

AdvanSix Inc.
Policy Regarding Insider Trading and Other Transactions in AdvanSix Securities

This Policy describes the rules on trading or participating in any transactions involving AdvanSix securities or securities of other publicly traded companies while in possession of material and confidential information. This Policy applies to all directors, officers and employees, no matter where located. It also applies to certain family members, other members of a person's household and controlled entities as described below.

No Trading or Causing Trading While in Possession of Material Nonpublic Information

1. No director, officer or employee of AdvanSix may participate directly or indirectly in transactions involving the company's securities, while possessing material nonpublic information.
2. No director, officer or employee may "tip" or communicate material nonpublic information about AdvanSix to any other person, including family members and friends, or otherwise disclose such information without the company's express authorization.
3. Directors, officers and employees may not participate directly or indirectly in transactions involving the securities of other entities (including, for example, a current or prospective customer, supplier, joint venture participant, or party to an existing or potential transaction) while possessing material nonpublic information about that entity. Information that is not material to AdvanSix may nevertheless be material to the other entity.

Blackout Periods

Trading in AdvanSix securities by designated individuals is prohibited during the company's blackout periods. AdvanSix has established quarterly blackout periods that begin on the fifteenth day of the last month of each quarter and end at the close of the market on the second trading day following the date on which the company's financial results for the quarter just ended are publicly disclosed.

Who is subject to these quarterly blackout periods? Anyone who may be in possession of material nonpublic information during such periods including (1) directors, officers and assistant officers of the company; (2) all individuals reporting directly to the Chief Executive Officer and the Chief Financial Officer; (3) employees in the Controller's group who are involved in the preparation of financial statements (to be determined by the Controller); (4) employees with knowledge of financial performance forecasts; (5) investor relations professionals; and (6) family members or others living in the same household of the individuals listed above, family members whose transactions in AdvanSix securities are directed by, or are subject to the influence or control of, the individuals listed above, and any entities that the individuals listed above influence or control.

Employees not otherwise subject to the quarterly blackout periods are encouraged to refrain from trading AdvanSix securities during the quarterly blackout periods to avoid the appearance of improper trading.

The quarterly blackout periods apply, whether or not a reminder notice of the blackout is sent.

Clearance of Securities Transactions

In addition to complying with the prohibition on trading during blackout periods, the individuals subject to the quarterly blackout periods must obtain clearance from the General Counsel (or other attorneys designated by the General Counsel) before engaging in any transaction involving AdvanSix securities. Transactions requiring clearance include all transactions noted above, as well as gifts and any stock option exercise.

A request for clearance to trade in AdvanSix securities should be submitted to the General Counsel (or other designated attorneys) at least two business days in advance of the proposed transaction. When a request for clearance is made,

the requestor should confirm in the request that he or she (i) has reviewed this Policy and (ii) is not aware of any material nonpublic information about the company. A proposed transaction must be consummated within five business days of receipt of clearance unless an exception is granted or the person becomes aware of material nonpublic information before the trade is executed, in which case the preclearance is void and the transaction must not be completed. Transactions not effected within the time limit are again subject to clearance. If permission to engage in the transaction is denied, the transaction may not proceed, and the person making the request should not inform any other person of the restriction.

Violation of this Policy will result in disciplinary action, up to and including termination for cause and may result in severe legal penalties under applicable securities laws.

Definitions

Material. Information is generally regarded as “material” if it has market significance, that is, if its public dissemination is likely to affect the market price of securities, or if it otherwise is information that a reasonable investor would want to know before making an investment decision.

Nonpublic. The fact that information has been disclosed to a few members of the public does not make it public for insider trading purposes. To be “public” the information must have been disseminated in a manner designed to reach investors generally, and the investors must be given the opportunity to absorb the information.

Additional Guidance

10b5-1 Plans. Rule 10b5-1 of the Securities and Exchange Commission provides an exception to the insider trading rules when its provisions are followed. To be eligible, a person must enter into a “10b5-1 plan” specifying the circumstances in which transactions in the AdvanSix securities will take place in the future. In general, a 10b5-1 plan can only be established when the person entering into the plan is not aware of material nonpublic information. Once the plan is adopted, the person must not exercise any influence over the amount of securities to be traded, the price at which they are to be traded or the date of the trade. The plan must either specify the amount, pricing and timing of transactions in advance or delegate discretion on these matters to an independent third party. You may enter into a 10b5-1 plan only if the plan meets the requirements of Rule 10b5-1 and the plan is approved by the General Counsel (or other designated attorneys). Any contemplated 10b5-1 plan must be submitted for approval prior to the entry into the plan.

Other Prohibited Transactions

As a matter of policy, other prohibited transactions involving AdvanSix securities include: (1) short sales and derivatives; (2) trading options or futures; (3) financial instruments (including prepaid variable forward contracts, equity swaps, collars, and exchange funds) that are designed to hedge; (4) holding securities in a margin account or pledged as collateral for a loan; and (5) standing and limit orders.

Assistance

Compliance with this Policy is of the utmost importance both for you and AdvanSix. This Policy is not intended to address all conceivable questions about compliance with the securities laws. **You should not try to resolve uncertainties on your own as the rules relating to insider trading are often complex, not always intuitive and carry severe consequences. Questions concerning compliance with the securities laws and this Policy should be addressed to the General Counsel.**