

Oracle Corporation 2020 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 intellectual property rights, technology policy, cloud computing, taxation, and international trade, can have an impact on stockholder value.

Oracle is acutely aware of the current state of political discourse in the United States and the turbulent political environment in which we are operating. Oracle strongly encourages our employees to participate in the political process, to volunteer, and to vote. The limited contributions made directly by Oracle Corporation to non-profit organizations and industry trade groups take fully into account the specific activities of the organization, the group's focus on specific policies of impact to Oracle, and the long-term protection of Oracle's brand. As can be seen from the disclosures in this report, Oracle's contributions are limited, made without regard to political orientation, and have a clear connection with Oracle's business interests.

It bears emphasizing that Oracle Corporation is legally prohibited from making political contributions to candidates for Federal office. While we are aware of some calls to withdraw or pause from the political process given current events in the United States, Oracle believes it is necessary and appropriate to continue our limited engagement to further the long-term interests of the company and our stockholders. We believe Oracle's voice in these policy discussions provides an important perspective that can assist lawmakers in creating policies that promote the competitiveness and innovative capacity of the United States. Lastly, we believe a review of the activities disclosed in this report demonstrate that our contributions are far afield from current events.

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 2020, 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, such as IT modernization, artificial intelligence, intellectual property rights, taxation, and international trade. Oracle's Government Affairs department reports to Oracle's CEO, who oversees the group's activities. 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

As a general rule, 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 being 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 General Counsel. In addition, all Oracle employees must comply with Oracle's [Code of Ethics and Business Conduct](#), which provides detailed guidance regarding engaging with government public sector employees and officials.

Lobbying

Oracle engages in discussions with governments on policy issues of significance to the company. Oracle's Federal lobbying activities are disclosed to the [Secretary of the US Senate](#) and the [Clerk of the US House of Representatives](#) 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 number of industry and trade associations that advocate on behalf of policy issues that are important to our business. While we do not always share or agree with all of the views espoused by such groups, we believe our membership in these groups allows us to work collaboratively with organizations with similar interests on key policy issues and advocate in favor of those interests. Oracle makes payments to these groups, some of which are 501(c)(4) organizations, including membership fees and dues. Our Government Affairs department regularly reviews the costs and benefits of our memberships in trade associations. Oracle's 2020 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 2020 contributions reportable under US state or local laws
- Oracle's calendar year 2020 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. Oracle PAC is managed by a steering committee that consists of Oracle PAC donors and Oracle Government Affairs personnel. All Oracle PAC donors are welcome to recommend potential recipients of Oracle PAC contributions, and all contributions are approved by the steering committee before disbursements are made. Records of Oracle PAC's Federal Election Commission (FEC) reports, which detail contributions and expenditures, are publicly available on the [FEC website](#).

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, 2020 to December 31, 2020**

ORGANIZATION	DATE	DISBURSED AMOUNT
Anthony Rendon for Assembly 2020	3/9/20	\$4,700.00
Bay Area Legislative Leaders PAC	1/14/20	\$5,000.00
California Democratic Party	9/17/20	\$25,000.00
Californian Republican Party	9/17/20	\$25,000.00
Democratic Attorneys General Association	3/10/20	\$50,000.00
Democratic Governors Association	10/22/20	\$100,000.00
Republican Attorneys General Association	1/14/20	\$50,000.00
Republican Governors Association	10/20/20	\$100,000.00
Friends of Chris Sununu	9/3/20	\$2,000.00
Innovation and Technology Caucus of the Texas House of Representatives	12/8/20	\$5,000.00
Friends of Spencer Cox	9/3/20	\$ 5,000.00
Northern Virginia Technology Council PAC	9/15/20	\$5,500.00
Jay Inslee for Washington	9/3/20	\$2,000.00

Membership Payments*

from January 1, 2020 to December 31, 2020

\$500,000 and above

BSA | The Software Alliance

\$100,000 - \$499,999

Alliance for Competitive Taxation
American Conservative Union
Americans for Tax Reform
Business Roundtable
High Tech Inventors Alliance (HTIA)
Information Technology Industry Council (ITIC)
Information Technology Acquisition Advisory Council (IT-AAC)
Technology CEO Council
Technology Network (TechNet)
U.S. Chamber of Commerce
United States Telecom Association (USTelecom)

\$25,000 - \$99,999

Bay Area Council
Center for Cybersecurity Policy and Law
Center for Procurement Advocacy
Coalition For Government Procurement
CompTIA
Copyright Alliance
CTIA - The Wireless Association
Information Technology - Information
Sharing and Analysis Center (IT-ISAC)
Intellectual Property Owners Association
Internet Accountability Project (IAP)
Meridian International Center
National Center For APEC
National Foreign Trade Council
Professional Services Council
Silicon Valley Leadership Group
Silicon Valley Tax Directors Group
The Ripon Society
United States Council For International Business
United States Information Technology Office (USITO)
US-ASEAN Business Council

\$10,000 - \$24,999

Advanced Energy Economy
California Chamber of Commerce
California State Society
Center for Cybersecurity Policy and Law
Colorado Association of Commerce
and Industry
Competitive Carriers Association
Inter-American Dialogue
Mavericks, Inc.
Northern Virginia Technology Council
Potomac Exchange
Trans-Atlantic Business Council
Transatlantic Policy Network

\$0 - \$9,999

Moving NC Forward
National Association of Business Political
Action Committees
Portland Business Alliance
U.S.-Colombia Business Partnership

*Does not include subscriptions, events, or sponsorships.

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