



ASSOCIATED BANC-CORP

THIRD-PARTY CODE OF CONDUCT

June 2024

Associated Banc-Corp (together with its subsidiaries, “Associated,” “we” or the “Company”) is committed to serving its customers with integrity and complying with the laws and regulations that apply to its business. We expect our vendors, suppliers, distributors, partners, business associates, and third-party representatives (“**Third Parties**”) to uphold these standards of conduct and professional integrity and communicate them to their organization.

This Third-Party Code of Conduct (“Code”) sets forth Associated’s expectation that its **Third Parties uphold the highest standards of ethics and comply with all applicable laws and regulations.** These expectations should complement each Third Parties own company policies, applicable legal requirements, and the terms of any agreements that a Third-Party may have with Associated. Associated reserves the right to review, monitor, and verify compliance with this Code. Associated will take appropriate steps in its judgment in response to actual or suspected non-compliance with this Code (consistent with any applicable agreement terms), such as requesting a Third-Party audit, requiring a corrective action plan, termination of the Third-Party relationship, or other consequences available under applicable laws.

Associated’s **Code of Business Conduct and Ethics**, *which sets forth our compliance standards in more detail, is available at* <https://investor.associatedbank.com/corporate-information/documents/default.aspx>.

Associated encourages Third Parties to raise questions or concerns about this Code to their Associated point of contact.

Third Parties shall promptly report any violations of laws, rules or regulations or this Code via the Associated Ethics Hotline, at (877) 781-2432 (anonymously or otherwise).

Compliance with Applicable Governmental Laws, Rules, and Regulations

- Associated expects its Third Parties to comply with both the letter and the spirit of all laws, rules, and regulations that apply to the Third Parties business, particularly those related to Third Parties performance of duties for Associated.

Anti-Bribery, Anti-Corruption & Business Expenses

- Associated does not tolerate bribes, kickbacks, or illegal quid pro quos in any way related to the Company's business. Associated prohibits Third Parties from corruptly giving anything of value, directly or indirectly, to any person (whether a private person or public official) in order to obtain or retain business or secure an unfair business advantage.
- All business expenses provided by Third Parties related to Associated's business – including gifts, hospitality, or other business gratuities – must comply with any agreements with Associated and with applicable anti-corruption laws and ethics rules.

Anti-Money Laundering

- Associated expects its Third Parties to comply with all applicable anti-money laundering laws and regulations.

Conflicts of Interest & Corporate Opportunities

- Third Parties (and their employees) must avoid actual or potential business or financial conflicts of interest involving Associated – i.e., instances where the Third Parties personal interests (including interests of the Third-Party itself or the Third Parties employees, officers, or directors) interfere or appear to interfere with Associated's interests.
- Third Parties (and their employees) are prohibited from taking for themselves personally opportunities that are (a) discovered through the use of Associated property, information, or position; (b) using Associated property, information, or position, directly or indirectly, for position or personal gain; or (c) competing with Associated for business opportunities.
- Any actual or potential conflicts of interest must be promptly reported to Associated.

Insider Trading

- Third Parties who have access to confidential information about Associated (or other public companies through their work for Associated) are not permitted to use or share (i.e., “tipping”) that information for stock trading purposes. All non-public information about Associated (or other companies obtained via the Third Parties relationship with Associated) should be considered confidential information.

Antitrust, Competition, and Fair Dealing

- Associated expects its Third Parties to comply with applicable laws that deal with fair competition and anti-competitive business practices.
- Third Parties must not directly or indirectly enter into any formal or informal agreement with competitors that fixes or controls prices, divides or allocates markets, limits the production or sale of products, boycotts certain suppliers or customers, eliminates competition or otherwise unreasonably restrains trade.
- Third Parties must deal fairly with the Company's customers, service providers, suppliers, competitors, and employees.
- Third Parties may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

Record Management and Recording Transactions

- Third Parties are expected to ensure that all financial books, records and accounts related to their relationship with Associated are maintained in reasonable detail, appropriately reflect transactions and events, and conform to applicable legal requirements.
- Records must reflect the true nature of the payment, transaction, or other activity and must not be falsified.

Confidential Information & Protection of Proprietary Information

- We expect our Third Parties to safeguard and protect Associated's confidential information, as well as the confidential information of Associated's customers, suppliers, shareholders, Associated employees, or other third parties. Confidential information includes all non-public information relating to Associated or other companies that would be harmful to Associated or its customers, if disclosed, or that might be of use to Associated's competitors.
- Third Parties are also expected to protect Associated's proprietary information, which includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports.

Privacy & Data Protection

- Third Parties must comply with all applicable privacy and data protection laws and regulations relating to the sharing, use, disclosure, and safeguarding of Associated consumers' and customers' nonpublic and personal information and assist Associated in complying with its own obligations in this regard.

Human Rights, Discrimination, Harassment, and Bullying

- We expect all Third Parties and their subcontractors to uphold the fundamental principles of human rights as set forth in the United Nations Universal Declaration of Human Rights.
- We expect our Third Parties to avoid child, forced, indentured, or involuntary labor in their business activities, and to comply with all applicable human rights prohibiting such activities. We also expect suppliers to comply with applicable labor laws and standards, including with respect to compensation and working hours and breaks.
- Associated expects its Third Parties to conduct themselves in a professional manner with courtesy and respect for others. Associated does not tolerate harassment, including physical, verbal, or non-verbal harassment (including sexual harassment), bullying, or illegal discrimination by our Third Parties.
- Associated's goal is to work with Third Parties that value diversity and inclusion, and we encourage our Third Parties to build a diverse employee base, including (but not limited to) diversity with respect to age, race, color, creed, religion, disability, marital status, sex, sexual orientation, or national origin.

Environment, Safety, and Health

- Associated expects its Third Parties to operate in a manner protective of human health, safety, and the environment, especially as it relates to Third Parties' work with Associated.
- Associated expects its Third Parties to provide a safe and hygienic working environment by following industry, local health and safety laws through proactive management and controls that minimize health and safety risks and support accident prevention for all personnel. Additionally, Third Parties must provide and maintain for all personnel and stakeholders a work environment that meets applicable federal, country, state and municipal laws regulating occupational safety and health. Third Parties should also comply with all applicable environmental laws and regulations.
- We encourage our Third Parties to be mindful of their environmental impact, and to find opportunities to drive sustainability as part of their business activities. This includes through the business' operations, products and services during their entire life cycle, and by considering factors including use of energy, greenhouse gas emissions, water, biodiversity, waste, hazardous materials, and other natural resources.

Use and Protection of Associated Corporate Assets

- If provided with Associated's assets (including technology, software, proprietary information, or other physical assets), Third Parties are expected to protect these assets and ensure their efficient use for legitimate business purposes.