



## **CODE OF ETHICS**

---

The Trustees and staff of The Vantive Foundation are committed to conducting the affairs of the Foundation in accordance with the highest ethical standards.

As further set forth in our various internal policies, including the Conflict of Interest and Disclosure Policy, the Whistle Blower Policy and the Equal Employment Opportunity and Anti-Harassment Policy, we strive to:

- Never waiver our moral compass or ethical standards;
- Treat our grantees and potential grantees fairly;
- Treat our employees with respect, fairness and good faith, and provide conditions of employment that safeguard their rights;
- Comply with the law;
- Provide accurate public disclosure of our finances and activities;
- Promptly report internally any violations of this Code of Ethics, and protect good faith reporters from retaliation; and
- Disclose and appropriately handle potential conflicts of interest and conduct the affairs of the Foundation in such a manner that private benefits or the appearance thereof is avoided.

The Foundation reserves the right to amend and/or supplement this policy at any time.

Last Update: April 20, 2010