ORACLE CORPORATION CORPORATE GOVERNANCE GUIDELINES

(As last amended by the Board of Directors on September 16, 2026)

The primary function of the Board of Directors (the "Board") of Oracle Corporation ("Oracle") is to provide oversight, direction and leadership over Oracle's strategy, operations and management. The Board intends that these guidelines serve as a flexible framework within which the Board may conduct its business.

1. Director Qualifications

A majority of the members of the Board must qualify as independent directors in accordance with the applicable listing standards of the New York Stock Exchange (the "Independence Rules"), as determined by the Board. The Nomination and Governance Committee of the Board is responsible for reviewing with the Board the requisite skills and characteristics of potential Board members as well as the composition of the Board as a whole.

The policy of the Nomination and Governance Committee is to consider all properly submitted stockholder candidates for membership on the Board as well as candidates submitted by current Board members and others. Any stockholder of Oracle wishing to submit a candidate for the Nomination and Governance Committee's consideration must provide a written notice recommending the candidate to the Corporate Secretary of Oracle at Oracle Corporation, 2300 Oracle Way, Austin, Texas 78741 or by email at Corporate_Secretary@oracle.com (with a confirmation copy sent by mail). The written notice must include the candidate's name, biographical data and qualifications and attach a written consent from the candidate agreeing to be named as a nominee and to serve as a director if elected. Nominees for director will be selected by the Nomination and Governance Committee in accordance with the policies and principles in its charter and the procedures set forth herein.

In selecting the nominees, the Nomination and Governance Committee will assess the candidates' independence (as defined in the Independence Rules), character, acumen and business judgment, while also focusing on the overall mix of strengths on the Board. The Nomination and Governance Committee will endeavor to assemble a Board with a wide range of skills, experiences and perspectives and will consider a candidate's personal and professional ethics, integrity and values, professional relationships, as well as the willingness and ability to devote the substantial time necessary to effectively serve on the Board. The Nomination and Governance Committee, acting on behalf of the Board, also believes that the Board is enriched by varied perspectives, backgrounds and experiences in order to create an outstanding, dynamic and effective Board to represent the interests of the stockholders. The Nomination and Governance Committee will seek Board endorsement of the final candidates recommended by the Committee. The same identifying and evaluating procedures apply to all candidates for director, whether submitted by stockholders or otherwise.

The Nomination and Governance Committee and full Board will periodically evaluate the appropriate size of the Board and make any changes it deems appropriate. The Board does not believe that it should establish term limits or a mandatory retirement age for its members. The Board believes that it is desirable to maintain a mix of longer-tenured, experienced directors that have developed increased knowledge of and valuable insight into Oracle and its operations, and newer directors with fresh perspectives. The Board also believes that longer-tenured, experienced directors are a significant strength of the Board, given the large size of Oracle, the breadth of Oracle's product offerings and the international scope of the organization.

2. Majority Voting for Directors

If a nominee for director in an uncontested election of directors (i.e., an election other than one in which (i) the number of director nominees exceeds the number of directorships subject to election or (ii) proxies are being solicited by a person other than Oracle), does not receive the vote of at least "the majority of the votes cast" at any meeting for the election of directors at which a quorum is present and no successor has been elected at such meeting, the director will promptly tender his or her resignation to the Board. For purposes of this corporate governance policy, "the majority of votes cast" means that the number of shares voted "for" a director's election exceeds 50% of the number of votes cast with respect to that director's election. "Votes cast with respect to that director's election" shall include votes to withhold authority but shall exclude abstentions and failures to vote with respect to that director's election.

The Nomination and Governance Committee will make a recommendation to the Board as to whether to accept or reject the tendered resignation. The Board must act on the tendered resignation, taking into account the Nomination and Governance Committee's recommendation, within 90 days from the date of the certification of the election results. The Board shall promptly publicly disclose by furnishing a report with the U.S. Securities and Exchange Commission its decision regarding the tendered resignation, including its rationale for accepting or rejecting the resignation offer. The Nomination and Governance Committee in making its recommendation, and the Board in making its decision, may each consider any factors or other information that it considers appropriate and relevant, including, but not limited to, (i) the stated reasons, if any, why stockholders withheld their votes, (ii) possible alternatives for curing the underlying cause of the withheld votes, (iii) the director's tenure, (iv) the director's qualifications, (v) the director's past and expected future contributions to Oracle, and (vi) the overall composition of the Board.

The director who tenders his or her resignation will not participate in the recommendation of the Nomination and Governance Committee or the decision of the Board with respect to his or her resignation. If a majority of the Nomination and Governance Committee do not receive the vote of at least "the majority of the votes cast", then the independent Directors of the Board who received the vote of at least "the majority of the votes cast" shall appoint a committee amongst themselves to consider the resignation offers and recommend to the Board whether to accept them. The Board may accept a director's resignation or reject the resignation. If the Board accepts a director's resignation, or if a nominee for director is not elected and the nominee is not an incumbent director, then the Board, in its sole discretion, may fill any resulting vacancy pursuant to the provisions of Section 2.02 of the Bylaws or may decrease the size of the Board pursuant to the provisions of Section 2.01 of the Bylaws. If a director's resignation is not accepted by the Board, such director will continue to serve until the next annual meeting and until his or her successor is duly elected, or his or her earlier resignation or removal.

This corporate governance policy will be summarized or included in each proxy statement relating to an election of directors of Oracle.

3. Director Responsibilities

The basic responsibility of the directors is to exercise their business judgment to act in a manner they reasonably believe is in the best interests of Oracle and its stockholders and in a manner consistent with their fiduciary duties. In fulfilling that responsibility, directors may ask such questions and conduct such investigations as they deem appropriate, and may reasonably rely on the information provided to them by Oracle's senior executives and its outside advisors and auditors.

The Board is also responsible for overseeing management's efforts to assess and manage material risks and for reviewing options for risk mitigation. The Board reserves oversight of the major risks facing Oracle and may delegate risk oversight responsibility to committees of the Board. The Board and its committees assess whether management has an appropriate framework to manage risks and whether that framework is operating effectively. Among other things, Oracle's oversight system is designed so that the Board and its committees focus on areas of material risk to Oracle.

Directors are expected to attend the Annual Meeting of Stockholders, regularly attend Board meetings and meetings of committees on which they serve and to meet as frequently as they deem necessary to properly discharge their responsibilities. In addition, directors should stay abreast of Oracle's business and markets, and as appropriate, meet with Oracle's customers or attend events or take other actions they deem appropriate to enhance Oracle's business and their effectiveness as directors. Agendas and other information that are important to the Board's understanding of the business to be conducted at a Board or committee meeting should generally be distributed in writing to the directors at least two days before the meeting, and directors should review these materials and prepare in advance of the meeting.

The Executive Chair of the Board and the Corporate Secretary will establish and disseminate the agenda for each Board meeting. Each Board member is free to suggest the inclusion of items on the agenda. Each Board member is free to raise at any Board meeting subjects that are not on the agenda for that meeting. The Board will periodically review with the Chief Executive Officers ("CEOs") Oracle's long-term strategic plans. The Board believes that management speaks for Oracle. Individual Board members may, from time to time, expressly represent Oracle in meetings or otherwise communicate with various third parties on Oracle's behalf. It is expected that Board members will do this with the knowledge of the management and, unless warranted by unusual circumstances or as contemplated by the committee charters, only at the request of management. For communications with employees see "Director Access to Officers and Employees", below.

All directors are expected to comply with the Oracle Code of Ethics and Business Conduct; provided that the provisions regarding conflicts of interest in the "Conflicts of Interest" section of these guidelines shall apply to non-employee directors in lieu of the conflict of interest provisions contained in the Oracle Code of Ethics and Business Conduct.

4. Executive Sessions and Leadership Roles

The non-management directors (i.e., directors who are not Oracle officers) will meet at regularly scheduled executive sessions without the CEOs or other members of Oracle's management present. Any director may also request additional executive sessions of non-management directors to discuss any matter of concern.

On an annual rotating basis, the chairs of the Finance and Audit Committee, Nomination and Governance Committee and the Compensation Committee shall serve as the lead independent director ("**Lead Independent Director**"). The Board believes the position of Lead Independent Director is strengthened by the particular insights and diversity of viewpoints that the different committee chairs bring to the position. The Lead Independent Director's duties include, among others, serving as a liaison between the non-management directors and the management directors, including the Executive Chair and the CEOs; facilitating discussion among non-management directors on key issues and concerns outside of Board meetings; being available, when appropriate, for consultation and direct communication with large stockholders; and such other additional duties as the Board may determine.

The Board does not have a policy mandating the separation of the roles of Chair and CEO. The Board elects the Chair and the CEOs, and each of these positions may be held by the same person or by different people. The Board believes it is important to retain flexibility to determine whether these roles should be separate or combined based upon the Board's assessment of Oracle's needs and leadership at a given point in time.

The Board retains the discretion to consider these matters on a case-by-case basis.

5. Conflicts of Interest / Changes in Responsibilities

It is the responsibility of each director to ensure that other commitments do not conflict or materially interfere with the director's responsibilities to Oracle. Each director is required to annually disclose in writing to the Chief Legal Officer all of his or her executive, employment, board of directors, advisory board or equivalent positions in other organizations (private and public, including non-profit entities; provided that advisory board or equivalent positions with non-profit entities do not need to be disclosed). Each director shall also disclose any such proposed position with a public company (or any material change in a position with a public company) before it becomes effective and any position with a private entity promptly following his or her appointment to such entity. Directors shall also promptly disclose to the Chief Legal Officer: (1) any potential conflicts of interest that may arise from time to time with respect to matters under consideration by the Board, (2) any change potentially affecting his or her independence, and (3) a material change in his or her job responsibilities due to retirement, assuming new responsibilities or other material changes in principal employment.

The Chief Legal Officer shall report all such disclosures to the Committee on Independence Issues of the Board (the “Independence Committee”). The Board shall consider such disclosures and other available information and shall take such actions as it considers appropriate, which may include requesting the director to recuse himself or herself from certain discussions or to refrain from voting with respect to certain matters.

6. Board Committees

The Board will have at all times a Finance and Audit Committee, a Compensation Committee, a Nomination and Governance Committee and an Independence Committee. All of the members of these committees will be “independent” directors, as defined in the Independence Rules, and in accordance with the Exchange Act of 1934, as amended, and the rules and regulations promulgated thereunder.

Committee members and chairs will be appointed by the Board upon the recommendation of the Nomination and Governance Committee.

Each of the above standing committees will have its own written charter. The charters will set forth the purpose, authority and responsibilities of the committees as well as qualifications for committee membership, procedures for committee member appointment and removal, committee structure and operations and how the committee reports to the Board. The charters of each standing committee will be reviewed periodically with a view to delegating to the standing committees the full authority of the Board concerning specified matters appropriate to such committee.

The chair of each committee, in consultation with the committee members and senior management, will determine the frequency and length of the committee meetings consistent with any requirements set forth in the committee’s charter. The chair of each committee, in consultation with the appropriate members of the committee and management, will develop the committee’s agenda.

The Board may, from time to time, establish or maintain additional committees as it deems appropriate and delegate to such committees such authority permitted by applicable laws and Oracle’s Bylaws as the Board sees fit.

The Board and each Board committee shall have the power to hire legal, accounting, financial or other advisors as they may deem necessary in their best judgment with due regard to cost, without the need to obtain the prior approval of any officer of Oracle. The Corporate Secretary of Oracle will arrange for payment of the invoices of any such third party.

7. Director Access to Officers and Employees

Directors have full and free access to officers and employees of Oracle. Any meetings or contacts that a director wishes to initiate may be arranged through the Executive Chair, the Executive Vice Chairs, the CEOs or the Corporate Secretary. The directors should seek to ensure that any such contact is not disruptive to the business operations of Oracle and will, to the extent necessary and appropriate, inform the Executive Chair and the CEOs of any communications between a director and an officer or employee of Oracle.

The Board, the Executive Chair or the CEOs may request that certain members of senior management attend all or any portion of a Board meeting and will schedule presentations by managers who: (a) can provide additional insight into the items being discussed because of their personal involvement in these areas, or (b) have future senior management potential.

8. Director Compensation

The form and amount of director compensation will be determined by the Compensation Committee in accordance with the policies and principles set forth in its charter. Changes in director compensation, if any, approved by the Compensation Committee will be reviewed and ratified by the full Board before becoming effective.

9. Director Orientation and Continuing Education

The Board or Oracle will establish, or identify and provide access to, appropriate orientation programs, sessions or materials for newly elected directors of Oracle for their benefit either prior to or within a reasonable period of time after their nomination or election as a director. This orientation may include presentations by senior management to familiarize new directors with Oracle's strategic plans, its significant financial, accounting and risk management issues, its Compliance Program, its Code of Ethics and Business Conduct, its principal officers, and its internal and independent auditors.

Directors are expected to keep current on issues affecting Oracle and its industry and on developments with respect to their general responsibilities as directors. The Board regularly engages in continuing education about Oracle's business and encourages directors to attend appropriate outside continuing education programs, the costs of which Oracle covers.

10. Director and Executive Officer Stock Ownership

Directors and executive officers are required to own shares of stock in Oracle to align their interests with the long-term interests of Oracle's stockholders. The Compensation Committee oversees and reviews compliance with the stock ownership guidelines and shall periodically review and recommend changes to the director and executive officer stock ownership requirements.

11. CEO Evaluation

The Compensation Committee will conduct an annual review of each of the CEO's performance and compensation, as set forth in its charter (and may, in its discretion, consult for this purpose with the Nomination and Governance Committee). The Board will review the Compensation Committee's report in order to ensure that each CEO is providing the best leadership for Oracle in the long- and short-term.

12. Performance Evaluation

The Board, led by the Nomination and Governance Committee, will annually conduct a self-evaluation to determine whether the Board and its committees are functioning effectively. The full Board will discuss the evaluation to determine what action, if any, could improve Board and committee performance. The Board, with the assistance of the Nomination and Governance Committee, as appropriate, shall periodically review these Corporate Governance Guidelines to determine whether any changes are appropriate. The Board also receives reports on each standing committee's self-evaluation.

13. Management Succession

The Nomination and Governance Committee will periodically review and assess the adequacy of Oracle's policies, plans and procedures with respect to succession planning, including policies and principles for CEO selection and performance review, as well as policies regarding succession in the ordinary course of business and in the event of unexpected events or emergencies.

14. Process for Communications with the Board

Any interested party wishing to communicate with any of the directors regarding bona fide issues about Oracle may write to the director(s), c/o the Corporate Secretary of Oracle Corporation at Oracle Corporation, 2300 Oracle Way, Austin, Texas 78741 or by email at Corporate_Secretary@oracle.com. The Corporate Secretary periodically will forward these communications to the appropriate directors or committees of the Board.

