

Part II Organizational Action *(continued)*

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

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 ▶ Christian W. Bockhop Date ▶ 4/30/25

Print your name ▶ **CHRISTIAN W. BOCKHOP** Title ▶ **SENIOR VICE PRESIDENT**

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.

Renasant Corporation
Attachment to Form 8937
FEIN: 64-0676974

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (hereinafter the “Code”), and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations relating to the effects of the Merger (as described below) between Renasant Corporation and The First Bancshares, Inc. on the tax basis of Renasant Corporation stock received in the Merger in exchange for The First Bancshares, Inc. stock. The information contained herein does not constitute tax advice, and you are strongly encouraged to consult a competent tax advisor regarding the particular consequences of the Merger to you, including the applicability and effect of all US. Federal, state and local, and foreign tax laws. Renasant Corporation does not provide tax advice to its stockholders. The information contained herein does not purport to be complete or to describe the consequences that may apply to particular categories of stockholders or to your unique tax posture. You are urged to read the Material U.S. Federal Income Tax Consequences of the Merger contained within the Form 424(b)(3) filed by Renasant Corporation with the Securities and Exchange Commission on September 17, 2024, which can be accessed at www.sec.gov.

Item 10. CUSIP number

The CUSIP number of The First Bancshares, Inc. (hereinafter “FBMS”) stock is 318916103
The CUSIP number of Renasant Corporation (hereinafter “RNST”) stock is 75970E107

Item 14. Description of the Organizational Action

Pursuant to the terms of the Agreement and Plan of Merger dated as of July 29, 2024 (the “Agreement”), by and between FBMS and RNST, FBMS merged with an into RNST (the “Merger”), subject to the terms and conditions set forth in the Agreement, with RNST surviving. In the Merger, each share of FBMS common stock issued and outstanding was converted into the right to receive one share of RNST common stock (the “Merger Consideration”). RNST did not issue any fractional shares of RNST common stock in the merger. Instead, any FBMS shareholder who otherwise would have been entitled to receive a fractional share of RNST common stock, received an amount in cash upon the completion of the Merger in lieu of a fractional share of RNST common stock. The cash value of a fractional share was based on a share price of \$35.25, which was computed by averaging the closing price over twenty days from February 19, 2025 through March 18, 2025.

Items 15 and 16. Description of the Quantitative Effect of the Organizational Action, and Description of the Calculation of the Change in Basis

Renasant Corporation believes that the Merger qualifies as a tax-free reorganization per section 368(a)(1)(A) of the Code. Generally, ignoring the impact of cash paid in lieu of fraction shares, the tax basis of RNST common stock received by an FBMS shareholder will be equal to their tax basis in the FBMS stock they surrendered. For shareholders not receiving cash in lieu of fractional shares, generally the Merger will not result in a taxable gain or loss.

The receipt by an FBMS shareholder of cash in lieu of fractional shares of RNST common stock will be treated as if the fractional shares had been distributed to the FBMS shareholders in connection with the Merger and then had been redeemed for cash in a taxable transaction. Gain or loss will be recognized

based on the difference between the amount of cash received in lieu of the fractional share and the portion of the shareholder's aggregate tax basis in the shares of FBMS common stock surrendered that is allocable to the fractional share. The gain or loss generally will be long-term capital gain or loss if the holding period of such shares of FBMS stock is more than one year at the effective date of the merger. Note that the deductibility of capital losses may be limited.

For example, assume Shareholder A had 1.5 shares of FBMS stock with an aggregate tax basis of \$45, and upon consummation of the Merger received one share of RNST stock, plus \$17.63 (the \$17.63 representing the payment for Shareholder A's fractional share of 0.5 shares of FBMS stock). Shareholder A's tax basis in FBMS stock prior to the Merger would be \$30 per share. After the Merger, Shareholder A's tax basis in its one share of RNST stock is \$30. Shareholder A would have tax basis in the stock deemed sold of \$15 (\$30 tax basis per share, times 0.5 shares), and would report a taxable gain of \$2.63 (Shareholder A's \$17.63 payment for its fractional share of 0.5 shares of FBMS stock, less its tax basis in these shares of \$15). Assuming Shareholder A held its FBMS stock for greater than one year, this \$2.63 gain would be a long-term capital gain.

The details provided above are generally applicable to most taxpayers but may not be true for your unique individual tax posture. The above example is a simplified example for illustrative purposes only, and may not be analogous to your fact pattern. You are strongly urged to consult with a competent tax advisor, who can advise you on the implications of the Merger on your personal tax posture.

Item 17. List of Applicable Code Sections

As stated above, the Merger was structured to qualify as a tax-free merger pursuant to Code section 368(a)(1)(A). In general, the income tax consequences to shareholders are determined under Code sections 354, 358, and 1221. Payments in lieu of fractional shares are determined under Code section 302, pursuant to Rev. Rul. 66-365.

Item 18. Can Resulting Losses be Recognized

Generally, shareholders will not be able to recognize a loss due to the Merger. Shareholders who receive payments in lieu of fractional shares of stock may recognize a gain or loss as described above on these payments.

Item 19. Other Information

The reportable tax year of the adjustment to the basis of securities as a result of the Merger is the shareholder's tax year that includes April 1, 2025.