

Compensation Review & Oversight

Oracle's compensation policy and philosophy is to pay employees in a fair, and non-discriminatory manner. New Hires are paid and are typically placed within the salary range for the job depending on their background experience, skills, market conditions. A new hire's salary is reviewed at hire to make sure they are being placed in the right job, level and salary based on their experience and skills. The HR staff, may analyze, or may request a manager to explain, the reasons for the pay level to ensure that the pay is warranted and consistent with Oracle's guidelines. Similarly, any pay increase that may be given to incumbent employees is consistent with Oracle's compensation policies and is subject to review as warranted.

As noted above, there are a myriad of specific factors that can affect a new hire or incumbent employee's pay. The above reflects the primary factors although there can be others, as well as other non-compensation circumstances that can affect an employee's pay. For example, a new employee may be hired by Oracle as a result of an acquisition in which case the "acquisition hire" comes to Oracle usually in their same job and salary.

Following are some examples of special circumstances that can affect pay decisions: incumbent employee may take a job that is a "downgrade" from a higher level job; or a highly valued employee has received a job offer from another company and Oracle wishes to incentive the employee to remain at Oracle by increasing that employee's compensation. Some departments or business units may also be subject to budgetary constraints that could affect the level of pay/pay increases available to new hires/employees in that organization.

In addition to the forgoing explanations, we have attached company documents describing our compensation philosophy and practices.

Attachments:

- 1 – Compensation Guidelines**
- 2 – Manager PowerPoint Training**

Exhibit P-51

Exhibit No. 26
Witness name:
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Date: 05/08/19
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