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ORACLE

Oracle Integrity Helpline

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When should I turn to Oracle's Integrity Helpline?

You should turn to the Integrity Helpline in the following circumstances:

- If you would like information or assistance on a compliance or ethics issue.
- If you would like to request training on Oracle policies for yourself or your team.
- If you have reason to suspect a violation of the Oracle Code of Ethics and Business Conduct or Oracle's Anti-Corruption Policy and Business Courtesy Guidelines, or you have observed conduct that you believe may violate applicable law or Oracle's ethical obligations.
- If you have previously sought guidance or reported a concern through another reporting channel and consider the matter unresolved.
- If you wish to remain anonymous and you work in a country that permits anonymous reporting.

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Should I report my concern through Oracle's Integrity Helpline or to my management?

You can raise concerns about questionable ethical behavior at Oracle in several ways.

- Face-to-face discussions with your manager or others in your management chain are often the best way to resolve on-the-job issues.
- Your Human Resources representative or others in the Human Resources organization are generally best suited to address human relations issues.
- Your Regional Compliance and Ethics Officer or any member of the Compliance and Ethics organization can help you resolve compliance and ethics issues.
- You may access Oracle's Integrity Helpline at any time, day or night, either over the phone or through this Website.

Even if you are uncomfortable with any of these resources, or if the resource is part of the problem, please DO raise the concern - don't ignore it.

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What are the hours of service?

Oracle's Integrity Helpline offers a secure channel for you to raise your concerns 24 hours a day / 7 days a week / every day of the year.

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What if this is an emergency?

Please do not use Oracle's Integrity Helpline to report emergencies. To report events presenting a threat to life or property, please immediately contact your local authorities.

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How does Oracle's Integrity Helpline work?

The Integrity Helpline is a tool you may use at any time, either through this Website or over the phone, to request guidance or training with respect to Oracle policies, report suspected violations of law, Oracle's Code of Ethics and Business Conduct or related policies, and follow up on an inquiry or report. Oracle has contracted with EthicsPoint, a NAVEX Global company, to administer its Integrity Helpline. Because the Integrity Helpline is administered by a third-party vendor, we can provide our employees a secure tool, 24-hour access and, if requested, anonymous report submission where permitted by local law. The Integrity Helpline Website is hosted on EthicsPoint's servers and the phone numbers are operated by EthicsPoint.

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What happens when I call the Oracle Integrity Helpline?

Oracle's Integrity Helpline is administered by a third party, EthicsPoint. When you place a call to the Integrity Helpline, the EthicsPoint Call Center Intake Specialist (CCIS) will capture your inquiry or report, asking you to provide detailed information. You may choose to remain anonymous when speaking with the CCIS if you are not submitting a report from a country, such as Portugal, that prohibits anonymous reporting; however, doing so may impede our ability to adequately respond to your inquiry or investigate the matter. Therefore, you are encouraged to identify yourself. You should also be prepared, if you are willing, to provide the names of witnesses and potential victims of any alleged unethical conduct to increase the success of an investigation into your complaint. While inquiries and reports may be submitted anonymously in most cases, we cannot guarantee confidentiality or anonymity as the nature of the issue and/or related case details may reveal the identities of those involved. However, every effort will be made to maintain a high level of discretion in responding to inquiries and reports submitted through Oracle's Integrity Helpline.

The CCIS will record your inquiry or report on the EthicsPoint server and make it available to Oracle's Compliance and Ethics office, led by the Global Chief Compliance and Ethics Officer. The EthicsPoint CCIS cannot provide you advice or resolve your issue over the phone. If your matter is urgent, s/he will provide you with information to contact the Compliance and Ethics office directly so you can receive immediate assistance.

The CCIS will provide you with a report key and password for you to follow up on your question or your report by phone or online. Please check back with Oracle's Integrity Helpline periodically to:

- check the accuracy of the report;
- confirm acknowledgement of the report;
- find out if additional information is needed to process your inquiry/concern; and
- determine the status of the investigation.

Continued follow-up on a matter is particularly important for reports submitted anonymously as we have no other means to communicate with you. If you have identified yourself by name, the Compliance and Ethics office or a designated subject matter expert will contact you directly to discuss your concern and ask any additional questions important to resolution of your concern. Please note that all Oracle Integrity Helpline communications are treated with the same level of discretion as the initial report.

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Are there additional ways to make a report, ask a question or request training?

There are many ways you may report concerns regarding compliance and ethics, ask a compliance or ethics-related question, or request training on Oracle policies:

- You may contact your manager or another person in your management chain.
- You may contact your Human Resources representative or another person in the Human Resources organization.
- You may email or call a member of the Compliance and Ethics organization.
- You may send correspondence to Oracle America, Inc., 500 Oracle Parkway, 7th Floor, Redwood City, CA, 94065, Attention: Dorian Daley, V.P. Legal and Global Chief Compliance and Ethics Officer.

For individuals in the EU countries, Switzerland and Norway, the Oracle Integrity Helpline allows you to report only allegations of banking, finance, accounting or audit irregularities, bribery, kickbacks or other corruption. If your concern relates to another ethics or compliance issue, we encourage you to report it directly to the EMEA Regional Compliance and Ethics Officer or through the other established reporting channels listed above.

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How does Oracle investigate concerns?

A report submitted through Oracle's Integrity Helpline is first reviewed by a member of the corporate Compliance and Ethics team in the Oracle Legal department. Where called for, the report is assigned for investigation to an investigation team that may include both internal and external resources. These individuals may be located in the United States or in another country. The information in your report is shared with team members as appropriate, and your concerns are investigated promptly, thoroughly and discreetly.

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Will my concern be seen by the right people?

All inquiries and reports are first reviewed by a member of the corporate Compliance and Ethics team and then referred to other subject matter experts or investigators as appropriate. People who see your inquiry or report may include members from Oracle Legal, Human Resources, Business Assessment & Audit, Finance, Global Information Security, and/or management as well as members of the Compliance and Ethics organization and external resources such as outside counsel, auditors, forensics providers, and/or technical staff at EthicsPoint.

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Where do my questions and reports go? Who can access them?

Oracle's Integrity Helpline reports are stored directly on EthicsPoint secure servers to preserve the security of the data. EthicsPoint makes these reports available to Oracle's Compliance and Ethics office, which is charged with evaluating the situations described, responding to questions and overseeing any investigations.

All inquiries and reports are first reviewed by a member of the corporate Compliance and Ethics team and then referred to other subject matter experts or investigators as appropriate. People who see your inquiry or report may include members from Oracle Legal, Human Resources, Business Assessment & Audit, Finance, Global Information Security, and/or management as well as members of the Compliance and Ethics organization and external resources such as outside counsel, auditors, forensics providers, and/or technical staff at EthicsPoint. These individuals may be located in the United States or in another country. In addition, all information you provide may be separately stored by the individuals described above.

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Will I face retaliation for reporting a concern through the Oracle Integrity Helpline?

Oracle has zero tolerance for retaliation. In fact, retaliation is a violation of Oracle's Code of Ethics and Business Conduct and its Anti-Corruption Policy and Business Courtesy Guidelines. Retaliation may result in disciplinary action against a retaliating party, including termination. If you feel you have been mistreated because you raised a concern in good faith, please bring the situation to the attention of Human Resources or a member of the Compliance and Ethics organization so that it may be properly investigated and addressed.

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Will I hear about the progress or outcome of an investigation?

To protect the privacy of all concerned, Oracle generally cannot discuss the specifics of investigations except with management responsible for the affected business, Human Resources and any employee directly impacted by disciplinary or remedial action. However, if you make a report to the Oracle Integrity Helpline - even anonymously - you will be provided a unique report key and password. We urge you to contact the Helpline either by phone or online to receive updates or provide additional information that may be necessary for proper investigation of your concern.

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What if I don't feel my concern has been addressed properly? What can I do?

Should you believe your inquiry or report has not been addressed properly, you may escalate your concern directly to Dorian Daley, V.P. Legal and Global Chief Compliance and Ethics Officer, by emailing dorian.daley@oracle.com.

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Is the Oracle Integrity Helpline really anonymous or can the company trace my call or online report?

Although it is generally easier to conduct an effective investigation if you identify yourself, in all countries except Portugal, you may choose to remain anonymous. Please be assured that if you report your concern anonymously, there is no way for Oracle to trace your call. EthicsPoint, the outside vendor that manages the system, does not use caller ID and does not record the calls. Reports from your computer would come through a secure Internet portal which does not trace or show user screen names. EthicsPoint also removes Internet addresses to ensure that anonymity in the EthicsPoint system is maintained.

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as the reporting party - need to ensure that the body of the report does not reveal your identity. For example, phrases such as "From my cube next to Jan Smith..." or "In my 33 years..." should be avoided.

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What should I do if I lose my report key or password?

To preserve the security of your data, access to your report and any further communication is carefully controlled. Therefore, if you lose your report key or password, you must file a new report to obtain updates or provide additional information in connection with the initial report. In the new report you should mention that the matter relates to a prior report.

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If I raise a concern, will my manager or co-workers find out that I contacted Oracle's Integrity Helpline?

Whether your report is anonymous or not, we cannot guarantee confidentiality or anonymity as the nature of the issue and/or related case details may reveal the identities of those involved. However, Oracle's Integrity Helpline system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. In addition, every effort will be made to maintain a high level of discretion in responding to inquiries and investigating reports submitted through Oracle's Integrity Helpline. Please also note that Oracle has zero tolerance for retaliation where a concern has been raised in good faith. Retaliation may result in disciplinary action against the retaliating party, including termination.

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If my boss or other managers are involved in the violation I report, will they know I reported them?

Whether your report is anonymous or not, we cannot guarantee confidentiality or anonymity as the nature of the issue and/or related case details may reveal the identities of those involved. However, Oracle's Integrity Helpline system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. In addition, every effort will be made to maintain a high level of discretion in responding to inquiries and investigating reports submitted through Oracle's Integrity Helpline. Please also note that Oracle has zero tolerance for retaliation where a concern has been raised in good faith. Retaliation may result in disciplinary action against the retaliating party, including termination.

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Are there resources available that assist with translations if I speak or write a language other than English?

Whether an inquiry or report is submitted to the Oracle Integrity Helpline using the telephone or online, there are translation resources available to assist with inquiries or reports made in languages other than English. If communicating over the telephone, the reporter must be able to speak the name of their preferred language in English to the Oracle Integrity Helpline operator. The operator will conference in a translator who will then assist with capture of the inquiry or report.

If an inquiry or report is made online in a language other than English, it will be translated into English for handling by the Compliance and Ethics office. Any future correspondence between you and the Compliance and Ethics office will be translated as necessary.

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ANTI-CORRUPTION POLICY FAQS

Oracle is committed to promoting a corporate culture that is centered on integrity, accountability and ethical business conduct. Oracle's Integrity Helpline provides the company's employees, business partners, customers and other stakeholders around the globe a resource for asking questions or voicing concerns regarding compliance and ethics at Oracle. Oracle has contracted with an independent third party, EthicsPoint, a NAVEX Global company, to provide the Integrity Helpline service.

Anyone may visit this Website or call the Integrity Helpline at any time to request guidance or training with respect to Oracle policies, report suspected violations of law, Oracle's Code of Ethics and Business Conduct or related policies, and follow up on an inquiry or report. EthicsPoint will route all inquiries and reports to Oracle's Compliance and Ethics office, which will insure that your questions are answered or training is provided, that all credible reports of suspected misconduct are investigated fairly, thoroughly and discreetly, and that appropriate corrective action is taken where warranted.

If you choose to submit an inquiry or report anonymously, we strongly encourage you to provide sufficient detail to enable a prompt and accurate response or a full investigation where warranted. Please include a careful description of the facts giving rise to your concern with names, dates and places where available. Please make a record of your report key and password so that you can check the status of your inquiry or report and respond to any requests for additional information. Employees who seek out guidance or who submit a report of suspected misconduct in good faith or cooperate in a compliance investigation will not be subject to retaliation or punishment.

Please select from the buttons to the right to submit a new report, request guidance or training on Oracle policies, or follow up on a report that has already been submitted.

The Integrity Helpline should not be used to report events presenting a threat to life or property. In such situations, please contact your local authorities immediately.

Report a Concern

Click here to report a suspected violation of Oracle's Code of Ethics and Business Conduct.

Ask a Question

Click here to ask an ethics-related question or request guidance or training on Oracle policies.

Follow Up

Click here to follow up on your report or request.

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