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

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

► See separate instructions.

Part I Reporting Issuer				
1 Issuer's name		2 Issuer's employer identification number (EIN)		
THE TAMPA BANKING COMPANY		59-2775258		
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact		
RON HERNANDEZ	813-872-1216	RHERNANDEZ@BANKOFTAMPA.COM 7 City, town, or post office, state, and ZIP code of contact		
6 Number and street (or P.O. box if mail is not	delivered to street address) of contact	7 City, town, or post onice, state, and 212 code of contact		
601 BAYSHORE BOULEVARD		TAMPA, FL 33606		
8 Date of action	,			
OCTOBER 1, 2021	COMMON STOCK	49 Assert number(a)		
10 CUSIP number 11 Serial number	(s) 12 Ticker symbol	13 Account number(s)		
Part II Organizational Action Atta	ch additional statements if needed. Se	e back of form for additional questions.		
14 Describe the organizational action and, if a	applicable, the date of the action or the date	e against which shareholders' ownership is measured for		
the action ► SEE ATTACHMENT				
		and the state of t		
		ty in the hands of a U.S. taxpayer as an adjustment per		
share or as a percentage of old basis ▶ S	EE ATTACHMENT			
16 Describe the calculation of the change in	basis and the data that supports the calcula	ation, such as the market values of securities and the		
valuation dates ► SEE ATTACHMENT				
				
~				

Pa	rt II	Org	anization	al Action (continued)					
17						s) and subse	ction(s) upon	which the tax tr	reatment is based ▶	SEE ATTACHMENT
18	Cai	any res	ulting loss be	recognized?	SEE A	TTACHME	NT			
					_					
_										
_										
_										
	-									
19	Pro	vide anv	other inform	ation necess	arv to implem	ent the adju	stment, such	as the reportab	le tax year ▶ SEE	ATTACHMENT
		vide diriy								
	_									
_										
_										
_										
_										
_		Under pe	nallies of perju	ry, I declare th	at I have exam	ined this retu	rn, including ac	companying sche	edules and statements,	and to the best of my knowledge an
		belief, it is	itrie concci,	and complete.	Declaration of p	preparer (othe	r than officer) is	based on all info	rmation of which prepa	rer has any knowledge.
Sig He	ro l		14	ana a					Data > 11/4 /	ſ
ne	16	Signature	X						Date ► 11/2	21
		Print your	name ► SU	AN MILLE	IR /				Title ► CFO	•
Pa		Pri	inii we prepai	e s name		Proparer's si	gnature A	1	Date	Check if PTIN
Pre	ера	CI -	BERT P	CROWE T	T.D.	16	4-14	Tan	11/2/2021	self-employed P00868782 Firm's EIN ▶35-0921680
Us	e O			CROWE L	LP L SPRING	S BLVD.	STE 600	FRANKLIN	, TN 37067	Phone no. 615-360-5500
Sen	d Fo	m 8937	including ac	companying	statements) to	o: Departme	nt of the Trea	sury, Internal Re	evenue Service, Ogo	

Attachment to Form 8937 Report of Organizational Actions Affecting Basis of Securities The Tampa Banking Company

FEIN: 59-2775258

Part II, Line 14

The Tampa Banking Company ("TBBC"), through its wholly-owned subsidiary Bank of Tampa (FEIN: 59-1447189, "BOT"), acquired Hillsboro Bank (FEIN: 59-3491132, "HB") through a merger transaction and HB simultaneously merged into Bank of Tampa ("BOT") effective October 1, 2021. 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 HB common stock was exchanged for a combination of .3905 shares of TBBC common stock and cash. Total consideration paid was \$29,553,924, \$25,190,908 in TBBC stock and \$4,362,585 in cash. Each HB shareholder had their choice to receive TBBC stock only, cash only, or a combination of TBBC stock and cash.

For those shareholders who received only cash consideration in the exchange, there were no TBBC shares received and therefore, no basis calculation necessary.

For those HB shareholders who received a combination of cash and stock, the aggregate basis of TBBC shares received in the merger will be generally determined in accordance with IRC Section 358(a), as follows:

- · The basis of HB shares exchanged
- Reduced by the cash received in the merger (if any)
- Increased by any gain recognized in the exchange, computed on a per share basis.

Part II, Line 16

The basis of TBBC shares received, once computed, must be allocated to the individual TBBC shares received in accordance with Treasury Regulation §1.358-2(a). Since fewer shares of TBBC common stock were received than shares of HB common stock surrendered, the basis of the HB shares surrendered must be allocated to the shares of TBBC stock received in a manner that reflects, to the greatest extent possible, that a share of TBBC stock received is received in respect of HB shares of stock that were acquired on the same date and at the same price. To the extent it is not possible to allocate basis in this manner, the basis of the HB shares surrendered must be allocated to the shares of TBBC stock received in a manner that minimizes the disparity in the holding periods of the surrendered shares whose basis is allocated to any particulate TBBC share received. This could result in a single share of TBBC 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.

Part II, Line 17

Tax treatment of the merger is based on the following Internal Revenue Code (IRC) sections and subsections as more fully discussed below: 368(A), 354, 356, 358, and 1221.

Part II, Line 18

HB shareholders who receive solely cash will recognize gain or loss equal to the difference between the taxable basis of the HB shares surrendered and the amount of cash received. The deductibility of capital losses is subject to limitation.

HB shareholders who receive a combination of TBBC stock and cash may generally recognize gain, but not loss, equal to the lesser of the total gain realized or the difference between the taxable basis allocable to the whole or fractional shares surrendered and the amount of cash received.

HB shareholders who receive only TBBC stock will generally not recognize gain or loss.

Part II, Line 19

xion is the sharehold	ers tax year that inci	udes October 1, 20	ecurities as a result 121.	