

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 368(A)

IRC SECTION 354

IRC SECTION 356

IRC SECTION 358

IRC SECTION 1221

IRC SECTION 302

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 ▶ SEE ATTACHMENT

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 ▶ *[Handwritten Signature]* Date ▶ *5/14/20*
Print your name ▶ *John V. Rayburn* Title ▶ *EVP / CFO*

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	JOHN V. RAYBURN, CPA	<i>[Handwritten Signature]</i>	<i>5/14/20</i>		P00429464
	Firm's name ▶ CARR, RIGGS & INGRAM, LLC	Firm's EIN ▶ 72-1396621		Phone no. 615-665-1811	
Firm's address ▶ 3011 ARMORY DRIVE, SUITE 190 NASHVILLE, TN 37204					

Reliant Bancorp, Inc.
Attachment to Form 9937
FEIN: 37-1641316

Report of Organizational Actions Affecting Basis of Securities

For purposes of this attachment, "Reliant" refers to the issuer, Reliant Bancorp, Inc. "FABK" refers to First Advantage Bancorp (FEIN: 26-0401680).

Part II, Line 14

The transaction is intended to qualify as a tax-free reorganization for U.S. federal tax purposes as FABK merged with and into PG Merger Sub, Inc., a Tennessee corporation and a wholly-owned subsidiary of Reliant, with FABK surviving the merger. Immediately following the initial merger and as part of a single integrated transaction, FABK merged with and into Reliant and continuing under the name "Reliant Bancorp, Inc." Immediately following the merger, First Advantage Bank, a wholly owned subsidiary of FABK, merged with and into Reliant Bank, a wholly owned subsidiary of Reliant, with Reliant Bank continuing as the surviving entity. The effective time of the merger was April 1, 2020 ("Effective Time"). As noted in the plan of merger between Reliant and FABK, shareholders of FABK common stock who held their shares of FABK common stock of record (directly or through their broker or nominee) as of the Effective Time received shares of Reliant common stock and cash.

In accordance with the merger agreement, each outstanding share of FABK common stock, par value \$0.01 per share (other than certain excluded shares), was converted into and cancelled in exchange for the right to receive (i) \$3.00 in cash, without interest, (ii) 1.17 shares of Reliant common stock, par value \$1.00 per share and potentially a proportional cash payment in lieu of issuance of any fractional share of Reliant common stock.

In addition, each outstanding option to purchase FABK common stock was cancelled in exchange for a cash payment in an amount equal to the product of (i) \$30.00 minus the per share exercise price of the option multiplied by (ii) the number of shares of FABK common stock subject to the option (to the extent not previously exercised).

Part II, Line 15

The tax basis of Reliant shares received in the merger will be generally determined as follows:

- The tax basis of FABK shares surrendered
- Reduced by the cash received in the merger (other than cash received in lieu of fractional shares)
- Increased by any taxable gain recognized in the exchange (other than gain or loss from fractional shares deemed sold)
- Reduced by the tax basis in any fractional shares deemed received in the exchange and sold

The tax basis of individual shares of Reliant is then determined by dividing the tax basis determined above by the number of Reliant shares received.

The FABK shareholders receiving cash in lieu of fractional shares of Reliant are deemed to have received the fractional shares in the exchange and then sold the fractional shares for cash. Taxable gain or loss will be equal to the difference between the tax basis of the shares deemed exchanged and the amount of cash received.

The following information is necessary to compute gain to be recognized in the exchange on a per share basis as to each share of FABK common stock that was held by a holder of record as of the Effective Time:

- Fair market value of Reliant common shares received per FABK common share:
\$10.25 x 1.17 shares = \$11.99 per share
- Cash received in exchange of a common share of FABK of \$3.00

Part II, Line 16

The basis of Reliant shares received, once computed as per above, must be allocated to the individual Reliant shares received.

Part II, Line 18

Based upon the merger agreement and the facts and circumstances known by Reliant, no loss will be recognized for federal income tax purposes in this transaction by FABK shareholders who received Reliant common stock and cash in exchange for their FABK common stock. A FABK shareholder receiving cash in lieu of fractional shares of FABK may recognize loss if the amount of cash received is less than the basis in the fractional shares.

Part II, Line 19

The reportable tax year is the tax year including April 1, 2020. The information disclosed in this return should not be relied upon as tax advice and each shareholder should consult their tax advisor as to reporting the results.