REMEMBER: Use Oracle's Integrity Helpline to Ask Compliance or Ethics Questions and Report Suspected Unethical Business Conduct

The Oracle Integrity Helpline is a resource available to employees, contractors, business partners and other stakeholders to raise concerns or seek guidance with respect to ethical business practices. Should you prefer to ask a question or make a report anonymously, you may do so over the Integrity Helpline where permitted by local law. Certain jurisdictions, including many in the European Union (EU), limit topics that may be reported anonymously or may prohibit anonymous reporting altogether. The Oracle Integrity Helpline will alert employees who identify themselves as being from affected countries and will inform them of any special reporting rules that apply.

WHAT IS THE ORACLE INTEGRITY HELPLINE?
Oracle provides a number of ways to report allegations of misconduct. You may report allegations directly to your manager, or to your local manager, to your Regional Compliance and Ethics Officer or to Human Resources. You may also report allegations of misconduct through the Oracle Integrity Helpline, both over the phone and over the web, in each case anonymously where permitted by local law. The Integrity Helpline is operated by an independent third-party firm specializing in ethics reporting services. Calls to the Integrity Helpline are not recorded or traced, and no identity tracking is used on the Helpline's website. The Helpline call desk is staffed 24 hours a day, seven days a week, and the website is also available for your use at any time.

You may ask questions or raise concerns relating to any subject concerning compliance and ethics, including:

- Antitrust or Unfair Competition
- Banking
- Bribery, Kickbacks, or Other Corruption
- Conflicts of Interest
- Customer/Partner/Supplier Relations
- Economic Boycott or Trade
- Employee Relations
- Environmental Safety and Security
- Falsification of Documents, Reports, or Records
- Finance, Accounting or Audit Irregularities
- Government Contracting or Post-Government Employment Violations
- Improper Lobbying and Political Activities
- Misuse of Company or Third-Party Confidential Information
- Misuse or Misappropriation of Company Assets
- Other Policy or Business Practice Violations
- Retaliation for Filing an Integrity Helpline Report or Cooperating in a Compliance Investigation
- Securities Law and Insider Trading
Please continue to direct general HR questions regarding policies (for example, 401(k), leaves of absence, bonuses), processes (for example, transfers, approvals) and other topics unrelated to ethical or compliance issues to Human Resources.

HOW CAN I MAKE AN INTEGRITY HELPLINE REPORT?
Using the access information below, you can make a written report in English through the Oracle Integrity Helpline’s Website, or by phone in up to 150 languages through the Oracle Integrity Helpline call desk. The website will be available for use in a total of 18 languages by the end of July 2013. If you should need to make a report in a language other than English before the end of July, you may make your report by phone or to your manager, other local management, your Regional Compliance and Ethics Officer or Human Resources.

Oracle Integrity Helpline Website: www.oracleintegrityhelpline.ethicspoint.com
Oracle Integrity Helpline Call Desk (toll-free): 800.679.7417
Oracle Integrity Helpline EU Call Desk (international toll-free): 866.455.1215

If calling from outside the United States, you should first dial your country’s access number and then, when prompted, enter the appropriate Helpline toll-free telephone number. Certain jurisdictions outside of the United States, including many in the European Union (EU), limit topics that can be reported anonymously or may prohibit anonymous reporting altogether. The Oracle Integrity Helpline will alert employees who identify themselves as being from affected countries and will inform them of any special reporting rules that apply.

WHAT HAPPENS WHEN I USE ORACLE’S INTEGRITY HELPLINE?
If you call one of the toll-free Integrity Helpline phone numbers, a Communications Specialist employed by the third-party ethics reporting service will answer your call. The Communications Specialist will provide translation assistance if needed, and may ask additional questions to obtain sufficient detail to enable a response to or investigation of your inquiry or concern, as appropriate. If you choose not to provide your name (where allowable under local law), the Communications Specialist will still need to verify your work location, which is needed to enable an appropriate answer to an inquiry or investigation of a concern. At the end of the call, you will be given a report key and password that you can later use to check on the status of your question or concern. After the call, the Communications Specialist will write up a report of the call and forward it to Oracle’s Compliance and Ethics organization for response or investigation, depending on the nature of the call.

If you report your concern through the Integrity Helpline Website, you simply enter the requested information instead of relating it to a Communications Specialist. Again, you will be given a report key and password so that you can follow up. The information you submit will be forwarded directly to Oracle’s Compliance and Ethics organization without review or modification.

Oracle is a public corporation and takes ethics and compliance matters very seriously. Every inquiry will be answered and every credible report of misconduct will be investigated fairly, thoroughly and discreetly. In each case, appropriate disciplinary and/or remedial action will be taken where warranted. In accordance with Oracle’s Code of Ethics and Business Conduct and its Global Anti-Corruption Policy and Business Conduct Guidelines, Oracle does not retaliate against and will not tolerate retaliation against any employee who seeks out guidance or who submits a report of suspected misconduct in good faith, or who cooperates in a compliance investigation.

If at any time you have even a suspicion that Oracle’s obligations have been compromised you should immediately report it. Should you believe your reported concerns have not been addressed properly, you may escalate your report to Mary E. Doyle, Global Chief Compliance and Ethics Officer by emailing mary.doyle@oracle.com, or to me by emailing dorian.daley@oracle.com.


Dorian Daley
Senior Vice President, General Counsel and Secretary

ORACLE CONFIDENTIAL -- INTERNAL