the outset of the investment and are paid as simple interest. Bonds are purchased directly from the Issuer through the Issuer's website. To purchase a Bond, investors must register their personal information and then select from the available options ("listings"). Payment for purchases of the Bonds will be processed through an ACH transaction linked to an investor's bank account. All ACH transactions must be drawn on a U.S. bank account. The Issuer reserves the right to suspend the sale of the Bonds for a period of time or to reject any specific purchase order. See Description for additional information regarding the Bonds. The Issuer acts as the registrar and as paying agent.

Interest Accrual and Payments

Starting 30 days prior to maturity, Bondholders will receive email notification(s) providing instructions for redemption or reinvestment. Such notification will contain (i) the current rates then offered on the Bonds and (ii) if not previously received by the Bondholder, the then-current prospectus for the Bonds that would be issued upon reinvestment. If a Bondholder notifies the Issuer in writing, email, or online selection by the maturity date that the Bondholder elects not to reinvest in the Bond, then at maturity, the Issuer shall promptly repay the principal and any accrued but unpaid interest. If a Bondholder does not respond to the notice(s), both principal and interest are automatically reinvested for the same duration as the previous Bond consistent with the current offering. If the original interest rate is not offered at the time of reinvestment and the Bondholder provides no instructions, renewed Bonds may be assigned a lower rate.

Automatic reinvestment at maturity will not be offered to Bondholders residing in the states of California, Georgia, Kentucky, Louisiana, Ohio, and Oregon. Unless the Issuer receives documented positive affirmation of intent to renew from Bondholders residing in these states, principal and accrued interest will be paid out in full at maturity.

Increasing an Investment in the Bonds

Bondholders may not increase the principal balance of a Bond, but may buy additional Bonds. The Bonds provide a fixed rate of interest to Bondholders for the term of the particular Bond as set forth on the related application, online listing, or pricing supplement.

Early Redemption

Bonds are expected to be held to maturity, but if needed, the Bondholder may have early redemption. Early redemption by the Bondholder will result in a penalty. This penalty will be the sum of the interest paid or accrued to the date of request. Silvan will redeem the balance to the Bondholder within 30 days. To request early redemption the Bondholder should call the Silvan Foundation at 800.414.7112.

Survivor's Option

If the beneficial owner of a Bond dies prior to the maturity of the Bond, such owner's authorized representative may provide the following items to the Issuer within one year of the date of death of the beneficial owner: written instruction to the Issuer regarding repayment pursuant to exercise of the Survivor's Option; an original death certificate for the beneficial owner of the Bonds at the time of death; appropriate evidence satisfactory to the Issuer that the representative has authority to act on behalf of the beneficial owner; any additional information the Issuer reasonably require evidencing satisfaction of any conditions to the exercise of the Survivor's Option or to document beneficial ownership or authority to make the election and to cause the repayment of the Bonds; and

A beneficial owner of a Bond is a person who has the right, immediately prior to such person's death, to receive the proceeds from the disposition of that Bond, as well as the right to receive payment of the principal of the Bond.

Upon the death of a person holding a beneficial ownership interest in a Bond as a joint tenant or tenant by the entirety with another person, or as a tenant in common with the deceased holder's spouse, the entire principal amount of the Bond held in this manner shall be deemed to pass onto the non-deceased person or spouse if otherwise consistent with applicable law. The surviving person or spouse shall not be entitled to exercise the Survivor's Option. However, the death of a person holding a beneficial ownership interest in a Bond as tenant in common with a person other than such deceased holder's spouse will be deemed the death of a beneficial owner with respect to such deceased person's interest in the Bond, and only the deceased beneficial owner's percentage interest in the principal amount of the Bond will be subject to repayment.

The death of a person who, during his or her lifetime, was entitled to substantially all of the beneficial ownership interests in a Bond will be deemed the death of the beneficial owner of that Bond for purposes of the Survivor's Option, regardless of whether that beneficial owner was the registered holder of the Bond, if the beneficial ownership interest can be established to the satisfaction of the Issuer. A beneficial ownership interest will be deemed to exist in typical cases of nominee ownership, ownership under the Uniform Transfers to Minors Act or Uniform Gifts to Minors Act, community property or other joint ownership arrangements between spouses. In addition, the beneficial ownership interest in a Bond will be deemed to exist in custodial and trust arrangements where one person has all of the beneficial ownership interest in that Bond during his or her lifetime.

An otherwise valid election to exercise the Survivor's Option may not be withdrawn. Each election to exercise the Survivor's Option will be accepted in the order that elections are received by the Issuer, except for any election the acceptance of which would contravene any of the limitations described in the preceding paragraph. Bonds accepted for repayment through the exercise of the Survivor's Option normally will be repaid as soon as possible after the date of the acceptance. Each tendered Bond that is not accepted in any calendar year due to the application of any of the limitations described in the preceding paragraph will be deemed to be tendered in the following calendar year in the order in which all such Bonds were originally tendered. If a Bond tendered through a valid exercise of the Survivor's Option is not accepted, the Issuer will provide a notice to the authorized representative of the deceased beneficial owner that states the reason that Bond has not been accepted for repayment.

All other questions regarding the eligibility or validity of any exercise of the Survivor's Option will be determined by the Issuer, in its sole discretion, which determination will be final and binding on all parties. For the avoidance of doubt, the Issuer also retains the right to reject in its sole discretion any exercise of the Survivor's Option where the deceased held no or only a minimal beneficial ownership interest in the Bonds and entered into arrangements with third parties in relation to the Bonds prior to death for the purpose of permitting or attempting to permit those third parties to directly or indirectly benefit from the exercise of the Survivor's Option. For assistance with the exercise of the Survivor's Option, please contact the Issuer at 800.414.7112 or info@silvanfoundation.org.

Minimum Investment Amount

Bonds: The minimum investment amount for a Bond is \$100, subject to available offerings.

Tax Considerations

Bondholders earning greater than \$600 in any calendar year will be provided with a Form 1099-INT or other notice in January of each year indicating the interest paid or deemed to be paid on their Bonds in the prior year. Depending upon the type of Bond held, Bondholders have the right to either receive annual payments of accrued interest, have those annual payments of interest reinvested, or make a donation of the annual interest. The interest will be taxable to Bondholders annually regardless of whether the Bondholder receives it, reinvests it, or donates it to the Issuer. If the Bondholder donates the interest to the Issuer, the Bondholder may be entitled to a charitable contribution (i.e., donation) deduction. Payments of principal and interest may be subject to "back-up withholding" of U.S. federal income tax if the Bondholder fails to furnish the Issuer with a correct Social Security Number or tax identification number, or if the Bondholder or the IRS has informed the Issuer that the Bondholder is subject to back-up withholding.

In addition, the Bondholder may be deemed to receive additional taxable interest under Section 7872 of the Internal Revenue Code of 1986, as amended (the "Code"), if the interest paid to the Bondholder is below the applicable federal rate, which is a minimum rate of interest which the Internal Revenue Service requires be included in certain loan transactions. In that situation, the Internal Revenue Service may impute income up to that applicable federal rate. If the Bondholder believes this may apply, the Bondholder should consult with his or her tax advisor.

If the law creating the tax consequences described in this "Tax Considerations" summary changes, this summary could become inaccurate. This summary is based on the Code, the regulations promulgated under the Code and administrative interpretations and court decisions existing as of the date of this prospectus. These authorities could be changed either prospectively or retroactively by future legislation, regulations, administrative interpretations, or court decisions. Accordingly, this summary may not accurately reflect the tax consequences of an investment in the Bonds after the date of this prospectus.

Finally, this summary does not address every aspect of tax law that may be significant to a Bondholder's particular circumstances. It is not intended to discuss all individual tax consequences of investments in the Bonds. For instance, it does not address special rules that may apply if the Bondholder is a financial institution or tax-exempt organization, or if the Bondholder is not a citizen or resident of the United States. Nor does it address any aspect of state or local tax law that may apply to a Bondholder. This summary is not written to be used, and it cannot be used, for the purpose of avoiding tax penalties. Potential Bondholders are advised to consult their individual tax counsel or advisor to determine the particular federal, state, local or foreign income or other tax consequences particular to their investment in the Bonds. All Bonds are general unsecured obligations of the Issuer.

No representation or warranty of any kind is made by the Issuer or its officers, directors, counsel or other agents or advisors with respect to any tax consequences of any investment in the Bonds.

EACH PROSPECTIVE INVESTOR IS HEREBY ADVISED TO SEEK HIS, HER, OR ITS OWN TAX ADVICE CONCERNING THE TAX CONSEQUENCES OF AN INVESTMENT IN THE BONDS

Distribution

Bonds are purchased directly from the Issuer through the Issuer's website. To purchase a Bond, investors must register their personal information and then select from the available options. Payment for purchases of the Bonds will be processed through an ACH transaction linked to an investor's bank account. See Description for additional information regarding the Bonds.

Financial Reporting

The Issuer's Form 990 will be prepared by an independent CPA, and be available within 120 of fiscal year-end, unless the Issuer files for an extension in which case the Form 990 will be available following the date on which it is filed.

Use of Proceeds

Bond proceeds will be used to support the mission of the Silvan Foundation, primarily in the purchase of land and investments intended to cover the cost of the permanent preservation of that land. This land may be in any jurisdiction that has a reasonable expectation of the stability of owners rights. Any species planted by Silvan must be believed to be 'native' to that location, and have a reasonable expectation of survival. Silvan may invest in cash, cash equivalents, and publicly traded securities, including but not limited to: bankers acceptances; commercial paper, municipal bonds and corporate bonds; bank or credit union deposits; certificates of deposits (CDs); U.S. government or agency obligations, including U.S. government backed investments of any kind such as certificate of deposit account registry service (CDARs) or federally insured cash account (FICA) or similar; variable rate demand Bonds (VRDNs) or related instruments; money market funds, short-term bond funds, individual equities, electronically traded funds, and mutual funds. The Issuer may also enter into foreign currency exchange contracts and cross-currency interest rate swaps, but only in order to hedge the Issuer's currency risk. Any securities brokerage relationship undertaken by Silvan will be with a licensed broker subject to the laws of the United States.

Institutional Grants

Silvan may receive Institutional Grants at any time.

Conflicts of Interest

The Issuer has a Conflict of Interest Policy for Directors & Officers and an Employee Conflict of Interest Policy. These policies are designed to increase awareness of potential conflicts of interest and to protect the Issuer's interest when it is contemplating entering into a transaction that might benefit the private interest of an employee, director or officer of Silvan or might result in a possible excess benefit transaction. The policies are intended to supplement but not

replace any applicable state and federal laws governing conflict of interest applicable to the Issuer. Each employee, director, and officer of the Issuer is also subject to the Issuer's Code of Ethics.

Legal Matters

There are no known pending legal proceedings involving the Issuer or, with respect to the Issuer, its directors, officers or employees acting in their capacity representing the Issuer.

Changes to Personal Information

All transactions and changes of personal information must be completed online at www.silvanfoundation.org.

Taxpayer ID

If the Issuer lacks the correct Social Security or Taxpayer Identification Number ("TIN") and is unable to verify that the prospective investor is not subject to backup withholding by the IRS, the prospective investor will not be permitted to purchase or re-invest in a Bond.

Existence

The Issuer will keep in full effect its existence, rights and franchises as a corporation under the laws of the State of Florida (unless it becomes, or any successor issuer hereunder is or becomes, organized under the laws of any other state, in which case such successor issuer will keep in full effect its existence, rights and franchises under the laws of such other jurisdiction) and will obtain and preserve its qualification to do business in each jurisdiction. No successor issuer is contemplated at this time. An event of default in the Bonds would occur if any successor issuer were not qualified as a charitable entity under Section 501(c) of the IRC, or were deemed to be an investment company.

Certain Key Bylaw Provisions

The Issuer's Bylaws require the offices of Executive officer, and Operating officer. The Executive officer has general management control of the Issuer's business and affairs when the Board of Directors is not in session. The Operations officer maintains the minutes of all proceedings of the Board of Directors and is responsible for the giving and serving of all required notices to directors and others. The Issuer's fiscal year consists of 12 months and closes each year on December 31.

The Board of Directors may authorize any officer or agent to enter into any contract or execute any instrument in the name of and on behalf of the Issuer. Such authority may be general or on an ad hoc basis for specific instances.

Exempt Activities

No substantial part of the Issuer's activities shall consist of attempting to influence legislation or any election for public office. The Issuer may not engage in, or carry on, any activities not permitted to be engaged in, or carried on by, a corporation described in Section 501(c)(3) (and exempt from taxation under Section 501(a)) of the Code.