

► See separate instructions.

Part I	Reporting Issuer
--------	------------------

<b>1 Issuer's name</b> Eagle Bancorp Montana, Inc.		<b>2 Issuer's employer identification number (EIN)</b> 27-1449820	
<b>3 Name of contact for additional information</b> Laura Clark	<b>4 Telephone No. of contact</b> 406-442-3080	<b>5 Email address of contact</b> lclark@oppbank.com	
<b>6 Number and street (or P.O. box if mail is not delivered to street address) of contact</b> P.O. Box 4999		<b>7 City, town, or post office, state, and ZIP code of contact</b> Helena, MT 59604-4999	
<b>8 Date of action</b> 1/31/2018		<b>9 Classification and description</b> Reorganization pursuant to IRC 368(a)	
<b>10 CUSIP number</b> 269426100	<b>11 Serial number(s)</b>	<b>12 Ticker symbol</b> EBMT	<b>13 Account number(s)</b>

**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 ► IRC Sections 354, 356, 358 and 368(a)

**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 adjustment to basis would be taken into account in the tax year of the shareholder during which the merger occurred (e.g., 2018 for calendar year taxpayers).

**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 ►

*Laura Clark*

Date ►

*3/8/18*

Print your name ► Laura Clark

Title ► Senior VP/Chief Financial Officer

**Paid  
Preparer  
Use Only**

Print/Type preparer's name

Sean Clancy

Preparer's signature

Date

Check ☐ if  
self-employed

PTIN

P01454715

Firm's name ► Nixon Peabody LLP

Firm's EIN ► 16-0764720

Firm's address ► 799 9th St. NW, Suite 500, Washington, DC 20001

Phone no. (202) 585-8332

Send Form 8937 (including accompanying statements) to: Department of the Treasury, Internal Revenue Service, Ogden, UT 84201-0054

**Eagle Bancorp Montana, Inc.**

**EIN: 27-1449820**

**Attachment to IRS Form 8937**

**REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES**

**Form 8937 Part II, Line 14:**

On January 31, 2018, TwinCo, Inc. ("TwinCo") merged into Eagle Bancorp Montana, Inc. ("Eagle") with Eagle surviving in a merger transaction pursuant to Section 368(a) of the Internal Revenue Code (the "Code").

The TwinCo shareholders exchanged each of their TwinCo common stock (other than excluded shares and dissenting shares) into a right to receive either: (1) a combination of \$247.16 in cash and 11.1540 shares of Eagle common stock (the "Mixed Election"); (2) \$449.38 in cash (the "Cash Election"); or (3) 24.7866 shares of Eagle common stock (the "Stock Election"). TwinCo shareholders who made no election or an untimely election received the Mixed Election.

**Form 8937 Part II, Lines 15 & 16:**

For each TwinCo shareholder who received the Stock Election, the aggregate tax basis in the Eagle common stock received pursuant to the transaction should equal the aggregate tax basis in the original TwinCo common stock surrendered in the transaction, reduced by the basis attributable to any fractional share of Eagle common stock deemed sold as explained below.

For each TwinCo shareholder who received the Cash Election, there was no Eagle common stock received and therefore there is no basis calculation necessary.

Each TwinCo shareholder who received the Mixed Election generally will recognize gain (but not loss) equal to the lesser of (1) the amount of cash treated as received in exchange for TwinCo common stock in the merger (excluding any cash received in lieu of a fractional share of Eagle common stock) and (2) the amount of gain realized in the transaction. The amount of gain realized in the transaction will equal the excess, if any, of (a) the sum of the amount of cash treated as received in exchange for TwinCo common stock in the merger (excluding any cash received in lieu of a fractional share of Eagle common stock) plus the fair market value of Eagle common stock (including the fair market value of any fractional share) received in the merger, over (b) the cost basis in the TwinCo common stock exchanged. To the extent TwinCo shareholders owned separate, identifiable blocks of TwinCo common stock immediately prior to the merger, gain or loss must be calculated separately for each identifiable block of shares surrendered in the merger, and loss realized on one block of shares may not be used to offset gain realized on another block of shares. Shareholders owning separate, identifiable blocks of TwinCo common stock should consult with a tax advisor to determine the allocation of Eagle common stock and cash consideration received between such blocks of TwinCo common stock, the amount of any gain to be recognized, and the possibility of recognizing any loss.

Fair market value is generally the price at which property would change hands between a willing buyer and a willing seller, neither being under any compulsion to buy or to sell and both having reasonably knowledge of the facts. Shareholders should consult with a tax advisor to determine what measure of fair market value is appropriate.

For each TwinCo shareholder who received the Mixed Election, the aggregate tax basis of Eagle common stock received (including the basis in any fractional share deemed sold for cash) will be equal to the aggregate tax basis of TwinCo common stock surrendered, decreased by the amount of cash received (other than cash received in respect of a fractional share) and increased by the amount of gain, if any, recognized (but excluding any gain realized in connection with the deemed sale of a fractional share of Eagle common stock as discussed below). To the extent TwinCo shareholders owned separate, identifiable blocks of TwinCo common stock immediately prior to the merger, the aggregate basis of the Eagle common stock received must be apportioned among the shares in such a manner as to replicate the previously owned blocks of TwinCo common stock. Shareholders owning separate, identifiable blocks of TwinCo common stock should consult with a tax advisor to determine the tax bases and/or holding periods of Eagle common stock received.

Holders of TwinCo common stock immediately prior to the merger who received cash in lieu of a fractional share of Eagle common stock generally should be treated as having received such fractional share in the merger and then as having received cash in exchange for such fractional share. Gain or loss generally should be recognized based on the difference between the amount of cash received in lieu of the fractional share and the adjusted tax basis allocated to such fractional share of Eagle common stock.

Shareholders should consult with a qualified tax advisor for questions regarding the specific tax treatment of this transaction based on their individual facts and circumstances.

**Form 8937 Part II, Line 18:**

TwinCo shareholders who received the Stock Election generally should not recognize any gain or loss.

TwinCo shareholders who received the Cash Election should recognize capital gain or loss equal to the difference between the amount of cash received and the costs basis of the TwinCo common stock.

TwinCo shareholders who received the Mixed Election may generally recognize gain (but not loss) equal to the lesser of (1) the amount of cash treated as received in exchange for TwinCo common stock in the merger (excluding any cash received in lieu of a fractional share of Eagle common stock) and (2) the amount of gain realized in the transaction. The amount of gain realized in the transaction will equal the excess, if any, of (a) the sum of the amount of cash treated as received in exchange for TwinCo common stock in the merger (excluding any cash received in lieu of a fractional share of Eagle common stock) plus the fair market value of Eagle common stock (including the fair market value of any fractional share) received in the merger, over (b) the cost basis in the TwinCo common stock exchanged.