

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name First Horizon National Corporation		2 Issuer's employer identification number (EIN) 62-0803242	
3 Name of contact for additional information Janet E. Denkler	4 Telephone No. of contact (901) 523-4478	5 Email address of contact jedenkler@firsthorizon.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 165 Madison Avenue		7 City, town, or post office, state, and Zip code of contact Memphis, TN 38103	
8 Date of action 10/2/2015		9 Classification and description See attachment	
10 CUSIP number 320517105	11 Serial number(s)	12 Ticker symbol FHN	13 Account number(s)

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 ▶ _____

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

Sign Here	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.			
	Signature ▶	<i>Janet E. Denkler</i>	Date ▶	<i>12/23/2015</i>
	Print your name ▶	<i>Janet E. Denkler</i>	Title ▶	<i>V.P. and Asst Treasurer</i>
Paid Preparer Use Only	Print/Type preparer's name	<i>William Foxes</i>	Preparer's signature	<i>W Foxes</i>
	Firm's name	▶ BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ		Check <input type="checkbox"/> if self-employed
	Firm's address	▶ 166 MADISON SUITE 2000		Firm's EIN ▶
				Phone no.

First Horizon National Corporation

Attachment to Form 8937

Report of Organizational Actions Affecting Basis of Securities

Form 8937 Part I, Box 9:

The securities subject to reporting include all shares of First Horizon National Corporation ("FHN") issued in exchange for the outstanding common stock of TrustAtlantic Financial Corporation ("TrustAtlantic") as a result of the merger of TrustAtlantic with and into a subsidiary of FHN on October 2, 2015 (the "Merger").

Form 8937 Part II, Box 14:

As a result of the Merger, TrustAtlantic shareholders exchanged each share of their common stock for 1.3261 shares of common stock of FHN or a right to receive an equivalent amount of cash. Elections by the TrustAtlantic shareholders to receive cash or stock were subject to the requirement that 25% of the Merger Consideration must be in the form of cash. Because of the elections made in connection with the Merger, some TrustAtlantic shareholders received only shares of FHN common stock (except for cash received in lieu of fractional shares) and some TrustAtlantic shareholders received a combination of shares of FHN common stock and cash.

Form 8937 Part II, Box 15 & 16:

FHN believes that the Merger qualifies as a reorganization within the meaning of Section 368(a) of the Internal Revenue Code. As a result, the tax basis of the shares of FHN common stock received by a TrustAtlantic shareholder will be the same as the basis of the shares of TrustAtlantic common stock surrendered in exchange for the shares of FHN common stock, plus any gain recognized by such shareholder in the Merger and minus any cash received by such shareholder in the Merger.

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

Form 8937 Part II, Box 17:

FHN believes that the Merger qualifies as a reorganization within the meaning of Section 368(a) of the Code. Consequently, the federal tax consequences of the Merger to the TrustAtlantic shareholders are determined under Sections 354, 356, 358 and 1221 of the Code.

Form 8937 Part II, Box 18:

In general, a TrustAtlantic shareholder who received any FHN common stock in exchange for his or her TrustAtlantic common stock cannot recognize any loss, except as discussed above with respect to fractional shares.

Form 8937 Part II, Box 19:

In general, any adjustment to the tax basis that causes gain or loss to be recognized by a TrustAtlantic shareholder as a result of the completion of the Merger should be reported for the taxable year which includes October 2, 2015.

No ruling from the Internal Revenue Service (the "IRS") has been requested, or will be obtained, regarding the U.S. federal income tax consequences of the Merger described in this report. This report is not binding on the IRS and the IRS and the U.S. courts could disagree with one or more of the positions described above.

The above information does not constitute tax advice. It does not address the tax consequences that may apply to any particular shareholder, and each shareholder is urged to consult his or her own tax advisor regarding the tax consequences of the merger.