

POLICY ON PROHIBITION OF DISCRIMINATION AND HARASSMENT¹

Effective June 1, 2015

It is the policy of Viskase Companies, Inc. (the “Company”) to maintain a professional work environment in which all individuals are treated with respect and dignity. The Company prohibits all discriminatory practices, including sexual harassment and harassment based on race, color, religion, gender, pregnancy, national origin, sexual orientation, age, disability, marital status, veteran status, alienage or citizenship status, creed, genetic predisposition or carrier status, status as a victim of domestic violence, or any other category protected by federal, state, or local law.

1. Definition of Sexual Harassment

Sexual harassment constitutes discrimination and is illegal under federal, state, and local laws. For purposes of this policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal, non-verbal or physical conduct of a sexual nature when, for example: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment; (ii) submission to or rejection of such conduct is used as the basis for decisions that affect an individual’s employment opportunities; or (iii) such conduct is unwelcome and severe or pervasive enough to create an intimidating, hostile, or offensive work environment or such that it unreasonably interferes with an individual’s work performance.

Sexual harassment may involve individuals of the same or different genders. Examples of sexual harassment may include, but are not limited to: unwanted sexual advances, demands for sexual favors; sexual jokes, unwelcome flirtations, advances or propositions; coerced sexual acts; verbal abuse of a sexual nature; graphic, verbal commentary about an individual’s body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; and/or displays in the workplace of sexually suggestive objects or pictures.

2. Definition of Harassment Based on Race, Color, Religion, Gender, National Origin, Sexual Orientation, Age, Disability, Marital Status or any Other Category Protected by Law

Under this policy, harassment is unwelcome verbal, non-verbal, or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, gender, national origin, sexual orientation, age, disability, marital status or any other category protected by law, or that of his or her relatives, friends or associates, and that (i) is severe or pervasive enough to create an intimidating, hostile, or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual’s work performance; or (iii) otherwise adversely affects an individual’s employment opportunities.

Harassing conduct includes, but is not limited to: (i) epithets, slurs, quips, or negative stereotyping that relate to race, color, religion, gender, national origin, sexual orientation, age, disability, marital status or any other category protected by law; (ii) threatening, intimidating or hostile acts that relate to race, color, religion, gender, national origin, sexual orientation, age, disability, marital status or any other category protected by law; (iii) written or graphic material (including graffiti) that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin,

sexual orientation, age, disability, marital status or any other category protected by law and that is placed on walls, bulletin boards, or elsewhere on the Company's premises, or circulated (including through email, text messages, and/or social media) or displayed in the workplace; or (iv) "jokes," "pranks," or other forms of "humor" that are demeaning or hostile with regard to race, color, religion, gender, national origin, sexual orientation, age, disability, marital status or any other category protected by law.

Sex-based harassment – that is, harassment not involving sexual activity or language (e.g., male manager yells only at female employees and not male employees) – may also constitute unlawful discrimination if it is severe or pervasive and directed at employees because of their gender.

3. Individuals and Conduct Covered by this Policy

This policy applies to all applicants and employees, and prohibits harassment, discrimination and retaliation, whether engaged in by fellow employees or by non-employees with whom the employee or applicant comes into contact in the course of employment (e.g., customers, service providers or contractors).

Conduct prohibited by this policy is unacceptable in the workplace and in any Company-sponsored work-related setting outside the workplace, such as business trips, business meetings and business-related social events. Similarly unacceptable under this policy is participation in Company-sponsored work-related activities whether in or outside the workplace that are inconsistent with a professional atmosphere that promotes equal employment opportunity or that are exclusionary with respect to any individual's race, color, religion, gender, national origin, sexual orientation, age, disability, marital status or any other category protected by law. This type of prohibited conduct includes patronizing, in connection with Company-sponsored work-related activities, adult entertainment establishments or facilities that exclude use by any individual on the basis of his or her protected status.

In addition, these policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, race, religion, or other characteristic protected by law, from participating in business or Company-sponsored work-related social activities or discussions in order to avoid allegations of harassment. The law and the Company's policies prohibit disparate treatment on the basis of any protected characteristic with regard to terms, conditions, privileges, and perquisites of employment. The prohibitions against harassment, discrimination, and retaliation are intended to complement and further these policies, not to form the basis of an exception to them.

4. Complaint Procedure

The Company strongly urges the reporting of all incidents of discrimination, harassment, or retaliation, regardless of the offender's identity or position, so that an effective and thorough investigation can be conducted, and effective remedial action can be taken when appropriate.

All of us share the responsibility for the success of this policy and are required to report concerns regarding conduct that may be contrary to it. Further, individuals who believe they have experienced conduct that is contrary to this policy or who have concerns about such matters should contact their supervisor or the Human Resources Department. Individuals should not feel obligated to file their complaints with their immediate supervisor first before bringing the matter to the attention of the Human Resources Department. Complaints will be accepted in writing or orally.

EMPLOYEES WHO HAVE EXPERIENCED CONDUCT THEY BELIEVE IS CONTRARY TO THIS POLICY HAVE AN OBLIGATION TO UTILIZE THIS COMPLAINT PROCEDURE. AN EMPLOYEE'S FAILURE TO FULFILL THIS OBLIGATION COULD AFFECT HIS OR HER RIGHT TO PURSUE LEGAL ACTION.

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of discrimination and harassment. Therefore, while no fixed reporting period has been established, employees are strongly urged to promptly report complaints or concerns so that rapid and constructive action can be taken.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to discriminatory or harassing conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

5. Investigating a Complaint

All allegations of discrimination, harassment, or retaliation will be promptly investigated by the Human Resources Department in coordination with the General Counsel. The investigation may include individual interviews with the parties involved and, when necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

The Company will endeavor to maintain confidentiality throughout the investigatory process to the extent practical and appropriate under the circumstances. The Company, however, has a legal obligation to act on all information it receives if it believes an individual may be engaging in conduct that violates Company policies or the law. Individuals involved in the investigation process are expected to provide their full cooperation and to maintain confidentiality. If an employee refuses to participate in a Company inquiry, the Company will base its conclusions on the other information gathered during the inquiry, and inferences drawn from all of the credible evidence.

At the conclusion of the investigation, the Company will advise any individual who has made a complaint under this policy that the investigation has concluded and share other information as may be appropriate under the circumstances.

6. Retaliation is Prohibited

The Company prohibits retaliation against any individual who reports discrimination or harassment or participates in an inquiry of such reports. Retaliation against an individual for reporting discrimination or harassment or for participating in an inquiry into a claim of discrimination or harassment is a serious violation of this policy. Any person who engages in such retaliation will be subject to disciplinary action up to and including termination of employment. The prohibition against retaliation includes, but is not limited to, remarks, threats, physical or verbal abuse, any discrimination in terms of pay, advancement, opportunities, termination of employment, job assignments or reassignments, unwelcome or unwarranted transfers, threats of punishment or revenge, actual punishment or revenge, or other acts that could be interpreted as retaliatory.

7. Disciplinary Action for Violating this Policy

If the Company finds that this policy has been violated, the violator will be subject to appropriate disciplinary action. Although the specific corrective and disciplinary action taken will be within the Company's discretion, it may include placing the employee on a leave of absence, verbal counseling, written disciplinary notice, reassignment, suspension, probation, demotion and/or termination of employment. In appropriate circumstances, the Company may also take remedial action, such as counseling, training and/or monitoring, even where a violation of this policy is not found. In addition, conduct that is unlawful may subject employees to civil, and in some cases, criminal liability.

The Company recognizes that false accusations of discrimination or harassment can cause serious

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harm to innocent persons. If an investigation results in a finding that the complainant knowingly made a false accusation of discrimination or harassment, the complainant may be subject to disciplinary action, up to and including termination of employment.

This policy is not written nor intended to restrict management's authority regarding disciplinary or employment decisions concerning employee behavior that is deemed unacceptable regardless of whether the employee's behavior constitutes discrimination or harassment.

¹ This policy is applicable to all United States based employees and United States facilities of the Company. This policy is not intended to be contrary to the terms of any collective bargaining agreement applicable to employees of the Company, if the application to bargaining unit employees would constitute a violation of such collective bargaining agreement or an unfair labor practice under United States law.