

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 ▶

[The merger became effective on April 1, 2026, and, therefore, the reportable taxable year is the taxable year that includes the April 1, 2026 effective date.](#)

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 ▶ /s/ Robert A. Cafera, Jr. Date ▶ May 7, 2026

Print your name ▶ Robert A. Cafera, Jr. Title ▶ Chief Financial Officer

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.			

FIRSTSUN CAPITAL BANCORP
EIN 81-4552413
Attachment to Form 8937

Merger of First Foundation Inc. with and into FirstSun Capital Bancorp

REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

The information contained in Form 8937 and this attachment does not constitute tax advice and does not purport to be complete or describe the consequences that may apply to particular categories of stockholders. **Each stockholder is advised to consult his or her tax advisor regarding the tax treatment of the merger.** Further discussion of the tax consequences of the merger can be found in FirstSun Capital Bancorp’s Registration Statement on Form S-4/A filed with the U.S. Securities and Exchange Commission on January 14, 2026 under the heading “Material U.S. Federal Income Tax Consequences of the Merger” available at www.sec.gov (the “*Form S-4*”).

Part I, Box 9

Securities Issued

FirstSun Capital Bancorp common stock
FirstSun Capital Bancorp non-voting common stock

Securities Retired

First Foundation Inc. common stock
First Foundation Inc. Series A Noncumulative Convertible Preferred Stock
First Foundation Inc. Series C Non-Voting Common Equity Equivalent Stock

Part I, Box 10 and 12

Security	CUSIP number	Ticker Symbol
Securities Issued		
FirstSun Capital Bancorp common stock	337 67U 107	FSUN (Nasdaq)
FirstSun Capital Bancorp non-voting common stock	337 67U 206	N/A
Securities Retired		
First Foundation Inc. common stock	320 26V 104	FFWM (NYSE)
First Foundation Inc. Series A Noncumulative Convertible Preferred Stock	320 26V A99	N/A
First Foundation Inc. Series C Non-Voting Common Equity Equivalent Stock	BR2 084 E99	N/A

Part II, Box 14

The organizational action involves the merger of First Foundation Inc. (“*First Foundation*”) with and into FirstSun Capital Bancorp (“*FirstSun*”) on April 1, 2026, with FirstSun as the surviving corporation (the “*merger*”). The merger was consummated pursuant to that certain Agreement and

Plan of Merger, dated as of October 27, 2025, as amended, by and between FirstSun and First Foundation (the “*merger agreement*”).

As a result of the merger, each share of First Foundation common stock issued and outstanding immediately prior to the effective time became entitled to receive 0.16083 of a share of FirstSun common stock (the “*exchange ratio*”), subject to certain exceptions described in the merger agreement.

Under the merger agreement, if, as a result of receiving shares of FirstSun common stock in the merger, any holder (together with its affiliates) would own more than 4.99% of the outstanding shares of FirstSun voting common stock immediately following the effective time, such holder may elect to receive shares of FirstSun non-voting common stock for the portion of shares in excess of 4.99%.

In addition, at the effective time, each then-outstanding share of First Foundation Series A Noncumulative Convertible Preferred Stock (the “*Series A stock*”) and First Foundation Series C Non-Voting Common Equity Equivalent Stock (the “*Series C stock*”) and together with the Series A stock, the “*First Foundation Preferred Stock*”) was converted into the right to receive 0.16083 of a share of FirstSun common stock for each share of First Foundation common stock into which the First Foundation Preferred Stock was convertible into immediately prior to the effective time.

Holders of First Foundation common stock and holders of First Foundation Preferred Stock who otherwise were entitled to a fractional share of FirstSun common stock (voting or non-voting) instead received an amount in cash (rounded to the nearest cent) determined by multiplying the average of the closing-sale prices per share of FirstSun voting common stock on the Nasdaq Stock Market LLC (“*Nasdaq*”) for the consecutive period of five full trading days ending on the trading day immediately preceding the April 1, 2026 effective date (the “*FirstSun closing share value*”) by the fraction of a share (rounded to the nearest one-thousandth when expressed in decimal form). The FirstSun closing share value was \$36.34.

Part II, Box 15

As described in the Form S-4, the merger is intended to qualify as a “reorganization” within the meaning of Section 368(a) of the Internal Revenue Code of 1986, as amended (the “*Code*”). If the merger so qualifies, the aggregate tax basis of the FirstSun common stock (voting or non-voting) that a U.S. holder receives in the merger will equal such U.S. holder’s aggregate adjusted tax basis in the shares of First Foundation common stock or First Foundation Preferred Stock that it surrenders in the merger, decreased by the amount of any tax basis allocable to any fractional share interest for which cash is received, as described below.

The holding period for the shares of FirstSun stock (voting or non-voting) that a U.S. holder receives in the merger (including any fractional share deemed received and redeemed for cash as described below) will include the holding period for the shares of First Foundation common stock or First Foundation Preferred Stock that such U.S. holder surrenders in the merger. The basis and holding period of each block of FirstSun common stock (voting and non-voting) a U.S. holder receives will be determined on a block-for-block basis depending on the basis and holding period of the blocks of First Foundation common stock and/or First Foundation Preferred Stock exchanged for such block of FirstSun common stock (voting or non-voting). A U.S. holder of First Foundation common stock or First Foundation Preferred Stock who receives cash instead of a

fractional share of FirstSun common stock will be treated as having received such fractional share of FirstSun common stock in the merger and then as having received cash in redemption of such fractional share of FirstSun common stock. As a result, such U.S. holder generally will recognize gain or loss equal to the difference between the amount of cash received instead of a fractional share and the U.S. holder's adjusted tax basis allocable to the fractional share of FirstSun common stock it is treated as receiving. Such gain or loss generally will be capital gain or loss and will be long-term capital gain or loss if, as of the effective time of the merger, the holding period for such fractional share (including the holding period of shares of First Foundation common stock and/or First Foundation Preferred Stock surrendered therefor) exceeds one year.

Part II, Box 16

Refer to the description of the basis calculation in Part II, Box 15 above. The closing price on March 31, 2026, the last business day before the effective date of the merger, for a share of FirstSun common stock on Nasdaq was \$36.46.

Part II, Box 17

Tax consequences to surrendering stockholders of First Foundation common stock or First Foundation Preferred Stock are determined under Sections 302, 354, 356, 358, 368, 1001, 1221, and 1223 of the Code.

Part II, Box 18

If the merger qualifies as a "reorganization" within the meaning of Section 368(a) of the Code, a U.S. holder will not recognize loss on the exchange of First Foundation common stock or First Foundation Preferred Stock for shares of FirstSun common stock (voting or non-voting), except that loss may be recognized by those U.S. holders treated as having received a fractional share pursuant to the merger and then as having exchanged that fractional share for cash to the extent the amount by which the cash received by such holder is less than the holder's basis in the fractional shares as set forth above.