ASSOCIATED BANK, N.A.
COMMUNITY COMMITMENT PLAN
FOR 2016-2018

Our Purpose
Associated Bank, N.A. ("Associated") recognizes our success is dependent upon strong relationships with the communities where we live and serve. Our defined approach to being a responsible corporate citizen is grounded in fostering stronger, more stable communities. This approach includes providing sound financial services throughout our three-state footprint of Wisconsin, Illinois, and Minnesota; giving of our time through colleague volunteerism; and, strengthening our communities through our provision of financial resources.

Helping to ensure the well-being of our communities is an integral part of our strategy. Through targeted efforts and specific commitments to the minority and low-to-moderate income ("LMI") customers and communities within our footprint ("Intended Customers and Communities") we work to address some of the most important economic development issues in the markets we serve.

Ultimately, we believe we can only be successful if the communities in which we operate are also successful. For this reason, Associated, including our Board of Directors and executive leadership, desire to make public our Community Commitment Plan ("Plan") outlining what we hope to achieve over the next three years in the areas of lending, investments, and services as they relate to our Intended Customers and Communities. It is our intent to publish progress updates regarding this plan on an annual basis going forward. By striving to meet the goals stated in this Plan, we are ensuring both Associated’s long-term vitality and taking an important step toward becoming the premier financial services company in the Midwest.

Our Overall Commitment
Associated commits to extend at least $1.5 billion in loans and at least $6 million in grants and other expenses to our Intended Customers and Communities by the end of 2018 in order to achieve the goals outlined below. We will continually monitor and track our progress against this Plan via a series of metrics reviewed internally, and we will publish progress reports on our website on an annual basis. Finally, we will continue to comply with all applicable state and Federal laws and regulations and work in partnership with our regulators to fulfill these commitments.

Our Partnership with Our Communities
To achieve the Plan goals, we will continue to collaborate with community leaders, various nonprofit organizations, governmental entities and other community representatives in support of the economic health of our communities. These relationships play a vital and multifaceted role in successfully implementing this plan, including: (i) helping us to better understand the needs of the communities that are the focus of this Plan; (ii) creating more direct access to consumers and communities that will directly benefit from the Plan; and (iii) influencing key elements of our Plan as it evolves.

To effectively foster these relationships, we will form Community Advisory Councils ("Councils"). Council membership will represent various nonprofit groups and have expertise in key areas including homeownership counseling, small business support, neighborhood stabilization/revitalization, and community services designed to better reach our Intended Customers and Communities. The Councils will work with Associated colleagues, periodically reviewing our progress on this Plan, keeping us informed on specific community development needs, and advising on solutions that will meet those needs. The Councils will launch in 2016 and will be based in Chicago, Milwaukee and Minneapolis.

Our Commitments in Lending
Associated understands that effectively extending credit to qualified minority and LMI borrowers is essential to achieving the overall goal of actively participating in community development. We are committed to serving the credit needs of our Intended Customers
and Communities, including small businesses and community development organizations. We are also committed to meeting these credit needs while still following safe and sound banking practices. To further our goals, we prudently underwrite loans and carefully consider the borrower’s ability to repay, recognizing the reality that extending credit to unqualified borrowers does them and our communities a disservice. All underwriting will continue to fully conform to applicable regulations and regulatory guidance. Associated is an Equal Housing and Equal Opportunity Lender. We will seek advice from our Councils and other community organizations to ensure our loan products are designed to meet the needs of the community. Additionally, we will lend to organizations that support community development.

The chart below presents our overall lending goals for 2016 through 2018. For residential mortgages, we are making a commitment to each state in our footprint in both units and dollars. For small business loans, which are defined as loans to businesses with revenues less than $1 million and loan commitments under $1 million, we are making one commitment in both units and dollars for our entire footprint. We will monitor our performance, and every year we will report our progress toward meeting these commitments. We recognize that changes in the level of interest rates and general market conditions may impact our performance. To that end, if the need arises, we may adjust our commitments during the course of the Plan.

### Mortgage Lending

Our Residential Lending division originates mortgage and home equity lines to consumers across our footprint. We use our full array of channels and products to maximize our reach to our Intended Customers and Communities. Channels for loan origination and funding include: loan officers, branches, loan production offices (LPOs), third-party originators (mortgage bankers, mortgage brokers and correspondent banks), loan and portfolio purchases, loan-by-phone and online banking. Our lending products include standard mortgages and home equity lines, government programs (e.g., FHA loans) and proprietary loan products.

We will achieve the goals stated in the chart below by refining our lending practices, adding staff, enhancing our training programs, adding to our marketing spending and increasing our community outreach efforts. We offer both standard and proprietary mortgage products that are specifically designed to address the needs of many households within our Intended Communities. We have also enhanced our existing training program, including training on programs specific to the relevant products and programs designed to give our Community Reinvestment Act (“CRA”) residential loan officers the skills to effectively reach our Intended Customers and Communities. Additionally, our Multi-cultural and Affordable Lending management team will continue to be present in the communities we serve, actively and vigorously collaborating with community leaders and housing assistance partners to find lending opportunities.

<table>
<thead>
<tr>
<th>Product</th>
<th>Location</th>
<th>Measure</th>
<th>Three-Year Commitment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-4 Family Residential Mortgages</td>
<td>Wisconsin</td>
<td>Units</td>
<td>6,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Volume in $ Millions</td>
<td>$615</td>
</tr>
<tr>
<td></td>
<td>Illinois</td>
<td>Units</td>
<td>2,300</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Volume in $ Millions</td>
<td>$385</td>
</tr>
<tr>
<td></td>
<td>Minnesota</td>
<td>Units</td>
<td>1,500</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Volume in $ Millions</td>
<td>$210</td>
</tr>
<tr>
<td>Small Business</td>
<td>Entire Footprint</td>
<td>Units</td>
<td>1,500</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Volume in $ Millions</td>
<td>$235</td>
</tr>
</tbody>
</table>
As we monitor and report on our progress toward reaching these goals, we will be prepared to adjust our strategies to account for economic conditions, such as rising interest rates. Such adjustments could include shifting resources to focus on multifamily lending or supporting nonprofit developers. Associated strives to achieve these goals through direct originations, however, purchasing and funding whole loans that enhance our reach to our Intended Customers and Communities will remain part of the strategy.

**Small Business Lending**

We originate small business loans through a variety of channels and products. As with residential lending, we use all our available channels and products to maximize the outreach to the Intended Customers and Communities. Channels for small business loan origination include our branches, commercial relationship managers and online banking. Products include a full array of conventional business loans, government-guaranteed loan products (e.g., Small Business Administration loans) and business credit cards.

**Community Development Lending**

In addition to lending to minority and LMI borrowers and small businesses, and to fully achieve the goals of this Plan, we will continue to make commitments to developments in the communities within our footprint. This includes making loans that create affordable housing options in LMI communities, provide community services to LMI individuals, promote economic development within LMI communities, and serve to help revitalize or stabilize LMI neighborhoods. Over the next three years, we plan to lend $80 million for community development purposes.

Our Commercial Real Estate Group will continue to work with developers and tax credit syndicators to explore opportunities to develop affordable housing throughout our footprint. Additionally, through community outreach and active prospecting efforts, we will seek opportunities to promote economic development through new construction and renovation of commercial properties that will have an impact on the communities we serve. Channels for Community Development Lending include: construction loans, term loans and letters of credit. These loans will provide leadership opportunities for complex and layered transactions to achieve the stated lending goals.

**Our Commitments to Investing**

**Monetary Investments**

Over the next three years, we plan to invest $230 million in monetary investments that have a main purpose of providing additional resources to the minority and LMI communities within our footprint. Specifically, we plan to invest in mortgage-backed securities, certificates of deposit in minority-owned banks, small business investment corporations, low income housing tax credits, new market tax credits, historic tax credits and loan pools. We will leverage the information learned from our Community Advisory Councils to identify appropriate investing opportunities.

**Social Investments**

The company volunteers its expertise and provides financial contributions to nonprofit organizations that support community development. We designate 1% of annual pretax profits for charitable purposes with the majority of that total supporting CRA-qualifying contributions. We surpassed that target in 2015, providing $1.9 million in CRA-qualifying contributions to various nonprofit organizations. These include organizations such as Housing Resources, Inc. of Milwaukee, Neighborhood Housing Services of Chicago, Minneapolis Urban League and similar organizations that focus on creating affordable housing; provide community services to our Intended Customers and Communities; promote economic development of small businesses; and revitalize and stabilize LMI neighborhoods. Going forward, we will seek advice from our Councils to identify organizations that best align with the goals stated in this Plan. Subject to any major circumstances that might impair our charitable contributions formula described above, we intend to make at least $6 million in CRA-qualified contributions between 2016 and 2018.

Associated will continue to support colleague volunteerism in organizations and programs that primarily serve the Intended Customers and
Communities. Our colleagues have a strong tradition of engaging in this type of volunteerism, using their expertise to serve on boards of directors and to support the organizations’ staff and clients. And, over the past three years, our colleagues recorded 4,700 CRA-qualified service hours in the communities we serve.

Our goal is to significantly increase CRA-qualified volunteerism. In support of these efforts, we have increased paid volunteer time off in 2016 from four to eight hours per employee. This company-supported initiative equates to approximately $4 million in paid time off for volunteerism purposes by the end of 2018, which includes volunteering for CRA-qualified activities. We will also increase our focus on providing access to volunteer opportunities that support the goals outlined in this Plan.

Our Commitments to Providing Services

Access to Services to Our Intended Customers and Communities

Associated is committed to ensuring that we effectively provide access to our financial products and services. In doing so, we must acknowledge that the landscape of banking is changing, with a noticeable shift from transactions performed in branches to transactions performed via electronic means. As a result, we need to ensure that all of our current and prospective customers, including our Intended Customers and Communities, have access to our services and products.

To accomplish this, we must strike a fine balance between maintaining a physical presence within the communities we serve and providing cutting-edge electronic banking options and alternative channels, including online banking and mobile banking. Teller transactions at branches industrywide dropped more than 15% between the beginning of 2012 and mid-2015; transactions at Associated branches dropped 19% during the same timeframe. Similarly, industrywide consumer usage of digital channels (online banking, mobile banking and ATMs) continued to rise significantly.

Associated has invested heavily in these channels, and consumer adoption of digital channels outpaces the industry. Additionally, an analysis of mobile banking usage demonstrates there has been a significant increase in mobile phone and smartphone usage among minorities and LMI individuals. This indicates that mobile banking is an effective tool for providing these groups access to financial services. With these trends in mind, Associated, in conjunction with our peers, has selectively consolidated our physical branch network over the past eight years. At the same time, we have significantly invested in developing our alternative channels, including online banking, mobile banking, full-service ATMs, and a 24/7/365 telephone-based Customer Care center to address these changing access needs.

However, while we acknowledge this shift in consumer habits, Associated still recognizes the importance of a physical presence, especially in minority and LMI census tracts. Currently, 24% of our branches are in LMI census tracts and those branches were recently included in a $140 million plan to renovate and upgrade those branches to ensure continued access to high-quality financial services. Additionally, during the past two years we have opened four new full-service branches in LMI census tracts in Wisconsin and Minnesota.

We also commit to further expanding our physical presence in LMI and majority-minority census tracts through 2018. Specifically, in 2016 we expect to open at least one additional full-service branch in Chicago’s Rogers Park neighborhood and four loan production offices in majority-minority and/or LMI neighborhoods — three in Chicago and one in Milwaukee. We also intend to open additional LPOs in minority and/or LMI neighborhoods in 2017 and are currently scoping potential locations including locations in Chicago and Milwaukee. The LPOs will provide services beyond loan origination, including financial education, full-service ATMs, and technology kiosks that enable prospective customers to learn about, open and activate Associated’s full array of deposit products.

Products, Services and Programs

We are currently implementing a variety of services and programs that are specifically designed to reach our Intended Customers and Communities. We launched in 2014 our Credit Builder loan program, which is designed to help consumers build favorable credit history and help build savings. Customers enrolled in this program receive a $1,000 loan (with no loan fees) that is deposited into a savings account and used to secure the loan. The customer then pays back the $1,000 over two years and, once the $1,000 is repaid, the customer gets the $1,000. Since the introduction of Credit Builder at the end of 2014, over 1,000 of our customers have enrolled.

We also launched the Homeowner’s Edge Loan Plus (HELP) program, which is our proprietary down payment assistance program. HELP offers down payment, rate reduction and closing cost assistance for primary residences in select majority-minority census tracts. HELP borrowers do not need to meet income requirements, are able to make low down payments, and in some instances do not need private mortgage insurance. HELP borrowers that are first-time homebuyers are also required to complete financial education and counseling. We also are participating in the Federal Home Loan Bank Down Payment Plus program, providing down payment assistance for LMI borrowers. Additionally, in 2016 we plan to reintroduce select state and local bond programs that are tailored for first-time homebuyers.

Additionally, over the next three years, we commit to providing over $9.8 million to borrowers in our CRA lending footprint, including relevant majority-minority census tracts, as part of a Subsidy Fund. The purpose of the Subsidy Fund will be for reducing interest rates and down payments and providing closing cost assistance to qualified borrowers. We also commit $2.8 million toward funding home repair grants. We will distribute these funds through HUD-approved, third-party community assistance agencies that will make them available to financially distressed homeowners whose homes are in need of repair.

Associated also has a strong tradition of providing financial education to our Intended Customers and Communities. We have partnered with various community home counseling organizations to provide homebuyer seminars, housing fairs and financial literacy workshops for consumers and small business owners throughout our footprint. For the next three years, we will provide over $1.4 million to fund similar programs in key markets including Chicago, southeast Wisconsin, Northeast Illinois and the Twin Cities.

Focused Marketing

The company will drive increased awareness of its community-based lending opportunities and assistance programs through specific affirmative marketing outreach programs. This includes print and radio advertising designed to reach the Intended Customers and Communities. It also includes complementary marketing materials used in Associated Bank branch and loan production office locations.

Our Colleagues

Recognizing the value our colleagues bring to the organization and the markets we serve, we work to attract and develop high-caliber talent. Integral to the success of this Plan is the company’s CRA Officer who is responsible for establishing CRA policy and monitoring the Bank’s performance in complying with the requirements of the CRA program. These efforts are complemented by the Director of Multi-cultural and Affordable Lending who is responsible for leading strategic initiatives relative to CRA and Affordable Lending for the Bank.

We also rigorously train our colleagues who have substantial involvement in residential lending on key aspects of fair lending, including obligations contained in the Federal Fair Housing Act and the Equal Credit Opportunity Act. Many of these colleagues, together with various community home counseling partners, conducted homebuyer seminars and housing fairs for prospective homebuyers and financial literacy workshops for local consumers.

2 These programs and the funds we commit are included in our overall financial commitments mentioned above.
Diversity and Inclusion Within Associated

Associated’s customers represent people of diverse backgrounds. To effectively attract and serve these customers, we aspire to have our colleague population mirror the larger communities in which we do business. Through targeted recruitment activities and a concerted effort to present diverse candidates for interviews, we have doubled minority hiring over the past two years in key markets.

We encourage all colleagues to expand their networks by participating in one or more of the company’s voluntary Colleague Resource Groups, including the Cultural Awareness Network (“CAN”). CAN currently has more than 300 participants. Its primary focus is to promote racial and ethnic diversity within Associated and is directly involved in recruiting and retaining colleagues of color. CAN also plays an important role in achieving the goals outlined in this Plan, including generating several ideas that help us attract minority and LMI customers, and serving as a channel through which we can effectively reach out to minority and LMI communities.

For more information regarding Associated’s Diversity and Inclusion efforts, please visit http://Careers.AssociatedBank.com/pdf/7526DILookBack_FNL.pdf

For more information regarding Associated’s Community Commitment Plan for 2016-2018, please contact our CRA Officer Gwen Washington at 414-278-1069 or Gwen.Washington@AssociatedBank.com.