ASSOCIATED INVESTMENT SERVICES, INC.

FORM CRS (Effective March 25, 2022)

Associated Investment Services, Inc. (AIS) is registered with the Securities and Exchange Commission (SEC) as both a broker-dealer and an investment adviser and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at **Investor.gov/CRS**, which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer both brokerage and investment advisory services to retail investors. Some clients choose to receive both services from us.

Our **brokerage services** include buying and selling securities at your direction and providing you with investment recommendations, research, financial tools and planning services, and investor education from time to time or at your request. As your broker:

- **Monitoring:** We will gladly answer your questions, but we do not monitor your brokerage account. For example, we do not monitor your account's performance.
- **Investment Authority:** We ask about your financial background, goals, and needs, and we use that information to provide you with recommendations, but we do not accept discretionary authority to trade your accounts. You make the ultimate decision regarding the purchase or sale of investments in your account.
- **Limited Investment Offerings:** You can buy and sell a variety of securities without receiving any recommendations from us, including mutual funds, annuities, ETFs, college savings plans, equities, options, and fixed income securities. If, however, we recommend that you purchase a product, we will only recommend products on our Approved Product List. The list includes those products that have been reviewed and approved by our Product Committee, and it typically consists of a limited number of mutual fund families, college savings plans, and annuities.
- **Account Minimums and Other Requirements:** There is a minimum account size for certain types of brokerage accounts. In addition, the services for which your account is eligible can vary based upon several factors, including the account's size and amount of trading activity, the length and nature of your relationship with us and our affiliates, your investment objectives, goals and experience, and other factors. Current brokerage account minimums are described in our **fee schedule**.

Our **advisory services** include asset allocation services using managed portfolios from third-party investment managers. As your adviser:

- **Monitoring:** We will gladly answer your questions, and we will review your advisory account with you when you ask us. In addition, we proactively ask to speak with you at least once per year to review your account, but we do not provide any other advisory account monitoring services. The third-party manager of the program you select is responsible for the ongoing oversight of their model or investment strategy on an overall basis, but they do not monitor your account specifically.
- **Investment Authority:** When you use our asset allocation services, we will provide you with recommendations, but you make the ultimate decision regarding which program to use. If, however, you choose to work with one of the third-party managers we make available to you, that manager will execute the individual purchase and sale decisions in your account, consistent with the program you selected, without your prior signoff.
- **Limited Investment Offerings:** The securities that a particular third-party manager will purchase for your account will depend upon the terms of the program you select and may include mutual funds, ETFs, and other securities as applicable. Some third-party managers will invest some or all of your assets in their proprietary products. You, however, are permitted to place reasonable investment limitations on your account.

- **Account Minimums and Other Requirements:** You must meet certain investment minimums to open an advisory account. Current account minimums for each program are described in our Form ADV, Part 2A brochure.

For additional information about the services we offer, please see our Form ADV, Part 2A brochure (Items 4 and 7), the Associated Investment Services, Inc. Disclosure Concerning Fees, Charges, and Other Compensation provided to you when you opened your account and/or available upon request, and the Form ADV, Part 2A brochures of any applicable third-party managers. Our affiliates offer a number of additional financial products and services, including a range of bank products and services, as well as trust and custody services.

Conversation Starters. Ask your financial professional:

- *Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

What fees will I pay?

For **brokerage services,** the primary fees and costs you will pay us are per-trade fees for buying and selling investments in your account. Depending on the investments you select, these fees can include up-front sales charges and commissions (which may be a percentage of the amount you buy or some other specified amount), as well as fees that are charged on an on-going basis for as long as you hold the investment ("trails"). Because we are compensated for transactions, **we have an incentive to encourage you to trade more frequently** and in greater amounts.

You also will pay fees for custodial or administrative services (*e.g.,* account maintenance and closing fees, wire fees, transfer fees, bank charges, and other fees), as well as fees and expenses that are charged by, or included in the expense ratios of, certain of your investments, including for example mutual funds, ETFs, and annuities. For example, variable annuities offer optional benefits and investment options that you may select for an additional fee, and they charge a surrender fee if you sell the contract before a set amount of time has passed.

For additional information about the fees and costs for our brokerage services, please see our Fee and Commission Schedule, your account agreement(s), the Associated Investment Services, Inc. Disclosure Concerning Fees, Charges, and Other Compensation, the Personalized Investment Proposal, the Mutual Fund/UIT Disclosure & Acknowledgement, the Variable Annuity Exchange Disclosure, the Fixed Annuity Exchange Disclosure, the Securities Exchange Disclosure, as well as prospectuses and other applicable offering documents.

For **advisory services,** the primary fees and costs you will pay us are the program fees for the program(s) you select. The program fee is calculated as a percentage of the assets invested in your advisory account according to the fee schedule in your advisory agreement with us. This means the more assets you invest in your account, the more you will pay in fees. Therefore, **we have an incentive to encourage you to increase your advisory account assets.**

The program fee includes most transaction costs and fees paid to a broker-dealer or bank that has custody of your assets and, therefore, is typically higher than a typical asset-based advisory fee that does not include transaction costs and fees. Our clients typically pay the program fee each month, but please see your advisory agreement for the payment frequency that applies to your account.

You also will pay fees for custodial or administrative services (*e.g.,* account maintenance and closing fees, wire fees, transfer fees, bank charges, and other fees), as well as fees and expenses that are charged by, or included in the expense ratios of, certain of your investments, such as mutual funds and ETFs.

For additional information about the fees and costs for our advisory services, please see our **Form ADV, Part 2A brochure** (Item 5), your Statement of Investment Selection, your account agreement(s), our **Fee and Commission Schedule**, the Associated Investment Services, Inc. **Disclosure Concerning Fees, Charges, and Other Compensation**, as well as prospectuses and other applicable offering documents.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Conversation Starter. Ask your financial professional:

- *Help me understand how these fees and costs might affect my investments. If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when providing recommendations as my broker-dealer or when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation as your broker-dealer or act as your investment adviser, we have to act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations and investment advice we provide you. Here are some examples to help you understand what this means.

Examples of Ways We Make Money and Conflicts of Interest.

- **Proprietary products:** We (and/or companies affiliated with us) earn higher fees, compensation, and other benefits when you invest in a product that we (or one of our affiliates) advise, manage, or sponsor, such as a mutual fund or advisory program. As such, we have an incentive to recommend (or to invest your assets in) those products over similar third-party products.
- **Third-party payments:** We utilize National Financial Services LLC (NFS) as the sole firm to provide clearing and custody services for our clients' brokerage and advisory accounts. NFS provides us with a monthly credit based on the amount of our clients' assets and transactions held and executed by NFS, and we use that credit to reduce fees and charges that we would otherwise pay NFS. Our receipt of this credit creates a financial incentive for us to continue to exclusively use NFS to provide clearing and custody services.
- **Revenue sharing:** Certain managers and sponsors (or their affiliates) or another third party (such as an intermediary) share the revenue they earn when you invest in certain investment products (primarily mutual funds) with us. As such, we have an incentive to recommend products where we receive revenue sharing over other products where we do not receive revenue sharing or those where we receive less revenue sharing. For example, AIS receives a monthly distribution fee on all Fidelity Money Market Sweep Fund balances based on the net assets of our clients beneficially owning shares in one of those portfolios.

Conversation Starter. Ask your financial professional:

- *How might your conflicts of interest affect me, and how will you address them?*

For additional information about these and other conflicts of interest, please see the Associated Investment Services, Inc. **Disclosure Concerning Fees, Charges, and Other Compensation** provided to you when you opened your account and/or available upon request, our **Form ADV, Part 2A**, your account agreements, and (as applicable) prospectuses and other offering documents.

How do your financial professionals make money?

Compensation from the purchase and sale of investment products. In general, our financial professionals receive a portion of the revenue they generate from the following sources: (1) commissions charged to clients in connection with the purchase or sale of ETFs, equities, fixed income products, and other investments; (2) advisory account program fees; (3) up-front sales charges, commissions, and marketing and distribution fees (sometimes called "12b-1 fees") for various financial products such as mutual funds, insurance, and annuities; and (4) fees and/or production credits for referrals to our affiliates and other employees. In addition, our financial professionals are eligible to receive bonus compensation that generally (and sometimes solely) is based on the revenue generated by the financial professional. Some goals also take referrals to affiliates into consideration.

Non-cash compensation. We receive (and our financial professionals also receive) non-cash compensation from sponsors of products that we offer, which may include occasional gifts up to $100 per vendor per year; occasional meals, tickets or other entertainment; sponsorship support of educational or training events (including events we arrange for clients and prospects) and seminars and/or payment of expenses related to training and education of employees, which can (and often do) include recreational activities; marketing support and, in certain limited circumstances, the development of tools used by us for training or recordkeeping purposes.

Conflicts of Interest. Our compensation structure, including potential cash and non-cash compensation from third parties, creates financial incentives for our financial professionals to encourage you to purchase multiple products and services, to recommend products and services that generate greater compensation, and to refer you to our affiliates.

Do you or your financial professionals have legal or disciplinary history?

Yes. Visit **Investor.gov/CRS** for a free and simple search tool to research us and our financial professionals.

Conversation Starter. Ask your financial professional:

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Additional Information

For additional information about our services, please see the Associated Bank web site at **AssociatedBank.com**, FINRA's BrokerCheck web site at **brokercheck.finra.org**, and the SEC's Investment Adviser Public Disclosure web site at **adviserinfo.sec.gov**. If you would like additional, up-to-date information or a **copy of this disclosure**, please call us at 800-595-7722.

Conversation Starter. Ask your financial professional:

- *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*