



## Policy against Trafficking in Persons and Slavery



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## Purpose

Oracle is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy, includes forced labor and unlawful child labor. Oracle will not tolerate or condone human trafficking or slavery in any part of our global organization. This policy is consistent with Oracle's Code of Ethics and Business Conduct and our core values to protect and advance human dignity and human rights in our global business practices.

Oracle employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Oracle conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

## Scope

This Policy applies to all personnel employed by or engaged to provide services to Oracle, including, but not limited to, Oracle's employees, officers, temporary employees, contingent workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this Policy, "employees").

Every Oracle employee is responsible for reading, understanding and complying with this Policy.

Oracle managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them. If you have any questions or concerns relating to this Policy, consult the Oracle Legal Department or a member of the Compliance and Ethics Organization. If you learn of any conduct that you believe may violate this Policy, report it immediately by any of the means listed under the heading "Policy Compliance" below.

## Policy Statement

Oracle prohibits trafficking in persons and slavery. Oracle employees, contractors, subcontractors, vendors, suppliers, partners and others through whom Oracle conducts business must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons;
- Procuring commercial sex acts;
- Using forced labor in the performance of any work;
- Destroying, concealing, confiscating, or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions; such as failing to disclose, in a format and language accessible to the potential candidate, basic information or making material misrepresentations during the recruitment of candidates regarding the key terms and conditions, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if provided by Oracle), any significant cost to be charged to the candidate, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants/candidates recruitment fees;
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing.

Oracle has undertaken actions, and is committed to maintaining and improving its systems and processes, to eradicate human trafficking and slavery in its direct hardware supply chain.



Oracle requires its direct hardware supply chain suppliers to observe all applicable laws and conduct business in an ethical and responsible manner. Oracle has adopted the Electronic Industry Citizenship Coalition (EICC) Code of Conduct, which prohibits the use of forced, bonded, indentured or involuntary prison labor.

Oracle continues to verify, evaluate, promote awareness about, and address risks associated with forced labor and human trafficking in its direct hardware supply chain. Examples of actions undertaken include the following:

**Evaluating and addressing supply chain risks:**

Oracle has incorporated by reference the EICC Code of Conduct into its standard direct hardware supply chain supplier agreements. Oracle also participates in industry efforts to increase awareness of human trafficking and to implement EICC programs.

**Auditing suppliers:**

Oracle audits its direct hardware supply chain suppliers based on the EICC Code of Conduct and also reviews the audit results for these suppliers.

**Supplier certification:**

Oracle has initiated a supplier certification process that requires direct hardware supply chain suppliers to certify to the best of their knowledge that the materials they incorporate into products were generated in compliance with applicable anti-slavery and human trafficking laws.

**Accountability standards:**

Oracle upholds accountability standards and procedures for employees and direct hardware supply chain suppliers who fail to meet Oracle's business conduct requirements.

**Training:**

Oracle provides training on human trafficking and slavery issues to employees that directly manage the direct hardware supply chain.

## Investigations and Audits

Oracle will perform investigations and audits to verify that business is being conducted in compliance with this Policy. All Oracle employees and third parties through whom Oracle conducts business are required to fully and promptly cooperate with Oracle's internal and external auditors and investigators, and must respond fully and truthfully to their questions, requests for information, and documents. Any failure by an employee to completely cooperate, or any action to hinder an investigation or audit, including for example, hiding or destroying any information or documentation, providing false answers or false information, or deleting email or other documents, may be grounds for disciplinary action, up to and including termination, subject to applicable law.

## Policy Compliance

Report any conduct that you believe to be a violation of this Policy, either directly to a member of the Compliance and Ethics Organization, to the Oracle Legal Department, to the Global Chief Compliance and Ethics Officer, or to Oracle's Executive Vice President, General Counsel and Secretary. Reports may also be made through the Oracle Integrity Helpline at 800-679-7417 or, for the EU countries, 866-455-1215 or the [Oracle Integrity Helpline Website](#), both of which allow anonymous reporting as permitted by applicable law. Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy as permitted by applicable law.

Oracle will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation, even when no evidence is found to substantiate the report.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals.

## Related Documents and Processes

- [Oracle Corporation UK Ltd Modern Slavery Policy Statement 2018](#)
- **Oracle America Inc. Compliance Plan for Covered U.S. Government Contracts**
  - o **Note:** The Compliance Plan is only applicable for U.S. federal government contracts to (1) provide supplies (not including commercial-off-the shelf (COTS) items) acquired outside the U.S. or services to be performed outside the U.S.; AND (2) the contract has an estimated value exceeding five hundred thousand dollars (\$500,000). For questions about the Compliance Plan or modifications to the Plan, contact [nacomplianceprogram-appr\\_ww@oracle.com](mailto:nacomplianceprogram-appr_ww@oracle.com).
- **Oracle Codes of Conduct**
  - [Employee Code of Ethics and Business Conduct](#)
  - [Partner Code of Ethics and Business Conduct](#)
  - [Supplier Code of Ethics and Business Conduct](#)