



Anticorruption Policy Statement

AdvanSix Inc. (the “Company”) is committed to ensuring its operations comply with all relevant and applicable laws and regulations that govern our activities to guarantee a level playing field among corporations. By operating at high standards of ethical and compliant conduct, we protect not only our employees but also our communities and business from risk, which in turn establishes a strong basis for sustainable business over time. This Anticorruption Policy (“Policy”) applies worldwide to the Company, its affiliates, and its other business associations that are effectively controlled by the Company, directly or indirectly, and all directors, officers, and employees of the Company. The purpose of this Policy is to provide clear guidance for compliance with all applicable anti-bribery and anti-corruption laws and to encourage and provide guidance for reporting of any suspected violations.

1. Strict Prohibition of Bribes and All Forms of Illegal Payments:

The Company strictly prohibits soliciting, giving or receiving any bribes, kickbacks, illegal payments, and anything of value to influence, encourage or otherwise facilitate business to a government official or any other person, directly or indirectly through a third party. Corruption is the abuse of entrusted power for personal gain. Bribery and fraud are considered corrupt practices. Facilitating payments are a type of bribe, usually defined as payments made to expedite or facilitate the performance of a public official for a non-discretionary, routine governmental action. A kickback is the seller’s return of part of an item’s purchase price to a buyer or buyer’s representative to induce a purchase or improperly influence future purchases. Facilitating payments and kickbacks, whether legal or not in a country, are prohibited under this Policy.

We have a duty to comply with local and internationally applicable laws, such as the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and other applicable local anti-bribery and anti-corruption laws and regulations. Likewise, we do not allow any third-party intermediaries to engage in bribery or any other corrupt behavior on our behalf or for our benefit. Anti-bribery laws prohibit “indirect” as well as direct offers and payments, thus the Company may be held liable for the conduct of third parties such as the Company’s agents and business partners when we know or reasonably should have known of the unlawful conduct.

In particular we observe a high standard of conduct whenever we deal with public sector officials and under no circumstances will the Company offer, promise, give or accept money or anything of value to or from government officials or political parties to improperly obtain or retain business, secure an improper advantage, or otherwise influence them to act improperly. A government official may include anyone, regardless of rank or title, who is:

- an officer or employee of any local, provincial or national government, including government agencies (for example, members of parliament, police officers, firefighters, members of the military, tax authorities, customs inspectors, food and drug agency regulators, etc.);
- a director, officer, representative, agent or employee of any government-owned or controlled business or company;
- any person with the responsibility to allocate or influence expenditures of government funds, including persons serving in unpaid, honorary or advisory positions;
- an officer or employee of a public international organization (e.g., the United Nations, International Olympic Committee, International Red Cross, World Bank, etc.);
- any person acting in an official capacity or on behalf of any government or public international organization (for example, an official advisor to a government);
- any officer or employee of a political party;
- any candidate for political office; and
- a close relative (for example, parent, sibling, spouse or child) of any of the above.

2. Avoid Conflict of Interest and Appearance of Impropriety

At all times, we strive to avoid the appearance of impropriety even if the conduct itself is not prohibited. Employees are not permitted to engage in any interest, investment or association where a conflict of interest might arise. While we are committed to strong working relationships with our customers, suppliers and other business partners, we observe established guidelines for how gifts and entertainment are offered or accepted to avoid actual or perceived conflicts of interest. The Company's employees and third parties shall not offer, give, promise, solicit, or accept any gift, hospitality, or any other thing of value to any person:

- Which could be regarded as illegal or improper; or
- Which violates the recipient's policies; or

- Which was intended to improperly affect or influence the outcome of a business transaction; or
- Which could be regarded as affecting a business transaction.

Certain gifts or expenses are inherently suspect given that it is not possible to track or record. Under no circumstances shall any Company employee give to any person (i) cash or the equivalent (e.g., gift cards or vouchers), (ii) gifts, travel or hospitality costs to family members of government officials or (iii) gifts that violate local customs, rules or regulations governing the conduct of the government official, or that would reflect poorly on the Company.

3. Accurate Books and Records

We keep accurate books and records to ensure we document how our time and funds are spent, regardless of the size of the transaction, including gifts and hospitality, in reasonable detail. We employ anti-bribery financial controls, including but not limited to defined delegations of authority, validation of required approvals, countersignature requirements for payment approvals, submission of supporting documentation, stringent controls on cash, detailed requirements for transaction descriptions, management review of material transactions, and independent financial audits. Honest and accurate books and records are a direct reflection of the Company's reputation, thus we must never make a false representation in our records.

4. Reporting Violations or Concerns and AdvanSix's Non-Retaliation Policy

The Company will not tolerate any form of discrimination, harassment or retaliation against any person who raises a concern in good faith or refused to participate in conduct that would violate law or this Policy. All reports will be investigated and appropriately addressed. Managers reinforce our culture of integrity and compliance by ensuring questions or concerns can be raised without fear of retaliation and addressed in a timely and responsive manner. Employees may anonymously use the Company's externally hosted ACCESS Integrity and Compliance Helpline or email to raise compliance concerns or questions about the Company's transactions or other activities.