

Adopted by the Board of Directors  
June 16, 2004  
Amended by the Board of Directors  
February 8, 2018

**CCUR Holdings, Inc.  
Policy Regarding Stockholder Communications  
with the Board of Directors**

The Board of Directors of CCUR Holdings, Inc. (“CCUR”) has adopted this policy for stockholders to send communications to the Board of Directors.

*Regular Stockholder Communications.* CCUR shall maintain on its corporate website information explaining that stockholders who wish to communicate directly with the Board of Directors may do so by writing to the Board of Directors as a group or to the non-management directors as a group at CCUR’s mailing address at its corporate headquarters to the attention of the Corporate Secretary. The Corporate Secretary shall review all written correspondence received from stockholders and forward such correspondence periodically to the directors.

*Relationship with CCUR Accounting/Auditing Complaint Policy.* The foregoing is in addition to CCUR’s Accounting/Auditing Complaint Policy adopted pursuant to Section 10A of the Securities Exchange Act of 1934, as amended.