Form **8937**(December 2017) Department of the Treasury Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

► See separate instructions.

OMB No. 1545-0123

Part I Reporting Issuer								
1 Issuer's name		_	***	2 Issuer's employer identification number (EIN)				
SIMMONS FIRST NAT	TIONAL CORPOR	71-0407808						
3 Name of contact for additional information 4		4 Telephon	e No. of contact	5 Email address of contact				
BOB FEHLMAN	501-558-		BOB.FEHLMAN@SIMMONSBANK.COM					
6 Number and street (or F	P.O. box if mail is not	7 City, town, or post office, state, and ZIP code of contact						
P.O. BOX 7009] a Ol	Monaton and decreased as	PINE BLUFF, AR 71611					
8 Date of action	9 Class	9 Classification and description						
ADDIT 12 2010		COMMO	N STOCK					
APRIL 12, 2019 10 CUSIP number	11 Serial number(s		12 Ticker symbol	13 Account number(s)				
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828730200	N/A		SFNC	N/A				
		h additional		See back of form for additional questions.				
				date against which shareholders' ownership is measured for				
the action ► SEE A								
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Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis > SEE ATTACHMENT								
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		asis and the c	lata that supports the calc	culation, such as the market values of securities and the				
valuation dates ► SE	E ATTACHMENT							
	 							

Part	II	Organizational Action (continued)			
17 L	ist the	applicable Internal Revenue Code section	n(s) and subsection(s) upon which the tax t	reatment is based	•	
		ION 368(A)				
		TON 354				
_		'ION 356		<u>. </u>		
		ION 358				
		ION 1221				
`		ION 1362				
INC	1001	10N 1302				
		<u> </u>				
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18 C	an any	y resulting loss be recognized? \triangleright SEE .	ATTACHMENT			
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40 0					DEDODELDE	
19 P	OTH	any other information necessary to imple	ment the adjustment, such as the reportab	ne tax year ► THE	REPORTABLE TAX YEAR	
15 DE	CEM.	BER 31, 2019.				
			<u>.</u>			
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	tinde	r penalties of perium. I declare that I have evan	mined this return, including accompanying sche	dules and statements	and to the best of my knowledge and	
	belief	f, it is true, correct, and complete. Declaration of	f preparer (other than officer) is based on all infor	mation of which prep	arer has any knowledge.	
Sign		0111		. ,		
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11010	Signa	ature >		Date ► O.1 (.	2017	
	Print	your name ► BOB FEHLMAN	In the second se			
Paid		Print/Type preparer's name	Preparer's signature	Date	Check if PTIN	
Prepa	ırer	ROBERT PARKER, CPA	<u></u>	1	self-employed P00868782	
Use C		Firm's name ► CROWE LLP			Firm's EIN ► 35-0921680	
		Firm's address ▶ 720 COOL SPRING	GS BLVD, STE 600, FRANKLIN	N, TN 37067	Phone no. 615-360-5500	
Send Fo	rm 89		to: Department of the Treasury, Internal Re			

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

Part II, Line 14

Simmons First National Corporation (SFNC) acquired Reliance Bancshares, Inc. (Reliance) through a merger transaction and Reliance simultaneously merged into SFNC effective April 12, 2019. The merger qualified as a tax-free reorganization under Section 368 of the Internal Revenue Code.

Part II, Line 15

Pursuant to the Agreement and Plan of Merger, each share of Reliance common stock was exchanged for 0.0431 shares of SFNC common stock and \$0.60 in cash plus cash in lieu of fractional shares. In total, 3,999,623 shares of SFNC stock were issued with a value of \$102,830,307 (\$25.71 per share) along with \$62,568,494 of cash including cash in lieu of fractional shares (calculated as \$24.94 per fractional share).

The merger qualified as a tax-free reorganization under Section 368 of the Internal Revenue Code. As such, the federal income tax consequences to former Reliance shareholders are determined under Code Sections 354, 356, 358 and 1221. A Reliance shareholder who receives cash and SFNC shares generally will recognize gain (but not loss) in the amount equal to the lesser of: (i) the amount by which the sum of the fair market value of the SFNC shares and cash received by the Reliance shareholder exceeds shareholder's adjusted tax basis in the Reliance shares; and (ii) the amount of cash received by such shareholder. Each Reliance shareholder's total tax basis in Reliance common stock should equal such shareholder's total tax basis in the Reliance stock surrendered in the merger transaction, decreased by the amount of cash received and increased by the amount of gain recognized in the transaction.

Part II, Line 16

In exchange for each share of Reliance common stock, the Reliance shareholder will receive 0.0431 shares of SFNC common stock and \$0.60 in cash, with total value of \$1.71. The shareholder will generally recognize capital gain (discussed in #18), with the nature of the gain being determined by how long Reliance stock was held by each individual shareholder.

The basis of SFNC shares received, once computed, must be allocated to the individual SFNC shares received in accordance with Treasury Regulation §1.358-2(a). See also Proposed Treasury Regulation §1.358-2(b). Since fewer shares of SFNC common stock were received than shares of Reliance common stock surrendered, the basis of the Reliance shares surrendered must be allocated to the shares of SFNC stock received in a manner that reflects, to the greatest extent possible, that a share of SFNC stock received is received in respect of Reliance shares of stock that were acquired on the same date and at the same price. To the extent it is not possible to allocate the basis in this manner, the basis of the Reliance shares surrendered must be allocated to the shares of SFNC stock received in a manner that minimizes the disparity in the holding periods of the surrendered shares whose basis is allocated to any particular SFNC share received. This could result in a single share of SFNC stock having a split basis and a split holding period. See Example (14) of Treasury Regulation §1.358-2(c) for an illustration of this principle. Each Reliance shareholder should consult their tax advisor for specific guidance.

The acquisition of Reliance by SFNC on April 12, 2019, qualified as a reorganization within the meaning of Section 368(A) of the Internal Revenue Code. Therefore, the federal income tax consequences to the Reliance shareholders are determined under Code Sections 354, 356, 358 and 1221. Former Reliance shareholders will maintain their historical aggregate tax basis in their newly issued SFNC shares, decreased by the amount of cash received and increased by the amount of gain recognized in the transaction. See explanation on Line 15 regarding the fair market value of SFNC stock.

Part II, Line 18

Reliance shareholders receiving a combination of SFNC stock and cash will generally recognize capital gain, but not loss, equal to the lesser of the total gain realized (difference between the value of cash and stock received over individual tax basis in the SFNC stock surrendered) and the amount of cash received in accordance with IRC Section 356(a)(1) and IRC Section 1001. Each Reliance shareholder should consult their tax advisor for specific guidance.