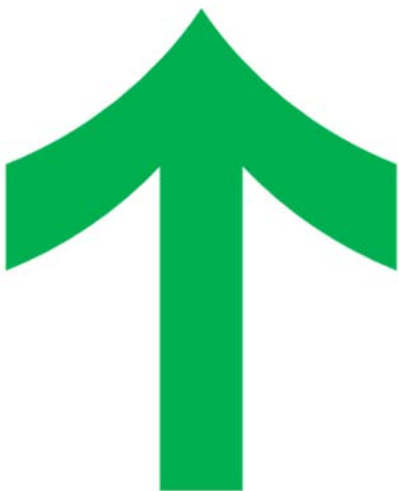


Associated Banc-Corp
Human Rights Statement
July 2024



Our Statement

The core values of Associated Banc-Corp and its subsidiaries (“Associated Bank” or “company”) are based on the belief that one of our duties is to respect and protect the fundamental human rights of individuals we interact with in the communities we serve. We are committed to work towards providing a safe, diverse, equitable, and inclusive environment that can foster growth and development and is free from harassment and discrimination. This statement defines Associated Bank’s guiding principles, commitments, and expectations in terms of human rights for the parent and all subsidiary companies.

Purpose

In everything we do, our company, affiliates and colleagues work with a shared commitment to Human Rights. Through adherence to this Human Rights Statement (the “Statement”) and other related policies of Associated Bank, we strive to uphold and help increase the advancement of human rights in our operations, businesses, supply chains, and the communities in which we operate. This policy applies to the entire organization. It has been designed to align with the United Nations Universal Declaration of Human Rights.

Our Commitment

We work to uphold the Universal Declaration of Human Rights which supports the fundamental belief that:

“All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.”

Specifically, we strive to incorporate the following rights in business dealings, relationships with vendors, in our communities, and in the treatment of our colleagues:

- The right to equality
- The right to life, liberty, and personal security
- Freedom from slavery
- Freedom from torture and degrading treatment
- The right to recognition as a person before the law

Our Colleagues

We recognize that our success begins with our colleagues. We aim to build and advance a diverse and equitable culture and enhance the colleague work experience. These efforts help us gain recognition as an employer of choice within our markets and by groups focused on diversity and inclusion.

Culture

We believe that our colleagues succeed in a culture characterized by consistent, transparent communication. Colleagues from a diversity of backgrounds should feel respected, included, and open to sharing ideas, and should be accountable for quality performance, including full compliance with applicable policies, procedures, and regulatory requirements.

Established in 2021, our Associated Bank Culture Team provides “voice of the colleague” feedback to help us assess the current and desired state of our company’s culture. The team includes colleague representatives from throughout the organization. Additionally, all colleagues are asked to provide feedback on company culture through our annual workplace survey.

Diversity, Equity, and Inclusion

We recognize that our colleagues are critical to the success of our company and therefore, we work to invest in the growth and development of our people as well as strive to provide a diverse, equitable, and inclusive environment. We believe our colleagues should be treated with respect and dignity—a belief embedded in the policies and practices published in our Code of Business Conduct and Ethics and other related policies of Associated Bank.

- Freedom from discrimination and promoting diversity in employment
 - We value and promote workforce diversity and do not tolerate unlawful discrimination or harassment. Associated Bank is an equal opportunity employer committed to creating a diverse and inclusive workforce. We support a work environment where colleagues are respected and given the opportunity to perform to their fullest potential without regard to age, race, color, creed, religion, disability, marital status, sex, sexual orientation, national origin, ethnicity, or other legally protected status, as required by law.
- Advancing a diverse and inclusive culture
 - We are committed to working with other businesses, nonprofit organizations, our colleagues, and in the communities we serve to advance diversity and inclusion.
 - We regularly monitor and measure pay equity, female and people of color representation at senior vice president levels and above, and company-wide representation of people of color, protected veterans, and individuals with disabilities.
 - We strive to ensure that diversity is embedded within the hiring process at all levels of the organization. We partner with community and national organizations with the goal of developing diverse talent pools and extend the reach of our recruitment efforts. For professional level hires, we commit to diverse candidate slates for women and people of color.
 - We promote our approach to diversity, equity and inclusion through annual required trainings, speaker and live interactive events, unconscious bias training, and diversity education. With a significant portion of colleagues participating, our seven Colleague Resource Groups help influence workplace culture, policies and programs. They also help to ensure we are building an inclusive environment for our colleagues, customers, and the communities we serve.

Code of Conduct and Ethics

Our [Code of Business Conduct and Ethics](#) provides guidance for all directors, officers, colleagues and contractors. These principles include the expectation of a workplace free from intimidation and harassment. Each year, all colleagues are required to review and acknowledge awareness of these principles and expectations.

We strive to maintain a workplace environment free from retaliation against any person who, in good faith, raises concerns regarding discrimination, harassment, bullying, policy violations or unethical, illegal, or inappropriate behavior, or who assists or participates in an investigation. Prohibited behaviors and actions under our Code of Business Conducts and Ethics include intimidation, adverse employment action related to a work assignment, wages or other terms of employment, discrimination, termination of employment and threats of any of the above.

We encourage open discussion regarding colleague concerns. Disputes that cannot be resolved through discussion with a manager, Human Resource representative, or our anonymous third-party ethics hotline are typically resolved through arbitration.

Health, Safety and Well-being

Our benefit offerings, including our well-being program and related incentives, focus on the physical, mental, and financial health of all colleagues. These efforts have been recognized by the American Heart Association and the Wellness Council of America.

The health and safety of our colleagues is of utmost importance and we endeavor to provide each colleague with a pleasant and productive work environment. We expect all colleagues to maintain a safe and healthy workplace by:

- Following safety and health rules and practices.

- Reporting incidents, injuries, unsafe equipment, practices, and conditions.
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Our Customers

We believe that Associated Bank is known for its strong relationships with our customers. We are distinguished by what we believe to be a consistent, quality customer experience, strong products and services, and commitment to continued excellence. We work with community partners to design products to meet customer financial needs and invest in technology to address barriers and bridge gaps between banking services, access, and usage.

Dedication to stopping Financial Crime

To combat financial crime, we provide training to identify and prevent money laundering, terrorist financing, and other financial crime. In addition to enforcing economic sanctions, we are committed to combatting human trafficking and slavery. This includes an internal task force that aims to:

- Prevent traffickers from operating within the company; and
- Raise awareness in the communities we serve.

Recognizing that abuse can happen to anyone, including vulnerable adults in our communities, we have developed a program to combat and prevent the exploitation and abuse of the elderly. Significant effort is directed toward identifying and preventing patterns of activity and identifying red flags that can be indicative of vulnerable adult exploitation.

Access to Financial Services

We work to ensure that all communities within our branch footprint, including minority and low-and moderate-income (LMI) communities have access to sound financial products and services through our branch network and digital banking services. This is complemented by our efforts to build a more inclusive and equitable environment both within our company and in the communities we serve.

Associated Bank has made investments in alternative delivery systems to address the evolving needs of our customers, expand our reach, and broaden our level of services. The addition of mobile delivery systems provides easier access to our products and services. Customers can interact with Associated Bank representatives via their mobile device, email, social media, interactive voice response, and live chat.

Financial Literacy

We believe financial education is essential to financial health. We offer a wide range of resources and tools to help our customers and the communities we serve manage personal finances and make smart financial decisions.

Communities

We are proud to play an active role in support of human rights – including vulnerable, marginalized, people of color, indigenous groups, and women’s rights – in the communities we serve. To focus our efforts, we have immersed ourselves into our communities, working with Community Advisory Councils in each of our major markets to address systemic economic development and equity issues.

Our [Community Commitment Plan](#) demonstrates our support through:

- The promotion of homeownership and small businesses.
- The revitalization of neighborhoods and the advancement of workforce development.
- Our philanthropy, volunteerism, and in-kind donations.

Upholding Our Commitment

We recognize that respecting human rights requires ongoing effort and that we must regularly assess our practices and policies in light of evolving business environments. Some of the principal actions that we undertake to ensure we are honoring our commitment include:

- Committing to providing a safe and secure work environment for all colleagues.
- Encouraging colleagues to raise concerns, ask questions and report potential policy violations or suspicious behaviors without fear of retaliation via a confidential Associated Bank Ethics Hotline.
- Conducting business in accordance with all applicable labor, safety, health, anti-discrimination, and other workplace laws.
- Maintaining policies that commit to upholding fundamental rights in our everyday interactions with colleagues, third-parties, customers and the communities where we do business.
- Offering equal employment opportunity to all and committing to diversity, equity, and inclusion and accessibility.

Reporting a Concern

The Company's Code of Business Conduct and Ethics outlines procedures for reporting violations or concerns on any ethics matters. All employees, stakeholders, or investors shall promptly report any violations of laws, rules or regulations or this Human Rights Statement via the Associated Bank Ethics Hotline, at (877) 781-2432 (anonymously or otherwise).

Employees are encouraged to raise concerns, to be alert to possible violations, and to report them without fear of retaliation.

Governance

Associated Bank is dedicated to ensuring the fulfillment of this Statement with respect to recruitment, hiring, job assignment, staffing, selection for training, benefits, promotions, transfers, leaves, rates of pay or other forms of compensation, and general treatment during employment.

Our Board of Directors (the "Board"), through the Compensation and Benefits Committee (the "CBC") of the Board is the approval authority of Associated Bank's Human Rights Statement. The CBC has delegated to senior management the responsibility for managing programs at Associated Bank that will uphold the principles and philosophies as described within the Human Rights Statement. On a periodic basis, the CBC will review and provide approval of the Statement, as updated.