

ORACLE

Oracle Corporation 2021 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 2021, 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 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 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 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 elected officials 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 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 specific policies of impact to Oracle, and the long-term protection of Oracle's brand. Oracle's 2021 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 2021 contributions reportable under US state or local laws
- Oracle's calendar year 2021 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 [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, 2021 to December 31, 2021**

ORGANIZATION	DATE	DISBURSED AMOUNT
NATIONAL		
Democratic Attorneys General Association	5/4/21	\$50,000.00
Democratic Governors Association	11/9/21	\$100,000.00
Republican Governors Association	11/9/21	\$100,000.00
TEXAS		
Grow Austin Parks	9/16/21	\$250,000.00
Grow Austin Parks	10/5/21	\$250,000.00
Grow Austin Parks	10/22/21	\$400,000.00
Travis County Democratic Party	10/14/21	\$10,000.00
UTAH		
Friends of Spencer Cox	4/15/21	\$5,000.00

Membership Payments* from January 1, 2021 to December 31, 2021

\$500,000 and above

BSA | The Software Alliance

\$100,000 - \$499,999

Americans for Tax Reform
Business Roundtable
Information Technology Acquisition Advisory Council (IT-AAC)
Information Technology Industry Council (ITIC)
Internet Accountability Project (IAP)
Technology Network (TechNet)
U.S. Chamber Of Commerce
United States Telecom Association (USTelecom)

\$25,000 - \$99,999

Alliance for Competitive Taxation
Asia Cloud Computing Association
Bay Area Council
Center for Procurement Advocacy
Coalition For Government Procurement
CompTIA
Copyright Alliance
CTIA - The Wireless Association
Homeland Security Dialogue Forum
High Tech Inventors Alliance (HTIA)
Information Technology Information Sharing
and Analysis Center (IT-ISAC)
Intellectual Property Owners Association
National Center For APEC
National Foreign Trade Council
O-RAN Alliance
Professional Services Council
Silicon Valley Leadership Group
Silicon Valley Tax Directors Group
State After Reform Partnership (STAR)
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
Colorado Association of Commerce and
Industry
Competitive Carriers Association
Digital Dialogue Forum
Inter-American Dialogue
Northern Virginia Technology Council
Open Ran Policy Coalition
The Texas State Society of Washington, DC
Trans-Atlantic Business Council
Transatlantic Policy Network
Western Governors' Association

\$0 - \$9,999

International Trademark Association
Moving NC Forward
National Association of Business Political
Action Committees
Potomac Exchange
Portland Business Alliance
State Government Affairs Council
The Massachusetts Society of Washington, DC
U.S.-Colombia Business Partnership

* Does not include subscriptions, events, or sponsorships

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