

Oracle 2019 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 175 countries, necessitating compliance with a complex web of international laws governing our operations. Proposed policy changes, such as those affecting intellectual property rights, taxation, and international trade, can have an impact on Oracle's bottom line and stockholder value. Oracle believes it is necessary and appropriate to engage in the political process to further the long-term interests of the company and our stockholders.

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 2019, 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. Oracle's political expenditures are made by Oracle's Government Affairs department in compliance with an annual budget approved by Oracle's CEO, who oversees the group's activities. 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 and are made without regard to the personal 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. From time to time Oracle engages in discussions with governments on policy issues of significance to the company. Oracle's Federal lobbying disclosure reports to the secretary of the US Senate and the clerk of the US House of Representatives are publicly available at their respective websites: https://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm and http://clerk.house.gov/public_disc/index.aspx. 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, including membership fees and dues. Our Government Affairs department regularly reviews the costs and benefits of our memberships in trade associations. Oracle's 2019 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 2019 contributions reportable under US state or local laws
- Oracle's calendar year 2019 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, Oracle employees came together in 1996 to form our own 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 www.fec.gov.

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

Oracle Corporate Political Contributions
from January 1, 2019 to December 31, 2019

ORGANIZATION	DATE	DISBURSED AMOUNT (US\$)
California		
Bay Area Legislative Leaders PAC	1/31/2019	2,500
Becerra for Attorney General	7/25/2019	1,000
Evan Low for Assembly 2020	5/23/2019	1,500
Irwin for Assembly 2020	6/17/2019	1,500
Portantino for Senate 2020	5/23/2019	1,500
Stern for Senate 2020	5/14/2019	1,500
Indiana		
Team Holcomb	6/18/2019	5,000
National		
Democratic Attorneys General Association	2/19/2019	25,000
Democratic Attorneys General Association	11/13/2019	10,000
Democratic Governors Association	11/7/2019	100,000
Republican Attorneys General Association	1/28/2019	25,000
Republican Governors Association	10/9/2019	100,000
Ohio		
Dewine Husted Inaugural Committee	3/6/2019	2,500
Virginia		
Friends of Jason Miyares	11/7/2019	500
Friends of Tim Hugo	5/14/2019	2,500
Texas		
2019 Texas Inaugural Committee	2/19/2019	10,000



Oracle Membership Payments*

from January 1, 2019 to December 31, 2019

\$500,000 - \$999,999

BSA | The Software Alliance
Trade Works for America

\$100,000 - \$499,999

Alliance for Competitive Taxation
American Conservative Union
Americans for Tax Reform
Business Roundtable
Center for Strategic & International Studies (CSIS)
High Tech Inventors Alliance (HTIA)
Hudson Institute
Information Technology Acquisition Advisory Council (IT-AAC)
Information Technology Industry Council (ITIC)
Interoperability Clearinghouse (ICH)
Technology CEO Council
Technology Network (TechNet)
The Federalist Society
United States Telecom Association (USTelecom)
U.S. Chamber of Commerce

\$25,000 - \$99,999

American Action Forum
Bay Area Council
Business Council for International Understanding
Center for Public Policy Innovation
Coalition for Government Procurement
Copyright Alliance
CTIA - The Wireless Association
Free and Fair Markets Initiative
Information Technology - Information Sharing and Analysis
Center (IT-ISAC)
Intellectual Property Owners Association
Internet Accountability Project (IAP)
Internet Technology & Innovation Foundation (ITIF)
Meridian International Center
National Foreign Trade Council
Professional Services Council
Rule of Law Defense Fund
Silicon Valley Leadership Group
Silicon Valley Tax Directors Group
The Ripon Society
United States Information Technology Office (USITO)
US-ASEAN Business Council
Washington Resource Associates

\$10,000 - \$24,999

Alianta
California Chamber of Commerce
California State Society
Colorado Association of Commerce
CompTIA
Global Women's Innovation Network (GlobalWIN)
Inter-American Dialogue
Mavericks, Inc.
Potomac Exchange
Trans-Atlantic Business Council
Transatlantic Policy Network
Women's High-Tech Coalition

\$0 - \$9,999

National Association of Business Political
Action Committees
Northern Virginia Technology Council
Portland Business Alliance
U.S.-Colombia Business Partnership

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