

## California Transparency in Supply Chains Act Disclosure

The California Transparency in Supply Chains Act of 2010 (SB 657) (the “Act”) was designed to increase the amount of information available to consumers concerning retail goods and manufactured products regarding efforts to address the issues of slavery and human trafficking in their direct supply chain. This disclosure is provided in response to the Act’s requirements, on behalf of AdvanSix Inc. and its affiliates (“AdvanSix”) to outline our continuing efforts to protect human rights and reduce the risks of slavery and human trafficking in either the Company’s operations or its global supply chains.

AdvanSix plays a critical role in global supply chains, innovating and delivering essential products for our customers in a wide variety of end markets and applications that touch people’s lives, such as building and construction, fertilizers, agrochemicals, plastics, solvents, packaging, paints, coatings, adhesives, and electronics. Our reliable and sustainable supply of quality products emerges from the vertically integrated value chain of our U.S.-based manufacturing facilities. AdvanSix strives to deliver best-in-class customer experiences and differentiated products in the industries of nylon solutions, chemical intermediates, and plant nutrients, guided by our core values of Safety, Integrity, Accountability and Respect.

AdvanSix’s overarching approach to protect human rights and to bar the use of any forced, indentured or involuntary labor or child labor is guided by the common principles found within the United Nations Universal Declaration of Human Rights and Guiding Principles for Business and Human Rights and Rights at Work, the American Chemistry Council’s Responsible Care® program.

### A. Code of Business Conduct

AdvanSix’s Integrity and Compliance program reflects our core values and helps our employees, representatives, contractors, consultants, and suppliers meet a high standard of business conduct globally. At the core of the Integrity and Compliance program is the AdvanSix [Code of Business Conduct](#) that applies across the Company to all directors, officers and employees. The Code of Conduct serves as a set of baseline requirements that enables employees to recognize and be aware of how to report compliance, integrity, and legal issues. It also outlines our organization’s pledge to operate in a safe, ethical and compliant manner, promote a positive workplace, respect each employee, promote development through education and training that broadens work-related skills, and value diversity of perspectives and ideas. The Code of Conduct provides guidance and outlines expectations in a number of key integrity and compliance areas, including the prohibition of sexual or other forms of harassment, avoiding conflicts of interest, our commitment to health, safety and environmental matters, maintaining accurate books and records, anti-corruption and proper business practices, trade compliance, insider trading, data privacy, respect for human rights, and the appropriate use of information technology and social media. One of the hallmarks of a successful enterprise is a transparent culture of integrity and compliance, as well as a commitment to health, safety and environmental matters. Operating with integrity enhances our ability to operate safely, sustain the credibility of our brand, maintain a strong reputation, and build a track record of growth and performance.

AdvanSix endeavors to live these values and meet the highest standards of corporate behavior in all aspects of business. The foundation for our human rights policy and our values is integrity and caring for people, which are fundamental to the success of our enterprise. The Board of Directors exercises oversight over AdvanSix’s policies, including governance oversight of Environmental, Social and Governance matters, programs related to compliance with its Code of Business Conduct, as well as related legal and regulatory compliance matters, with day-to-day responsibility for ensuring compliance delegated to the Executive Leadership Team. Our Senior Vice President and General Counsel conducts an annual review of this Policy.

AdvanSix’s Code of Business Conduct establishes practices and standards on a broad range of human rights and workplace issues. In particular, the Code states:

*Our Company does not condone or employ child labor. At AdvanSix, we will not employ anyone under the age of sixteen, even if authorized by local law. If local law is stricter than Company policy, we will comply with that law.*

*In addition, we will never use forced, indentured or involuntary labor in any of our operations. As part of our commitment to our communities and our world, AdvanSix will not tolerate any instances of human trafficking or other forced labor. We will also never conduct business with any third parties who engage in human trafficking or forced labor.*

AdvanSix has zero tolerance for human trafficking and slavery, has measures in place to ensure that AdvanSix employees, agents and suppliers do not engage in human trafficking and slavery activities, and continually revises those measures to keep in step with relevant legislation. Our corporate commitment to safeguard human rights and prevent forced labor and child labor in all of its operations is evidenced in our [Supplier Code of Conduct](#), [Human Rights Policy](#), [Policy Statement Against Slavery and Human Trafficking](#), [Sustainable Procurement Policy](#) and other related statements, each of which is discussed below. AdvanSix firmly believes that ethical conduct goes beyond compliance and must be rooted in a strong governance culture. In such documents, AdvanSix identifies specific international conventions and principles as the basis for its conduct and expectations for its employees, agents, customers and suppliers. These documents are available to the public on AdvanSix’s website, and additionally published on its intranet to ensure accessibility by all employees.

**B. Supplier Code of Conduct**

Within our supply chain, AdvanSix has established an expectation that its suppliers ensure that they provide their employees a safe working environment, that they treat their workers with dignity and respect, that they engage in environmentally sound and sustainable manufacturing processes, and that they comply with the law in all countries in which they conduct business. With respect to forced labor, our [Supplier Code of Conduct](#) states:

**No Involuntary Labor or Human Trafficking.** Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. As part of this commitment to prohibiting human trafficking, Suppliers may not engage in any of the following conduct:

- (i) Destroying, concealing, or confiscating identity or immigration documents;
- (ii) Using fraudulent recruiting tactics; or
- (iii) Charging employees unreasonable recruitment fees or providing inadequate housing based on local standards, laws and directives.

Concerning child labor, our [Supplier Code of Conduct](#) explicitly states:

**No Child Labor.** Child labor is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be 16 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher.

All AdvanSix suppliers are required to comply with the Supplier Code of Conduct, and this requirement is included in all new contracts and in all purchase order terms and conditions entered into by AdvanSix and its affiliated entities.

### C. Human Rights Policy and Policy Statement Against Slavery and Human Trafficking

AdvanSix's [Human Rights Policy](#) and [Policy Statement Against Slavery and Human Trafficking](#) describe the Company's expectations and policies regarding human rights to ensure the exercise of appropriate due diligence in all of its operations, as evidenced by the various operational policies and procedures published on our website and available to AdvanSix teammates. The Human Rights Policy was initially published in November 2018, and subsequently revised in 2019 and 2023.

At AdvanSix, one of our core values is integrity, and we have always supported the values of the United Nations Global Compact. In 2020, AdvanSix signed its commitment to the UN Global Compact, which means we are committed to meeting fundamental responsibilities in four areas – Human Rights, Labor, Environment and Anti-Corruption – and providing an annual update on our progress toward implementing the UN Global Compact's 10 principles and advancing the UN Sustainable Development Goals (SDGs). The UN Global Compact's principles are part of our day-to-day business practices, connected with our organization's empowered high-performing culture, and consistent with our overall commercial and sustainability strategies.

AdvanSix’s Human Rights Policy is guided by common principles found within the United Nations Universal Declaration of Human Rights and Guiding Principles for Business and Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the American Chemistry Council’s Responsible Care® program, and implemented through AdvanSix’s Code of Business Conduct, Supplier Code of Business Conduct, and other AdvanSix corporate policies, procedures, and guidelines relating to its Human Rights Policy.

With respect to children and young workers, our Human Rights Policy states:

*As a fundamental principle, we do not employ children or support the use of child labor. We do encourage the creation of educational, training or apprenticeship programs tied to formal education for young people.*

With respect to forced labor which may be facilitated through human trafficking, our Policy Statement Against Slavery and Human Trafficking states:

*AdvanSix has a corporate-wide policy directed at combatting human trafficking. AdvanSix policy specifies that its employees, agents and suppliers shall not – amongst other activities -:*

- (1) Engage in human trafficking;*
- (2) Use forced labor;*
- (3) Destroy, conceal, confiscate, or otherwise deny an employee access to that employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;*
- (4) Make material misrepresentations during the recruitment of employees regarding: (i) the key terms and conditions of employment, including wages and fringe benefits, (ii) the location of work, (iii) living conditions, (iv) housing and associated costs (if employer or agent provided or arranged), (v) any significant cost to be charged to the employee, and (vi) if applicable, the hazardous nature of the work;*
- (5) Use recruiters who do not comply with local labor laws of the country in which the recruiting takes place; and*
- (6) Charge employees any recruitment fees.*

**D. Sustainable Procurement Policy**

AdvanSix’s [Sustainable Procurement Policy](#) defines key principles, roles and responsibilities that apply to purchasing activities for the enterprise. Such Policy is used by the Company to seek visibility into our supply chain through various procedures established through such policies, by screening our suppliers. An AdvanSix objective is to source responsibly at AdvanSix, and to measure and improve the sustainability of its suppliers to continue to achieve our sustainability objectives and deliver value to our customers. As part of our sustainability framework,

AdvanSix in turn requires its suppliers to comply with the Code of Business Conduct and the Supplier Code of Conduct, both of which sets forth clear expectations and commitments from our suppliers to respect human rights, which as excerpted above expressly prohibit forced labor and child labor.

### **1. Verification of Product Supply Chains to Evaluate and Address Risks of Human Trafficking and Slavery.**

AdvanSix uses internal supplier audits and to verify the qualifications of certain existing and potential future suppliers. While these processes are not specifically nor exclusively focused on trafficking and slavery, if AdvanSix becomes aware of any circumstances involving such conduct in its supply chain, AdvanSix will conduct an investigation and take appropriate remedial action(s).

In addition, in 2024, AdvanSix was recognized with its third consecutive Platinum rating by EcoVadis, an independent corporate social responsibility assessment agency. The Platinum rating is EcoVadis' highest rating and places the company in the top one percent (1%) of all companies assessed. EcoVadis evaluates corporate sustainability performance in the areas of environment, labor and human rights, ethics, and sustainable procurement.

### **2. Audits of Suppliers to Evaluate Compliance with Company Standards for Trafficking and Slavery in Supply Chains.**

AdvanSix procures goods and services from a broad range of industries, domestically and internationally. To minimize or prevent the risk of trafficking and slavery occurring in our extended supply chain, AdvanSix carefully selects and evaluates its current and prospective suppliers. We acknowledge the importance of risk mitigation and relationship management through the procurement process, including complying with the Act. All AdvanSix suppliers are required to comply with the Supplier Code of Conduct, which explicitly and this requirement is included in all new contracts and in all purchase order terms and conditions entered into by AdvanSix and its affiliated entities.

### **3. Compliance Certification of the Company's Suppliers.**

AdvanSix procures its goods from its supplier using either (a) purchasing agreements or (b) purchase orders, both of which include terms and conditions that expects its direct suppliers to comply with all applicable laws and regulations as a general matter, and to comply with the Supplier Code of Conduct, which as described above expressly bars slave, forced, bonded, indentured, or involuntary prison labor as well as child labor. AdvanSix expects suppliers to implement systems and controls to promote compliance with applicable laws and principles as set forth in the Supplier Code of Conduct. While a formal compliance certification process is not utilized, AdvanSix starts with the careful selection of its suppliers and requirement that suppliers comply with the Supplier Code of Conduct.

Furthermore, AdvanSix supplier corporate social responsibility risk ("CSR") is assessed using the third-party EcoVadis IQ tool. Suppliers are assessed for criticality to AdvanSix's business

risk and EcoVadis scores. The criticality and risk assessment are used to prioritize our supplier assessments and inform a continuous discussion with suppliers for improvement of CSR performance. This reflects AdvanSix’s commitment to ensuring its key suppliers are meeting CSR performance indicators, with assessments tied to EcoVadis key themes: Environment, Labor & Human Rights, Ethics, and Sustainable Procurement.

In addition, AdvanSix is a member of Together for Sustainability® (“TfS”). The TfS network supports and accelerates AdvanSix’s sustainable procurement programs by providing access to comprehensive CSR assessments and audits, driving the continued development of sustainable supply chain practices and enabling opportunities for best practices and knowledge-sharing within a network of companies committed to sustainability.

#### **4. Internal Accountability.**

Any AdvanSix employee who becomes aware of a situation that may involve a violation of the Code of Business Conduct, Human Rights Policy, Policy Statement Against Slavery and Human Trafficking or any applicable law or regulation has a responsibility to report it. Failure to comply with the Code of Conducts and Company policies can have serious consequences, which may include disciplinary action, up to and including termination, as well as possible civil or criminal penalties. AdvanSix will treat all reports confidentially to the extent possible, consistent with the law, Company policy and the Company’s need to conduct a thorough investigation.

The means to report violations and whistleblower procedures are well established and publicized in AdvanSix’s Code of Business Conduct, Supplier Code of Conduct, and other related policies and procedures. To protect whistleblowers, AdvanSix encourages anyone who becomes aware of a violation of the policies to speak up through several channels and resources available to facilitate an open dialogue and resolution with respect to suspected incidents or breaches of AdvanSix’s Code of Conduct or its various policies. Stakeholders may bring their concerns to (i) for employees, their manager, supervisor, Human Resources representative, or local complaint or grievance process, (ii) a member of the Legal and Compliance team, (iii) the ACCESS Integrity and Compliance Helpline, a confidential 24-hour service answered by an independent third-party provider. To protect whistleblowers, AdvanSix does not tolerate any form of retaliation against an individual for reporting in good faith actual or potential misconduct or violations of the foregoing policies.

#### **5. Training.**

All AdvanSix employees, including our Board of Directors and Executive Officers, certify, on an annual basis, as to their acknowledgment of the Code of Conduct and that they will act in accordance with the Code of Conduct. In connection with our quarterly and annual SEC reporting, key members of management similarly certify as to their compliance with the Code of Conduct as well as confirmation of their responsibility to report suspected violations of law, Company policy and/or the Code of Conduct, which as outlined above prohibits the use of slave, forced, bonded, indentured, or involuntary prison labor as well as child labor.