

# Oracle Corporation 2022 Political Activity Report

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## 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 2022, 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 2022 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 2022 contributions reportable under US state or local laws
- Oracle's calendar year 2022 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](mailto:investor_us@oracle.com).

### **Kenneth Glueck**

Executive Vice President  
Oracle Corporation

## Corporate Political Contributions from January 1, 2022 to December 31, 2022

ORGANIZATION	DATE	DISBURSED AMOUNT
<b>NATIONAL</b>		
Democratic Attorneys General Association	6/7/22	\$ 25,000.00
Democratic Governors Association	5/10/22	\$ 100,000.00
Democratic Governors Association	9/27/22	\$ 50,000.00
Republican Attorneys General Association	5/26/22	\$ 25,000.00
Republican Governors Association	3/1/22	\$ 2,000.00
Republican Governors Association	5/10/22	\$ 100,000.00
Republican Governors Association	9/27/22	\$ 50,000.00
<b>CALIFORNIA</b>		
California Democratic Party	9/27/22	\$ 35,000.00
California Republican Party	9/27/22	\$ 20,000.00
Colonel (Ret.) Tom Umberg for Senate 2022	9/27/22	\$ 2,500.00
Dave Min for State Senate 2024	9/27/22	\$ 2,500.00
Evan Low for Assembly 2022	9/27/22	\$ 1,500.00
Irwin for Assembly 2022	9/27/22	\$ 1,500.00
Jesse Gabriel for Assembly 2022	9/27/22	\$ 1,500.00
Josh Becker for Senate 2024	9/27/22	\$ 2,500.00
Rob Bonta for CA Attorney General 2022	9/27/22	\$ 8,100.00
<b>KANSAS</b>		
Schmidt for Kansas	7/1/22	\$ 2,000.00
<b>NEW MEXICO</b>		
New Mexicans for Michelle	7/1/22	\$ 2,000.00
<b>TEXAS</b>		
Texas Democratic Party	9/6/22	\$ 5,000.00
Texas Republican Legislative Caucus	10/26/22	\$ 2,500.00
Texas Senate Republican Caucus	12/1/22	\$ 2,500.00
<b>VIRGINIA</b>		
A Safer Virginia PAC	9/22/2022	\$ 10,000.00
Glenn Youngkin Inaugural Committee 2022	1/12/2022	\$ 10,000.00

## Membership Payments\* from January 1, 2022 to December 31, 2022

### \$500,000 and above

BSA | The Software Alliance

### \$100,000 - \$499,999

Alliance for Competitive Taxation  
American College of Healthcare Executives  
American Conservative Union  
Americans for Tax Reform  
College of Healthcare Information Management Executives  
Conference of Western Attorneys General  
Healthcare Financial Management Association  
Information Technology Acquisition Advisory Council (IT-AAC)  
Information Technology Industry Council (ITIC)  
Internet Accountability Project  
Interoperability Clearinghouse (ICH)  
Technology CEO Council  
Technology Network (TechNet)  
The Health Management Academy  
U.S. Chamber of Commerce  
United States Telecom Association (US-Telecom)

### \$25,000 - \$99,999

Asia Cloud Computing Association  
Center for Procurement Advocacy  
Coalition For Government Procurement  
Copyright Alliance  
CTIA - The Wireless Association  
Healthcare Information and Management Systems Society  
High Tech Inventors Alliance (HTIA)  
Homeland Security & Defense Forum  
Information Technology Information Sharing  
and Analysis Center (IT-ISAC)  
Intellectual Property Owners Association  
National Center For APEC  
National Foreign Trade Council (NFTC)  
O-RAN Alliance  
Open RAN Policy Coalition  
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

American Legislative Exchange Council (ALEC)  
California Chamber of Commerce  
California State Society  
Colorado Association of Commerce and  
Industry  
CompTIA  
Digital Dialogue Forum  
Inter-American Dialogue  
National Conference of State Legislatures  
(NCSL)  
National Defense Industrial Association (NDIA)  
National League of Cities  
Northern Virginia Technology Council  
State Government Affairs Council  
Tennessee Chamber of Commerce  
and Industry  
The Texas State Society of Washington, DC  
Trans-Atlantic Business Council  
Transatlantic Policy Network  
US-UAE Business Council  
Western Governors' Association

### \$0 - \$9,999

American Chamber of Commerce Saudi Arabia  
American Hospital Association  
American Medical Informatics Association  
American Nurses Association  
American Nursing Informatics Association  
Nashville Healthcare Council  
National Association of Business  
Political Action Committees  
Potomac Exchange  
R&D Credit Coalition  
US-Colombia Business Partnership

\* Does not include subscriptions, events, or sponsorships