| 1 | UNITED STATES DEPARTMENT OF LABOR | 1 | PURSUANT TO NOTICE, the deposition of |
|--|--|--|--|
| 2 3 | OFFICE OF ADMINISTRATIVE LAW JUDGES | 2 3 | KATE WAGGONER, called for examination, was taken at 1244 Speer Boulevard, Suite 515, Denver, Colorado, |
| 4 | OFFICE OF FEDERAL CONTRACT) OALJ Case No. 2017-OFC-00006 COMPLIANCE PROGRAMS, UNITED) | 45 | commencing at 9:16 a.m., on Wednesday, May 1, 2019 before Susan Bretschneider, court reporter and notary |
| 5 | STATES DEPARTMENT OF LABOR,) OFCCP No. R00192699 | 6 | public in and for the State of Colorado. |
| 6 |) Plaintiff,) | 8 | INDEX EXAMINATION PAGE |
| 7 |) V.) | 10 | By Mr. Miller 4 |
| 8 |) ORACLE AMERICA, INC.) | 11 12 | EXHIBIT FIRST REFERENCE |
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| 25 | SUSAN BRETSCHNEIDER | 24 25 | |
| 25 | JOB No. 190501CRL | | |
| | 1 | | 3 |
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GRADILLAS COURT REPORTERS (310) 859-6677

J-102 102.1

| 1 | right? | 1 | to accommodate the second day tomorrow, but I assume, |
|----|--|----|---|
| 2 | A. Yes. | 2 | you know, that process appears to be ongoing, so we'll |
| 3 | Q. So I'm just going to run over the ground | 3 | see what we can do then. |
| 4 | rules again just so it's clear what we're doing here, | 4 | Q. (By Mr. Miller) Okay, so, you know, you're |
| 5 | but we'll shorten it up a bit since you have heard it | 5 | under oath, you're going to I'm going to ask you |
| 6 | before. | 6 | questions. You will need to answer them for me unless |
| 7 | MS. CONNELL: Can I put something on the | 7 | your attorney explicitly instructs you not to answer |
| 8 | record at the beginning? Do you mind? | 8 | them based on privilege. If I ask an unclear question, |
| 9 | MR. MILLER: I suppose not. What do you | 9 | please ask me to clarify. It'll probably happen at |
| 10 | have to put on the record? | 10 | sometime where I ask you an unclear question. If you |
| 11 | MS. CONNELL: I just wanted to put on the | 11 | don't ask me to clarify and you answer the question, |
| 12 | record and confirm that Ms. Waggoner is here to testify | 12 | what the transcript is going to read is that you |
| 13 | today in her personal capacity, not as any 30(b)(6) | 13 | personally understood what I said and answered it, and |
| 14 | witness and so under Rule Federal Rule of Procedure | 14 | I'm always happy to clarify. |
| 15 | 30(d), OFCCP is entitled to one day of deposition with | 15 | We should be careful not to talk over one |
| 16 | her for up to seven hours. | 16 | another. It's a little bit easier with a video because |
| 17 | As we discussed beforehand, we still have | 17 | we can sort of follow the conversation, but with a |
| 18 | compensation-related data and documents to produce in | 18 | written transcript, it's kind of a mess if we interrupt |
| 19 | this case, and we've suggested that you may wish to | 19 | each other. So I will do my best not to talk over you. |
| 20 | depose her once our production is complete, but | 20 | You try to do your best to not talk over me. |
| 21 | notwithstanding that meet and confer, OFCCP still chose | 21 | I am available to take a break if you need |
| 22 | to depose her today. | 22 | one with the one exception, if a question is |
| 23 | So we do want to confirm that, from our | 23 | outstanding, I do need that answered before you take a |
| 24 | perspective, today is the one day of deposition for her | 24 | break. Do you understand all that? |
| 25 | in her personal capacity. | 25 | A. Yes. |
| | _ | | 7 |
| | 5 | | 7 |
| 1 | We've also met and conferred related | 1 | Q. Ms. Waggoner, can you tell me what your |
| 2 | regarding 30(b)(6) topics. As OFCCP knows, Ms. Waggoner | 2 | current job is at Oracle? |
| 3 | has already been deposed over the course of two days in | 3 | A. My current job is the senior director of |
| 4 | the Jewett matter on compensation-related matters there. | 4 | global compensation. |
| 5 | We have asked that OFCCP consider those topics because | 5 | Q. And how long have you been in that |
| б | we have produced the unredacted deposition transcripts | 6 | position? |
| 7 | of her testimony in that case on the condition that | 7 | A. Since January of 2018. |
| 8 | OFCCP consider that when issuing its own 30(b)(6) topics | 8 | Q. And what was the position you held before |
| 9 | related to compensation here. Our understanding thus | 9 | that? |
| 10 | far is OFCCP has been unwilling to do that. | 10 | A. Director of global compensation. |
| 11 | We have also requested of OFCCP to | 11 | Q. How long did you hold that position? |
| 12 | accommodate Ms. Waggoner, depose her tomorrow on any | 12 | A. Oh, a year and a half, two years, maybe. I |
| 13 | 30(b)(6) topics related to compensation, although OFCCP | 13 | don't recall the exact dates. It's just a progression. |
| 14 | declines that request. | 14 | Q. Did you first get that position in November |
| 15 | So with all of this in mind, I just want to | 15 | of 2014? |
| 16 | make clear that we reserve our right to raise these | 16 | A. I think I was probably a senior manager |
| 17 | issues with regard to the ongoing meet and confer over | 17 | around that time. |
| 18 | the 30(b)(6) topics. | 18 | Q. Okay. So for about a year and a half |
| 19 | MR. MILLER: That's fine. I we agree | 19 | before you were senior director, you were just director |
| 20 | that she's here in her individual capacity today. You | 20 | of global compensation, and then before that, you were |
| 21 | know, as you say, there's a dispute between the parties | 21 | senior manager |
| 22 | as to whether or not we would get additional time with | 22 | A. Yes. |
| 23 | her as more documents are produced or whatever, but | 23 | Q. of compensation? |
| 24 | that's fine, it's on the record. | 24 | A. Of compensation. |
| 25 | With the 30(b)(6), you know, we were unable | 25 | Q. And when did you first become senior |
| 20 | | | |
| | б | | 8 |
| | | | |

| 1 | manager of compensation? | 1 Q. And does Chris Edwards also report to Phil? |
|--|--|---|
| 2 | A. I think that was November of 2014. Prior | 2 A. Yes. |
| 3 | to that, I was a consultant, not in management, but also | 3 Q. And before you were senior director for |
| 4 | in the comp field. | 4 global compensation, when you were just director for |
| 5 | Q. All right, in your current position, what | 5 global compensation, what were your job duties? |
| 6 | are your job duties? | 6 A. Fairly similar. It hasn't changed a whole |
| 7 | A. I'm in charge of the team that does various | 7 lot. There just have been progressively more things |
| 8 | things. I work on the we do the administration of | ⁸ added into those types of responsibilities, and the role |
| 9 | all of our annual compensation program, so annual merit | 9 has just grown a little bit as far as what in |
| 10 | increases, equity grants and corporate bonus plans. We | 10 general, it has remained fairly the same. My |
| 11 | administer that and work with our Oracle software to | 11 responsibility is to ensure global consistency in how we |
| 12 | make that happen globally. | 12 run programs. |
| 13 | My team also is responsible for any M and A | 13 Q. Okay. Can you tell me what duties were |
| 14 | compensation activity, so integrating employees into our | 14 added between going from director to senior director? |
| 15 | job codes and our pay plans and those anything | 15 A. There weren't really any. It was just a |
| 16 | related to that. | 16 step progression. I have been doing the same type of |
| 17 | We also are responsible for the global job | 17 thing for quite a few years. |
| 18 | tables, salary survey, international salary survey | 18 Q. And as senior manager of compensation, what |
| 19 | submission. I do executive comp work and things for our | 19 were your job duties? |
| 20 | compensation committee of the board of directors. It's | 20 A. So when I was a senior manager, the the |
| 21 | a wide variety of responsibilities globally. | 21 team was not split the way it was, and so I had some |
| 22 | Q. Do you play any role with respect to | 22 client groups that were where I was I was part of |
| 23 | initial compensation for employees at Oracle? | • · · · · |
| 23 | A. I do not. | Ŭ |
| | | consulting work as well and worked directly with the business. And then there was another person who did |
| 25 | Q. Who does? | business. And then there was another person who did |
| | 9 | 11 |
| | | |
| | | |
| 1 | MS. CONNELL: Objection, vague, calls for | 1 consulting work, and both of us split when it came to |
| 1 2 | speculation. | 2 the compensation programs, like focal bonus, equity, we |
| | speculation. A. There is a there is a team of people | the compensation programs, like focal bonus, equity, we would split those, so we each had a little bit of the |
| 2 | speculation. A. There is a there is a team of people that are considered comp consultants that could be | the compensation programs, like focal bonus, equity, we would split those, so we each had a little bit of the program administration and then a little bit of the |
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| 1 | leaders, marketing leaders, the support leaders, IT | 1 actually happened, does it show like amounts to be given |
|--|--|--|
| 2 | leaders. I've done I've been around a long time, so | 2 to individual groups or individual people? |
| 3 | I've done a little bit of | 3 A. It's at an individual level. |
| 4 | Q. How long have you worked at Oracle? | 4 Q. Okay. |
| 5 | A. I was a part of the J.D. Edwards | 5 A. Individual employees are like I said, |
| 6 | acquisition, so that was in 2005, J.D. Edwards | 6 there might be 70 thousand employees eligible in a plan, |
| 7 | acquisition by PeopleSoft, which was then acquired by | 7 and it is each individual employee. |
| 8 | Oracle in 2005. | 8 Q. Okay, so what you are actually checking is |
| 9 | Q. So coming back to your job duties as senior | 9 to make sure that people who are eligible for that plan |
| 10 | director and I guess also business director, when you | 10 got paid under that plan? |
| 11 | say that you are in charge of administering all annual | 11 A. Not necessarily. |
| 12 | compensation programs, what do you mean? | 12 Q. Okay. What do you what are they I |
| 13 | A. That means that my team works to we | 13 guess I'm still a little confused about what you're |
| 14 | define and establish and communicate the eligibility | 14 comparing between the plan and then what happened. |
| 15 | rules for those programs. We make sure that our Oracle | 15 A. If an increase was put in the plan and |
| 16 | system, called work force compensation, is set up and | 16 received approval for an individual employee, did that |
| 17 | prepared to accept input from the leaders in the | 17 increase get posted to the employee's record. |
| 18 | business for recommendations for their their | 18 Q. Now, I understand. So after the approval |
| 19 | increases or rewards. And we are the point of contact | 19 process has happened and the decision has been made, |
| 20 | for we develop the training for the managers and the | then it's applied to the employee, you're just making |
| 21 | HR business partners to be able to conduct those and | sure the employee actually gets that increase? |
| 22 | work within those systems. And we establish the | A. Yes, that it's recorded to their record. |
| 23 | timeline, and we we then seek the appropriate | 23 Q. Okay. All right, so you told me that you |
| 24 | approvals and then process it and post it all to their | 24 dealt with programs, setting them up to receive input |
| 25 | records and audit it and make sure that everything was | 25 from managers related to the annual compensation |
| | | |
| | 13 | 15 |
| | | |
| | | |
| 1 | submitted in the system appropriately. | 1 program, you told me you develop training for the |
| 2 | And it's just sort of a from start to | 2 managers and HR business partners, you told me you set |
| 2 3 | And it's just sort of a from start to finish making sure the program goes smoothly across the | 2 managers and HR business partners, you told me you set 3 the time lines, you told me you audited submissions. |
| 2 3 4 | And it's just sort of a from start to finish making sure the program goes smoothly across the globe. | 2 managers and HR business partners, you told me you set 3 the time lines, you told me you audited submissions. 4 Is there anything else that you do with |
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| 1 | A. So this is someone on my team who does it. | 1 | lead for mergers and acquisitions. It entails |
|----------|--|----|--|
| 2 | I don't personally do it. She works with internal IT to | 2 | reviewing reviewing information on the targeted |
| 3 | set up the script for eligibility, and then they run the | 3 | company's employees, the duties of those employees and |
| 4 | program, and the plan populates according to the script. | 4 | providing guidance to HR and the business as far as into |
| 5 | Then there are audits that take place to | 5 | which Oracle job family they would probably fall, |
| 6 | make sure that the script worked as we intended and that | 6 | providing guidance in terms of what to do with their |
| 7 | people who we expected to be eligible are showing as | 7 | compensation package when they come on board and |
| 8 | eligible and the people who we expect not to be eligible | 8 | providing guidance in terms of any plan, any |
| 9 | are not eligible. | 9 | compensation type plans that they have at their company |
| 10 | Q. Which programs do you set up as part of | 10 | and how that might how they might be integrated into |
| 11 | your annual compensation program responsibilities? | 11 | what we offer at Oracle. |
| 12 | A. The any base salary increase programs, | 12 | Q. Is there anything else that this global |
| 13 | the annual equity grant and a corporate bonus program. | 13 | comp team does for mergers and acquisitions since you |
| 14 | Q. Do you do other things with internal Oracle | 14 | have been the director? |
| 15 | compensation databases besides just setting them up for | 15 | MS. CONNELL: Objection, calls for |
| 16 | the annual program? | 16 | speculation. |
| 17 | MS. CONNELL: Objection, vague. | 17 | A. I can't think of anything else. |
| 18 | A. Not that I can recall. | 18 | Q. (By Mr. Miller) And how how was this |
| 19 | Q. (By Mr. Miller) In preparing for this | 19 | process different when you were just director of global |
| 20 | deposition today, did you review internal Oracle | 20 | compensation? |
| 21 | databases? | 21 | A. I wouldn't say that those general steps are |
| 22 | A. No. | 22 | different. |
| 23 | Q. What did you do to prepare and before | 23 | Q. Okay, and how is it different when you were |
| 24 | you answer, I don't want to know about conversations you | 24 | senior manager? |
| 25 | may have had with counsel. I'm just asking generally | 25 | A. Probably not very different from then |
| | 17 | | 19 |
| 1 | how you prepared for this deposition. | 1 | either. |
| 2 | A. We just met yesterday for a few hours. | 2 | Q. So earlier I asked you how it changed if |
| 3 | Q. Did you review any documents? | 3 | it had changed over time, and you said yes. Can you |
| 4 | A. Yes. | 4 | tell me what way this part of your job changed over |
| 5 | Q. Did you review documents that have been | 5 | time? |
| 6 | produced in this matter? | 6 | A. The part that has changed the most in the |
| ° 7 | A. Yes. | 7 | time that I have been in the capacity of supporting M |
| 8 | Q. Did you review any electronic databases? | 8 | and As is in how we kind of evaluate the compensation |
| 9 | A. No. | 9 | packages, because we have learned a lot from the |
| 10 | Q. You also told me that you have | 10 | hundreds of acquisitions that Oracle has done over the |
| 11 | responsibility for mergers and acquisition activities, | 11 | years. The approach that we have taken has sort of |
| 12 | and I believe what you said was involving bringing | 12 | evolved. |
| 13 | employees from the acquired company into the Oracle | 13 | Q. And that's with respect to looking at the |
| 14 | compensation system; is that right? | 14 | compensation the individual received from the business |
| 15 | A. Yes. | 15 | before it was acquired? |
| 16 | Q. What does that entail? | 16 | MS. CONNELL: Objection, misstates her |
| 17 | MS. CONNELL: Objection, vague as to time. | 17 | testimony. |
| 18 | Q. (By Mr. Miller) Do you need a more | 18 | A. It is in evaluating everything about how |
| 19 | specific time? Has it changed? | 19 | they did things at the company company wide to how we |
| 20 | A. Yes. | 20 | do things at Oracle. |
| 20 | Q. Since you've been senior director, what | 21 | Q. (By Mr. Miller) So how has that process |
| 22 | does the mergers and acquisition part of your job | 22 | evolved? |
| 23 | entail? | 23 | A. We Oracle used to take a little more of |
| 23 24 | A. So I have a person on my team who is the | 24 | a firm stance and say we bring people over laterally, |
| 25 | main point of contact. She is the global compensation | 25 | nothing changes with their comp, and we take, you know, |
| | | | |
| | 18 | | 20 |

| 1 | six to 12 months to really evaluate what those employees | 1 Q. And you've mentioned a couple of times now |
|--|--|--|
| 2 | do and they're eligible for our next global program, and | 2 that you're trying to match these employees to the |
| 3 | any compensation-related changes would be made after | 3 correct job family. What is a job family? |
| 4 | time to evaluate the role in this the role of the | 4 A. It is a series of job codes and titles |
| 5 | person. | 5 where the very general duties of what that role does |
| 6 | Now, there is a little bit more care taken | 6 match, but it's multiple levels. So we have six |
| 7 | because we spend so much money on the acquisitions | 7 individual contributor levels and six or seven manager |
| 8 | themselves, and we need to be mindful of making sure the | 8 levels within a family. |
| 9 | employees want to stay and work for Oracle. So | · · · |
| 10 | | |
| | sometimes there are adjustments made to ensure that they | 10 development, a job family might be software developer? |
| 11 | are satisfied and don't leave as soon as we buy them. | 11 A. Correct. |
| 12 | Q. When you say Oracle used to have this | 12 Q. And then if these career levels you were |
| 13 | policy to wait six to 12 months to do adjustments, can | 13 talking about, it would be like a software developer |
| 14 | you give me a time frame when that policy was operative? | 14 two, that would then represent that they were in the IC2 |
| 15 | MS. CONNELL: Objection, misstates her | 15 level in that job family? |
| 16 | testimony. | 16 A. Correct. |
| 17 | A. We've never had a policy. It was more | 17 Q. So once you've determined which job |
| 18 | common practice that we would bring them on board to | 18 families that match, what do you do with that |
| 19 | evaluate and get a real grip on what it is they do and | 19 information? |
| 20 | make our decision and make a more informed decision. | 20 A. The like I said, our role is to provide |
| 21 | I don't know exactly when exactly how | the guidance to say this is where we believe this person |
| 22 | long we've been I don't know exactly how long we've | 22 falls within as regarding the general duties that |
| 23 | been now being more mindful at the front end. | ²³ we've been told they perform. And we just document that |
| 24 | Q. (By Mr. Miller) Did a change happen after | 24 our recommendation would be the developer family, and |
| 25 | 2015? | then that goes to HR and the line of business leader, |
| | | |
| | 21 | 23 |
| | | |
| 1 | A. It's 2019 now. I really don't know. I | 1 and they make they end up doing the final kind of |
| 1 2 | A. It's 2019 now. I really don't know. I really don't know. | 1 and they make they end up doing the final kind of 2 mapping to say, okay, we know this person, and we can |
| 2 | really don't know. | 2 mapping to say, okay, we know this person, and we can |
| 2 3 | really don't know. Q. You told me that one of the tasks that your | 2 mapping to say, okay, we know this person, and we can 3 assess that they perform at this level or whatever. |
| 2 3 4 | really don't know.Q. You told me that one of the tasks that your team does when you are looking at mergers and | 2 mapping to say, okay, we know this person, and we can 3 assess that they perform at this level or whatever. 4 Q. How does that process relate to the |
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| 1 | Or they might say it doesn't fit so nicely, | 1 MS. CONNELL: Calls for speculation. |
|--|--|--|
| 2 | we recommend an increase, but, again, it is it is | 2 A. I don't think so, but I don't I don't |
| 3 | guidance. It's not final say. | 3 know. |
| 4 | Q. The final say would go to HR and the line | 4 Q. (By Mr. Miller) Do you develop trainings |
| 5 | of business head? | 5 that do cover your guidelines? |
| 6 | A. HR and the line of business head generally | 6 A. Yes. |
| 7 | make that decision of whether they're going to do | 7 Q. Is that well, let me back up a moment. |
| 8 | anything with the comp package. | 8 Is that training just part of your regular |
| 9 | Q. Does HR have equal decision making | 9 duties, developing that training? |
| 10 | authority with the line of business head? | 10 MS. CONNELL: Objection, vague. |
| 11 | MS. CONNELL: Objection, calls for | 11 A. No, the no, not regular duties. |
| 12 | speculation and vague. | 12 Q. (By Mr. Miller) How often do you develop |
| 13 | A. I don't have any idea. | 13 training regarding the guidelines for compensation? |
| 14 | Q. (By Mr. Miller) The next thing I think you | 14 A. In my entire time at Oracle, we've I |
| 15 | told me you did as part of your job duties is both | 15 mean, I've been part of training around guidelines and |
| 16 | senior director and director of global compensation was | 16 helping with decision making probably twice. |
| 17 | to develop training for managers and HR business | 17 Q. Do you present training on these |
| 18 | partners. What's that entail? | 18 guidelines? |
| 19 | A. That is just about taking screenshots and | 19 A. Not recently. |
| 20 | providing step-by-step instruction on how to use our | 20 Q. When was the last time you presented |
| 21 | system when we're open for focal or equity or corporate | 21 training on guidelines? |
| 22 | bonus plan. | 22 A. 2013 maybe, 2014 for an in person. |
| 23 | Q. Do you also provide policies that Oracle | 23 Q. When you were involved in developing |
| 24 | has about compensation in this training? | training on these guidelines, were you just part of a |
| 25 | MS. CONNELL: Objection, assumes facts. | team, or did you have leadership over that development? |
| | | |
| | 25 | 27 |
| | | |
| 1 | A M/s depit weather being weltained but as went | 1 A I had be developed in even the development |
| 1 | A. We don't really have policies, but as part | 1 A. I had leadership over the development. |
| 2 | of that training, we don't give guidelines either. It | 2 Q. What did you do to develop training on the |
| 2 3 | of that training, we don't give guidelines either. It is strictly about the system. | 2 Q. What did you do to develop training on the3 guidelines? |
| 2 3 4 | of that training, we don't give guidelines either. It is strictly about the system. Q. (By Mr. Miller) So this has come up a | 2 Q. What did you do to develop training on the 3 guidelines? 4 A. I worked with global peers to to come up |
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| 1 | correct? | 1 Q. So the job family that you are in now would |
|--|--|---|
| 2 | A. Yes. | 2 be director of human resources; is that the job family? |
| 3 | Q. Did you report to Phil Genish when you were | 3 A. The family would be considered HR |
| 4 | director of compensation? | 4 management. |
| 5 | A. Yes. | 5 Q. Okay. So job families are not always some |
| 6 | Q. Did you report to Phil Genish when you were | 6 subset of the system title? |
| 7 | senior management of compensation? | 7 MS. CONNELL: Objection, vague. |
| 8 | A. For part of the time. That was when I had | 8 A. No, I think that is. It's the HR |
| 9 | a change in manager. | 9 management track, so it's |
| 10 | Q. Who was your manager for the other part of | 10 Q. (By Mr. Miller) I mean, the reason I asked |
| 11 | the time? | 11 it that way, you told me your system title was senior |
| 12 | A. Sue Charle was her name. | 12 director of HR? |
| 13 | Q. And who does Phil Genish report to? | 13 A. Yes. |
| 14 | A. Joyce Westerdahl. | 14 Q. Which doesn't have HR management as part of |
| 15 | Q. So we briefly talked about some of the | 15 the title? |
| 16 | arrangement of jobs at Oracle. Do you know what your | 16 A. Also senior director indicates management, |
| 17 | current global career level is? | 17 and so manager, senior manager, director, senior |
| 18 | A. M5. | 18 director VP, that's management of HR, so it's just HR |
| 19 | Q. Did that change when you went from director | 19 management would be the umbrella. |
| 20 | to senior director? | 20 Q. Okay. Do you know which job function |
| 21 | A. Yes. Director is M4. | 21 you're a part of? |
| 22 | Q. And when you were a senior manager, do you | 22 A. HR. |
| 23 | remember what your global career was? | 23 Q. So I've just run through all these factors |
| 24 | A. M3. | that describe you as an employee. How were you aware of |
| 25 | Q. And we've been using your job title as | 25 your global career level? |
| | 29 | 31 |
| | | |
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| 1 | senior manager, director and senior director of global | 1 MS. CONNELL: Objection, vague. |
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| 1 | case, the case for which we're conducting this | 1 | Going off the record. |
|--|---|--|---|
| 2 | deposition, is about a specific facility a specific | 2 | (Recess was taken.) |
| 3 | Oracle facility. | 3 | THE VIDEOGRAPHER: The time is 10:16 a.m. |
| 4 | My understanding is that Oracle has | 4 | Back on the record. |
| 5 | separate compensation systems for a headquarters region | 5 | A. So could I just clarify, please, when we |
| 6 | in California and then the rest of California; is that | 6 | were talking about policies before? I did think of one |
| 7 | right? | 7 | policy that I'm aware exists from October of 2017 |
| 8 | MS. CONNELL: Objection, assumes facts. | 8 | Q. (By Mr. Miller) Okay. |
| 9 | A. I don't know what you mean by "compensation | 9 | A that was rolled out by the U.S. |
| 10 | systems." | 10 | compensation team. I didn't have anything to do with |
| 11 | Q. (By Mr. Miller) Yeah, maybe I'm being a | 11 | the development or the roll out of it, and that's why it |
| 12 | little imprecise. Is pay different for the headquarters | 12 | was not fresh in my head, but that policy relates to |
| 13 | organization within Oracle than, say, like a | 13 | asking candidates about prior salary or using that as a |
| 14 | non-headquarters location? | 14 | consideration in determining pay for a job at Oracle. |
| 15 | MS. CONNELL: Objection, vague and | 15 | So that is a policy that forbids managers from doing |
| 16 | ambiguous, assumes facts. Compound and calls for a | 16 | that. |
| 17 | narrative. | 17 | So, like I said, that's not part of my |
| 18 | A. The we have a set of ranges for | 18 | role, and I wasn't part of it, so it wasn't fresh in my |
| 19 | headquarters versus outside of headquarters. | 19 | head that we have that one. |
| 20 | Q. (By Mr. Miller) Okay. When you say | 20 | Q. Thanks for the clarification. |
| 21 | "ranges," are you talking about salary ranges? | 21 | A. Yes. |
| 22 | A. Yes. | 22 | Q. So just to help me understand how the U.S. |
| 23 | Q. Is there anything else that's different in | 23 | compensation team fits together with your team, does the |
| 24 | the compensation system between headquarters and | 24 | U.S. compensation team report to global compensation? |
| 25 | non-headquarters? | 25 | A. No. |
| | | | |
| | 33 | | 35 |
| | | | |
| 1 | MC CONNELL. Objection warms and | 1 | |
| 1 | MS. CONNELL: Objection, vague and | 1 | Q. So are you then in parallel with the U.S. |
| 2 | ambiguous, calls for a narrative, assumes facts. Calls | 2 | compensation team? |
| 2 3 | ambiguous, calls for a narrative, assumes facts. Calls for speculation. | 2 3 | compensation team? A. They are I would say they are my client |
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1 Q. And the specific question I had in mind is, 1 software called Aria? 2 2 say, in software development again, could you have a That's one place where they can look. Α. 3 3 manager that was in the software developer family? Q. Where are other places they can look? 4 MS. CONNELL: Objection, incomplete 4 MS. CONNELL: Objection, calls for 5 5 hypothetical. speculation. 6 A. Yes. б A. Another place would be HCM in our human 7 7 Q. (By Mr. Miller) Is there any way that -capital management. 8 8 well, let me try something -- let me ask this question a Q. (By Mr. Miller) What else is in Aria? 9 9 MS. CONNELL: Objection, vague, calls for little differently. 10 When we were talking about the job family 10 speculation. you were in, you said you were in HR management, 11 11 A. Physical addresses, phone numbers, org 12 correct? 12charts. 13 A. Uh-hum. 13 Q. (By Mr. Miller) Would those all be Q. So are there other HR employees who are not 14 14 available to, say, an individual contributor? 15 15 managers? Α. Yeah. 16 A. Yes. 16 MS. CONNELL: Objection, calls for Q. So, for example, one of your subordinate 17 17 speculation. 18 compensation consultants, what job family would they be 18 Q. (By Mr. Miller) And what's in HCM? 19 in? 19 MS. CONNELL: Objection, calls for 20 MS. CONNELL: Objection, incomplete 20 speculation and vague. 21 21 hypothetical, calls for speculation. A. Could you be more specific? A. My subordinates are in a compensation 22 22 Q. (By Mr. Miller) Sure. Well, first, why 23 consultant family. 23 don't you tell me what HCM stands for. Q. (By Mr. Miller) So in the specific example 24 24 A. Human capital management. 25 of the job in which you work, there is a separate job 25 Q. You said that, my apology. 37 39 1 family for managers from non-managers? 1 A. Yeah. 2 2 A. Yes. **Q.** What kind of information is maintained in 3 Q. And then also you said that -- earlier that 3 human capital management about employees? 4 4 the employees can look up information about their system MS. CONNELL: Objection, vague and calls 5 5 identification on their own; is that right? for speculation. 6 6 A. Correct. A. Off the top of my head, I know it contains 7 7 Q. And then the system identification is a mailing address, job code, salary, supervisor, 8 8 little awkward, but what I meant is the things we have employment history. 9 been discussing, you know, job function, job family, 9 Q. (By Mr. Miller) Do you know of anything 10 10 global career level, things like that. else that's in there? 11 11 A. Okay. MS. CONNELL: Same objection. 12 Q. Can a, you know, front-line sort of IC2 12 A. I can't think of -- I'm sure there is, but 13 13 employee look up all of that information? Can they see I can't think of specifics. 14 14 job function? Q. (By Mr. Miller) Does either HCM or Aria 15 MS. CONNELL: Objection, calls for 15 contain budget information? 16 16 MS. CONNELL: Objection. Calls for speculation. 17 17 A. I'm not sure. speculation and vague. 18 Q. (By Mr. Miller) Are you aware of any 18 A. No. 19 limitations on what a front-line employee could 19 Q. (By Mr. Miller) And when you were senior 20 20 determine about their job using internal software? manager, we talked a bit about how you divided up the 21 MS. CONNELL: Objection, calls for 21 various groups that you worked with between you and Lisa 22 22 speculation and vague. Gordon. Do you remember that? 23 23 A. I'm not sure exactly what is in when they A. Yes. log in to view their own record. Q. And I think you told me that you had 24 24 25 25 responsibilities at one point or another for all kinds Q. (By Mr. Miller) And is this internal 38 40

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| 1 | | | |
|---|---|--|---|
| T | of elements within Oracle. I think you mentioned sales, | 1 | Q. (By Mr. Miller) Does your group? |
| 2 | product development, marketing support and IT; is that | 2 | MS. CONNELL: Objection, vague and calls |
| 3 | right? | 3 fo | r speculation. |
| 4 | I believe I also mentioned consulting. | 4 | A. I'm not sure exactly what she would get |
| 5 | Q. Thank you. Was there ever a point when you | 5 inv | volved in at the end after the business has made their |
| 6 | were senior manager of compensation that you and Lisa | 6 re | commendations. |
| 7 | Gordon had divided the areas of responsibility between | 7 | Q. (By Mr. Miller) But nothing comes to you |
| 8 | sales and non-sales? | 8 wł | nere you then see whether or not it's consistent in |
| 9 | A. Not that I can think of. I'm not sure, | 9 te | rms of, as you mentioned, trying to find the right job |
| 10 | though. | 10 fa | mily and that kind of thing? |
| 11 | Q. So you said a couple of times that your job | 11 | A. No. |
| 12 | is to ensure global consistency compensation. When you | 12 | Q. Do you receive training for your job? |
| 13 | say consistency, what what is it that you are seeking | 13 | MS. CONNELL: Objection, vague. |
| 14 | to make sure is consistent? | 14 | A. What kind of what do you mean by that? |
| 15 | MS. CONNELL: Objection, misstates her | 15 | Q. (By Mr. Miller) Well, I guess I just mean |
| 16 | testimony. | 16 th | at over the course of your job, let's say let's |
| 17 | A. I believe what I was talking about, | | st stick with the director of global compensation, |
| 18 | consistency, I was speaking more to consistency in how | 18 se | nior director for global compensation for the moment. |
| 19 | we administer our programs, how we administer focal, how | 19 | Does Oracle provide you with training on |
| 20 | we administer equity and bonus and consistency in how we | 20 hc | w to do your job, do they offer annual refresher |
| 21 | use our global job architecture and how we would match a | 21 CC | urses, do they help you prepare for and do your job? |
| 22 | certain job to a specific level in a survey, just | 22 | A. Uh-hum. |
| 23 | consistency in that way. | 23 | MS. CONNELL: Same objection. |
| 24 | Q. (By Mr. Miller) And thus far when we have | 24 | A. There are mandatory trainings that I must |
| 25 | talked about it, we have talked about doing | 25 ta | ke regarding non-discrimination, insider trading, |
| | - | | |
| | 41 | | 43 |
| 1 | recommendation to various elements inside Oracle; is | 1 ha | rassment. There are various trainings that we are |
| 2 | that right? | | quired to take, yes. |
| 3 | MS. CONNELL: Objection, vague. | 3 | Q. (By Mr. Miller) And insider trading, you |
| 4 | A. What do you mean by "elements"? | | |
| | | 1 ma | an things related to the Securities and Exchange |
| | | | ean things related to the Securities and Exchange |
| 5 | Q. (By Mr. Miller) I think you told me that | 5 C c | ommission rules, right? |
| 5 6 | Q. (By Mr. Miller) I think you told me that you provided recommendations to HR business partners and | 5 Co 6 | ommission rules, right? A. Yes. |
| 5 6 7 | Q. (By Mr. Miller) I think you told me that you provided recommendations to HR business partners and line of business heads about pay, for instance, for | 5 Cc 6 7 | ommission rules, right? A. Yes. Q. What kind of non-discrimination training do |
| 5 6 7 8 | Q. (By Mr. Miller) I think you told me that you provided recommendations to HR business partners and line of business heads about pay, for instance, for people brought in under the M and A program. | 5 Cc 6 7 8 yo | mmission rules, right? A. Yes. Q. What kind of non-discrimination training do u get? |
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| 1 | them but, for this piece, how do you determine what | 1 they were made available to managers online as on-demand |
|--------|--|---|
| 2 | should be in the training with respect to | 2 trainings, and we did a big announcement to HR to make |
| 3 | non-discrimination in pay? | ³ them aware that they were available for them to help |
| 4 | MS. CONNELL: Just caution the witness not | 4 support their clients. |
| 5 | to disclose the contents of any attorney-client | 5 Q. (By Mr. Miller) Has it changed since 2011? |
| 6 | privileged discussion she may have had. | 6 A. Not not really, no. |
| 7 | A. I'm not really sure what what you're | 7 Q. And I realize that was a little |
| 8 | asking. | 8 non-specific question. Let me ask it first this way. |
| 9 | Q. (By Mr. Miller) What I'm asking is if you | 9 Has the training or sorry, the |
| 10 | aren't getting training on how to do this as part of | 10 guidelines, have they changed since 2011? |
| 11 | your job, how to avoid discrimination in pay, how do you | 11 MS. CONNELL: Objection, vague. |
| 12 | determine what goes into guidelines that you're sharing | 12 A. What part of the guidelines, what are we |
| 13 | with management with respect to ensuring | 13 talking about? |
| 14 | non-discrimination in pay? | 14 Q. (By Mr. Miller) Well, you say there's nine |
| 15 | MS. CONNELL: Objection, misstates her | 15 modules that go into this series, correct? |
| 16 | testimony and assumes facts. | 16 A. Uh-hum. |
| 17 | A. The training the training that I was | 17 Q. And these were the modules that were |
| 18 | part of building was a globally collaborative effort, | 18 developed in 2011 on the bottom of these slides, |
| 19 | and there are many professionals as all over the globe | 19 correct? |
| 20 | who had input on that and multiple years of experience | 20 A. Yes. |
| 21 | and knowing. | 21 Q. Are the guidelines different today than |
| 22 | Q. (By Mr. Miller) Okay. So I'd like to ask | 22 they were in 2011? |
| 23 | you some questions about how these guidelines work. So | 23 MS. CONNELL: Objection, vague. |
| 24 | I'd like to show you an exhibit I'm going to ask the | 24 A. I haven't reviewed every one of these |
| 25 | court reporter to mark as Exhibit 1. | recently, but when we created them, we intentionally |
| 25 | Court reporter to mark as Exhibit 1. | 2.3 Tecently, but when we created them, we intentionally |
| | 45 | 47 |
| 1 | (Exhibit 1 marked for identification.) | 1 created them to be very compensation 101, just general |
| 2 | Q. (By Mr. Miller) Take a moment just to flip | 2 practitioner, the right ways to do things, and so I |
| 3 | through it. | would be surprised if much has changed. |
| 4 | A. Okay. | 4 Q. (By Mr. Miller) So just a moment ago you |
| т 5 | Q. Do you recognize this document? | 5 told me how in 2011, they were created and posted and |
| 6 | A. I do. | you told HR about them and made them widely available so |
| | Q. What is it? | you told first about them and made them widely available so they could use them in doing their work on compensation; |
| 7 | | · · · · · · · · · · · · · · · · · · · |
| 8 | A. It is the the one of the nine modules | 8 is that right? 9 A. Yes. |
| 9 | of our global training. | |
| 10 | Q. If I can direct your attention to the | 10 Q. Is that process for making the guidelines |
| 11 | second page, you'll notice at the bottom it's got a sort | 11 available still the process used now? |
| 12 | of long number? | 12 MS. CONNELL: Objection, vague and calls |
| 13 | A. Uh-hum. | 13 for speculation. |
| 14 | Q. There's a dash two at the bottom of the | 14A.So because technology has evolved a lot, |
| 15 | second page to help you follow along. | 15 our company has evolved a lot, we have, I would say, |
| 16 | A. Okay. | 16 spruced up and now have actually released today like |
| 17 | Q. So this is one of the modules, and what's | 17 general comp 101 little video snippets that essentially |
| 18 | underlined here is salary ranges. Is that what this | 18 cover much of the same topics. |
| 19 | module is? | 19 Q. (By Mr. Miller) So perhaps the format has |
| 20 | A. Yes. | 20 changed? |
| 21 | Q. So how are these guidelines implemented at | A. Yes, yes, they no longer have to just look |
| 22 | Oracle? | 22 at a PowerPoint slide. |
| 23 | MS. CONNELL: Objection, vague and calls | Q. I'm drawing your attention to page three, |
| 24 | for speculation. Assumes facts. | 24 which is the next page, so I will just represent to you |
| 25 | A. Back in 2011, we created and posted and | that this is the comment that was associated with this |
| | 46 | 48 |
| | υ | 01 |

| 1 | slide. | 1 Q. (By Mr. Miller) If you will take just a |
|--|--|--|
| 2 | A. Uh-hum. | 2 moment to look at that for me. |
| 3 | Q. Looking at this comment, there's two | 3 MS. CONNELL: I'm just going to say for the |
| 4 | paragraphs basically, and the second paragraph, there is | 4 record that I can't tell if these have been |
| 5 | a disclaimer about this simply being an overview and | 5 designated as confidential, but I do see actual ranges |
| 6 | then asks, I guess, whoever the audience is for this, to | 6 in here. So to the extent these exhibits have been |
| 7 | work with their local compensation team representative | 7 marked confidential when they were produced, we are |
| 8 | and HR manager on employee compensation issues. Do you | 8 our position is they maintain their confidential |
| 9 | see that section? | 9 designation. I just can't tell. |
| 10 | A. Uh-hum. Yes. | 10 MR. MILLER: Sure. |
| 11 | Q. How does the manager responsible for | 11 A. I'm not sure these would have been. |
| 12 | compensation work with the HR manager and compensation | 12 MR. MILLER: The xerox thing in the middle? |
| 13 | team representative? | 13 MS. CONNELL: Well, it has way more than |
| 14 | MS. CONNELL: Objection, assumes facts and | 14 MR. MILLER: Just to make it clear, let's |
| 15 | calls for speculation. | 15 correct that exhibit. |
| 16 | A. What do you mean? | 16 MS. CONNELL: Just to make it even clearer, |
| 17 | Q. (By Mr. Miller) Well, so what this what | 17 I'm going to designate both of these as confidential. |
| 18 | that note seems to be supposing is that you will have a | 18 (Off the record discussion.) |
| 19 | compensation issue arise for an employee of some kind | 19 Q. (By Mr. Miller) Can you confirm for me |
| 20 | and the focal reviews come up and they are due for an | 20 that your exhibit goes to dash 16 on the last page? |
| 21 | increase or there is some off-cycle increase or | 21 A. Yeah. Yeah. |
| 22 | something. | MS. CONNELL: Thank you. |
| 23 | What is the manager responsible for making | 23 Q. (By Mr. Miller) So do you need a moment to |
| 24 | that pay decision supposed to do in involving HR in the | 24 look at this again? |
| 25 | compensation? | 25 A. No. |
| | | |
| | 49 | 51 |
| | | |
| 1 | MS_CONNELL: Objection_accumac facto and | 1 Do you recognize this document? |
| 1 | MS. CONNELL: Objection, assumes facts and | 1 Q. Do you recognize this document? |
| 2 | calls for speculation. | 2 A. I do. |
| 2 3 | calls for speculation.A. I mean, this is simply telling them that if | 2 A. I do. 3 Q. What is it? |
| 2 3 4 | calls for speculation.A. I mean, this is simply telling them that if you have a question about a specific compensation | A. I do. Q. What is it? A. It is our roll-out of global equity |
| 2 3 4 5 | calls for speculation. A. I mean, this is simply telling them that if you have a question about a specific compensation related topic or someone on your team, give your HR | A. I do. Q. What is it? A. It is our roll-out of global equity guidelines to global compensation and global recruiting. |
| 2 3 4 5 6 | calls for speculation. A. I mean, this is simply telling them that if you have a question about a specific compensation related topic or someone on your team, give your HR manager a call. | A. I do. Q. What is it? A. It is our roll-out of global equity guidelines to global compensation and global recruiting. Q. Okay. And do you see on the first page |
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| 1 | specific zones based on their equity practices and | 1 that we weren't sure that we could really even create |
|--|---|---|
| 2 | created these ranges to give our global compensation | 2 guidelines that we could say were global. |
| 3 | team and our global recruiting team an idea of what the | 3 We eventually agreed that by calling them |
| 4 | local markets were like in terms of equity practices. | 4 guidelines, there was an understanding that some would |
| 5 | So this was more of just a roll-out of | 5 get lower than minimum, some would get higher than |
| 6 | saying we now have these, and this is how you would use | 6 maximum, and that's okay. This is just a representation |
| 7 | them. | 7 of what the market would suggest is appropriate. |
| 8 | Q. And when you say "ranges," you're talking | 8 MS. CONNELL: For the record, I want to |
| 9 | about the tables that appear on the pages that are dash | 9 designate the testimony about this Exhibit 2 as |
| 10 | 11 and dash 12? | 10 confidential. |
| 11 | A. Yes. | 11 MR. MILLER: Let's go off the record just |
| 12 | Q. In preparing these guidelines, did you take | 12 for a moment. |
| 13 | into account making them fair and equitable with respect | 13 (Off the record discussion.) |
| 14 | to race or gender? | 14 THE VIDEOGRAPHER: The time is 10:50 a.m., |
| 15 | MS. CONNELL: Objection, vague and | 15 going off the record. |
| 16 | ambiguous. | 16 (Off the record discussion.) |
| 17 | A. By the nature of using market data, market | 17 THE VIDEOGRAPHER: The time is 10:50 a.m. |
| 18 | data does not indicate race or gender at all. | 18 Back on the record. |
| 19 | Q. (By Mr. Miller) So what you determined | 19 Q. (By Mr. Miller) And then for the second |
| 20 | were ranges based on location primarily? | 20 section on this page that's got a dash 4 at the bottom, |
| 21 | A. And whether they are technical or | 21 the second comment says that the there's a comp |
| 22 | non-technical and whether they're an IC4 or a M6. | 22 committee meeting where the initiative was fully |
| 23 | Q. All right. Drawing your attention to the | 23 embraced by the, I guess, comp committee. What is the |
| 24 | page that's marked with a dash 4 at the bottom, this is | 24 comp committee? |
| 25 | again the comment to slide three. There are just two | 25 A. They are the independent directors, the |
| 20 | again the comment to side three. There are just two | |
| | 53 | 55 |
| | | |
| - 1 | conton and in this common to | 1 in allow and put we are being of the allow and of allow atoms with a sure |
| 1 | sentences in this comment? | 1 independent members of the board of directors who are |
| 2 | A. Uh-hum. | 2 part of the compensation committee for Oracle. |
| 2 3 | A. Uh-hum.Q. One suggests that you should discuss the | 2 part of the compensation committee for Oracle. 3 Q. What does the compensation committee do? |
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| vague. A. Not below the EV level. G. By Mr. Miley Okay, Im going to show you another exhibit mow. M.S. CONNELL: You can end the confidential designation. (Exhibit 3 marked for identification.) M.S. CONNELL: Jeremiah, do you know if these were designated confidential? M.R. MILLER: You know, I don't because of the weight weither you whather or ant have data, there is a tag associated with them in the production. Built don't how of surve wither or ant have data, there were designated confidential? M.S. CONNELL: Okay, If they were produced is the native data, these were designated confidential. M.S. CONNELL: Okay, If they were produced antively, there would be no way to make that data dow, that are legal compliant when? M.S. CONNELL: Okay, If they were produced antively, there would be no way to make that designation. So if they were, then we not decourse that designation. So of they were, hon way to make that designation and calls for speculation, calls for spe | 1 | MS. CONNELL: Calls for speculation and | 1 | A. Yes. |
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| you another exhibit now. Was CONNELL: You can end the confidential designation. (Exhibit 3 marked for identification.) MS. CONNELL: Jermiah, do you know if MR. MILLER: You know, I don't because of the way they were produced is the native format, so there is a tag associated with them in the production. MS. CONNELL: Okay, if they were produced in the native data, tapear on the document itself. MS. CONNELL: Okay, if they were produced natively, there would be no way to make that Goff designation. So if they were, then we would designate in order to main in its confidential in order to main in its confidential in order to main in its confidential on drain to main in its confidential on drain to main in its confidential on drain to main in its confidential in order to main in its confidential in order to main in its confidential on drain to main in its confidential on drain to main in its confidential in order to main in its confidential or order to main in its confidential in order to main in its confidential or order to main in its confidential in order to main in its confidential or order to main its is confidential in order to main in its confidential or order to main in its confidential or order to main in its confidential or order to main its is confidential in order to main in its confidential or order to main its is conf | | | | |
| 6 MS. CONNELL: You can end the confidential 7 designation. 8 (Exhibit 3 marked for identification.) 9 MS. CONNELL: Jeremiah, do you know if 10 MS. CONNELL: Vou can set if the exerce designated confidential? 11 MR. MILLER: You know, I don't because of 14 the way they were produced is the native format, so 13 there is a tag associated with them in the production. 14 But I don't know for sure whether or not these were 15 tagged that way. 16 MR. GARCIA: I think in the native data, 17 these were designated as confidential, but it did not 18 appear on the document itself. 19 A. Connell.: Cixay, if they were produced 10 MR. MILLER: That's fine, Erin, and I'm 10 A. Sconnell.: Way were, then we would designation. 11 Sconfidential inony, and we can discuss it later 12 fit turns out they weren't marked confidential. 14 MS. CONNELL: Yeah, wash is onfidential 15 sure about a thing, it's fine with me if you want to 16 confidential now, and we can discussit later 16 MS. C | | | | • |
| 7 designation. 7 the sixth page of this exhibit, it's marked with a dash. 8 (Exhibit 3 marked for identification.) MS. CONNELL: Jeremiah, do you know if 9 MR. MILLER: You know, I don't because of Cracle's Compensation Philosophy and Objectives? 10 there is a tag associated with the min the production. Cracle's Compensation Philosophy and Objectives? 11 MR. MILLER: You know, I don't because of Cracle's Compensation Philosophy and Objectives? 12 the way they were produced is the native format, so The first is a tag associated with the min the production. 14 But I don't know for sure whether or not these were Tage on the document issleft. 15 MR. GARCIA: I think in the native data, The set is a legal conclusion. 16 appear on the document issleft. SconNELL: Objection, calls for 17 these were designation during the deposition. Cit (Miller) Are there any laws in 18 specific that could be complexes. We aren't breaking the law in the 19 onfidential could, now, if you're not 20 Confidential is probably true given what 21 designation. SconNELL: Yeah, that's fine. I just 22 MR. MILLER: I understand. I think that 23 ordinatian moduling is probably true given what 24 MS. CONNELL: Yeah, wash. So foro | | | | |
| Exhibit 3 marked for identification.) (Exhibit 3 marked for identification.) M. K. CONNELL: Aremiah, A to you know if M. M.LLER: You know, i on't because of the way they were produced is the native format, so But I don't know for surve whether or not these were tagged that way. M. GARCIA: I think in the native data, these were designated as confidential, but it did not appear on the document itself. matively, there would be on way to make that confidential designation. So if they were, then we would designated confidential designation. So if they were, then we we used designated. designation. So if they were, then we would designated confidential designation. So if they were that the safet as confidential in our and the or our avit omak that designation. M. S.CONNELL: Okay. If they were produced matively, there would be one way to make that designation. M. M. S.CONNELL: Weak way to make that designation. M. S.CONNELL: Yeah, wast ne light of a logal conclusion. f t turns out they weren't marked confidential designation. M. S.CONNELL: Yeah, wast ne. I just don't wart anything to lose its confidential dordiv werit designated Exhibit 3 as confidential f the cortain. M. S.CONNELL: Yeah, wesh. So for purposes f touris out the original sprabably true given what they contain. M. CONNELL: Yeah, wesh. So for purposes f tourdau modules, 'you're taking about the set of f tourdau modules, 'you're taking about the set of f tourdau modules, 'you're taking about the set of f tourdau modules, 'you're taking about the set of f tourdau modules, 'you're takin | | | | |
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| 10 these were designated confidential? 10 A. Yes. 11 MR. MILLER: You know, I don't because of the way they were produced is the native format, so that says. You are to provide 11 0. There's a bullet well, I guess a dash, the third dash down, that says. You are to provide 12 But I don't know for sure whether or not these were disgnated as confidential, but it did not appear on the document itself. 11 N. CONNELL: Okay, if they were produced natively, there would be no way to make that designation. So if they were, then we would designate a fuscion. A. I guess I I feel like the words kind of speak for themselves. We aren't breaking the law in the programs that we run. 11 MR. CARCA: I think in the native data, these were designated as confidential, but it did not appear on the document itself. 10 A. I guess I I feel like the words kind of speak for themselves. We aren't breaking the law in the programs that we run. 12 ontidential designation. So if they were, then we would designate its as confidential now, and we can discuss it later if it turns out they weren't marked confidential. 11 G. (By Mr. Miller) And to be clear, I'm not a saking for you to render a legal opnion. I'm asking what the sense to you. 13 MR. MLLER: I understand. I think that they were net were likely made produced as confidential is probably true given what the grant anything to lose its confidential and they data, when we are unning compensation programs. 1 decisions. I'm not a legal copnion. I'm asking what this means to you. M. A. I think about do you m | | | | - |
| 11 MR. MLLER: You know, it don't because of 12 the way they were produced is the native format, so 13 the third dash down, that says, You are to provide 14 But I don't know for sure whether or not these were 15 tagged that way. 16 MR. GARCIA: I think in the native data, 17 these were designated as confidential, but it did not 18 appear on the document itself. 19 MS. CONNELL: Okay, if they were produced 10 antively, there would be no way to make that 11 G. (By Mr. Miller) Are there any laws in 12 this schibit as confidential in order to maintain its 12 the schibit as confidential in order to maintain its 12 the schibit as confidential in order to maintain its 14 the schibit as confidential in order to maintain its 15 okay with it being confidential. 16 with its means to you. 17 MS. CONNELL: Yeah, thats fine. I just 18 decisions. I'm not a legal expert, but I know when 20 G. (By Mr. Miller) Are there aval way in 17 MR. MILLER: Yeah, weah. So for purose 18 | | • | | |
| 12 the way they were produced is the native format, so 12 the third dash down, that says, You are to provide 13 there is a tag associated with them in the production. 13 compensation programs that are legally compliant. What 14 But I don't know for sure whether or not these were 14 designation So of the conclusion. 14 15 tagged that way. MR. GARCIA: I think in the native data, 16 speculation and calls for a legal conclusion. 16 mR. GARCIA: I think in the native data, 16 speculation and calls for a legal conclusion. 17 these were designated as confidential, but it did not appare on the document itself. 16 18 goed for the mostly were, then we would designate 17 A. I guess I ~ I feel like the words kind of 19 natively, there would be no way to make that 20 Q. (By Mr. Miller) Are there any laws in 21 specific that could be complead with here? 21 22 MR. MILLER: Tharts fine, Erin, and Im 23 31 the would be in with figure were 23 32 don't wan anything to lose its confidential. 24 4 MR. MILLER: I understand. I think that 27 3 | | - | | |
| there is a tag associated with them in the production. But I don't know for sure whether or not these were lesignated as confidential, but it did not appear on the document itself. M.S. CONNELL: Okay, if they were produced as confidential but it did not appear on the document itself. M.S. CONNELL: Okay, if they were produced as confidential but it did not appear on the document itself. M.S. CONNELL: Okay, if they were produced as confidential now, and we can discuss it later this exhibit as confidential now, and we can discuss it later if it turns out they weren't marked confidential designation. Sure about a thing, it's fine with me if you want to call it as confidential is probably true given what the your statement earlier these were level faulter were avere alleging and they weren't marked confidential. M.S. CONNELL: Yeah, yeah. So for purposes of today, well designate modules wered. M.S. CONNELL: Yeah, yeah. So for purposes of today, well designate modules wered. M. Connell: Yeah, Yaah. So for purposes of today, well designate modules wered. M. Connell: Yeah, Yaah. So for purposes of today, well designate modules wered. M. Connell: Yeah, Yaah. So for purposes of today, well designate modules we made. M. Connell: Yeah, Yaah. So for purposes of today, well designate first bit 3 as confidential. G. (By Mr. Miller) Okay. Do you cocognize this end of the content is - comes from those. G. (By Mr. Miller) And when you say 'the nine individual modules, 'you're talking about the set of PowerPoints that the first exhibit J showed you was a part of? A. Correct, from 2011. G. And if you look at the very first page of that silde? M. Connell: I see Exhibit 4. (Exhibit 4 matked for identification.) M. Connell: I see Exhibit 4. (Exhibit 4 matked for identification.) M. Connell: I see Schibit 4. (Exhibit 4 matked for identification.) M. Connell: | | | | |
| 14 But I don't know for sure whether or not these were tagged that way. 14 does "legally compliant," mean in this context? 15 tagged that way. MS. GARCIA: I think in the native data, these were designated as confidential, but I tid not appear on the document itself. MS. GANNELL: Objection, calls for a legal conclusion. 16 MR. GARCIA: I think in the native data, these were designated as confidential, but I tid not appear on the document itself. NS. CONNELL: Objection, calls for a legal conclusion. 20 natively, there would be no way to make that designate this exhibit as confidential norder to maintain its confidential designation. Q. (By Mr. Miller) Are there any laws in specific that could be complied with here? 21 specific that could be complied with here? MS. CONNELL: Objection, vague and ambiguous, calls for a legal conclusion. 22 ontidential now, and we can discuss it later if it turns out they weren't market confidential designate. MS. CONNELL: Yeah, that's fine. I just don't want anything to lose its confidential designate thes were likely made - produced as confidential is probably true given what they contain. 1 decisions. I'm not a legal expert, but I know when 22 G. (By Mr. Miller) Chay. Do you recognize this document? MS. CONNELL: Yeah, yeah. So for purposes of today, well designate theigal ycompliant, we mean there are countries in Latin America where we have seally compliant, we mean there are the countries in Europe where you must do - you must give X ispercent, or there are countries in Latin Ameri | | | 13 | |
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| MR. GARCIA: I think in the native data, these were designated as confidential, but it did not appear on the document itself. MS. CONNELL: Chay, if they were produced confidential designation during the deposition. confidential designation during the deposition. confidential designation during the deposition. designation. So if they were, then we would designate confidential designation during the deposition. designation. So if they were, then we would designate confidential designation during the deposition. designation during the deposition. designation during the deposition. designation during the deposition. designation during the deposition. for turns and the deposition. decisions. I'm not a legal expert, but I know when confidential designate and the deposition. decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when decisions. I'm not a legal expert, but I know when deci By were | | | 15 | • • • |
| 17 A I guess I-I feel like the words kind of 18 appear on the document itself. 19 MS. CONNELL: Okay, if they were produced 20 natively, there would be no way to make that 21 designation. So if they were, then we would designate 21 this exhibit as confidential in order to maintain its 22 this exhibit as confidential norder to maintain its 23 confidential designation during the deposition. 24 MR. MILLER: That's fine, Erin, and I'm 25 okay with it being conditional, you know, if you're not 26 call it as confidential now, and we can discuss it later 3 if it turns out they weren't marked confidential 4 MS. CONNELL: Yeah, that's fine. I just 4 designation. 5 don't want anything to lose its confidential. 6 designation. 7 MS. CONNELL: Yeah, that's fine. I just 6 designation. 7 MS. CONNELL: Yeah, yeah. So for purposes 7 MS. CONNELL: Yeah, yeah. So for purposes 8 of today, we'll designate Exhibit 3 as confidential. 7 MS. CONNELL: Yeah, yeah yeas of purposes | | | 16 | - |
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| MS. CONNELL: Okay, if they were produced natively, there would be no way to make that designation. So if they were, it may to make that designation. So if they were, it may the aposition. G. (By Mr. Miller) Are there any laws in spectral this exhibit a confidential in order to maintain its confidential norder to maintain its confidential norder to maintain its confidential action. They were, it may there the seven at this, it's fine. Erin, and I'm okay with it being conditional, you know, if you're not call it as confidential now, and we can discuss it later if it turns out they weren't marked confidential and they weren't marked confidential designation. MS. CONNELL: Yeah, that's fine. I just don't want anything to lose its confidential a confidential is probably true given what they contain. MR. MILLER: I understand. I think that your statement earlier these were likely made produced as confidential is probably true given what they contain. MS. CONNELL: Yeah, yeah. So for purposes of today, well designate Exhibit 3 as confidential. M. CONNELL: Yeah, yeah. So for purposes this document? M. Connell: Yeah, yeah. So for purposes this document? M. Conservent? A. I recogrize it as being kind of a compliation of the rine individual modules. You're talking about the set of PowerPoints that the first exhibit 1 showed you was a part of? A. Correct, from 2011. Q. And I you look at the very first page of this exhibit, you can see it is a copyright of 2012 on that slide? | 18 | | 18 | - |
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| 25 okay with it being conditional, you know, if you're not 57 59 1 sure about a thing, it's fine with me if you want to 57 59 1 sure about a thing, it's fine with me if you want to 6 6 2 call it as confidential now, and we can discuss it later 1 decisions. I'm not a legal expert, but I know when 2 M.S. CONNELL: Yeah, that's fine. I just 3 asking for you to render a legal opinion. I'm asking 4 MS. CONNELL: Yeah, that's fine. I just 5 M. It means that we shouldn't do anything 5 model as confidential 6 A. It means that we shouldn't do anything 6 against the law when we are running compensation 9 programs. 7 MS. CONNELL: Yeah, yeah. So for purposes 0 (By Mr. Miller) Ckay. Do you recognize 1 Men of the content is comes from those. 1 A. I recognize it as being kind of a 1 compliation of the nine individual modules we made. 1 M. Miller) And when you as ay 'the nine 1 individual modules, 'you're taking about the set of 1 R. Much of the content is comes from those. 2 A. Correct, from 2011. A. Correct, from 2011. | 23 | confidential designation during the deposition. | 23 | |
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| 7MR. MILLER: I understand. I think that7against the law when we are running compensation8your statement earlier these were likely madeproduced as confidential is probably true given what9Q. (By Mr. Miller) Fair enough. I'm going to10they contain.9Q. (By Mr. Miller) Fair enough. I'm going to11MS. CONNELL: Yeah, yeah. So for purposes10show you some more exhibits here. There'll be, I guess,12of today, we'll designate Exhibit 3 as confidential.10show you some more exhibits here. There'll be, I guess,13M. (By Mr. Miller) Okay. Do you recognize11Hare of them.14this document?12A. And I will add this is global, so when15A. I recognize it as being kind of a12when we talk legally compliant, we mean there are16compliation of the nine individual modules we made.17percent, or there are countries in Latin America where18Q. (By Mr. Miller) And when you say "the nine18business.19individual modules," you're talking about the set of19Q. Thank you for the clarification.20PowerPoints that the first exhibit I showed you was a20MR. MILLER: I am going to ask the court21part of?21K. Correct, from 2011.2223Q. And if you look at the very first page of23MS. CONNELL: I see Exhibit 4 is labeled24this exhibit, you can see it is a copyright of 2012 on25designation for the depo.25that slide?25designation for the de | 5 | | | |
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| 25 that slide? 25 designation for the depo. | | | | |
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| 58 60 | 25 | that slide? | 25 | designation for the depo. |
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| 1 Q. (By Mr. Miller) Do you recognize this 1 reporter to mark as Exhibit 5. 2 document? 2 (Exhibit 5 marked for identification.) 3 A. I do. 3 MS. CONNELL: Mark this as confider 4 Q. What is it? 4 also. Also, point out that this also appears to be separate, two exhibits in one. 5 A. It is essentially print screens of 5 separate, two exhibits in one. | be is here? |
|--|----------------|
| 3A.I do.3MS. CONNELL: Mark this as confider4Q.What is it?4also.Also, point out that this also appears to b5A.It is essentially print screens of5separate, two exhibits in one. | be is here? |
| 4Q. What is it?4also. Also, point out that this also appears to l5A. It is essentially print screens of5separate, two exhibits in one. | be is here? |
| 5 A. It is essentially print screens of 5 separate, two exhibits in one. | s here? |
| | |
| | |
| 6 information that is available on our global compensation 6 MR. MILLER: Do we have two exhibit | |
| 7 intranet site. 7 A. We have doubles of this. | |
| 8 Q. Who has access to this intranet site? 8 MR. MILLER: Too many copies. | |
| 9 MS. CONNELL: Objection, calls for 9 Q. (By Mr. Miller) Can you tell me where | e vour |
| 10 speculation. 10 page ends, Ms. Waggoner, what's the last Bat | |
| 11A. Oracle employees.11A. 798. | |
| 12 Q. (By Mr. Miller) All Oracle employees? 12 Q. (By Mr. Miller) Well, that is how I inter | bnd |
| 13 MS. CONNELL: Same objection. 13 to present them to you, but I will ask you, there | |
| 14 A. I can't be positive, but I would think so. 14 actually two documents in here. Actually, let n | |
| 15 Q. (By Mr. Miller) And this particular 15 15 with that. | |
| 16 exhibit is a printout of three pages with a heading on 16 Looking at this Exhibit 5 I've given you | |
| 17 it on the first page that says total compensation; is 17 is there more than one document in there? | ۰, |
| 18 that right? | |
| 10A. Yes.19Q. Where can you give me the number | vre whore |
| | |
| 20Q. How does the information that's provided on20the documents begin and end?21your intranet website work with the compensation21A. I think 598 is something totally separate | oto |
| | |
| | /0u |
| | i+ Λ |
| | |
| 25A.I'm not sure what you mean.25Q.It's the same in terms of the same co | ntent? |
| 61 63 | |
| | |
| 1 Q. (By Mr. Miller) I'm curious how they're 1 A. It appears to be. | |
| 2 related. This appears to cover, from my read of it, 2 Q. But from a I mean, it's so the re | |
| 3 some of the information that's been in, say, the 4 PowerPoints we have looked at so far. 3 I'm asking you about this is if you look at Ext 4 this has got a heading that says total competing | |
| | |
| | |
| another version of the same set of guidelines, or is this something different than what's in the PowerPoints? before launching into total compensation. | Jennes |
| 8 MS. CONNELL: I will object that the 8 I guess what I'm asking, the question | |
| | |
| | TIDIC 4, |
| 10preamble and lacks foundation and assumes facts, and10page 597?11it's vague.11MS. CONNELL: Objection. The doc | oumonto |
| | cuments |
| 12A. What is posted on the intranet site is the12speak for themselves.13target audience is the general employee population, and13A. I mean, I'm just comparing. Looks I | iko |
| 14 what is in the guidelines is manager, it's for managers 14 word for word. | IKE |
| 15 and HR, and the overall information provided should be 15 Q. (By Mr. Miller) So looking at the las | ` + |
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| | |
| 20 MS. CONNELL: Objection, misstates her 20 Q. But you recognize it? | |
| 21 prior testimony. 21 A. I do recognize it. | |
| A. The intended audience was HR and managers 22 Q. How do you recognize it? | |
| 23 as training for them in making decisions. 23 A. Because this was shown to me in m | iy previous |
| 24 Q. (By Mr. Miller) Okay. I'm going to show 24 deposition. 25 vou another exhibit that I'm going to ask the court 25 Q. Oh. okay. but you don't know where | this |
| 25 you another exhibit that I'm going to ask the court 25 Q. Oh, okay, but you don't know where | ; u 115 |
| 62 64 | |

1 came from? 1 your understanding of how pay increases work at Oracle? 2 A. I don't. 2 MS. CONNELL: Object to the preamble that 3 3 Q. Do you know who made it? Oracle has taken that position. 4 4 A. I don't. A. I guess I don't -- I don't really know 5 5 Q. Okay. Let's -- I should have one more what -- what you're asking -- I'm not sure what you're б exhibit to show you here in this run. б asking. I mean, it states that salary increases are 7 7 offered at the discretion of your manager. There are I will ask the court reporter to mark this 8 8 as Exhibit 6. various levels of manager, so we don't specify. 9 9 (Exhibit 6 marked for identification.) Q. (By Mr. Miller) That's -- what I am really 10 10 MR. MILLER: I will do my best to give you asking is what is your understanding about the level at 11 which those salary increases are made? 11 just one copy of it. Yeah. 12 12 MS. CONNELL: It's just -- it is marked --A. It could be at any level. 13 Q. (By Mr. Miller) So somebody three or four 13 I am just noting for the record it's marked as 14 confidential. I don't know if I need to do that every 14 steps up from the employee could make it -- could 15 15 time for you if it's already got the confidential authorize or offer a salary increase? 16 16 designation on it, but I am --MS. CONNELL: Objection, incomplete 17 17 hypothetical, calls for speculation. (Off the record discussion.) 18 18 Q. (By Mr. Miller) Do you recognize this A. I suppose. I don't -- I don't deal with 19 19 document? salary increases to individual employees but maybe. 20 A. Again, it's -- looks like it's from our 20 Q. (By Mr. Miller) So I'm about to get into a 21 21 internal -- our intranet site in the global larger exhibit, so why don't we take a short break here. 22 22 compensation -- on the global compensation page with you THE VIDEOGRAPHER: The time is 11:12 a.m., 23 the sub menu of job changes and discretionary titles. 23 going off the record. 24 Q. (By Mr. Miller) And, again, the intended 24 (Recess was taken.) 25 25 audience for this is all employees, not just managers? THE VIDEOGRAPHER: The time is 11:25 a.m. 65 67 A. Correct. 1 Back on the record. 1 2 2 Q. So let's look at Exhibit 4 again just once Q. (By Mr. Miller) Ms. Waggoner, I wanted you 3 for me. At the bottom of this page, there's heading 3 to look at Exhibits 1, 2 and 3 for me, just the front of 4 4 that says salary increases? them. 5 A. Correct. 5 So, Ms. Waggoner, if you look at Exhibits 1 6 6 Q. Do you see -- so on here, it says that and 3, there's nothing to indicate on these front pages 7 7 salary increases are offered at the discretion of your that there are guidelines, is there? 8 8 manager; is that right? MS. CONNELL: Objection, the document 9 A. That's what it says. 9 speaks for itself. 10 10 MS. CONNELL: The document speaks for A. I would say that, no, I mean, the word 11 11 itself. "quidelines" isn't on here. 12 Q. (By Mr. Miller) What does that mean for 12 Q. (By Mr. Miller) And it's prominent on 13 13 the line employee, for the IC employee? Exhibit 2, correct? MS. CONNELL: Objection, vague, calls for 14 14 MS. CONNELL: Objection, the document 15 speculation. 15 speaks for itself. 16 A. I'm not sure what you mean by that. 16 A. It's part of the title. 17 17 Q. (By Mr. Miller) Well, it says your manager Q. (By Mr. Miller) Did you change the way you has discretion over salary increases. Does that mean 18 communicated these guidelines to employees between, I 18 19 your direct manager? 19 guess it would be, 2011 and 2012 and 2016 with respect 20 MS. CONNELL: Objection, misstates the 20 to how you talked about them as guidelines? 21 document and calls for speculation. Also assumes facts. 21 MS. CONNELL: Objection, vague. 22 22 A. I -- I don't know. A. Not that I can think of. 23 23 Q. (By Mr. Miller) So I believe in other Q. (By Mr. Miller) So in 2011 or 2012, you

24 places, Oracle has taken the position that front-line

²⁵ managers have discretion over pay increases. Is that

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they don't have that appellation with them?

would have presented these as guidelines even though

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| 1 | MS. CONNELL: On the front page, to be | 1 | dealt with pay discrimination. Is that a portion of the |
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| 2 | clear for the record. | 2 | training? |
| 3 | A. I don't I mean, we presented them as | 3 | A. It's non-discrimination in general in our |
| 4 | comp 101. We didn't present them as anything other than | 4 | employment practices. |
| 5 | general comp training. | 5 | Q. But does it cover appropriately setting pay |
| 6 | Q. (By Mr. Miller) Okay. And then if you | 6 | so as to not create disparities for people based on race |
| 7 | recall earlier, we were discussing your role in | 7 | or gender? |
| 8 | anti-discrimination training with respect to setting | 8 | MS. CONNELL: Objection, assumes facts. |
| 9 | pay. Do you remember that? | 9 | A. I don't recall. |
| 10 | MS. CONNELL: Objection, misstates her | 10 | Q. (By Mr. Miller) Are you aware of anybody |
| 11 | prior testimony. | 11 | providing this kind of training in connection with |
| 12 | A. I'm not sure which part you're talking | 12 | compensation at Oracle? |
| 13 | about. | 13 | MS. CONNELL: Object objection, calls |
| 14 | Q. (By Mr. Miller) Well, you told me that | 14 | for speculation. |
| 15 | part of the training that you gave was training related | 15 | A. I don't know. |
| 16 | to prevent discrimination in pay positions, correct? | 16 | Q. (By Mr. Miller) I'd like to show you |
| 17 | A. No. | 17 | another exhibit I'm going to ask the court reporter to |
| 18 | Q. Don't think so? Okay. | 18 | mark as Exhibit 7. |
| 19 | MS. CONNELL: Objection, misstates her | 19 | (Exhibit 7 marked for identification.) |
| 20 | prior testimony. | 20 | MS. CONNELL: Mark Exhibit 7 as |
| 21 | Q. (By Mr. Miller) Did you provide training | 21 | confidential. |
| 22 | or discussion in providing these guidelines about not | 22 | Q. (By Mr. Miller) Have you finished |
| 23 | discriminating on the basis of sex or race in pay? | 23 | reviewing it? |
| 24 | MS. CONNELL: Objection, vague and the | 24 | A. Yes. |
| 25 | documents speak for themselves. | 25 | Q. Do you recognize this document? |
| | 69 | | 71 |
| 1 | A. I don't think that I talked at all about me | 1 | A. Vaguely. |
| 2 | training anybody on non-discrimination. | 2 | Q. What do you recognize it as? |
| 3 | Q. (By Mr. Miller) Well, for instance, in | 3 | A. Looks like it's a manager training. |
| 4 | looking at Exhibit 3, I asked you on page 6, I believe | 4 | Q. Did you take any part in developing this |
| 5 | it is, dash 6 I asked you what legally compliant | 5 | this document? |
| 6 | meant. And you told me a variety of things. One of the | 6 | A. I did not. |
| 7 | things you mentioned is that it would include a | 7 | Q. Did you take any part in delivering this |
| 8 | requirement not to discriminate in setting pay; is that | 8 | training? |
| 9 | right? | 9 | A. I did not. |
| 10 | A. I mean, my my response was legally | 10 | Q. All right, I'd like to draw your attention |
| 11 | compliant, I think, speaks for itself, and you asked | 11 | to what is slide four and the page is dash 5. |
| 12 | what does that mean, and to me, legally compliant would | 12 | I believe you told me at the beginning of |
| 13 | non-discrimination would fall under that, but I | 13 | this deposition one of your responsibilities was to |
| 14 | certainly didn't train on anything like that. | 14 | maintain and I think update the global job table; is |
| 15 | Q. So you didn't provide anti-discrimination | 15 | that right? |
| 16 | in pay training? | 16 | A. Correct. |
| 17 | A. No. | 17 | Q. And so this slide appears to have a little |
| 18 | Q. Are you aware that anybody provides that | 18 | example piece of the global job table; is that right? |
| 19 | training? | 19 | MS. CONNELL: Document speaks for itself. |
| 20 | MS. CONNELL: Calls for speculation. | 20 | Q. (By Mr. Miller) And is this what you meant |
| 21 | A. Non-discrimination training is mandatory | 21 | by global job table? I mean, I assume it's much larger |
| 22 | for our managers. I mentioned that that's some of the | 22 | than this, but is this an example of part of it? |
| 23 | mandatory training I received. | 23 | A. Yes. |
| 24 | Q. (By Mr. Miller) Right. I guess I didn't | 24 | Q. When you say "global job table," does that |
| 25 | understand that the training you received specifically | 25 | include all of the jobs at Oracle? |
| | 70 | | 72 |

| 1 | MS. CONNELL: Objection, vague as to jobs. | 1 | table, what does that entail? |
|----------|--|----------|---|
| 2 | A. The global job table includes the general | 2 | A. So, again, I have someone on my team who |
| 3 | and bag job codes, system job codes and job titles that | 3 | works on this, but it has to do with with making |
| 4 | exist at our company, but it certainly doesn't it's | 4 | sure, for example, if we have an existing family that |
| 5 | not representative of every job, because our jobs get | 5 | only goes up to an IC5 and a line of business determines |
| 6 | much more granular underneath a general bucket of, say, | 6 | they need an IC6, they come to my team to say we need an |
| 7 | software development. | 7 | IC6 of this particular family, here is how we |
| 8 | Q. (By Mr. Miller) So does that mean to sort | 8 | distinguish the IC5 from the IC6 and could we please add |
| 9 | of ask it in reverse then, are there any employees at | 9 | this to our table. |
| 10 | Oracle who would not fit into a job code on the global | 10 | And we, as my team being responsible |
| 11 | job table? | 11 | globally, we get a global consensus that the IC6 level |
| 12 | MS. CONNELL: Objection, vague. | 12 | is necessary for the business, and then the person on my |
| 13 | A. Every employee has a job code. | 13 | team is able to go into the system to add that level to |
| 14 | Q. (By Mr. Miller) Okay. Looking at this | 14 | the table. |
| 15 | global job table, we have some of these elements that we | 15 | Q. How do you distinguish between the global |
| 16 | talked about at the very beginning of the deposition | 16 | career levels? |
| 17 | with respect to you. And there's little pop-up balloons | 17 | MS. CONNELL: Objection, vague. |
| 18 | on this slide, but in the section called job title, this | 18 | A. It has to do with years of experience, |
| 19 | is the formal job title, correct? | 19 | level of complexity of what they're working on, the |
| 20 | MS. CONNELL: Objection, misstates the | 20 | scope of what they're working on, the complexity, scope, |
| 21 | document. | 21 22 | years, their the influence of the role, who they |
| 22 | A. It's the system job title. | 22 | interact with, if they interact with C suite levels or |
| 23 | Q. (By Mr. Miller) As distinct from, say | 23 | most of their interaction is lower levels, there are various things that go into play in determining a career |
| 24 25 | well, let's take you as an example. We talked about | 24 | level. |
| 25 | this. You are the senior director of global | 25 | level. |
| | 73 | | 75 |
| 1 | compensation, but in the system, you're the senior human | 1 | Q. (By Mr. Miller) Are there other factors |
| 2 | resources manager? | 2 | beyond the ones you just named? |
| 3 | A. I'm the senior director of human resources, | 3 | A. There may be, but offhand, I |
| 4 | yes. | 4 | Q. When you say complexity of project and |
| 5 | Q. Sorry, forgive my misstatement. | 5 | scope of project, what do you mean by "project"? |
| 6 | A. Yes. | 6 | A. I don't think I said complexity of project. |
| 7 | Q. So what's in this global job table is the | 7 | I mean complexity of their role, complexity of the |
| 8 | second one, the senior director of human resources; is | 8 | products they work on, the complexity of the duties, the |
| 9 | that right? | 9 | decision-making authority that that person has or not |
| 10 | A. Correct. | 10 | a person, the decision-making authority that we assume |
| 11 | Q. Does this global job table ever include the | 11 | of a specific career level. Someone of a IC1 has little |
| 12 | discretionary title senior director of global | 12 | to no decision-making authority but someone as a 4 or a |
| 13 | compensation? | 13 | 5 or a 6. |
| 14 | A. No, discretionary titles are not included | 14 | Q. So when you're taking about the complexity |
| 15 | in the table. | 15 | of the product, how do you evaluate that? |
| 16 | Q. And the only other thing I want to confirm | 16 | MS. CONNELL: Objection, vague and assumes |
| 17 | is I believe earlier when we were talking about your | 17 | facts. |
| 18 | job, you know, I asked what your global career level was | 18 | A. We don't go down to the product level |
| 19 | and you told me it's currently M5. | 19 | evaluating that from a global table perspective. |
| 20 | Global career level, in this example | 20 | Q. (By Mr. Miller) How do you evaluate the |
| 21 | anyway, short for career level, right, but that's the | 21 | complexity of the duties? |
| 22 | same thing, isn't it? | 22 | MS. CONNELL: Objection, assumes facts and |
| 23 | A. It is. | 23 | vague. |
| 24 | Q. So when you told me early on you were | 24 | A. Again, we don't we don't personally |
| 25 | responsible for maintaining and updating the global job | 25 | evaluate. We we speak to at at a in general, |
| | | | |
| | 74 | | 76 |

| 1 across any function that we would be talking about, it across any function that we would be talking about, it 2 could be a developer, it could be a sidesperson. We have categories or we have these career levels that 5 really essentially are pretty standard in the market. 6 (By Mr. Millia) (What do you mean? 7 A. No. 9 would have X types of responsibility. 9 would have X that they you would each a lot of guidance and have Y types of responsibility. 9 for a very - it essentially talks 10 general they would each a lot of guidance and have Y types of responsibility. 9 for a very - it essentially talks 11 complexity or a different level of orce in resulty. 11 general therem, but the finges that core in hey when if the level at which the job is done in pretty and a grade could be an ECOS, but the range wouldn't be the same for very EOS. 11 general thereanity had an ICS, how do you determine that the ICS is necessary? 12 M. No. No. No. No. No. No. No. No. No. No | | | | |
|--|--|--|--|---|
| 3 it could be a developer, it could be a salesperson. We have categories or whave these career levels that really essentially are pretty standard in the market. We got - I mean, we got most of our Bigot Both sand to expect that they We got - I mean, we got most of our We got - I mean, we got most of our What we can be asset served the a different trone Whot hey work with. We review often - well, always, the business has to define and show us why and to say, you Y | 1 | | 1 | Q. Okay. And job code is linked to a specific |
| 4 A.v.o. 5 really espectially are prefix standard in the market. 6 We got - I mean, we got most of our 7 framework for the career levels from a Radford. They 8 A. No. 9 would have X types of responsibilities. At the IC1 10 level, gou would expect that they 11 guidance and have Y types of responsibility. 12 So it's a very - it essentially at purchas that evel the level at which the job is done in pretty 13 about the level at which the job is done in pretty 14 theomes to the next step up have to do with a different 15 it comes to the next step up have to do with a different 16 global job table and as your example was adding an IC5 17 Gerseit different itsend 18 global job table and as your example was adding an IC5 19 bob table and as your example was adding an IC5 10 a list bable and as your example was adding an IC5 11 the stat secontily had an IC5, how do you determine 11 that the caneer level, low on the say of 11 know, the latest one we had, for example, it talked 25 business has to define and show us | 2 | could be an attorney, it could be a financial analyst, | 2 | salary range, correct? |
| s really essentially are pretty standard in the market. s 0. (By Mr. Miller) What do you mean? f We got - I mean, we got most of our A Apb code is in the - in the United f framework for the career levels from a Radford. They States, a job code is linked to a grade. g diafne at the ICA level, you would expect that they would have X types of responsibilities. At the IC1 Because as we talked about before, there g uidance and have Y types of responsibility. So it's a very - it essentially talks and a grade could be an EOG, but the ranges, and the gous and the grade scale as we talked about before, there g both the level at with the job is done in pretty garde could be an EOG, but the strage wouldn't be g dobating the level at with the job is done in pretty garde could be could as you say 'grade." g dobating to babe and as your example was adding an IC6 Correct. g lobating to babe and as your example was adding an IC6 Correct. g Most ConNELL: Objection, assumes facts and G. So they appears to be an example inking g business has to define and show us why and to say, you Ya Ya We retwor often - well, always, the g dobating the well, they - their current So this appears to be an example linking g twe nevere the well, they - their current | 3 | it could be a developer, it could be a salesperson. We | 3 | MS. CONNELL: Objection, vague. |
| 6 We got - I mean, we got most of our framework for the career levels from A Radrod. They define at the IC4 level, you would expect that they would have X types of responsibilities. At the IC1 level, you would expect that they would need a tot of guidance and have Y types of responsibilities. So it's a very - I tessentially talks about the level at which the job is done in pretty general terms, but the things that come into play when the level of complexity or a different level of decision-making authority or the other really - decision-making authority or the other really - decision with a an IC5, how do you determine that the IC6 is necessary? A We review often - well, always, the business has to define and show us why and to say, you 77 77 70 70 71 70 70 70 70 70 70 70 70 70 70 70 70 70 | 4 | - | 4 | A. No. |
| 7 framework for the career levels from a Radford. They define at the C4 level, you would expect that they 9 would have X types of responsibilities. At the IC1 Because as we talked about before, there 10 level, you would expect that they would need a to of Build expect that they would need a to of 11 and a grade could be an C50, but the range wouldh't be 12 So its a vary it essentially talks 13 about the level at which the job is done in pretty 16 level of complexity or a different level of 17 decision-making authority or the other really 18 Gobal job table and as your example was adding an IC6 19 global job table and as your example was adding an IC6 10 Ms. CONNELL: Objection, assumes facts and 11 misstates her testimory. 12 Ms. CONNELL: Objection, assumes facts and 11 spoint be much bigger, fier one clients, dealing 12 the exist on- well, always, the 12 fit ago ong the max tievel, they their current 126 builders and wourd, wire well always, the 12 the other and by our at would appears to be an example linking 2 fit altestone we had, for example, i | 5 | really essentially are pretty standard in the market. | 5 | Q. (By Mr. Miller) What do you mean? |
| 8 define at the IC4 level, you would expect that they a 9 would have X types of responsibilities. 10 level, you would expect that they would need a lot of 11 guidance and have Y types of responsibilities. 13 about the level at which the job is done in pretry 14 general terms, but the things that come into play when 15 it comes to the next step up have to do with a different term 16 decision-making authority or the other really - 17 decision-making authority or the other really - 18 global job table and as your example was adding an IC6 19 global job table and as your example was adding an IC6 10 misstates her testimony. 21 Ms. CONNELL: Objection, assumes facts and 11 giobal job table and as how us why and to say, you 17 70 18 Know, the latest one we had, for example, it talked 19 there of othing at different terolities, dealing 10 CS parform, you know, support of deponding on the size 11 first as appropriate? 12 first as appropriate? 14 nour industry gure, if you dow with appears if you 15 it shaw th tis asy, but when when a - if 16 A Seque and term 17 | б | We got I mean, we got most of our | 6 | A. A job code is in the in the United |
| 9 would have X types of responsibilities. At the IC1 9 A. Because as we talked about before, there 10 level, you would expect that they would need a lot of 10 is - at Oracle, we have non-HO ranges, and a grade could be an EO6, but the range wouldn't be 12 So it's a very - it essentially talks 10 is - at Oracle, we have non-HO ranges, and a grade could be an EO6, but the range wouldn't be 12 but the level at which the job is of one inpetty G. Right. Okay, and when you say 'grade,'' 14 general terms, but the things that come into play when 10 It comes that neer the vert of which a different 16 level of complexity or a different level of 10 G. Right. Okay, and when you say 'grade,'' 19 global job table and as your eally 10 G. Yeah, okay. Turning your attention to 10 the the recently have a do you determine 10 side 6 and 7 of this presentation, and it's marked at 19 global job table and asyour symple was adding an IC6. Q. Yeah, okay. Turning your attention to side 6 and 7 of this presentation, and it's marked at 10 misstates her testimony. Q. To ken, okay. Turning your attention to side 6 and 7 of this presentation, and it's marked at 11 the the range would not to signification, assumes facts and | 7 | framework for the career levels from a Radford. They | 7 | States, a job code is linked to a grade. |
| 10 level, you would expect that they would need a lot of 11 guidance and have Y types of responsibility. 12 So iffs a very - it essentially talks 13 about the level at which the job is done in pretty 14 general terms, but the things that come into play when 15 it comes to the next step up have to do with a different 16 level of complexity or a different level of 17 decision-making authority or the other really - 18 goodal job table and as your example was adding an IC6 19 the the IC6 is necessary? 21 Ms. CONNELL: Objection, assumes facts and 22 Ms. CONNELL: Objection, assumes facts and 23 A. We review often well, always, the 24 business has to define and show us why and to say, you 77 79 71 responsibilities, its acertainly not 31 its - sait own, with the influence inst, dealing 32 to do with the influence inst, dealing 34 of the client or whatewor, but then at the next level, the 35 to a with the influence of and the different complexity or you know, support or depending on the size for the client or whatewor, but hen and the rest, fea | 8 | define at the IC4 level, you would expect that they | 8 | Q. How is that different from a salary range? |
| 11 guidance and have Y types of responsibility. and a grade could be an EQS, but the range wouldn't be 12 So it's a very – it essentially talks and a grade could be an EQS, but the range wouldn't be 12 about the level at which the job is done in pretty and a grade could be an EQS, but the range wouldn't be 14 general terms, but the things that come into play when and a grade could be an EQS, but the range wouldn't be 16 level of complexity or a different level of and a grade could be an QS, and when you say 'grade,' 17 decision-making authority or the other really - and a grade could be an QS, when you're talking about in this context is salary 18 Q. So when you're looking at adjusting the gidbal job table and as your example was adding an ICG to in line that recently had an ICS, how do you determine 19 full that the ICG is necessary? A. Yes. A. We review often well, always, the 21 MS, CONNELL: Objection, assumes facts and G. Baout how for this next level, that well, always, the 22 MS, CONNELL: Objection, that well always, the C. Team, that's what it say, but when if 23 business has to define and show us why and to say, you Tesponsibilities; is that right? 24 about how for this nexel level, then' we are an awangle linking < | 9 | would have X types of responsibilities. At the IC1 | 9 | A. Because as we talked about before, there |
| 12 So it's a very – it essentially talks 12 the same for every EOG. 13 about the level at which the job is done in pretty G. Right. Okay, and when you say "grade," what you're talking about in this context is salary 15 it comes to the next step up have to do with a different A. Correct. 16 decision-making authority or the other really – A. Correct. 17 decision-making authority or the other really – A. Correct. 18 global job table and as your example was adding an ICG N. Convect. 19 global job table and as your example was adding an ICG N. Convect. 20 MS. CONNELL: Objection, assumes facts and The sense hor every EOG. 21 M. We review often – well, always, the L. Have you seen charts like the ones that are 22 MS. CONNELL: Objection, assumes facts and S. So this appears to be an example linking 23 about how – for this next level, thy – their current So then you'no, withis exhibit. 24 A flexe you seen charts like the ones that are Incluster fact, Assumes facts. 25 business has to define and show us why and to say, you Really only in this exhibit. 25 about how – for this next level, thy – M. Image fact the section and the max | 10 | level, you would expect that they would need a lot of | 10 | is at Oracle, we have non-HQ ranges and HQ ranges, |
| 13 about the level at which the job is done in pretty 14 general terms, but the things that come into play when 15 it comes to the next step up have to do with a different 16 level of complexity or a different level of 17 decision-making authority or the other really - 18 Q. So when you're looking at adjusting the 19 global job table and as your example was adding an IC6 10 bit that the IC6 is necessary? 21 MS. CONNELL: Objection, assumes facts and 22 MS. CONNELL: Objection, assumes facts 23 A. We review often – well, always, the 24 business has to define and show us why and to say, you 25 business has to define and show us why and to say, you 26 Tot element or whatever, but then at the next level, 3 ICSs perform, you know, support or depending on the size 4 fte cleint or whatever, but then at the next level, 5 it's going to be much bigger, iter one clients, dealing 7 79 10 nean, that's what it says, but when – if 7 you read the responsibilities, it's cortainly not specific responsibilities, it's cortainly not 8 | 11 | guidance and have Y types of responsibility. | 11 | and a grade could be an EO6, but the range wouldn't be |
| 14 general terms, but the things that come into play when 15 it comes to the next step up have to do with a different 16 Q. Yeah, okay., Turning your attention to 17 decision-making authority or the other really 18 Q. So when you're looking at adjusting the 19 global job table and as your example was adding an IC6 20 to a line that recently had an IC5, how do you determine 14 M. Reconstructure, and it's marked at 21 M.S. CONNELL: Objection, assumes facts and 22 M.S. CONNELL: Objection, assumes facts and 23 misstates her testimory. 24 A. We review often - well, always, the 25 business has to define and show us why and to say, you 77 79 11 responsibilities; is that right? 25 about how - for this next level, they - their current 26 responsibilities, it's certainly not 36 as an industry gour, if you are whole opens, if you 7 79 11 responsibilities, it's entainly not 36 as an industry gour, if you do white papers, if you 7 Q. So you get a request to add a new | 12 | So it's a very it essentially talks | 12 | the same for every EO6. |
| 15 it comes to the next step up have to do with a different level of complexity or a different level of decision-making authority or the other really d. So when you're looking at adjusting the global job table and a sy oure example was adding an IC6 to a line that recently had an IC5, how do you determine misstates her testimory. 15 global job table and a sy oure example was adding an IC6 misstates her testimory. 21 MS. CONNELL: Objection, assumes facts and misstates her testimory. 16 A Yes. 22 MS. CONNELL: Objection, assumes facts and misstates her testimory. 23 A Really only in this exhibit. 23 M. We review often – well, always, the business has to define and show us why and to say, you 26 Carser level, job title, discretionary title and 26 for the client or whatever, but then at the next level, it's going to be much bigger, iter one clients, dealing with the C Suite. I mean, thats to do with their interactions with, you know, if you are known as an industry your, know, wit you are known as an industry your, know, wit you are known as an industry your, lyou do white papers, if you present places, you are probably a5 or a 6. That has to do with the influence of and the different complexity of what it is that you are working on. 1 responsibilities, it's certainly not specific responsibilities, it's differention, kay. I mean, if nothing 10 as on industry, you know, if you are known as an industry your, you know, if you are known if that's appropriate? 1 Really only indicate areal overview of what you are working on the wore at its stat you are work | 13 | about the level at which the job is done in pretty | 13 | Q. Right. Okay, and when you say "grade," |
| 16 level of complexity or a different level of 17 decision-making authority or the other really 18 Q. So when you're looking at adjusting the 19 global job table and as your example was adding an ICB 19 to a line that recently had an IC5, how do you determine 11 that the IC6 is necessary? 22 MS. CONNELL: Objection, assumes facts and 23 A. We review often - well, always, the 24 A. We review often - well, always, the 25 business has to define and show us why and to say, you 70 79 71 79 72 79 73 79 74 79 75 MS. CONNELL: Objection. The document 76 speak for the fact the the test test, they - their current 76 10 Ess perform, you know, support or depending on the size 76 11 77 MS. CONNELL: Objection. The document 78 Specific responsibilities. It's kind of a general 79 79 70 11 71 79 72 MS. CONNELL: Objection. The d | 14 | general terms, but the things that come into play when | 14 | what you're talking about in this context is salary |
| 11 decision-making authority or the other really Q. So when you're looking at adjusting the 17 Q. Yeah, okay. Turning your attention to 18 global job table and as your example was adding an ICG the bottom with 9 and 10. Do you see these two slides? 20 that the ICG is necessary? A. Yes. 21 that the ICG is necessary? A. We review often well, always, the 22 business has to define and show us why and to say, you C. Have you seen charts like the ones that are 23 A. We review often well, always, the C. So this appears to be an example linking 24 A. We review often well, always, the C. So this appears to be an example linking 25 tabut how - for this next level, they their current G. So this appears to be an example linking 26 of the client or whatever, but then at the next level, M. I mean, it has to do with their 3 Inclustry guru, if you do white papers, if you mout industry guru, if you do white papers, if you 9 for the tileapportail? A. I don't personally. So ra 6. That has 10 G. So you get a request to add a new career I so the means the subses has given us to decide 11 for they were at that level. So good argument and if, in fact, they'we | 15 | it comes to the next step up have to do with a different | 15 | grade, correct? |
| 13 G. So when you're looking at adjusting the 13 slide 6 and 7 of this presentation, and it's marked at 14 19 global job table and as your example was adding an IC6 14 15 to a line that recently had an ICS, how do you determine 14 that the IC6 is necessary? A. Yes. 22 MS. CONNELL: Objection, assumes facts and 32 A. Have you seen charts like the ones that are 21 MS. CONNELL: Objection, assumes facts and 32 A. Really only in this exhibit. 24 A. We review often well, always, the 24 A. We review often well, always, the 25 business has to define and show us why and to say, you 79 1 know, the latest one we had, for example, it talked about how for this next level, they their current 26 of the Cleint or whatever, but then at the next level, 1 responsibilities; is that right? 7 Wo CONNELL: Objection. The document speak for itself. Assumes facts. 8 who they work with. 1 responsibilities; is that right? 9 uraent, that so do with their for for they were at that level. 10 is an industry you know, if you are known as an industry you know, if you are kn | 16 | level of complexity or a different level of | 16 | A. Correct. |
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| to a line that recently had an ICS, how do you determine that the ICG is necessary? M.S. CONNELL: Objection, assumes facts and misstates her testimony. A. We review often well, always, the business has to define and show us why and to say, you 77 A. Really only in this exhibit. G. So has papears to be an example linking career level, job title, discretionary title and 77 79 know, the latest one we had, for example, it talked about how for this next level, they their current ICSs perform, you know, support or depending on the size of the Cleint or whatever, but then at the next level, it's going to be much bigger, tier one cleints, dealing with the Suite. I mean, it has to do with their interactions with, you know, if you are known as an industry guru, if you do white papers, if you present places, you are probably as of a 6. That has to do with the influence of and the different complexity of what it is that you are working on. G. So you get a request to add a new career level? A. Yes, that usually comes from the business. if that's appropriate? A. I don't personally. We review the docourmentation that the business as given us to decide if that's appropriate? A. I don't personally. We review the docourmentation that the business as given us to decide if there's a good argument and if, in fact, they've defined it as the next step up, and then we have a1 wouldin't say a committee, but it's sort of all the regional leads around the world, we say this has come before us, what do you guys think. | 18 | Q. So when you're looking at adjusting the | 18 | slide 6 and 7 of this presentation, and it's marked at |
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| MS. CONNELL: Objection, assumes facts and misstates her testimony. A. We review often well, always, the business has to define and show us why and to say, you A. We review often well, always, the constraints of the states has to define and show us why and to say, you know, the latest one we had, for example, it talked abut how for this next level, they their current ICSs perform, you know, support or depending on the size of the client or whatever, but then at the next level, they their current interactions with, you know, like I mentioned before, who they work with. In our industry, you know, if you are known as an industry guru, if you do white papers, if you present places, you are probably a 5 or a 6. That has to do with the influence of and the different complexity of what it is that you are working on. G. So you get a request to add a new career level? A. Yes, that usually comes from the business. G. And then you do an analysis and determine if that's appropriate? A. Yes, that usually comes from the business. G. And then you do an analysis and determine if there's a good argument and if, in fact, they've defined it as the next step up, and then we have a1 wouldn't say a committe, but if's sort of all the tare is port of a good argument and if, in fact, they've defined it as the next step up, and then we have a1 wouldn't say a committe, but if's sort of all the faces real step up, and then we have a1 wouldn't say a committe, but if's sort of all the port us, what do you guys think. M. We have discretionary tile are M. Koon they our doy uguys think. | 20 | to a line that recently had an IC5, how do you determine | 20 | A. Yes. |
| MS. CONNELL: Objection, assumes facts and misstates her testimony. A. We review often well, always, the business has to define and show us why and to say, you A. We review often well, always, the constraints has to define and show us why and to say, you know, the latest one we had, for example, it talked abut how for this next level, they their current ICSs perform, you know, support or depending on the size of the client or whatever, but then at the next level, they their current ICSs perform, you know, support or depending on the size of the client or whatever, but then at the next level, they their current Indexections with, you know, like I mentioned before, who they work with. In our industry, you know, if you are known as an andustry guru, if you do white papers, if you present places, you are probably a5 or a 6. That has to do with the influence of and the different complexity of what it is that you are working on. G. So you get a request to add a new career level? A. Yes, that usually comes from the business. G. And then you do an analysis and determine if that's appropriate? A. I don't personally. We review the dorourentation that the business has given us to decide if there's a good argument and if, in fact, they've defined it as the next step up, and then we have a1 wouldn't say a committe, but if's sort of all the tare is a good argument and if, in fact, they've defined it as the next step up, and then we have a1 wouldn't say a committe, but if's sort of all the general is any sub with, we say this has come 25 before us, what do you guys think. | 21 | that the IC6 is necessary? | 21 | Q. Have you seen charts like the ones that are |
| misstates her testimony. A. We review often – well, always, the business has to define and show us why and to say, you 77 1 know, the latest one we had, for example, it talked about how – for this next level, they – their current ICSs perform, you know, support or depending on the size of the client or whatever, but then at the next level, it's going to be much bigger, tier one clients, dealing with the C suite. I mean, it has to do with their interactions with, you know, like I mentioned before, who they work with. In our industry, you know, like I mentioned before, who they work with. In our industry, you know, like I mentioned before, who they work with. G. So you get a request to add a new career level? A. Yes, that usually comes from the business. G. And then you do an analysis and determine if that's appropriate? A. I don't personally. We review the document and if, in fact, they've defined it as the next step up, and then we have a – 1 wouldn't say a committee, but it's sort of all the regional leads around the world, we say this has come before us, what do you guys think. 23 A. Really only in this exhibit. 24 G. So this appears to be an example linking care er level, job title, discretionary title affect pay? M. So (NELL: Objection. The document specific responsibilities. It's got discretionary title affect pay? M. I don't personally. We review the documentation that the business has given us to decide if there's a good argument and if, in fact, they've defined it as the next step up, and then we have a – 1 wouldn't say a committe, but it's sort of all the regional leads around the world, we say this has come before us, what do you guys think. | 22 | | 22 | included in nine and 10 before? |
| 24 A. We review often well, always, the 24 Q. So this appears to be an example linking 25 business has to define and show us why and to say, you 77 79 1 know, the latest one we had, for example, it talked about how - for this next level, they their current 11 responsibilities; is that right? 26 of the client or whatever, but then at the next level, it's going to be much bigger, tire one clients, dealing it's going to be much bigger, tire one clients, dealing 6 with the C suite. I mean, it has to do with their in our industry, you know, like I mentioned before, Who they work with. 9 In our industry, you do white papers, if you 9 Q. By Mr. Miller) And this is not something 10 present places, you are probably a 5 or a 6. That has 0 C. By Mr. Miller) And this is not something 11 of what it is that you are working on. 12 Q. So you get a request to add a new career 12 I don't personally. We review the G. So does discretionary title affect pay? 12 M. I don't personally. We review the G. So does discretionary title affect pay? 13 indirectly? M. Is on in there. 14 I dort personally. We review the G. Go toes discretionary title affe | 23 | - | 23 | A. Really only in this exhibit. |
| 25 business has to define and show us why and to say, you 25 career level, job title, discretionary title and 26 know, the latest one we had, for example, it talked 79 1 know, the latest one we had, for example, it talked 1 2 responsibilities; is that right? 2 MS. CONNELL: Objection. The document 3 speaks for itself. Assumes facts. 4 of the client or whatever, but then at the next level, 5 iif sgoing to be much bigger, tier one clients, dealing with the C suite. I mean, it has to do with their 5 7 1 9 In our industry, you know, if you are known 10 as an industry guru, if you do white papers, if you 11 present places, you are probably a 5 or a 6. That has 12 M. No. 13 Q. So you get a request to add a new career 14 Q. So you get a request to add a new career 16 A. I don't personally. We review the 16 A. I don't personally. We review the 16 A. I don't personally. We review the 18 facts, calls for speculation. 19 A. I don't personally. We review the< | 24 | - | 24 | Q. So this appears to be an example linking |
| 77 79 1 know, the latest one we had, for example, it talked about how - for this next level, they - their current ICSs perform, you know, support or depending on the size of the client or whatever, but then at the next level, 1 responsibilities; is that right? 2 MS. CONNELL: Objection. The document speaks for itself. Assumes facts. A. I mean, that's what it says, but when if you read the responsibilities. It's kind of a general overview of what you would expect them to be responsible for if they were at that level. 9 In our industry, you know, if you are known as an industry guru, if you do white papers, if you present places, you are probably a 5 or a 6. That has to do with the influence of and the different complexity of what it is that you are working on. 0 (By Mr. Miller) And this is not something that would appear in the global job table? 1 A. Yes, that usually comes from the business. 0. And then you do an analysis and determine if that's appropriate? A. I don't personally. We review the documentation that the business has given us to decide if there's a good argument and if, in fact, they've defined it as the next step up, and then we have a -1 wouldn't say a committee, but it's sort of all the regional leads around the world, we say this has come before us, what do you ugys think. 0 (By Mr. Miller) Does it affect it indirectly? | 25 | - | 25 | |
| 1 know, the latest one we had, for example, it talked 2 about how for this next level, they their current 1 IC5s perform, you know, support or depending on the size 4 of the client or whatever, but then at the next level, 6 with the C suite. I mean, it has to do with their 7 it's going to be much bigger, tier one clients, dealing 8 who they work with. 9 In our industry, you know, like I mentioned before, 8 who they work with. 9 Q. (By Mr. Miller) And this is not something 10 as an industry guru, if you do white papers, if you 11 responsibilities, it's dot different complexity 11 of what it is that you are working on. 12 Q. So you get a request to add a new career 13 level? 14 Q. So you get a request to add a new career 15 level? 16 A lorn't personally. We review the 16 A lorin't personally. We review the 1 | | , ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | | |
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| 2about how for this next level, they their currentICSs perform, you know, support or depending on the sizeMS. CONNELL: Objection. The document3ICSs perform, you know, support or depending on the sizeA. I mean, that's what it says, but when if4of the client or whatever, but then at the next level,A. I mean, that's what it says, but when if5it's going to be much bigger, tier one clients, dealingyou read the responsibilities, it's certainly not6with the C suite. I mean, it has to do with theiroverview of what you would expect them to be responsible7interactions with, you know, like I mentioned before,overview of what you would expect them to be responsible8mot ney work with.O. (By Mr. Miller) And this is not something9as an industry guru, if you do white papers, if youO. (By Mr. Miller) And this is not something10as an industry guru, if you do white papers, if youO. (By Mr. Miller) And this is not something11present places, you are probably a 5 or a 6. That hasI12Q. Soy ouget a request to add a new careerI13of what it is that you are working on.I14Q. Soy ouget a request to add a new careerI16A. Yes, that usually comes from the business.I17Q. And then you do an analysis and determineIf that's appropriate?18if that's appropriate?A. I don't personally. We review the20documentation that the business has given us to decide21if there's a good argument and if, in fact, they've <td></td> <td></td> <td></td> <td></td> | | | | |
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| 5 it's going to be much bigger, tier one clients, dealing with the C suite. I mean, it has to do with their interactions with, you know, like I mentioned before, who they work with. In our industry, you know, if you are known as an industry guru, if you do white papers, if you present places, you are probably a 5 or a 6. That has to do with the influence of and the different complexity of what it is that you are working on. 4 Q. So you get a request to add a new career level? A. Yes, that usually comes from the business. G. And then you do an analysis and determine if that's appropriate? documentation that the busines has given us to decide if there's a good argument and if, in fact, they've defined it as the next step up, and then we have a1 wouldn't say a committee, but it's sort of all the regional leads around the world, we say this has come before us, what do you guys think. you read the responsibilities. It's certainly not specific responsibilities. It's kind of a general overview of what you would expect them to be responsible for if they were at that level. Q. (By Mr. Miller) And this is not something that would appear in the global job table? A. Yes, that usually comes from the business. G. A. I don't personally. We review the documentation that the busines has given us to decide if there's a good argument and if, in fact, they've defined it as the next step up, and then we have a1 wouldn't say a committee, but it's sort of all the before us, what do you guys think. | 2 | about how for this next level, they their current | 2 | MS. CONNELL: Objection. The document |
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| Q. (By Mr. Miler) Turning your attention to slide 15 and the accompanying note. So this is a page marked 25 and 26. So this slide is titled Choosing the Correct Job Code. So this slide is titled Choosing the Ms. CONNELL: Objection, assumes facts. A. So the job code, as it says, it reflects a posting for an opening on their team, because the job code of effects in evry, very general terms what the role to be that as seamless as possible, and that is on thing that in the job code, and then at hiring, are they locked into the job code is in the requisition or the posting, is that the only job code the employee could have? A. Depending on the candidate selected, they could go up one level or down one level. Q. Os that would then aftert A. But it has to be the same family. G. Osky. So on this slide, there's a second set of statement after the first one you reference that's about what's important about getting the correct jab code. I mean, it lists salary range, borus at Oracle that are impacted by job code? M. ConnelL: Coljection, assumes facts. G. Os that would then after A. The one that comes to mind would be many of other parts of employment at or aware of other parts of employment at oracles that are impacted by job code? M. ConNELL: Coljection, assume stats. G. Os that would then after ther first one you reference that's about what's important about getting the correct is business class for travel but, otherwise, I carit think of anything. G. (By Mr. Miller) I can see that really matters. All right. In the note, which is on page 26, there's a - there's just a note that says, Incorrect 3 job code impact offer letter or employment terms as especially for merger and acquisition employees. I guess I don't quite understand, why is | | • | |
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| 16 Correct Job Code. Who selects job code at Oracle? MS. CONNELL: Objection, assumes facts. 16 them the wrong code, if they're not set up correctly as a manager, for example, they wouldn't have access to our compensation program tools, because the system didn't identify them correctly as a manager. 10 role. So a manager will decide what role they have, and the manager would decide what job code to use in a posting for an opening on their team, because the job code reflects in very, very general terms what the role is that they need to fill. 16 them the wrong code, if they're not set up correctly as a manager, for example, they wouldn't have access to our compensation program tools, because the system didn't identify them correctly as a manager. 16 them the wrong code, if they're not set up correctly as a manager, for example, they wouldn't have access to our compensation team if there's a question about job code or filects in very, very general terms what the role is that they need to fill. 26 C. (By Mr. Miller) So they do that in the job code, and then at hiring, are they locked into the job maters? 10 27 A. Depending on the candidate selected, they could go up one level or down one level. 1 28 A. Depending on the candidate selected, they could go up one level or down one level. 1 39 So that would then affect A. But it has to be the same family. 1 30 O. (kay, Ko on this silde, there's a second set of statements after the first one you reference that's about what's important about getting the corres a would i | | | |
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| 1 | MS. CONNELL: Objection, vague, misstates | 1 | general, we call them, benchmark jobs. And if they are |
|----------|---|----------|---|
| 2 | the document. | 2 | in a survey, they are considered a benchmark job. And |
| 3 | A. I'm not really sure what the question is, I | 3 | we use data that comes out of those surveys to tell us |
| 4 | guess. | 4 | what the market rate is for that general job and level. |
| 5 | Q. (By Mr. Miller) Have job codes been a | 5 | Q. (By Mr. Miller) And what do you do with |
| 6 | factor in setting pay at Oracle for as long ago you've | 6 | the market rate information in setting the salary range |
| 7 | worked there? | 7 | at Oracle? |
| 8 | MS. CONNELL: Objection, assumes facts. | 8 | MS. CONNELL: Objection, vague. |
| 9 | Misstates the document. | 9 | A. Our general philosophy is that the market |
| 10 | A. There are many, many, many factors that go | 10 | 50th percentile would represent Oracle's midpoint of the |
| 11 | into setting pay, so I mean, the job code to which | 11 | range for a specific location. |
| 12 | someone applies would assist as kind of a starting point | 12 | Q. (By Mr. Miller) So maybe it would help, |
| 13 | to tell us about what that broad range may be. But then | 13 | too, just to look quickly as page 29. This is slide 17. |
| 14 | we have vocation and product and skills and experience | 14 | A. All right. |
| 15 | and knowledge and everything that they bring to the | 15 | Q. And so this slide has what looks to be an |
| 16 | table. There's a lot that goes into play with that. | 16 | example salary range. Is that what that is? |
| 17 | Q. (By Mr. Miller) How long has job code been | 17 | A. It appears, yeah. |
| 18 | used to set salary grade at Oracle? | 18 | Q. So what you're saying is the Radford or the |
| 19 | A. I am not really sure. | 19 | Mercer survey should be used to set the midpoint that's |
| 20 | MS. CONNELL: Objection, vague. | 20 | identified on this pay-range description? |
| 21 | Q. (By Mr. Miller) Has that always been the | 21 | A. Correct. |
| 22 | case since you worked there? | 22 | Q. How does Oracle determine the minimum or |
| 23 | A. Yes, I mean, the the structure of our | 23 | the maximum for that range? |
| 24 | general architecture has been in place since I've been | 24 | A. That is something that can vary from |
| 25 | around. There have been additions and subtractions | 25 | from country to country, from level to level generally, |
| | 85 | | 87 |
| | | | |
| 1 | throughout the years, but | 1 | and this is all kind of compensation theoretical. The |
| 2 | Q. (By Mr. Miller) And we talked about this | 2 | lower level jobs, you don't have to have quite as broad |
| 3 | briefly in passing. You said you were thinking U.S. | 3 | of a range because there isn't as much variation in what |
| 4 | when you answered my questions, which generally, you | 4 | people bring to the table. But as you get higher in |
| 5 | know, our case concerns a headquarters facility in | 5 | your career levels, it gets broader because people bring |
| 6 | California, but are job codes used globally? | 6 | a wide variety of different knowledge, skills, |
| 7 | A. Yes, our table absolutely is global. | 7 | abilities, education, all those kinds of things, and we |
| 8 | Q. It says global job table? | 8 | have to be able to account for the wide variety that |
| 9 | A. Yes. | 9 | could be in there. |
| 10 | Q. Good enough. All right, I'd like to direct | 10 | Q. And who ultimately sets the minimum or the |
| 11 | your attention now to slide 16 and the accompanying | 11 | maximum for a salary range? |
| 12 | note. This is marked 27 and 28. | 12 | MS. CONNELL: Objection, assumes facts, |
| 13 | A. Uh-hum. | 13 | vague. |
| 14 | Q. So we've talked about salary grade and | 14 | A. There isn't really a who. We have had the |
| 15 16 | salary ranges to some extent already. And also some of | 15 16 | same range widths for a really long time, and it was |
| 17 | the other topics on this slide have come up. | 17 | just kind of a best practices. They might be as narrow |
| | When you are setting a salary range, when Oracle sets a salary range, you've told me you rely on | 18 | as percent at the bottom up to percent at the top. Q. (By Mr. Miller) And then they are just |
| 18 | | | Q. (By Mr. Miller) And then they are just adjusted as the market salary surveys change? |
| 19 20 | Radford surveys; is that correct? A. Radford we have two main surveys, | 19 20 | A. Correct, we adjust the mid points, and then |
| 20 21 | A. Radioid we have two main surveys, Radford and Mercer. | 20 | our minimums and maximums adjust with that. |
| 21 | Q. And how do those help you set the salary | 22 | Q. So at the time you worked at Oracle, the |
| 23 | range? | 23 | spread in the salary range has been set as a percentage, |
| 24 | MS. CONNELL: Objection, vague. | 24 | and you are not aware |
| 25 | A. Our very general jobs can be mapped to very | 25 | MS. CONNELL: Objection, misstates her |
| | | | |
| | 86 | | 88 |

| 1 | testimony and assumes facts. | 1 for in positioning an employee? | |
|--|---|--|---|
| 2 | A. From the time I've been around, the range | 2 MS. CONNELL: Objection, vague. | Calls for |
| 3 | widths, like I said, it has to do with kind of best | ³ speculation. | |
| 4 | practices, and when you've been in the field for a | 4 A. Product, if I'm thinking like software | |
| 5 | while, you know what other companies are doing, you read | 5 developers, the product that they are develop | oing, if |
| б | into what the survey would recommend you do, and we've | 6 it's a really old legacy product or a cutting ed | ge new |
| 7 | had a fairly consistent range width for as long as I've | 7 and there's not a lot of talent out the | e that |
| 8 | been on who originally set them, I don't know. But | 8 know how to do this, they would command a | higher |
| 9 | it's been fairly consistent, and our ranges have | 9 position in the range versus somebody who's | working on |
| 10 | adjusted according to the way the market has adjusted in | 10 that's existed forever. | |
| 11 | those years or based on the midpoint. | 11 There are more in the market who co | ould do |
| 12 | Q. (By Mr. Miller) And when you're using the | 12 something like that than there are who could | do AI, for |
| 13 | Radford surveys to find the midpoint of these salary | 13 example, so an AI developer could command | l a higher |
| 14 | ranges, you say they are at a fairly general level of | 14 position and be commissioned higher in the r | ange than, |
| 15 | description, right? | 15 say, the | - |
| 16 | A. Correct. | 16 Q. (By Mr. Miller) Who determines whi | ch |
| 17 | Q. Do you do a job analysis to look at | 17 products are more valuable? | |
| 18 | Oracle's job to determine where they how they match | 18 MS. CONNELL: Objection, assume | facts. |
| 19 | up with those general descriptions? | 19 A. I wouldn't say anybody decides they | re more |
| 20 | MS. CONNELL: Objection, vague. | valuable, but the candidates that come and a | pply for our |
| 21 | A. Every year, our regional comp teams look at | 21 positions tell us what they're earning. They t | ell us |
| 22 | Radford's general descriptions to our general system | 22 what their competitive offers are to do somet | |
| 23 | descriptions and make sure we're still benchmarking | 23 different. | C |
| 24 | across, because ours are intentionally very broad, also, | 24 Q. (By Mr. Miller) And so then the mar | ager |
| 25 | and so they match they match up to but, yeah, we | attempting to make that hire is the one that p | |
| | | | |
| | 89 | 91 | |
| | | | |
| 1 | look at to make our wa're matching to the right general | 1 they fall in the colory range? | |
| 1 | look at to make sure we're matching to the right general | 1 they fall in the salary range? | |
| 2 | category of job each year. | 2 MS. CONNELL: Objection, calls for | |
| 2 3 | category of job each year. Q. (By Mr. Miller) Looking at slide 17 here, | 2 MS. CONNELL: Objection, calls for 3 speculation. | |
| 2 3 4 | category of job each year. Q. (By Mr. Miller) Looking at slide 17 here, this is the one marked as 29, there's a red box that | MS. CONNELL: Objection, calls for speculation. A. I mean, not necessarily it's a | agor and |
| 2 3 4 5 | category of job each year. Q. (By Mr. Miller) Looking at slide 17 here, this is the one marked as 29, there's a red box that said several factors should be considered to position | MS. CONNELL: Objection, calls for speculation. A. I mean, not necessarily it's a collaboration with recruiting and with the mar | |
| 2 3 4 5 6 | category of job each year. Q. (By Mr. Miller) Looking at slide 17 here, this is the one marked as 29, there's a red box that said several factors should be considered to position pay. Does that is that talking about positioning an | MS. CONNELL: Objection, calls for speculation. A. I mean, not necessarily it's a collaboration with recruiting and with the mar sometimes they involve HR and/or compensation | ation, but it |
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| 1 | Q. (By Mr. Miller) Again, looking at slide | 1 | So I would say a checks and balances exists |
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| 2 | 17, which is page 29 here, or we can just go with what | 2 | within that that very foundation of |
| 3 | you told me that people have position. One of the | 3 | Q. (By Mr. Miller) But they would have to ask |
| 4 | things you mentioned is internal equity with respect to | 4 | a question about it to involve HR and comp? |
| 5 | how the employee's peers are doing or being paid, I | 5 | MS. CONNELL: Objection, incomplete |
| б | guess; is that right? | 6 | hypothetical. |
| 7 | A. That's a factor, yes. | 7 | A. The HR is pretty involved in the |
| 8 | Q. What do you mean by "peers"? | 8 | recruiting process and the selection of candidates and |
| 9 | A. What I mean by peers are people who are | 9 | helping with those things. So I mean, I can't speak |
| 10 | performing similar work at a similar level on a similar | 10 | specifically to all situations, but our training |
| 11 | product where their duties are consistent and similar. | 11 | certainly advises that they that they work with the |
| 12 | And their location, also having to factor | 12 | professionals who are assigned to them. |
| 13 | in their location and their I mean, when we talk | 13 | Q. (By Mr. Miller) Can HR override I am |
| 14 | peers, we really mean doing the same the same role | 14 | sorry. Can HR override the manager's assessment of what |
| 15 | working on the same product. It's not it doesn't | 15 | it requires to produce internal equity? |
| 16 | come to job code or title because, as I said, those are | 16 | MS. CONNELL: Objection, calls for |
| 17 | incredibly general. | 17 | speculation, vague. |
| 18 | We have to get down a little bit more | 18 | A. I'm not really sure. |
| 19 | granular to say, oh, this is our group of people with | 19 | Q. (By Mr. Miller) When you're looking at |
| 20 | the hot skill working on AI today. Those are considered | 20 | these peer groups to think about internal equity, is |
| 21 | the peers, not people in the same job code but | 21 | there an attempt to ensure that the peer groups are |
| 22 | developing PeopleSoft. | 22 | representative across the relevant work force for race |
| 23 | Q. (By Mr. Miller) So for those peer groups, | 23 | and gender? |
| 24 | how then do you determine if there's internal equity? | 24 | MS. CONNELL: Objection, misstates her |
| 25 | MS. CONNELL: Objection, vague. Calls for | 25 | testimony, assumes facts, vague. |
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| | 93 | | 95 |
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| | | | |
| 1 | speculation. | 1 | A. I'm not involved in any peer group |
| 2 | A. I don't. The manager who's hiring would | 2 | analysis. |
| 2 3 | A. I don't. The manager who's hiring would look within their own team to say these are the people | 2 3 | analysis. Q. (By Mr. Miller) Is anybody, other than the |
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| 1 | attention back now to slide four. This is the page | 1 | same level, we could we could say compa-ratio could |
|--|--|--|---|
| 2 | that's marked with a dash 5 at the bottom. | 2 | be considered, but mostly the compa-ratio and |
| 3 | So, again, this is just a little example | 3 | benchmarking between peers is helpful if you have a |
| 4 | piece of the global job table, and there's an entry | 4 | manager who has people in many countries, and it gives |
| 5 | that's titled specialty area. What is "specialty"? | 5 | you an idea of how those peers are paid within their |
| б | A. It's just a little bit more granular | 6 | local market. |
| 7 | explanation of what someone within a function does. | 7 | Q. (By Mr. Miller) Drawing your attention back |
| 8 | Q. So do you know why specialty is a part of | 8 | now to slide 17, the one before page 29, so this has |
| 9 | establishing the global job table? | 9 | this example salary range, and the salary range is |
| 10 | A. It predates me having it in there, but, for | 10 | broken up into quartiles, and those quartiles are going |
| 11 | example, the function of product development would have | 11 | to correspond to compa-ratio quartiles, too, right? |
| 12 | a specialty area of software engineer, technical writer, | 12 | MS. CONNELL: I'm sorry, what page are you |
| 13 | QA, so it just gives a little bit more without | 13 | on? |
| 14 | | 14 | MR. MILLER: It's marked dash 29. |
| 14 | listing an entire description for every single family, | 15 | |
| | just gives a little bit more of an indicator of what | | A. Got it. No, because the quartiles will be |
| 16 | that job does in very general terms. | 16 | different depending on how wide the range is. |
| 17 | Q. Does that factor into the benchmarking | 17 | Q. (By Mr. Miller) Fair enough. Does Oracle |
| 18 | process where you are looking at the Radford or Mercer | 18 | make adjustments for low compa-ratios? |
| 19 | surveys? | 19 | MS. CONNELL: Objection, calls for |
| 20 | A. It doesn't. | 20 | speculation, assumes facts. |
| 21 | Q. But it does have an impact on what the job | 21 | A. Simply because of low compa-ratios, I'm not |
| 22 | area is, correct? | 22 | sure. |
| 23 | A. It doesn't. | 23 | Q. (By Mr. Miller) Does Oracle review |
| 24 | Q. Is specialty related to pay? | 24 | compa-ratios to see if there are effects by race or |
| 25 | MS. CONNELL: Objection, vague. | 25 | gender? |
| | 97 | | 99 |
| | | | |
| | | | |
| 1 | A. It's not. | 1 | MS. CONNELL: Objection, calls for |
| 1 2 | Q. (By Mr. Miller) Okay, drawing your | 1 2 | speculation, assumes facts. |
| | Q. (By Mr. Miller) Okay, drawing your attention now to slide 18 and the notes that would be | | speculation, assumes facts. A. I am not involved in that. |
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| 1 | and they know their compa-ratio, that gives them but | 1 | March 30th, 2017. Do you see that? |
|--|---|--|--|
| 2 | they are not familiar with a local market in a certain | 2 | A. Yes. |
| 3 | country, it gives them an indication of where they are | 3 | Q. So how frequently is this updated? |
| 4 | paid within that market. | 4 | A. I don't have any idea. |
| 5 | Q. So by using ratio, you can keep the pay | 5 | Q. Do you have any role in updating this? |
| 6 | relative to the market the same or at least compare pay | 6 | A. I do not. |
| 7 | relative to the market across different markets? | 7 | Q. So looking at the first page here, there's |
| 8 | A. Right, by using a ratio. | 8 | a a block or basically a table set where the category |
| 9 | Q. Does Oracle have policies about what | 9 | identified is assignment. Do you see those assignment |
| 10 | happens to compa-ratio when employees come from one | 10 | categories? |
| 11 | Oracle business in one country to another Oracle | 11 | A. Yes. |
| 12 | business in another country? | 12 | Q. And, in sequence, the first thing that's in |
| 13 | MS. CONNELL: Objection, vague, calls for | 13 | this assignment table is cost center change. Do you see |
| 14 | speculation. | 14 | that? |
| 15 | A. Again, I wouldn't say policy. We have | 15 | MS. CONNELL: I'm not following. Where are |
| 16 | the way that we look at international transfers would be | 16 | you looking? Sorry. |
| 17 | to consider what the current compa-ratio is for an | 17 | MR. MILLER: It's on the first page, |
| 18 | employee, and provided they are moving to the new | 18 | there's a block that's titled assignments. |
| 19 | location in the same capacity, same role, same level, | 19 | MS. CONNELL: Okay, got it. |
| 20 | same everything, they would use that as their starting | 20 | Q. (By Mr. Miller) So there's one that's got |
| 21 | point. It doesn't mean it has to stay there, but it's a | 21 | cost center change? |
| 22 | good reference point. | 22 | A. Uh-hum. |
| 23 | Q. (By Mr. Miller) And what kind of factors | 23 | Q. What is a cost center? |
| 24 | would affect whether the compa-ratio moved in that kind | 24 | A. It is it's a category that finance uses |
| 25 | of a transfer? | 25 | to say kind of give a general indication of the |
| | | | |
| | 101 | | 103 |
| | | | |
| - | | | |
| 1 | MS. CONNELL: Objection, incomplete | 1 | organization in which the person works. So like my cost |
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| 1 | a this is still in the assignment block and the | 1 page, it says global approval matrix, automated? |
|--|---|--|
| 2 | sequence I guess I guess that's what S and Q mean, | 2 A. Yeah. |
| 3 | says discretionary title change. Do you see that? | 3 Q. What's the difference between those two |
| 4 | A. Yes. | 4 processes? |
| 5 | Q. So if I'm reading this correctly, there are | 5 A. I don't know. |
| б | required approvals at HR and at first what looks like | 6 Q. And if you look back at Exhibit 8 for me, |
| 7 | 1 LVL, which I assume is first level; is that right? | 7 too. On the first page, the one marked dash 1 and then |
| 8 | A. Looks like it. | 8 in this case, the fourth page, the one marked dash 4, |
| 9 | Q. Why does the discretionary title require | 9 you've got the same automated versus non-automated? |
| 10 | any approvals? | 10 A. Looks like it. |
| 11 | MS. CONNELL: Objection, calls for | 11 Q. And going further back into Exhibit 8 onto |
| 12 | speculation, assumes facts. | 12 the page marked dash 6 and I apologize, it looks like |
| 13 | A. I don't know. | 13 some of these tables broke across pages in some strange |
| 14 | Q. (By Mr. Miller) And moving down to | 14 way. You can see that there is a box entitled M and A |
| 15 | there's a you know, there's a table entitled dollars | 15 approval matrix? |
| 16 | that that doesn't go on to the next page. It's on | 16 A. Yes. |
| 17 | this first page, though. Do you see the second in the | 17 Q. Do you know what this is? |
| 18 | sequence here, base salary change increase? | 18A.I mean, I can only go based on the title. |
| 19 | A. Yes. | 19 I'm assuming it's the lines of approval needed for M and |
| 20 | Q. And that has to be approved by HR, but it | 20 A . |
| 21 | doesn't look like the first level has to approve it; is | Q. The reason I was asking is given what you |
| 22 | that right? | 22 have to do with mergers and acquisitions, I thought |
| 23 | MS. CONNELL: Objection, calls for | 23 maybe you would have more familiarity with this but no? |
| 24 | speculation. | 24 A. I don't. |
| 25 | A. I can see how it's read that way. I | 25 Q. Okay. Do you know who generates these |
| | 105 | 107 |
| | | |
| 1 | baliave what this is it indicates that that's the | 1 approval matrices? |
| 1 | believe what this is it indicates that that's the | 1 approval matrices? |
| 2 | final, that's the top level that it needs to go to, so | 2 A. I don't. |
| 2 3 | final, that's the top level that it needs to go to, so an increase, it would work its way up all these other | A. I don't. 3 Q. Okay, I'm going to show you another |
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| 2 3 4 5 6 | final, that's the top level that it needs to go to, so an increase, it would work its way up all these other levels and the last, quote-unquote, approver is at that level, but at that level, they're not really digging into the details. It's more about a sanity check of | A. I don't. Q. Okay, I'm going to show you another exhibit, ask the court reporter to mark it as Exhibit 10. (Exhibit 10 marked for identification.) |
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| 1 | it's got a bullet point that says, Do not communicate | 1 work flows, day-to-day transactions. This has to do |
|--|--|---|
| 2 | anything until final LJE approval is obtained. Who is | 2 with a global compensation process. |
| 3 | LJE? | 3 Q. Okay. Okay, I'm going to show you another |
| 4 | A. Larry Ellison. | 4 exhibit, ask the court reporter to mark this as Exhibit |
| 5 | Q. So if you look at the first page of this | 5 11. |
| 6 | training, it says it's new manager training for | 6 (Exhibit 11 marked for identification.) |
| 7 | compensation processes. So does this mean then that you | 7 MS. CONNELL: Also mark Exhibit 11 as |
| 8 | are not allowed to communicate the outcome of the | 8 confidential. |
| 9 | compensation process until Larry Ellison approves of it? | 9 Q. (By Mr. Miller) Have you had a chance to |
| 10 | MS. CONNELL: Objection, misstates the | 10 review it? |
| 11 | document. | 11 A. Yes. |
| 12 | A. This is essentially training on how to use | 12 Q. Do you recognize this document? |
| 13 | our tool. That's why it says slash compensation work | 13 A. I do. |
| 14 | bench. There are screenshots from our system that we | 14 Q. What is it? |
| 15 | use used to use to administer our compensation | 15 A. It is a manager system for our new system, |
| 16 | processes. It speaks to the plans that I talked about | 16 which is work force compensation, and it gives |
| 17 | before that are run out of my team, and the final LJE | 17 screenshots and tells managers how to navigate that in |
| 18 | approval obtained, as I mentioned before, these do roll | 18 that new system. |
| 19 | up to the top level, but it is simply to confirm that | 19 Q. Did you participate in developing this |
| 20 | everything was within budget and that there has been no | 20 training? |
| 21 | spend outside of budget. It isn't a review or deep dive | A. I did not, but the person on my team who |
| 22 | into what's been recommended, it is just we have stayed | 22 runs programs did. |
| 23 | within budget, it is now okay to communicate what you've | 23 Q. Did you review this training? |
| 24 | recommended. | 24 A. Yes. |
| 25 | Q. (By Mr. Miller) But prior to getting this | 25 Q. I should be more clear, not just here |
| | 109 | 111 |
| | | |
| 1 | finally of an average managements and the company size to | 1. And any local distance manipulation that any income in the formal is used |
| 1 | final level of approval, managers are not to communicate | 1 today, but did you review this training before it was |
| 2 | any of those pay decisions, right? | 2 finalized and given? |
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| 1 | employees have, you know, three levels above them, some | 1 | loud, just read the body of the top e-mail and let me |
|--|---|--|---|
| 2 | have seven levels above them, but it starts with it's | 2 | know when you are done. |
| 3 | initially a recommendation that could be changed. I | 3 | A. Okay. |
| 4 | mean, it could be changed by them, it could be changed | 4 | Q. So given what you've been telling me about |
| 5 | by someone else on the hierarchy, but, like we said, | 5 | the way a CEO or ultimate approver approvals work, why |
| б | it's essentially not final until we've done the whole | 6 | is Ms. Ton recommending that this person include, you |
| 7 | the whole did everybody stay within budget and did | 7 | know, the unique points to justify the hire for review |
| 8 | everybody stay within what they were given. | 8 | up the chain? |
| 9 | And so we always called them | 9 | MS. CONNELL: Objection, calls for |
| 10 | recommendations because nothing is final until we've | 10 | speculation. |
| 11 | been through the entire process and can verify that | 11 | A. I don't have any idea. |
| 12 | everyone stayed within their budget. | 12 | Q. (By Mr. Miller) In making pay changes, |
| 13 | Q. Okay. Okay, I want to show you another | 13 | say, annual increase in salary or awarding a bonus or |
| 14 | exhibit and ask the court reporter to mark this as | 14 | something, what kind of information do managers have to |
| 15 | Exhibit 12. | 15 | enter into the system to satisfy the approval process? |
| 16 | (Exhibit 12 marked for identification.) | 16 | MS. CONNELL: Objection, vague, assumes |
| 17 | MS. CONNELL: Mark this exhibit as | 17 | facts and calls for speculation. |
| 18 | confidential as well, designated. | 18 | A. What do you mean by "in making pay |
| 19 | Q. (By Mr. Miller) Have you finished | 19 | changes"? |
| 20 | reviewing it? | 20 | Q. (By Mr. Miller) Well, so we just looked at |
| 21 | A. Uh-hum. | 21 | a PowerPoint that was talking about bonus awards, right, |
| 22 | Q. So at the very top, you can see this is | 22 | and so the manager makes a recommendation for the bonus, |
| 23 | from Vicki Ton to Sudhakar Kaki, I guess. I am | 23 | and it goes up through the approvals. What's required |
| 24 | mispronouncing these names. | 24 | to be in that recommendation in order for it to go |
| 25 | A. Uh-hum. | 25 | through the approval process? |
| 25 | A. Official. | 25 | |
| | 113 | | 115 |
| | | | |
| | | | |
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| 1 2 | Q. Do you know either of those people?A. I don't know Sudhakar. I am familiar with | 1 2 | MS. CONNELL: Objection, assumes facts, vague, calls for speculation. |
| | | | - |
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| 17 MS. CONNELL: Same objection. 17 A What do you mean? 18 Q. (By Mr. Miller) In looking at positioning an employees within the salary range, we talked about 18 Q. (By Mr. Miller) Well, you said the focal 20 review? Is positioning an employees salary transe, we talked about 18 Q. (By Mr. Miller) Now participation 21 looked at a PowerPoint and shared some things. One of the factors that we mentioned, too, was performance, is MS. CONNELL: Same objection. 22 MS. CONNELL: Objection, calls for 23 appears - and you're given a budget and you may make recommendations for salary increases for employees as a you deem appropriate, and it goes through various 21 117 119 21 speculation. 2 Q. (By Mr. Miller) Could you place an emperiore in a salary range without know performance for a new 1 approval chains. 2 MS. CONNELL: Objection, incomplete hires, somebody who had been there for sometime, can you place them in a salary range without knowing their performance? 1 A. (By Mr. Miller) S that a decision that's left up to the line of business, yes. For otheres, no. 2 Q. (By Mr. Miller) Okay, so excluding new hire. 1 MS. CONNELL: Objection, rause performance in the focal review? 3 A. Could you? Maybe. Q. (By Mr. Miller) So may understanding is | | | 16 | • • |
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| 1 | A. It's in some areas, yes, and in some | 1 Q. Do you know what the intermediate manager | S, |
|--|--|--|------|
| 2 | areas, no. | 2 the intermediate approvals are during that in that | , |
| 3 | Q. (By Mr. Miller) Is there any guidance | ³ approval process? | |
| 4 | about how to consider performance in making pay | 4 A. I can't I couldn't speak for all of | |
| 5 | decisions? | 5 them. We've got thousands. | |
| 6 | MS. CONNELL: Calls for speculation. | 6 Q. Do you know how often approvals are | |
| 7 | A. In some of the training that we've already | 7 rejected by intermediate managers? | |
| 8 | reviewed in our exhibits, there are slides in there that | 8 A. I couldn't | |
| 9 | specifically speak to theoretically where somebody would | 9 MS. CONNELL: Objection, calls for | |
| 10 | be placed based on their performance. I believe one | 10 speculation. | |
| 11 | specifically mentioned newer to the job. Does it bring | 11 A. I couldn't put a number to it. I mean, if | |
| 12 | everything to the table, probably Q 1, star performers, | 12 I had to be precise, I couldn't be precise. | |
| 13 | star everything, probably Q 3 or Q 4. There's general | 13 Q. (By Mr. Miller) Do you believe you could | |
| 14 | theoretical ways to approach that within our training. | 14 estimate how many? | |
| 15 | Q. And when you say Q 1, you mean quartile 1? | 15 A. My estimate would be that it's pretty rare | |
| 16 | A. Quartile 1. | 16 that a first-line manager, between that first line and | |
| 17 | Q. And Q 2 is quartile 2? | 17 maybe the next line, it might change between there, b | ut |
| 18 | A. Correct. | 18 for the most part, if people stay within budget, it | u. |
| 19 | Q. And Q 3 is quartile 3? | 19 stays with what that first-line manager would recomme | and |
| 20 | A. Correct. | 20 Q. And how are you able to arrive at that | ona. |
| 21 | Q. And Q 4 is quartile 4? | 21 estimate? | |
| 22 | A. Yes. | 22 A. Well, I I mean, I've been a comp | |
| 23 | Q. Is there any other training about how to | 23 consultant there before and been supporting these | |
| 24 | use performance in setting pay beyond as I said, with | 24 programs for a long time and know that the higher up | |
| 25 | the general guidelines there with the quartile? | 25 the further removed you get from the individual | |
| 23 | | 23 the future removed you get from the individual | |
| | 121 | 123 | |
| | | | |
| | • • • • • • | | |
| 1 | A. I don't know. | 1 employee, the less you know about the specifics, so the | 9 |
| 2 | MR. MILLER: Why don't we go off the | 2 highest levels don't tend to get involved in that. |) |
| 2 3 | MR. MILLER: Why don't we go off the record. | highest levels don't tend to get involved in that. Q. But that estimate is not based on, for | |
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| 1 | first-line manager and maybe one level above would agree | 1 Q. (By Mr. Miller) Have you had a chance to |
|--|---|---|
| 2 | to what the increase would be. | 2 review this document? |
| 3 | And then from there, as long as people stay | 3 A. Yes . |
| 4 | within budget, there isn't a lot of scrutiny all the way | 4 Q. Do you recognize this? |
| 5 | down to the individual employee level. | 5 A. Yes. |
| 6 | Q. So during the focal review, are the | 6 Q. What is it? |
| 7 | managers required to rank the employees they supervise | 7 A. It looks like our the FAQ that was |
| 8 | in making proposals about increases? | 8 released when they created this policy to no longer ask |
| 9 | MS. CONNELL: Objection, calls for | 9 for prior salary or consider it in determining pay for |
| 10 | speculation, assumes facts. | 10 new hires. |
| 11 | A. Required required, no. | 11 Q. Why did this policy come into effect? |
| 12 | Q. (By Mr. Miller) Is it common for them to | 12 MS. CONNELL: Objection, calls for |
| 13 | do so? | 13 speculation. |
| 14 | MS. CONNELL: Same objections. | 14 A. I don't know. I was not involved. |
| 15 | A. I I don't have any idea. It's not | 15 Q. (By Mr. Miller) Prior to this policy, was |
| 16 | something that's required within our tool. But while | 16 it Oracle's policy to ask for a salary history? |
| 17 | it's not required, they do have a limited budget, so | 17 A. Prior to this policy, we didn't have a |
| 18 | assuming they have people among whom they need to spread | 18 policy on that topic. |
| 19 | this budget, they likely take into consideration | 19 Q. Prior to this policy, was it Oracle's |
| 20 | performance and how they would rank in terms of priority | 20 practice to ask for prior salary information? |
| 21 | for whom to spend that limited budget on. | 21 MS. CONNELL: Objection, vague. |
| 22 | Q. (By Mr. Miller) But they are not required | A. I don't I don't know that it was a |
| 23 | to consider performance, correct? | 23 practice. |
| 24 | MS. CONNELL: Objection, asked and | 24 Q. (By Mr. Miller) If you look at this |
| 25 | answered. | exhibit, the first page which is marked 381077? |
| | 4.05 | 107 |
| | 125 | 127 |
| | | |
| 1 | A Thou are not required to enter performance | |
| 1 | A. They are not required to enter performance | 1 A. Yeah. |
| 2 | into our program. | 2 Q. There's a second I guess it's the second |
| 2 3 | into our program. Q. (By Mr. Miller) Well, I guess the question | Q. There's a second I guess it's the second paragraph under introduction. There's a bolded portion |
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| 1 | by the hiring manager to enter in the fields. The job | 1 Q. I'd like to draw your attention to slide |
|--|--|---|
| 2 | would auto populate, because it's the job for which they | 2 28. This is on the page marked dash 45 at the bottom. |
| 3 | posted the requisition. But it's data entry on the | 3 A. I'm sorry, dash 45? |
| 4 | salary to offer and some of those other elements. | 4 Q. Yes. |
| 5 | Q. Do you know what's required for the | 5 A. Okay. Okay. |
| 6 | iRecruitment job offer form? | 6 Q. So just take a moment to read this slide, |
| 7 | A. I actually do not. | 7 and I'll ask you some questions about it. |
| 8 | Q. Okay, I'm going to show you another | 8 A. Okay. |
| | exhibit, ask the court reporter to mark it as Exhibit | |
| 9 | • | |
| 10 | 14. | 10 were that the current salary of a candidate for hire |
| 11 | (Exhibit 14 marked for identification.) | 11 should be reviewed as part of the offer process? |
| 12 | MS. CONNELL: This exhibit is confidential | 12 MS. CONNELL: Objection, misstates the |
| 13 | as well. | 13 document, and the document speaks for itself. |
| 14 | Q. (By Mr. Miller) Are you finished reviewing | 14A.Well, it I see that it states should be |
| 15 | it? | 15 reviewed, but it also clearly states that's one factor, |
| 16 | A. Uh-hum. | 16 and the experience and current skill set should be |
| 17 | Q. Do you recognize this document? | 17 weighed more heavily in determining that. |
| 18 | A. I don't. | 18 Q. (By Mr. Miller) The question was, at least |
| 19 | Q. Drawing your attention to I guess this | 19 as of 2013, the guidelines were that current salary |
| 20 | is slide 12. It's on the page marked dash 22. | 20 should be reviewed as part of the offer process? |
| 21 | A. Uh-hum. Oh, dash 22? | 21 MS. CONNELL: Objection, misstates the |
| 22 | Q. Yeah, sorry. | 22 document. |
| 23 | A. Okay. | A. Like I said, the document says that it |
| 24 | Q. Is this an iRecruitment job offer form? | should be, but experience and skill set should weigh |
| 25 | A. It looks like it. | 25 more heavily. |
| | | |
| | 129 | 131 |
| | | |
| | | |
| 1 | Q. Do you know what the stars next to some of | 1 Q. (By Mr. Miller) I can see the other part. |
| 1 2 | Q. Do you know what the stars next to some of these fields mean? | 2 I am just asking about the first item. |
| | | I am just asking about the first item. A. If you read it, that's what it says. I'm |
| 2 | these fields mean? MS. CONNELL: Objection, calls for speculation. | 2 I am just asking about the first item. 3 A. If you read it, that's what it says. I'm 4 clarifying that we clearly state that experience and |
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| 1 | A. Then why do you keep asking? | 1 verification, and you mentioned there was something |
|----|--|---|
| 2 | MS. CONNELL: Counsel, this is getting | 2 else? |
| 3 | really argumentative. | 3 A. The identity, employment, salary |
| 4 | MR. MILLER: It is argumentative, fair | 4 verification, that all comes through on a background |
| 5 | point. | 5 check as well. |
| 6 | Q. (By Mr. Miller) Let's see, I'm going to | 6 Q. A background check, okay, all right. |
| 7 | show you another exhibit here. I guess it would be 16 | 7 Let's see, we talked about this briefly in |
| 8 | and 17. Well, I guess two, 16 and 17. | 8 terms of compa-ratio, I think. But when you transfer |
| 9 | (Exhibit 16 marked for identification.) | ⁹ within Oracle, within, say, job function, and it's a |
| 10 | Q. (By Mr. Miller) Are you done reviewing it? | 10 lateral transfer, so you're not changing those factors |
| 11 | A. Yes. | 11 that go into job codes like assistant job title, |
| 12 | Q. Do you recognize this document? | 12 function, global career level, does that require a |
| 13 | A. I don't. | 13 change in pay? |
| 14 | Q. Have you seen documents like this before? | 14 MS. CONNELL: Objection, lack of |
| 15 | A. I don't know that I have. | 15 foundation, assumes facts, calls for speculation. |
| 16 | MS. CONNELL: For the record, I'll | 16 A. Require? I wouldn't I wouldn't say |
| 17 | designate it as confidential, mark it as such. | 17 require, no. |
| 18 | Q. (By Mr. Miller) If you look at the very | 18 Q. (By Mr. Miller) Might it come with a |
| 19 | top of the first page, there's a little like I guess | 19 change in pay? |
| 20 | it's one sentence, partly italicized. It says, | 20 MS. CONNELL: Calls for speculation. |
| 21 | Consideration, apply online at iRecruitment dot Oracle | · · |
| 22 | dot com. Is iRecruitment the hiring portal? | |
| 23 | A. We now use two. There are one of the | |
| 23 | | jobs at Oracle, you have a lateral transfer, but you're not changing global career level, job title, function or |
| | acquisitions that one of the companies we acquired is | , · · · · · · · · · · · · · · · · · |
| 25 | called Taleo, I believe. Taleo is used for our job | ²⁵ family, I guess. Does that require a change in pay? |
| | 133 | 135 |
| | | |
| 1 | postings now. Our iRecruitment is used to submit | 1 A. So just moving to a different group doing |
| 2 | offers. | 2 the same thing? |
| 3 | Q. And then looking at the bottom of this | 3 Q. Yeah . |
| 4 | first page, you can see there's another italicized | 4 MS. CONNELL: Objection, incomplete |
| 5 | section talking about the employment process requiring a | 5 hypothetical, calls for speculation. |
| 6 | pre-employment screening process that involves salary | 6 A. Require, no. Possibly be considered? |
| 7 | verification. Do you see that? | 7 Maybe. |
| 8 | MS. CONNELL: Where are you? | 8 Q. (By Mr. Miller) So let's have a look then |
| 9 | MR. MILLER: It's at the bottom of the | 9 at I forgot which exhibit it was. Let me see at |
| 10 | first page. Actually might be on the bottom of the | 10 Exhibit 7. I want to draw your attention to slide 31. |
| 11 | second page, too. Yes. | 11 It's at dash 57. Let me know when you've had a chance |
| 12 | A. I see that. | 12 to review it. |
| 13 | Q. (By Mr. Miller) So at least as of whenever | 13 A. Uh-hum, yep. |
| 14 | this document was created, salary verification was part | 14 Q. So this just confirms what you told me, |
| 15 | of the hiring process? | 15 right, this is the same thing, it's just lateral |
| 16 | MS. CONNELL: Objection, misstates the | 16 transfers don't necessarily require a change in pay? |
| 17 | document, assumes facts, lacks foundation, calls for | 17 MS. CONNELL: Objection. The document |
| 18 | speculation. | 18 speaks for itself. |
| 19 | A. I don't have any idea. I know identity and | 19 A. Yeah, it wouldn't necessarily include a |
| 20 | employment verification, that's part of background | 20 change in pay. It doesn't say I would say, yes, it |
| 21 | checks, but managers aren't involved in background | 21 confirms when I said it's not required, but it's |
| 22 | checks, and recruiters aren't involved in background | 22 possible a lateral move could be could involve a pay |
| 23 | checks. | 23 change as well. |
| 24 | Q. (By Mr. Miller) Well, but salary | 24 Q. (By Mr. Miller) Would it involve a pay |
| 25 | verification is different, right, than employment | 25 change if that lateral move was from, say, cloud one |
| | 124 | 125 |
| | 134 | 136 |

| 1 | of your cloud products to, say, PeopleSoft? | 1 calls for speculation. |
|--|--|---|
| 2 | MS. CONNELL: Objection, incomplete | 2 A. The corporate bonus program is funded based |
| 3 | hypothetical and calls for speculation. | 3 on the performance of the business. Whether or not we |
| 4 | A. I don't know. You know, in any of those | 4 have a budget is completely dependent upon the |
| 5 | situations, it would be reviewed on case-by-case basis | 5 performance of the business. |
| 6 | and internal equity for peers. | 6 Q. (By Mr. Miller) Okay. But so it's not |
| 7 | One of the reasons we do this is because we | 7 tied to the individual performance of the employee? |
| 8 | don't want to cause infighting and battling over | 8 MS. CONNELL: Objection, vague. |
| 9 | resources and who has more money to throw at this | 9 A. The funding of the pool is not tied to |
| 10 | developer, so people are always wanting to jump. | 10 individual performance, no. |
| 11 | It doesn't make for a very collaborative | 11 Q. (By Mr. Miller) What about the award once |
| 12 | environment if you have people who think I could jump | 12 you have the pool? |
| 13 | over here and do the exact same thing and get a raise, | 13 A. If a manager is given a pool to spend, |
| 14 | so we try we try to limit that kind of activity | 14 then, yes, a bonus is supposed to be taken into |
| 15 | because it can be very toxic if it's competition between | 15 consideration. That's part of our philosophy of being |
| 16 | teams thinking they could get a raise to go do the same | 16 paid for performance. If you have a limited budget and |
| 17 | thing somewhere else. | 17 you have five people, the correct way to do things and |
| 18 | Q. (By Mr. Miller) Switching to slightly | 18 the way we speak about it as guidelines in training |
| 19 | different kinds of transfers, and I asked about this in | 19 would be that you reward your high performers first. |
| 20 | a little bit ago, but how does pay how is pay | 20 Q. And how would it be determined who the high |
| 21 | analyzed when a person transfers from a different | 21 performers are? |
| 22 | like an Oracle business in a different part of the world | MS. CONNELL: Objection, calls for |
| 23 | but no longer Oracle U.S. but let's say Oracle India, | 23 speculation. |
| 24 | how is their compensation handled when they transfer to | A. Varying teams have different ways of doing |
| 25 | the United States? | ²⁵ that. Some go through a formal appraisal, some go |
| | | |
| | 137 | 139 |
| | | |
| - | | |
| 1 | MS. CONNELL: Objection, incomplete | 1 through a formal rating, and some don't. There are some |
| 2 | hypothetical, calls for speculation, assumes facts. | 2 areas where you get down to the manager, and the manager |
| 2 3 | hypothetical, calls for speculation, assumes facts.A. I'm so sorry, I thought we covered this. | areas where you get down to the manager, and the manager knows who their performers are, but there's no formal |
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| 1 | the difference between policy and guidelines, and I | 1 more on a needs-to-know basis in lines of business where |
|--|---|---|
| 2 | think you explained that to me. And we've commented at | 2 equity is more common to be offered than the HR leader |
| 3 | various points, but when we're talking about these | ³ or recruiting may share, you know, to say, oh, you're |
| 4 | guidelines that you've developed and that we have been | 4 hiring in zone one and M5, this is what the range looks |
| 5 | looking at all day, are they how are they | 5 like and the guidelines, but we didn't want this to be |
| 6 | communicated to the employees? | 6 blasted anywhere because, like I mentioned before, we |
| 7 | A. So at this point, I think we actually only | 7 didn't want anyone to get the impression that an |
| 8 | reviewed one set of guidelines, and it had to do with | 8 . We didn't |
| 9 | the equity guidelines, and that was because there were | 9 want that misunderstanding. |
| 10 | specific numbers and ranges around it, and that's why we | 10 So it was meant to be intended for that |
| 11 | called it guidelines. It was just to give them an idea | 11 audience to be shared only really more as a need to know |
| 12 | of what that market might be. | 12 when discussing an offer for the annual grant. |
| 13 | The other and those are not available to | 13 Q. Okay. So the the documents we've looked |
| 14 | employees. And most of the other documentation, there's | 14 at today, the ICs, individual contributors, they would |
| 15 | some things that I said from the exhibits that are | 15 have access to the documents you said were posted on the |
| 16 | posted on the intranet that are available, so they can | 16 intranet; is that right? |
| 17 | see definitions of things, definitions of comp terms and | 17 A. Correct. |
| 18 | how, say, our annual programs work. | 18 Q. Would they have access to any of these |
| 19 | But, for the most part, the rest of those | 19 other documents? |
| 20 | exhibits and the trainings that we've made available are | 20 MS. CONNELL: Take your time. |
| 21 | the intended audience is HR and managers to assist | 21 Q. (By Mr. Miller) Yeah, you can look back |
| 22 | them in their conversations with them, but the average | through them. I know we've got 16 outstanding. |
| 23 | employee, it's not something that they would have access | A. So Exhibit 4 and Exhibit 5 minus that last |
| 24 | to. | 24 page, page 598, the one Exhibit 6, yes. I don't |
| 25 | Q. I'd like to turn your attention back to | 25 know. Exhibits 8 and 9 are the approval matrix. I have |
| | | |
| | 141 | 143 |
| | | |
| 1 | Exhibit 2 I'm going to draw your attention to slide | 1 no idea who has access to those. Exhibit 10 Exhibit 12 |
| 1 2 | Exhibit 2. I'm going to draw your attention to slide five, which is at dash 7 . Have you had a chance to | 1 no idea who has access to those. Exhibit 10, Exhibit 12 2 is that work flow that job offer. The ICs don't have |
| 2 | five, which is at dash 7. Have you had a chance to | 2 is that work flow, that job offer. The ICs don't have |
| 2 3 | five, which is at dash 7. Have you had a chance to review that? | 2 is that work flow, that job offer. The ICs don't have 3 that. I don't know who has access to Exhibit 13. |
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| 1 | A. The steps we take, from a from a | 1 | goals are related to assuring equal employment |
|--|--|--|--|
| 2 | compensation perspective, I believe the trainings that | 2 | opportunity compensation? |
| 3 | we've developed, the mandatory trainings that managers | 3 | A. I don't. |
| 4 | are required to take, including non-discrimination in | 4 | Q. When reviewing pay decisions, as you say, |
| 5 | employment practices and that training. | 5 | the final check in where you make sure everything is |
| 6 | We we prepare and educate by HR and our | 6 | within budget and then it's finalized, is there any |
| 7 | comp teams on how to advise and be legally compliant as | 7 | attempt to take into account Oracle's affirmative action |
| 8 | one of our trainers said or one of our trainings | 8 | obligations? |
| 9 | said. | 9 | MS. CONNELL: Objection, calls for |
| 10 | So from that standpoint, I think the | 10 | speculation, vague. |
| 11 | guidelines and the trainings that we set forth make that | 11 | A. I don't know. I do not review the details |
| 12 | clear that that's what Oracle is about in making fair | 12 | of the submissions. |
| 13 | and equitable decisions and using knowledge, skills, | 13 | Q. (By Mr. Miller) Does Oracle make pay |
| 14 | abilities, internal peer equity, pay for performance, | 14 | adjustments for individual employees based on assessment |
| 15 | those kind of factors when making their pay decisions. | 15 | of that employee's pay with respect to race, gender or |
| 16 | That's those are the ways that I've been involved in | 16 | ethnicity? |
| 17 | trying to ensure such things. | 17 | MS. CONNELL: Objection, calls for |
| 18 | Q. (By Mr. Miller) When you say training we | 18 | speculation, vague. |
| 19 | developed, are you talking about something other than | 19 | A. I don't know. |
| 20 | the kind of trainings we've been looking at today? | 20 | Q. (By Mr. Miller) Under what circumstances |
| 21 | A. No, I'm talking about the various modules | 21 | does Oracle make individualized pay adjustments? |
| 22 | that we've put together that say what you should | 22 | MS. CONNELL: Objection, calls for |
| 23 | consider when making decisions. | 23 | speculation, vague. |
| 24 | Q. And when we when you mentioned manager | 24 | A. Competitive offer, they might submit a |
| 25 | HR training, that's a thing that you mentioned a couple | 25 | resignation and say I have a competitive offer and we |
| | | | |
| | 145 | | 147 |
| | | | |
| 1 | of times that has to do with the training the | 1 | counter that offer for a promotion for an increase of |
| 1 | of times that has to do with the training, the | 1 | counter that offer for a promotion, for an increase of |
| 2 | anti-discrimination training you received or your | 2 | duties that didn't necessarily mean a promotion, but |
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| 1 | and all of the regions come forward with their request | 1 speculation. |
|--|---|---|
| 2 | for the country for the percentage for every country, | 2 A. No, I am not. No, not personally. |
| 3 | and at the very, very top level, we enter that into our | 3 Q. (By Mr. Miller) Have you been involved in |
| 4 | model, the country budgets, and that then gives us an | 4 reviewing the fairness of Oracle's pay systems with |
| 5 | idea of what our two CEOs and Larry Ellison as CTO, so | 5 respect to race, gender or ethnicity? |
| 6 | the very top level, refer to it as the Oracle board of | 6 MS. CONNELL: Objection, vague. |
| 7 | directors, and Larry, Mark and Safra are the next level | 7 A. I have not had anything to do with |
| 8 | down. | 8 evaluating for those reasons, no. |
| 9 | We model based on country budgets at the | 9 Q. (By Mr. Miller) So when we talk about |
| 10 | Larry, Mark and Safra level. And then from there, they | 10 these guidelines or the training, I think you have been |
| | | |
| 11 | make individual decisions on how much they want to | 11 pretty clear about this, but I just want to make sure I |
| 12 | spend. If the if the country model say, the | 12 understand. These are recommendations that you are |
| 13 | country model came to a 200 million dollar budget and at | 13 making to managers, they are not requirements; is that |
| 14 | this point in time, we can only afford 125, we have to | 14 right? |
| 15 | shave it down, and then it starts to get cascaded. They | 15 MS. CONNELL: Objection, vague. |
| 16 | then make decisions on that next level, and then each | 16 A. So the guidelines I think the only |
| 17 | level manager makes decisions on how they want to push. | 17 guidelines really that we've put forth in our exhibits |
| 18 | Q. Is it a single budget that then is broken | 18 were those global equity guidelines, and those were I |
| 19 | out by bonus and salary adjustments and equity, or are | 19 believe one of slides even stated they are guidelines, |
| 20 | there separate budgets for each of those? | 20 not rules. This just tells you where the general market |
| 21 | A. Separate for each. | 21 might fall for this kind of job and this career level |
| 22 | MR. MILLER: Let's go off the record. | 22 and this location. |
| 23 | THE VIDEOGRAPHER: The time is 2:51 p.m., | 23 The others are we consider more like comp |
| 24 | going off the record. | 101, general comp best practices for how to use a range, |
| 25 | (Recess was taken.) | ²⁵ for how to make pay decisions or how to evaluate an |
| | | |
| | 149 | 151 |
| | | |
| 1 | THE VIDEOGRAPHER: The time is 3:06 p.m., | 1 internal transfer or a promotion, but I would say |
| | THE VIDEOGRAPHER: The time is 3:06 p.m., we're back on the record. | |
| 2 | we're back on the record. | 2 general general practices for how to make the right |
| 2 3 | we're back on the record. Q. (By Mr. Miller) Ms. Waggoner, before we | 2 general general practices for how to make the right 3 decisions of the management. |
| 2 3 4 | we're back on the record. Q. (By Mr. Miller) Ms. Waggoner, before we went on break, I was asking you for reasons for | 2 general general practices for how to make the right 3 decisions of the management. 4 Q. (By Mr. Miller) But not requirements? |
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| 3 targeted in the first or lower or second quartile. This 3 and accompanying amendment sheats, if any, constitute a 4 is if somebody is moving from a non-sales to a sale glob or something like that. And then and then it gives and accompanying amendment sheats, if any, constitute a 6 an example of what you might do for that. and accompanying amendment sheats, if any, constitute a 7 So this would be more more guidelines if ue and complete record of my testimony. 6 | 1 | reduction in career level, and there's a reduction in | 1 | I, KATE WAGGONER, do hereby certify that |
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| an example of what you might do for that. 7 So this would be more - more guidelines 8 simply because there are scenarios in here that would 8 kind of guide them in how to make a decision, but it's 9 A. Okay, And then I just have like three 10 bousekeeping questions. One of them is you used the 11 abbreviation EVP at a couple of points. I assume you 12 abbreviation EVP at a couple of points. I assume you 13 A. Yes. 16 Q. And when you were taiking about the salary 17 ranges being different for HQ and non-HQ, you gave me a 18 list of some zip codes. Do you know if it also includes 19 A. Off the top of my head, I don't. 12 you reviewed in preparation for this deposition, and I 13 asked you if you had reviewed documents that diden have 15 A. No. 16 Task? 17 asked, So you have no questions to ask, 18 and I believe that we have been on the record for just 19 verviewed that the doposition, and we are off the record. 11 KATE UDECGRAPHER: The time is 3:12 p.m.) 15 I Susan Bretschneider 16 I susan Bretschneider 17 attem in shorthard by me at here and you and the result 18 over three hours, and change, soo 19 I susan Bretschneider 10 Produced in the and have are off the record. 11 I bereve dim preparation and we are off the record. < | 4 | is if somebody is moving from a non-sales to a sales job | 4 | true and complete record of my testimony. |
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| 1 | ERRATA SHEET | |
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