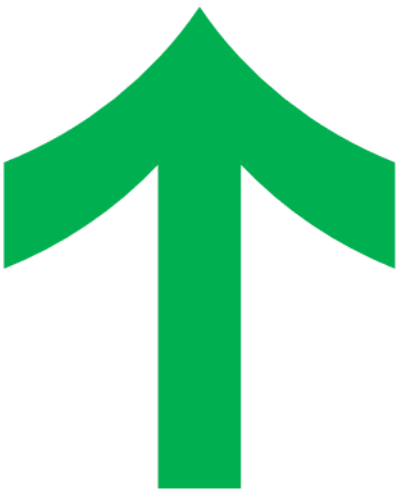


Associated Banc-Corp
Responsible Marketing Statement
2023



Overview

At Associated Banc-Corp (Associated or Associated Bank), our purpose is to uplift our customers, community and colleagues to be financially stronger. Motivating our efforts are our Core Values that reflect a shared commitment to how we aim to shape the future of Associated—Relentless Focus on People, Winning Spirit, Listen Then Act and Achieving Together.

Marketing is one of Associated Bank's more significant investments. We believe that all marketing efforts should provide genuine value to our audience. Our approach to marketing begins by listening to our colleagues, customers and consumers to determine what they want and need. This approach is supported by both internal and third-party consumer and customer research.

Our marketing strategies are based on a foundational belief that marketing should be fair, responsible and transparent. Marketing development is done in coordination with the corporate compliance team to stay in compliance with current regulations.

Associated Bank is a marketing name Associated Banc-Corp uses for products and services offered by the company and its affiliates. While the highest quality content and ability to reach our intended audiences is determined by our selected affiliate marketing partners, it is also important that these partners share our values and offer an environment that is safe for our brand and our customers.

Marketing Approach

Our Responsible Marketing Statement captures the core guidance of how we approach marketing. It applies to our colleagues, affiliate partners and anyone external who may carry out marketing communications or activities on our behalf. It also applies to all communications or activities irrespective of nature or media type. This includes sponsorships, promotions, in-branch materials, online or offline digital communications, TV, radio, print, outdoor, websites, blogs, influencer marketing, social media or sponsored content, AI, connected packaging, banners, and educational material.

Our marketing materials emphasize the importance of informed financial decisions and provide educational content to help customers make sound financial choices. We will not encourage customers to take on excessive debt or engage in irresponsible financial behavior.

By adhering to this Responsible Marketing Statement, Associated Bank aims to establish itself as a trusted financial institution that prioritizes customer welfare, complies with regulations and contributes to the overall financial strength of the communities it serves.

- **Colleague Training and Awareness:** Regular communication and awareness programs are conducted to promote responsible marketing practices and reinforce our commitment to our Responsible Marketing Statement. This includes training for colleagues directly involved in marketing activities.
- **Customer Privacy and Data Protection:** We recognize the importance of handling customer information in accordance with applicable privacy laws and regulations. Our marketing activities comply with our Privacy Policy, which outlines how we collect, use, store and protect customer data. We obtain explicit consent from customers for any marketing communications and provide them with clear opt-out mechanisms.
- **Marketing Assets:** Associated Bank marketing assets may only be created and placed in environments that are aligned with the values of the company and safe for our brand. We leverage traditional channels and evolving technologies for developing, producing and distributing marketing communications for enhanced interaction with customers.

- **Marketing Compliance:** We adhere to all applicable laws and regulations governing marketing practices, including but not limited to consumer protection laws, data protection regulations and advertising standards. We regularly review our marketing campaigns and materials to ensure compliance and take prompt action to address any identified issues.
- **Marketing Disclosure:** We strive to develop communications that are accessible, clear, and understandable across all our communications channels. Product disclosures, accessible at the point of sale and 24/7 on the disclosures page of our company's website, align with the Pew Charitable Trust's checking accounts disclosure model. Ultimately, this helps consumers understand the requirements and fees for each product and to evaluate what account best fits their needs.
- **Diversity, Equity, and Inclusion:** We believe passionately in applying the principles of diversity, equity and inclusion to all aspects of our marketing efforts. We understand it is an intentional practice designed to ensure we market our products and services in ways that reach all customers throughout the communities we serve and meet their unique and diverse needs. In particular, we ensure our marketing represents the diversity of consumers across our markets. We train our marketers how to approach diversity and inclusion, and to respect human dignity, avoid stereotypes and never condone violence, antisocial behavior or discrimination of any kind. We have implemented special-purpose loan programs to address the needs of underserved customers of our communities.

Information about Associated Bank products and services is available through our full array of channels including branch locations, loan production offices and telephone and digital platforms. To help serve customers with limited English proficiency, we staff our Customer Care team with multilingual representatives. In addition, we make verbal translation services available to our customers in more than 200 languages through Certified Languages International. We also train our colleagues how to support vision- and hearing-impaired individuals and we follow Web Content Accessibility Guidelines (WCAG) to make our digital services more accessible to people with disabilities.

- **Social & Environmental Responsibility:** We recognize our responsibility to contribute positively to the communities we serve and protect the environment. Our marketing activities align with our corporate social responsibility objectives. We support initiatives that promote financial inclusion, community development and environmental sustainability. We ensure our marketing is free of "greenwashing" by verifying that any environmental claims made in our marketing communications are accurate and supported by appropriate evidence.
- **Stakeholder Engagement and Accountability:** As part of our "Listen, then Act" Core Value, we engage with our customers, colleagues, regulators, and other stakeholders to gather feedback and understand their expectations regarding our marketing practices. We remain accountable for our marketing activities, respond to feedback and concerns in a timely and transparent manner, and make continuous improvements to uphold our commitment to responsible marketing practices.
- **Targeted Marketing and Fair Treatment:** As a part of our "Relentless Focus on People" Core Value, marketing efforts are relevant and appropriate for the intended audience. We avoid engaging in practices that exploit vulnerable individuals. We will not discriminate on the basis of race or color, religion, national origin, sex, marital status, age (provided the applicant has the capacity to contract), familial status, disability, military status, sexual orientation, gender identification or any other protected characteristic in our marketing activities.

Marketing Governance

We regularly monitor and evaluate our marketing campaigns to ensure compliance with our Responsible Marketing Statement and identify areas for improvement. We consider feedback from customers, employees and other

stakeholders in this evaluation process. If any concerns or breaches of this policy are identified, we will promptly address them and take corrective actions to prevent recurrence.

Additionally, Associated's Fair and Responsible Banking Committee is responsible for ensuring that products, services, and practices align with Core Values. This includes but is not limited to reviewing and monitoring results related to UDAAP laws and regulations to determine whether policies or procedures, product terms or offerings, or marketing efforts require adjustment or enhancement.
