

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶

IRC SECTION 305 (a)


IRC SECTION 307 (a)

18 Can any resulting loss be recognized? ▶ SEE ATTACHMENT

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ THE REPORTABLE TAX YEAR IS DECEMBER 31, 2018.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ▶ 

Date ▶ 3/7/18

Print your name ▶ BOB FEHLMAN

Title ▶ SEVP, CFO, & TREASURER

| | | | | | |
|-------------------------------|---|---|-----------------------------------|---|-----------|
| Paid Preparer Use Only | Print/Type preparer's name | Preparer's signature | Date | Check <input type="checkbox"/> if self-employed | PTIN |
| | ROBERT PARKER, CPA |  | Date: 2018.03.06 10:59:47 -06'00' | | P00868782 |
| | Firm's name ▶ CROWE HORWATH LLP | | | Firm's EIN ▶ 35-0921680 | |
| | Firm's address ▶ 720 COOL SPRINGS BLVD, STE 600, FRANKLIN, TN 37067 | | | Phone no. 615-360-5500 | |

Attachment to Form 8937
Report of Organizational Actions Affecting Basis of Securities
Simmons First National Corporation
FEIN: 71-0407808

Part II, Line 14

On January 18, 2018, the board of directors of Simmons First National Corporation approved a two-for-one stock split of the Corporation's outstanding Class A common stock in the form of a 100% stock dividend. Each shareholder of record on the close of business on the record date received one additional share of common stock for each share held. The record date for the stock split was January 30, 2018, with the new shares distributed on February 8, 2018.

Part II, Line 15

As a result of the two-for-one stock split, shareholders received one additional share of common stock for each share owned as of January 30, 2018. Immediately after the stock dividend, in accordance with Internal Revenue Code Section 307(a), the tax basis of each share held prior to the stock dividend was divided equally between the original share and the new share issued. The number of shares held by each shareholder was doubled, but each shareholder's total basis and proportionate interest in the Company remained the same.

Part II, Line 16

A shareholder will multiply the basis in each share held before the stock split by 50% to determine the basis, after the stock split, in that share and the additional share distributed in the stock split.

Part II, Line 18

No loss can be recognized in connection with the two-for-one stock split completed in the form of a stock dividend.