



CORPORATE POLICY

**SUBJECT: Policy for Complaint and Reporting Procedures
for Accounting and Auditing Matters**

**EFFECTIVE DATE: February 5,
2007, as amended July 1, 2015**

1.0 PURPOSE

Any person may submit a good faith complaint, report or concern regarding accounting or auditing matters relating to Astrotech Corporation or its subsidiaries (collectively, the "Company") to the management of the Company or to the Audit Committee of its Board of Directors (the "Audit Committee"). Further, Company employees may make such complaints or reports or voice such concerns without fear of dismissal or retaliation of any kind. The Company is firmly committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices.

2.0 POLICY

In order to facilitate reporting, the Audit Committee has established the following procedures for (a) the receipt, retention and treatment of complaints, reports and concerns regarding accounting, internal accounting controls or auditing matters and (b) the confidential, anonymous submission of complaints, reports and concerns by employees regarding questionable accounting or auditing matters. For purposes of this policy, these types of complaints, reports and concerns relate to "Accounting Matters" as more particularly described below.

2.1 Receipt of Complaints

Any person with concerns regarding Accounting Matters may report their concerns on a confidential, anonymous basis by calling the independent, toll-free "Compliance Hotline" (877) 778-5463 or by entering a concern online at www.reportit.net. (Use Company ID: **Astrotech** and password: **space123**). Employees of the Company may also report concerns pursuant to the Company's ethics and business conduct reporting procedures, including to their supervisor, any member of management, the human resources liaison or directly to the CFO.

3.0 PROCEDURE

3.1 Scope of Matters Covered by Procedures

Accounting Matters, as covered by these procedures, include any questionable accounting or auditing matter or any activity or practice that may include or result in any such questionable accounting or auditing matter involving the Company or an employee of the Company. By way of example, this could include or involve:

- fraud or error in the preparation, evaluation, review or audit of any financial statement of the Company;



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- fraud or error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company's internal accounting controls;
- improper access to or use of the Company's assets or property, including financial systems or software;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports (including discussions in quarterly and annual reports filed with the Securities and Exchange Commission) or audit reports of the Company; and
- deviation from full and fair reporting of the Company's transactions, financial condition or results of operations

3.2 Treatment of Complaints and Reports for Accounting and Auditing Matters

The Company has designated the CFO to review reports of all complaints received. The CFO investigates issues, and takes action on each inquiry. A summary of all actions (if any) is provided to the Audit Committee each quarter for review.

The Company will not take any adverse action against anyone as a result of their good faith complaint, report or concern pursuant to these procedures. The Company also will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions taken by the employee to assist in an investigation regarding conduct reasonably believed to violate the federal securities laws or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

4.0 AMENDMENTS

The Audit Committee may amend these procedures at any time, consistent with requirements of applicable laws, rules and regulations.

APPROVED BY RESOLUTION OF THE:

Corporate Audit Committee

/s/ Eric Stober

Eric Stober
Secretary