



WHISTLE BLOWER POLICY

The Vantive Foundation is committed to lawful and ethical behavior in all of its activities and requires that its Trustees, employees and consultants (collectively, "Foundation Persons") conduct themselves in a manner that complies with all applicable laws and policies. Set forth herein is the Foundation's policy with respect to reporting good faith concerns about the legality or propriety of Foundation actions or plans.

Reporting Concerns

A Foundation Person who has a good faith concern regarding the legality or propriety of any action contemplated to be taken or taken by the Foundation or another Foundation Person, or a good faith belief that action needs to be taken for the Foundation to be in compliance with laws, policies or ethical standards, should promptly advise the Foundation's Chief Executive Officer. If the CEO or executive management are unresponsive, the Foundation Person should report his or her concerns to a Trustee. Reports can be made verbally or in writing, in person or anonymously.

Investigation

The Foundation will investigate these reports with care and diligence. The Foundation's interest in being thorough in its investigation means that it cannot promise complete confidentiality, but it will act as discretely as reasonably possible. If as a result of the investigation the Foundation discovers a problem, it will promptly alert the CEO and the Trustees and take corrective action as it deems necessary.

Retaliation

The Foundation will not discharge, threaten or discriminate against a Foundation Person in any manner for his or her reporting in good faith what he or she perceives to be a wrongdoing, violation of law or policy, or other unethical or illegal conduct. The Foundation will impose disciplinary measures, up to and including termination, against anyone who threatens or retaliates against a Foundation Person who makes such a good faith report.

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

Last Update: March 20, 2010