

# Oracle Corporation 2024 Political Activity Report

## Dear Stockholder,

Oracle Corporation, our stockholders, and our employees are directly impacted by public policy decisions made at all levels of government in the United States and around the world. Oracle conducts business in more than 160 countries, necessitating compliance with a complex web of international laws governing our operations. Proposed policy changes, such as those affecting cloud computing, IT modernization, intellectual property rights, international trade, and taxation can have an impact on stockholder value.

## Transparency

Oracle recognizes that stockholders are interested in disclosure regarding corporate spending on US political activities. Oracle's level of activity in this area is relatively low. In 2024, Oracle's total expenses relating to political contributions and lobbying expenses were immaterial when compared to the company's total operating costs. Nonetheless, in the interest of transparency, we are providing this report in addition to what is mandated by the extensive political disclosure laws governing our activities.

## Oversight

Oracle is committed to the highest ethical standards, and we have procedures in place to ensure that our political contributions and lobbying expenditures are subject to appropriate oversight and in the best interest of stockholders. Oracle's public policy agenda is developed and advanced by Oracle's Government Affairs department, which focuses its efforts on public policy issues that are relevant to the long-term interests of Oracle. Oracle's Government Affairs department is overseen by an Executive Vice President who reports to Oracle's CEO. Oracle's Political Activity Reports are provided to the Finance and Audit Committee of the Oracle Board of Directors and are available on our website.

#### Process

Oracle Corporation is legally prohibited from contributing to Federal candidates for political office. To the extent Oracle is permitted by law to make contributions, for example, in certain states, Oracle's political expenditures are made by Oracle's Government Affairs department in compliance with an annual budget approved by the CEO. Candidates and other organizations considered for contributions are evaluated on a number of criteria, including their positions on issues of importance to Oracle, which may include issues affecting the business community in general or the technology industry specifically. All contributions are intended to promote the long-term interests of Oracle, its stockholders, and employees, and are made without regard to the political party of the candidate or political preferences of Oracle's executives, directors, and employees.

## Compliance

Oracle's government relations practices comply with all applicable Federal, state, and local laws and disclosure requirements. Oracle's political activities in the US are monitored by Oracle's Public Sector Legal & Compliance group, which reports directly to Oracle's Chief Legal Officer. In addition, all Oracle employees must comply with Oracle's <u>Code of Ethics and Business Conduct</u>, which provides detailed guidance regarding engaging with government public sector employees and officials.

## Lobbying

Oracle engages in discussions with elected officials on policy issues of significance to the company. Oracle's Federal lobbying activities are disclosed to the <u>Secretary of the US Senate</u> and the <u>Clerk of the US House of Representatives</u> and are publicly available at the respective linked websites. As a matter of policy, Oracle attempts to be over-inclusive when calculating and disclosing expenditures because we believe stockholder interest is broader than what is legally mandated. Oracle files similar publicly available lobbying reports with state and local agencies as required by state and local law, which in some cases have even broader disclosure requirements than Federal law.

## Industry and Trade Groups

Oracle belongs to a limited number of industry and trade organizations that advocate on behalf of policy issues important to our business. While we do not always share or agree with all of the views espoused by such groups, we believe our participation allows us to work collaboratively with organizations with similar interests on key policy issues and advocate in favor of those interests. Oracle's financial support to these groups, some of which are 501(c)(4) organizations, is made without regard to political affiliation. Our Government Affairs department regularly reviews the costs and benefits of our memberships in trade associations, taking fully into account the specific activities of the organization, the group's focus on

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specific policies of impact to Oracle, and the long-term protection of Oracle's brand. Oracle's 2024 trade association memberships are disclosed below.

## **Political Contributions**

Oracle makes relatively few direct political contributions using corporate funds. Disclosed below in this report are:

- Oracle's calendar year 2024 contributions reportable under US state or local laws
- Oracle's calendar year 2024 donations to organizations operating under Section 527 of the Internal Revenue Code

Oracle does not make expenditures for express advocacy or electioneering communications reportable under applicable laws.

## Oracle PAC

As part of Oracle's commitment to improve the public policy environment in which Oracle operates, Oracle employees came together in 1996 to form a nonpartisan political action committee, Oracle PAC. Oracle PAC enables eligible Oracle employees and stockholders to support elected officials who share our vision for innovation, competitiveness, regulation, and economic growth. Oracle PAC is a voluntary fund that is separate from Oracle Corporation and operates in compliance with federal laws governing PAC activities.

Records of Oracle PAC's Federal Election Commission (FEC) reports, which detail contributions and expenditures, are publicly available on the <u>FEC website</u>.

Should any stockholder require additional information, please contact Oracle's Investor Relations department at investor us@oracle.com.

#### Kenneth Glueck

Executive Vice President Oracle Corporation

## Corporate Political Contributions from January 1, 2024 to December 31, 2024

		DISBURSED AMOUNT
NATIONAL		
Democratic Attorneys General Association	2/8/24	\$25,000.00
Democratic Governors Association	3/12/24	\$100,000.00
Democratic Governors Association	4/2/24	\$20,000.00
Democratic Governors Association	6/13/24	\$100,000.00
Democratic Governors Association	9/17/24	\$30,000.00
Republican Attorneys General Association	2/8/24	\$ 25,000.00
Republican Governors Association	3/12/24	\$100,000.00
Republican Governors Association	6/13/24	\$100,000.00
Republican Governors Association	9/17/24	\$50,000.00
ARKANSAS		
Team SHS	8/16/24	\$5,000.00
ILLINOIS		
Illinois Veterans for Change	10/22/24	\$10,000.00
MISSOURI		
House Republican Campaign Committee	10/8/24	\$10,000.00
Majority Forward	10/28/24	\$5,000.00
Missouri Alliance PAC	8/16/24	\$10,000.00
Missouri Senate Campaign Committee	11/5/24	\$15,000.00
MONTANA		
Montana Republican State Central Committee	5/7/24	\$5,000.00
NEVADA		
Committee to Elect Aaron Ford	4/16/24	\$5,000.00
NEW MEXICO		
Torrez for New Mexico	10/1/24	\$5,000.00
NORTH CAROLINA		
Moving NC Forward	10/22/24	\$5,000.00
TEXAS		
Texas Senate Democratic Caucus	10/29/24	\$5,000.00
Texas Senate Republican Caucus	10/24/24	\$5,000.00
UTAH		
Friends of Spencer Cox	7/9/24	\$5,000.00
VIRGINIA		
A Safer Virginia PAC	7/23/24	\$10,000.00

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## Membership Payments\*

## from January 1, 2024 to December 31, 2024

#### \$500,000 and above

BSA | The Software Alliance

#### \$100,000 - \$499,999

Alliance for Competitive Taxation

Attorney General Alliance

College of Healthcare Information Management Systems

Healthcare Leadership Council

High Tech Inventors Alliance

Indo-Pacific Forum

Information Technology Acquisition Advisory Council (IT-AAC)

Technology CEO Council

United States Telecom Association

### \$25,000 - \$99,999

21st Century Policy Institute

Americans for Tax Reform

Center for Procurement Advocacy

Center Forward

Chamber of Commerce of Greater Kansas City

Cloud Service Providers

Coalition For Government Procurement

Copyright Alliance

CTIA - The Wireless Association

Future Forum Foundation

Healthcare Information And Management Systems Society

Healthcare Trust Institute

High Tech Inventors Alliance

Homeland Security and Defense Forum

Information Technology Information Sharing and Analysis Center (IT-ISAC)

National Center For APEC

National Conference of State Legislatures

National Foreign Trade Council (NFTC)

Professional Services Council

Silicon Valley Tax Directors Group

Senate Presidents' Forum

Shared Services Leadership Coalition

The Ripon Society

U.S. Chamber of Commerce

United States Council For International Business (USCIB)

United States Information Technology Office (USITO)

**US-ASEAN Business Council** 

## \$10,000 - \$24,999

Alliance for American Exceptionalism

American Chamber of Commerce Saudi Arabia

American Legislative Exchange Council (ALEC)

California Chamber Of Commerce

California State Society

Denver Metro Chamber of Commerce

Digital Dialogue Forum

**Equality Project** 

Greater Wichita Partnership

Missouri Chamber of Commerce and Industry

Northern Virginia Technology Council

Potomac Exchange

State Government Affairs Council

State Legislative Leaders Foundation

Tennessee Chamber of Commerce and Industry

The Texas Association of Business

The Texas State Society of Washington, DC

Transatlantic Policy Network

US-Ireland Partnership for Growth

**US-UAE Business Council** 

Western Governors Association

## \$0 - \$9,999

American Medical Informatics Association

Chamber of Commerce of Greater Kansas City Innovation and Technology Caucus of the Texas House of Representatives

International Trademark Association

National Association of Business Political Action

**R&D** Coalition

South Kansas City Chamber of Commerce

<sup>\*</sup> Does not include subscriptions, events, or sponsorships