
From: Luong, Hoan - OFCCP
To: Shauna Holman Harries
CC: Luong, Hoan - OFCCP
Sent: 11/20/2014 12:04:02 AM
Subject: Oracle HQCA (Redwood Shores, CA) // request for additional pay data
Attachments: Oracle_additional_pay_data_request.pdf

Dear Ms. Holman-Harries,

The Office of Federal Contract Compliance Programs (OFCCP) is currently reviewing the affirmative action plan that you submitted to the OFCCP on October 28, 2014. The OFCCP will need additional pay factors to evaluate Oracle's compensation practice. Enclosed with this email is a letter listing all the items that need to be submitted to OFCCP. Please provide the compensation data in Excel format.

Please submit the requested information to OFCCP by Wednesday, November 26, 2014.

Thank you,

Hoan Luong
Senior Compliance Officer
U.S. Department of Labor - OFCCP
90 7th Street, Suite 11-100
San Francisco, CA 94103
P: (415) 625-7835
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Exhibit No. 22
Witness name:
S. Holman-Harries
Date: 05/08/19
Robin L. B. Osterode CSR RPR

Exhibit P-47

ORACLE_HQCA_0000005203

U.S. Department of Labor

Office of Federal Contract Compliance Programs
Greater San Francisco/Bay District Office
90 7th Street, Suite 11-100
San Francisco, CA 94103



VIA ELECTRONIC MAIL

November 19, 2014

Shauna Holman-Harries
Director of Diversity Compliance
Oracle America, Inc.
500 Oracle Parkway
Redwood Shores, CA 94065

Dear Ms. Holman-Harries:

As you are aware, Oracle America, Inc. ("Oracle") located at 500 Oracle Parkway, Redwood Shores, CA 94065, was selected for a compliance evaluation by the Office of Federal Contract Compliance Programs (OFCCP). We thank you for your submission of materials to our office, and look forward to working with your company as this evaluation progresses.

The office completed a desk audit review of the compensation data submitted. The results of our analysis indicate differences in average compensation that require further investigation of Oracle's compensation practices.

While the desk audit results suggest possible indicators of compensation discrimination, the results should not be regarded as a finding of discrimination with respect to Oracle's compensation system. The desk audit analysis is only an initial screening procedure based on limited information. Therefore, in an attempt to better understand the compensation practices of Oracle, we are requesting that you provide additional data for further analysis and clarification.

For the next phase of our investigation, we are requesting that you provide the following information, for all employees in your workforce, as of the date used for the salary analysis included in your AAP:

1. Name and Employee ID number;
2. Gender;
3. Race/Ethnicity;
4. National Origin (including country of origin, domestic/foreign, visa status/type);
5. Hire Date;
6. Time in Company;
7. Time in Job;
8. Date of Birth;
9. Education (if available);
10. Leave Status (if applicable);

11. Job Title;
12. Job Group;
13. Job Family;
14. Job Function;
15. Job Subfunction;
16. Department;
17. Business Unit;
18. Organizational Unit;
19. Employee Work Location¹;
20. Salary Band/Level/Grade;
21. Stock Level;
22. Base Salary;
23. Actual Bonus/Incentive Compensation Paid;
24. Who is Eligible or Ineligible for Actual Bonus/Incentive Compensation Paid;
25. Actual Equity/Compensation (including RSUs, other stock/equity awards) Paid;
26. All Other Components of Compensation Paid;
27. Actual Total Compensation;
28. Part-Time vs. Full-Time Status;
29. Exempt vs. Non-Exempt Status²;
30. Other pay allowances, if any, such as commission pay, overtime pay, bonus pay or shift differential. Report each allowance in separate data columns;
31. All factors that are considered when determining pay allowances described in #30 above;
32. Data Dictionary (i.e., explanation of all codes for all submitted data)
33. Copies of employment manual and all human resources/employment policies, including compensation policies (i.e., compensation philosophy, salary bands, incentive/bonus policy, stock plans), promotion policies, and position/job descriptions;
34. All self-audits/pay equity studies and salary surveys;

These items are critical pieces of data that OFCCP needs to further evaluate the compensation differences identified during the desk audit. Please submit the data electronically in Microsoft Excel format 2010. We also suggest that the data be submitted on a password-protected CD.

At this stage of the investigation, OFCCP's goal is to better understand Oracle's compensation practices. Therefore, if any of the items requested above are not readily available, please contact us to discuss the specifics of the situation so that the best available and informative data is provided in a timely manner. OFCCP also encourages you to submit any additional information, data, or analyses used as factors in determining employee compensation (e.g., education, shift assignment, years of job-related experience prior to joining the company, etc.) that you believe is appropriate for OFCCP to consider in determining whether to investigate further. OFCCP will take such information, data, and analyses into account when making a determination as to whether further investigation is warranted.

¹ If the location of an employee affects his or her compensation because of economic market conditions or actual work performed at that location, please identify the location for all employees.

² If some employees receive a uniform base hourly rate for a specific job, please identify these employees and describe their compensation system.

Should you have any questions regarding this request, or feel that we have overlooked a vital piece of information, please contact me at (415) 625-7835. Please respond to the requests set forth in this letter within five (5) business days of receipt. Thank you for your cooperation.

Sincerely,



Hoan Luong
Senior Compliance Officer
San Francisco District Office