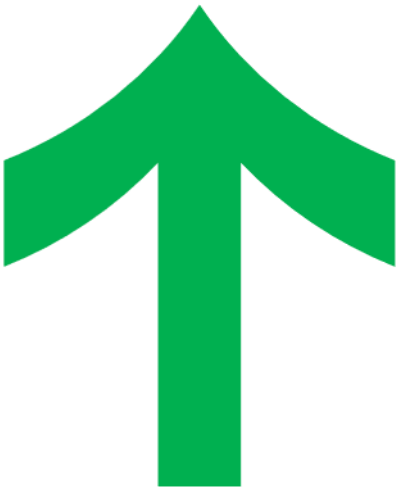


Associated Banc-Corp
Credit Lending Statement
2022



Our Approach

Risk management is a critical component to serving our customers' financial needs, while protecting Associated Bank and helping to achieve our strategic goals. It is essential to reducing earnings volatility and safeguarding our brand and reputation. Our Risk Management Process outlines our approach to managing risks.

Throughout the life of a client relationship, we consider the environmental, social and human rights risks along with credit risks.

Our Policy

Our commercial lending credit policy contains acceptable transaction terms, underwriting requirements, limits, addresses industries and transactions that we feel present higher risk and includes escalations process for review and approval of exceptions.

This policy is designed to prevent unintended or undesired exposures to clients that have an unacceptable level of risk, including Environmental and Social risk, potentially resulting in reputational damage or financial loss to Associated Bank. The ongoing review and oversight of our clients and portfolios helps to ensure that we are taking necessary steps to mitigate future credit, reputational and environmental risk in an evolving socially and environmentally responsible landscape.

Associated Bank has a low tolerance for reputational risk, and therefore seeks to conduct business in a responsible manner and participate in corporate citizenship activities that best serve communities and other stakeholders.

Our Client Selection Process

Based on governing laws and the related risks, Associated Bank has established governance around client selection to identify and monitor high-risk businesses and prevent opening accounts with prohibited businesses. Internal policies and procedures define high-risk and prohibited businesses, outline specific due diligence requirements designed to identify such businesses, ensure an adequate assessment of the associated risks, and continuously monitor for any changes to their risk profile.

Associated Bank continuously monitors developments and changes to Environmental and Social risks. We are committed to evaluating and improving our governance on an ongoing basis to assure adherence to our Core Values in the management of Environmental and Social risks when necessary.

Associated Bank has identified certain types of business relationships which are prohibited, meaning we will not knowingly finance transactions associated with businesses directly involved in the following activities:

- Bribery – including giving, offering, receiving, or requesting bribes.
- Child labor, forced labor or human trafficking
- Illegal logging or uncontrolled fire
- Illegal wildlife trafficking
- Natural resource extraction in UNESCO World Heritage sites
- Private prisons and immigration facilities

Governance

Our Board of Directors (the "Board"), through the Enterprise Risk Committee (the "ERC") of the Board is the approval authority of Associated's Credit Lending Policy. The ERC has delegated to senior management the responsibility for managing programs at Associated that will uphold the principles and philosophies as described within the Policy. On an annual basis, the ERC will provide initial approval of the Policy.