



**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

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18 Can any resulting loss be recognized? ▶ See Attachment


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19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ See Attachment

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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 ▶ \_\_\_\_\_ Date ▶ \_\_\_\_\_

<b>Paid Preparer Use Only</b>	Print your name ▶ <u>Clay Stinnett</u>		Title ▶ <u>Chief Financial Officer</u>	
	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed
	<u>Corey Pfeifer</u>		<u>6/5/2026</u>	PTIN <u>P01319923</u>
	Firm's name ▶ <u>Crowe LLP</u>	Firm's address ▶ <u>600 S. Tryon Street, 18th Floor Charlotte, NC 28202</u>		Firm's EIN ▶ <u>35-0921680</u> Phone no. (704) 593-4110

**Stock Yards Bancorp, Inc.**  
**61-1137529**  
**Attachment to Form 8937**

**Report of Organizational Actions Affecting Basis of Securities**

***CONSULT YOUR TAX ADVISOR***

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the “Code”), and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations relating to the effects on the tax basis of Stock Yards Bancorp, Inc. (“SYB”) common stock received in exchange for Field & Main Bancorp, Inc. (“F&M”) common stock as a result of the merger of F&M with and into SYB. The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. SYB does not provide tax advice to its shareholders. The tax treatment described below may not apply to all former shareholders of F&M. You are urged to consult your own tax advisor regarding the particular consequences of the merger to you, including the applicability and effect of all U.S. federal, state and local and foreign tax laws.

**Form 8937 Part I, Box 9**

The securities subject to reporting include all shares of Stock Yards Bancorp, Inc. (“SYB”) common stock issued in exchange for the outstanding common stock of Field & Main Bancorp, Inc. (“F&M”) as a result of the merger of F&M with and into SYB.

**Form 8937 Part II, Box 14**

On May 1, 2026 (“Effective Date”), pursuant to the Agreement and Plan of Merger dated January 27, 2026 (the “Merger Agreement”), by and between SYB and F&M, River Holdings, Inc., a wholly owned subsidiary of SYB, merged with and into F&M, with F&M continuing as the surviving corporation (the “Merger”). Immediately following the Merger, F&M merged with and into SYB, with SYB continuing as the surviving corporation (the “Upstream Merger”). Immediately following the Upstream Merger, Field & Main Bank, Inc., the banking subsidiary of F&M, merged with and into Stock Yards Bank & Trust Company, the banking subsidiary of SYB, with Stock Yards Bank & Trust Company as the surviving bank.

As a result of the Merger, each share of F&M common stock, par value \$10.00 per share, issued and outstanding immediately prior to the Effective Date was converted into the right to receive 0.6550 shares of SYB common stock, no par value.

No fractional shares of SYB common stock were issued in connection with the Merger, and F&M shareholders were entitled to receive cash in lieu of such fractional shares.

**Form 8937 Part II, Box 15**

The Merger qualifies as a tax-free reorganization within the meaning of Section 368(a) of the Internal Revenue Code of 1986, as amended (the "Code").

The receipt by any F&M shareholder of SYB common stock in exchange for F&M common stock in the Merger affects such shareholder's tax basis. Generally, the aggregate tax basis of SYB common stock received by any F&M shareholder that exchanges its shares of F&M common stock for the Merger consideration will be equal to the aggregate adjusted tax basis of the shares of F&M common stock surrendered, decreased by the amount of any cash received in the exchange (excluding any cash received in lieu of a fractional share of SYB common stock), and increased by the amount of gain (excluding any gain or loss resulting from the deemed receipt and redemption of fractional shares), if any, recognized by the F&M shareholder on the exchange.

F&M shareholders who receive cash in lieu of a fractional share of SYB common stock are, for purposes of determining the taxability of that cash, deemed to have received a fractional share in the exchange and then as having sold the fractional share for cash. These F&M shareholders will generally recognize a taxable gain or loss equal to the difference between the tax basis of the F&M common shares deemed to have been exchanged for the fractional shares and the amount of cash received.

The holding period of any shares of SYB common stock received by F&M shareholders in the Merger generally will include the holding period of shares of F&M common stock exchanged for such SYB common stock.

**Form 8937 Part II, Box 16**

Refer to the description of the basis calculation in Part II, Box 15 above. The April 30, 2026, closing price of a single share of SYB common stock on NASDAQ was \$72.33, which was used as fair market value of the transaction.

**Form 8937 Part II, Box 17**

The Merger qualifies as a tax-free reorganization within the meaning of Section 368(a) of the Code. Other relevant Code sections include 354, 356, 358, 368, 1001, 1221 and 1223.

**Form 8937 Part II, Box 18**

No loss can be recognized upon the exchange of F&M common stock for SYB common stock. If a taxable loss is calculated on the deemed sale of a fractional share of SYB common stock deemed to have been received in the exchange, this loss can be recognized.

**Form 8937 Part II, Box 19**

The Merger was completed on May 1, 2026. Consequently, the reportable tax year of the F&M shareholders for reporting the tax effect of the share exchange and cash receipt is the tax year that includes the May 1, 2026, Merger date. This is the 2026 calendar year for those shareholders who report taxable income based on a calendar year.