

## Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

▶ See separate instructions.

### Part I Reporting Issuer

<b>1</b> Issuer's name  RELIANT BANCORP, INC.		<b>2</b> Issuer's employer identification number (EIN)  37-1641316	
<b>3</b> Name of contact for additional information  DAN DELLINGER, CFO	<b>4</b> Telephone No. of contact  615-221-9161	<b>5</b> Email address of contact  DDELLINGER@RELIANTBANK.COM	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact  101 CREEKSTONE BLVD., SUITE 200		<b>7</b> City, town, or post office, state, and ZIP code of contact  FRANKLIN, TN 37064	
<b>8</b> Date of action  JANUARY 1, 2020		<b>9</b> Classification and description  COMMON STOCK	
<b>10</b> CUSIP number  75956B101	<b>11</b> Serial number(s)  N/A	<b>12</b> Ticker symbol  RBNC	<b>13</b> Account number(s)  N/A

### Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

**14** Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ SEE ATTACHMENT

**15** 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

**16** Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ SEE ATTACHMENT

**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 ▶ *Dan Decker*

Date ▶ *2/12/2020*

Print your name ▶ *Dan Decker*

Title ▶

**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>John Rayburn</i>	<i>1/31/20</i>		P00429464
Firm's name ▶	Firm's EIN ▶		Phone no.	
CARR, RIGGS & INGRAM, LLC	72-1396621		615-665-1811	
Firm's address ▶				
3011 ARMORY DRIVE, SUITE 190 NASHVILLE, TN 37204				

**Reliant Bancorp, Inc.**  
**Attachment to Form 997**  
**FEIN: 37-1641316**  
**Report of Organizational Actions Affecting Basis of Securities**

For purposes of this attachment, "Reliant" refers to the issuer, Reliant Bancorp, Inc. "TCB Holdings" refers to Tennessee Community Bank Holdings, Inc. (FEIN: 20-0041076).

**Part II, Line 14**

The transaction is intended to qualify as a tax-free reorganization for U.S. federal tax purposes as TCB Holdings merged with and into Reliant, with Reliant surviving the merger and continuing under the name "Reliant Bancorp, Inc." Immediately following the merger, Community Bank & Trust, a wholly owned subsidiary of TCB Holdings, 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 January 1, 2020 ("Effective Time"). As noted in the plan of merger between Reliant and TCB Holdings, shareholders of TCB Holdings common stock who held their shares of TCB Holdings common stock of record (directly or through their broker or nominee) as of the Effective Time received shares of Reliant common stock and cash.

Each TCB Holdings common shareholder of record as of the Effective Time became entitled to receive from Reliant 0.769 shares of Reliant common stock for each of their former shares of TCB Holdings common stock subject to surrender of the old TCB Holdings shares, plus \$17.13 in cash and potentially a proportional cash payment in lieu of the issuance of any fractional share of Reliant common stock.

**Part II, Line 15**

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

- The tax basis of TCB Holdings 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 TCB Holdings 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 TCB Holdings common stock that was held by a holder of record as of the Effective Time:

- Fair market value of Reliant common shares received per TCB Holdings common share:  
\$22.24 x 0.769 shares = \$17.10 per share
- Cash received in exchange of a common share of TCB Holdings of \$17.13

**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 TCB Holdings shareholders who received Reliant common stock and cash in exchange for their TCB Holdings common stock. A TCB Holdings shareholder receiving cash in lieu of fractional shares of TCB Holdings 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 January 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.