Our Code.
Our Connection.
Our Success.

ORACLE CODE OF ETHICS AND BUSINESS CONDUCT

EXHIBIT 119
Deponent Baxter
Date 7-3-19
Gina Carbone, CSR

Exhibit P-130

ORACLE

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ORACLE

A Message from Our Most Senior Leaders

Lawrence J. Ellison
Founder, Executive Chairman of the Board, and Chief Technology Officer

Safra Catz
Chief Executive Officer

Mark Hurd
Chief Executive Officer

Dear Colleagues:

As an Oracle employee, you are an influential part of an organization with a worldwide presence and the confidence of shareholders, customers, partners, and governments across the globe. We are leaders in our industry because we continuously strive to create and sell the best products and services while championing ethical business values that go well beyond minimum legal requirements.

The Oracle Code of Ethics and Business Conduct defines and implements these core values and is one of Oracle's most important documents. The Code sets forth key rules and provides links to policies and resources to help you understand Oracle's business values and your responsibilities. You should read the Code carefully and in its entirety, and you should reference it frequently as a guide to making the right decisions at Oracle.

We want to help you make decisions that always prioritize doing what's right. Although the Code makes it easy for you to know your obligations, it cannot anticipate every ethical dilemma you may face. You should seek guidance whenever the right course of action is not clear to you. If you ever have questions, issues, or concerns, we ask that you speak with your manager, your regional Compliance and Ethics Officer, the Chief Compliance Officer, your Human Resources partner, or use our Integrity Helpline. Oracle prohibits retaliation against any employee who raises a compliance issue or concern in good faith.

Our reputation and success depend upon the personal commitment that each of us makes to understand and uphold Oracle's values and to behave ethically in all of our business dealings. All of us, regardless of employment level, position, or geographic location, are expected each day to make the commitment to uphold the standards of business conduct in our Code. We appreciate your support in continuing to make Oracle a great company.

Lawrence J. Ellison **Safra Catz** **Mark Hurd**

ORACLE

2017 Code of Ethics and Business Conduct

ORACLE

Our Core Values

Oracle's Code of Ethics and Business Conduct (the "Oracle Code" or the "Code") rests on and implements the core business values that are essential to our success as a company. Our values are the foundation of all that we do; we all are expected to live these values every day. Our modeling of these values drives our long-term success by sustaining a company that has earned and deserves the confidence of shareholders, customers, governments, and partners around the world.

Our core values are

Integrity
We are honest and choose the path of integrity in all business transactions and dealings with others

Ethics
We act ethically in every business context

Compliance
We comply with all laws, regulations, and Oracle policies that govern our business and employees' actions on behalf of the company

Mutual Respect
We treat individuals with respect and dignity

Teamwork
We work together as a team to benefit Oracle

Communication
We share information effectively with each other, but also know how to protect the confidentiality of our information

Innovation
We innovate and seek new and creative approaches to problem solving

Customer Satisfaction
We treat customer satisfaction as a top priority

Quality
We incorporate excellence and quality in our work and strive to continuously improve

Fairness
We deal fairly with customers, suppliers, partners, and colleagues

ORACLE

Our Code

The Oracle Code is a fundamental set of rules defining how we conduct our business with the highest integrity and ethics. The Code, which applies to all Oracle entities, supplements and in many cases goes well beyond what is required to comply with laws and regulations. The Code has been prepared to help you succeed at work. Oracle's continued success with shareholders, customers, governments, and partners around the world depends upon your understanding of and ability to follow the Code in all of your business dealings.

From time to time, Oracle will revise the Code. When this happens, Oracle will notify you and you will be responsible for making sure you understand the new Code. For the most current version, always refer to the online Code located on the **Oracle Compliance and Ethics website**. If you have questions on how to interpret or comply with the Code, Oracle policies, or applicable law, contact a member of the Oracle Compliance and Ethics team or the Oracle Legal Department.

The Oracle Code applies to all personnel employed by or engaged to provide services to Oracle, including, but not limited to, Oracle's employees, officers, temporary employees, workers (including agency workers), casual staff, and independent contractors (for ease of reference throughout this Code, all will be referred to as "employees"). Employment by Oracle is subject to the terms and conditions established by your local organization. As part of those terms and conditions, you are also required to abide by the global standards set forth in this Code. If any part of this Code conflicts with local law, local law must be followed.

On the other hand, if a **local business practice** conflicts with our Code, you must follow our Code. In those instances where Oracle's Code is stricter than local law, you must follow our Code. If at any time, a part of the Code is determined under local law, by a competent government authority, to be invalid, enforceability of its other provisions shall not be affected. Oracle may interpret the Code at its sole discretion.

Only the Board of Directors can waive a provision of the Code. Any waiver and the reason for the waiver will be promptly disclosed to Oracle's stockholders.

ORACLE

Your Role

Employees

Oracle requires all employees to put compliance and ethics first. All employees must

- Act ethically and with integrity in all business dealings
- Know and follow the Code and Oracle policies, and comply the with the law
- Report all alleged, potential, or actual violations of Oracle's Code, or policies or the law using the available reporting channels
- Fully cooperate with compliance investigations, e.g., making your devices available for inspection (when legally permissible) and answering questions truthfully during an investigation
- Complete all mandatory compliance education courses and other Oracle Compliance and Ethics Program requirements in a timely manner

Managers

Managers at Oracle must be leaders in compliance and ethics. Managers must serve as role models for understanding and explaining the rules and demonstrating integrity at all times. Managers must encourage the reporting of compliance issues and create environments in which employees know they can and should raise concerns without fear of retaliation. Managers must

- Learn the Code and use it to onboard new employees and explain to teams, on a routine basis, how it applies to their line of business
- Demonstrate through actions that you always choose integrity
- Ensure that employees who report to you, either directly or indirectly, complete all mandatory compliance education courses and other Oracle Compliance and Ethics Program requirements in a timely manner
- Ensure that employees who report to you, either directly or indirectly, understand where and how to report compliance concerns
- Maintain an open-door policy that encourages employees to ask questions, including those related to business conduct and ethics
- Encourage employees to challenge and report questionable conduct
- Create an environment in which employees understand and believe that they may raise and report compliance concerns without fear of retaliation
- Managers should consider an employee's completion of compliance trainings and ethical behavior and/or violations when determining whether to promote or affect the compensation of the employees they manage
- Managers that **approve** expenditures for meals, refreshments, or entertainment must use discretion and care to ensure that these events are **reasonable and modest in cost**, not lavish or extravagant, justified by a legitimate business purpose, and not offered improperly to influence the recipients' business judgment

ORACLE

Speak Up

Code-Related Questions or Concerns

Oracle is committed to being a world-class company that enjoys the confidence of thousands of entities and individuals around the globe. To continue to do so, we need to understand whether problems exist with our personnel, business, or operations so that we can resolve issues promptly, take corrective action, or make needed improvements. We provide multiple resources for reporting allegations of misconduct, which Oracle will review or investigate as appropriate and, if justified, implement disciplinary actions or other remedies. As an Oracle employee, you are expected to report promptly any conduct that you believe in good faith may be a violation of the Code, as well as any other activities indicating a lack of compliance with Oracle's or our employees' legal or ethical obligations. Oracle will not tolerate retaliation against any employee who reports a concern in good faith or cooperates with a compliance investigation, even when allegations are not substantiated.

Options for reporting concerns or allegations of misconduct include

- Your manager
- Oracle Human Resources
- A member of the Legal team
- **Your Regional Compliance and Ethics Officer**
- The Chief Compliance and Ethics Officer
- Your employee representative (where applicable)
- **The Oracle Integrity Helpline**

If you wish to remain anonymous, feel uncomfortable reporting a concern to your manager, Oracle Human Resources, a member of the Legal team, a member of the Oracle Compliance and Ethics team, or feel that your concern has not been addressed properly, you should call the **Oracle Integrity Helpline**. The Helpline is operated by a third-party service provider and it allows for a report to be made **online** or by **telephone**. The helpline is confidential and available to all Oracle employees to raise concerns or to seek guidance regarding ethics and business conduct issues.

The Helpline is toll-free for all employees and is available 24 hours a day, seven days a week. The helpline provides interpreters for callers who want to communicate in languages other than English.

To submit a telephone report, call the Helpline at 800-679-7417. To submit a report regarding a facility or employee based in the European Union, call the EU Helpline at 866-455-1215. For either number, callers from outside the United States should first dial their country's access number and, when prompted, enter the appropriate helpline telephone number.

The **Integrity Helpline** does not record or trace calls or use any identity tracking technology. You may remain anonymous where permitted by local law, whether you call the Helpline or make the report online. Certain jurisdictions limit topics that may be reported anonymously through the Helpline. Oracle's processes allow for any local limitations and are set up to alert employees if and when special rules apply to them.

USA Helpline: 800-679-7417

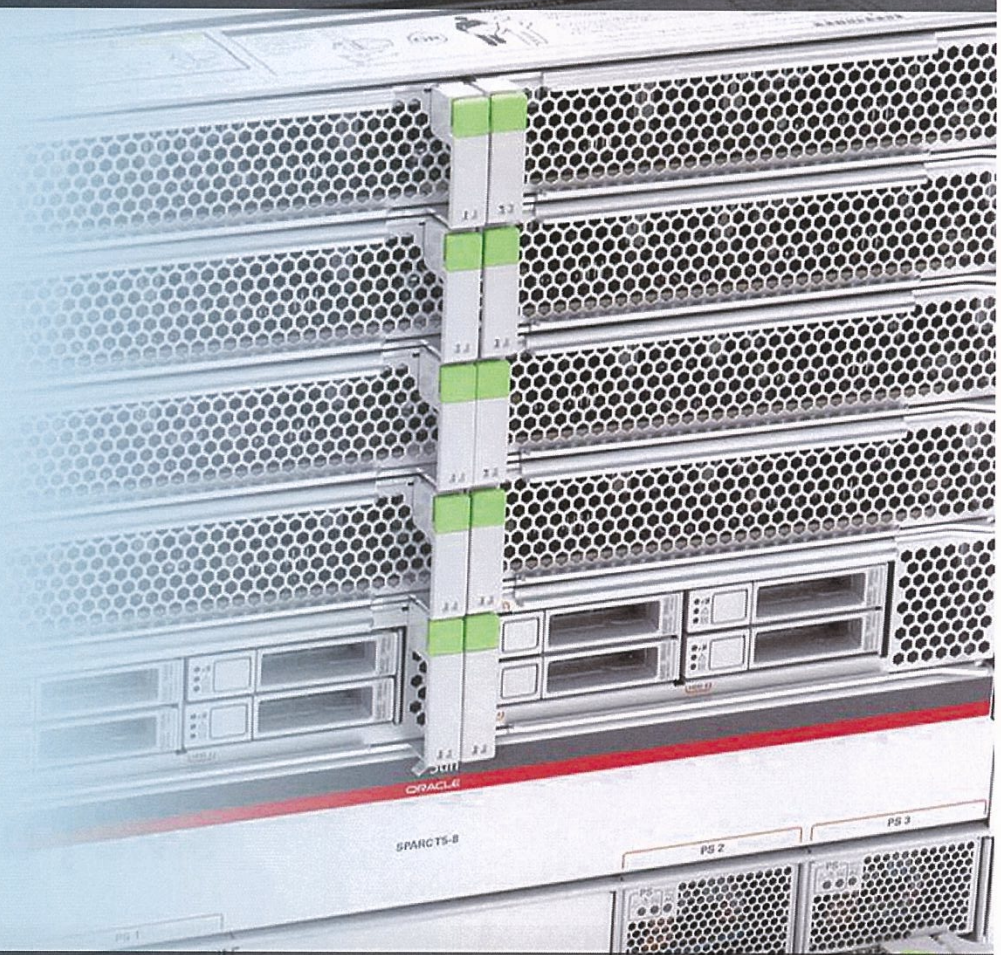
EU Helpline: 866-455-1215

When you report incidents through the Helpline via phone, an operator will ask questions to obtain the details of your concerns and will document the call. You will receive a report number, which you can use later to add details or to check the status of your report. You should provide as much detail as possible when raising a concern, including the parties involved, relevant dates, and specific conduct at issue. Due to confidentiality and other reasons, Oracle generally does not disclose the specifics of any internal investigation, but you may be able to contact the Helpline to learn whether an investigation has been closed.

All reports are handled in accordance with **Oracle's Internal Privacy Policy**, which is available on the **Oracle Legal Department website**.

ORACLE

Code Rules



ORACLE

Antitrust and Competition Laws

Typically, the countries in which Oracle operates have laws and regulations that prohibit unlawful restraint of trade, usually referred to as antitrust or competition laws. These laws are designed to protect consumers and markets against unfair business practices and to promote and protect healthy competition. Oracle commits to observing applicable antitrust and competition laws around the world.

Antitrust or competition laws vary from country to country, but generally, these laws prohibit agreements or actions that reduce competition without benefiting consumers. Among those activities generally found to violate antitrust or competition laws are agreements or understandings among competitors that

- Fix or control prices, including a reseller's prices to its customers
- Structure or orchestrate bids to direct a contract to a certain competitor or reseller or anti-competitively influence pricing (bid rigging)
- Boycott suppliers or customers
- Divide or allocate markets or customers
- Limit the production or sale of products or product lines for anti-competitive purposes

Agreements like those listed above are against public policy and Oracle policy. We must never engage in discussions of such matters with representatives of other companies, including Oracle partners. You should promptly report to the Oracle Legal Department any instance in which employees or third parties initiate such discussions. Contracts or other arrangements that involve exclusive dealing, tie-in sales, price discrimination, or other terms of sale may be unlawful under applicable antitrust or competition laws.
You should not enter into such arrangements without the approval of the Oracle Legal Department. Requests for the issuance of exclusivity certificates or employee involvement in drafting public tender bidding documents are generally prohibited and should also be raised to Oracle Legal for further review and approval.

Oracle also strives to ensure that our global practices comply with United States antitrust laws. In addition to local laws, antitrust laws of the United States apply to our international business operations and transactions, including imports to and exports from the United States.

Oracle has developed a substantial partner network through which we extend our reach to industry sectors and customers around the world. Oracle is committed to ensuring that our partners comply with all applicable laws. To support this objective, Oracle conducts enhanced reviews of certain transactions in select geographies and may obtain end-user documentation and information necessary for anti-bribery compliance purposes while fully respecting antitrust laws. Only authorized non-sales personnel, who are obligated to protect the information from further unauthorized disclosure, may collect and access such documents and information.

Antitrust and competition laws are complex; please seek advice from the **Oracle Legal Department** on any related questions.

ORACLE

Global Anti-Corruption and Bribery Laws

Oracle believes in doing business honestly and is committed to transparency in our business practices. We have no tolerance for corruption and bribery in connection with our business. You must comply with anti-corruption laws, such as the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, in all countries in which we do business.

Oracle is also committed to ensuring that our partners comply with all applicable laws, including anti-bribery and anti-corruption laws. To support this objective, Oracle conducts enhanced reviews of certain transactions in select geographies and may obtain end-user documentation and information necessary for anti-bribery compliance purposes while fully respecting antitrust laws. Only authorized non-sales personnel, who are obligated to protect the information from further unauthorized disclosure, may collect and access such documents and information.

No Improper Payments

We do not offer or pay bribes. You are prohibited from offering, promising, authorizing, directing, paying, making, or receiving any bribes, kickbacks, or payments of money or anything of value (directly or indirectly) to improperly obtain business or any other advantage for Oracle or yourself. The FCPA and other similar international anti-corruption laws outlaw bribery.

Penalties for violating these laws are severe and can include prison time and large fines for you personally.

The above prohibition is applicable to

- Government and public sector, which include public utilities, higher education, public healthcare entities, and public international organizations and their employees or officials
- Political parties or candidates for political office
- Business entities partially or wholly owned or controlled by government interests (often referred to as state-owned enterprises) and their employees or officials
- Privately-held commercial companies and their employees
- Oracle employees
- Any other third party

Additionally, Oracle prohibits all forms of money laundering, which involves disguising or channeling unlawfully obtained money, or transforming such money into legitimate funds.

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Oracle prohibits giving money or anything of value directly or indirectly to a government official or employee of a state-owned enterprise, or to the spouse, significant other, child, or other relative of any such person, for the purpose of influencing or rewarding an action or decision of the government or public sector employee or official or to gain any improper advantage for Oracle. "Anything of value" is intended to be broad and covers not only money, but also gifts, lavish or excessive entertainment, funding of personal travel such as sightseeing, contributions to charity, and employment opportunities. Oracle also prohibits facilitation or facilitating payments, which are payments to an official to speed up or expedite routine government actions, including processing and approving applications and permits.

For more information, refer to **Oracle's Global Anti-Corruption Policy and Business Courtesy Guidelines** (the "Anti-Corruption Policy") and the **Supplemental Policy on Dealing with Government** located on the **Compliance and Ethics website**.

ORACLE

Gifts, Meals, and Entertainment

Oracle can pay for bona fide business expenses and certain gifts for third parties, but only if done without corrupt intent and according to **Oracle's Anti-Corruption Policy**. Oracle's Anti-Corruption Policy provides specific guidelines to ensure that you comply with applicable anti-corruption laws, including the FCPA and UK Bribery Act.

Government entities and state-owned enterprises generally are governed by strict laws and regulations concerning the ability of their employees to accept entertainment, meals, gifts, gratuities, and other things of value from companies such as Oracle. In dealing with employees of these entities, it is Oracle's general policy that nothing of value will be given. Limited exceptions that may apply are covered in the **Anti-Corruption Policy** and the **Supplemental Policy on Government Contracting and Dealing with Government Officials and Employees**. Refer to the "Business Courtesies You May Extend" section of this Code for information regarding nongovernment entities. If you have any questions, contact a member of the Compliance and Ethics team.

Business Courtesies You May Extend

Furnishing meals, refreshments, entertainment, and event access in conjunction with business discussions with nongovernment personnel may be appropriate as long as the offering of such courtesies does not violate any policies of the recipient's organization, any contractual agreement with a customer, **Oracle's Global Travel and Expense Policy**, or the **Anti-Corruption Policy**. You are responsible for familiarizing yourself with any such standards, agreements, and policies and for complying with them.

Oracle prohibits giving anything of value (including charitable donations or sponsorship of events), directly or indirectly, to any private individual, firm, or entity as a means of improperly inducing business.

Employees who **seek** or **approve** expenditures for meals, refreshments, or entertainment must use discretion and care to ensure that these events are **reasonable and modest in cost**, not lavish or extravagant, justified by a legitimate business purpose, and not offered improperly to influence the recipients' business judgment.

Oracle's standards and the applicable laws for dealing with government employees and employees of state-owned enterprises are more stringent than standards for private sector company employees. In dealing with government employees and officials, it is our general policy that nothing of value will be given to such individuals. Limited exceptions that may apply are covered in the Anti-Corruption Policy and the Supplemental Policy on Government Contracting and Dealing with Government Employees and Officials. You are responsible for being familiar with the rules and regulations of the government entities with which you interact. Contact the **Compliance and Ethics team** if you have any questions about your activities and interactions with the government.

In any case, business courtesies must be small enough not to appear to influence the judgment of the recipient, secure unfair preferential treatment, or gain an improper advantage. A final test of appropriate business courtesies, even if allowed under the law, is whether public disclosure would be embarrassing to Oracle or the recipient.

Business Courtesies You May Receive

You may accept unsolicited gifts or other business courtesies from actual or potential customers, suppliers, or other business partners provided they are reasonable and modest in nature and amount, are justified by a clear and legitimate business purpose, or are not given to influence a business decision. Furthermore, accepting these courtesies should not impose a sense of obligation or give rise to the expectation that another party will receive anything in return. It is never appropriate to solicit these courtesies, either directly or indirectly. Before accepting a gift or other business courtesy, you must also confirm that doing so is permitted under local laws. Many countries impose limitations on gifts that may be exchanged, even among employees of private sector companies. Contact Compliance and Ethics for for information about laws in specific countries.

Oracle recognizes that in some parts of the world gift giving is a common, accepted practice and that refusing a gift could reflect poorly on Oracle. Even in those instances, however, you must comply with this Code, **Oracle's Anti-Corruption Policy** and all relevant local laws. Please refer to **Oracle's Anti-Corruption Policy** for additional information, including circumstances under which written approval is required.

You may accept occasional meals, refreshments, or other entertainment appropriate to the circumstances in connection with normal business discussions. Again, it is inappropriate to accept such favors if they are offered solely to influence your business decision. If an individual or firm doing or seeking business with Oracle offers you entertainment that is more than modest, routine, or outside of the guidelines provided in Oracle's Anti-Corruption Policy and Business Courtesies Guidelines, you must obtain written approval. Refer to the Anti-Corruption Policy and Business Courtesies Guidelines to understand the processes and approvals required prior to accepting such entertainment. We are all personally responsible for ensuring that acceptance of any business courtesy, gift, or entertainment is proper and does not reasonably appear to be an attempt to secure favorable treatment.

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Engaging Government and Public Sector Employees and Officials

Government Contracting

Oracle strictly observes the laws, rules, and regulations that govern the acquisition of goods and services and the performance of government contracts by governmental entities. Activities that may be appropriate when dealing with nongovernment customers may be improper and even illegal when dealing with government. The penalties for failing to follow government procurement laws are severe and include substantial civil and criminal fines, imprisonment, and debarment of Oracle from doing business with the government. Oracle employees who deal with any government agency, including international organizations, are responsible for learning and complying with all rules that apply to government contracting and interactions with government officials and employees, including the rules in **Oracle's Supplemental Policy on Government Contracting and Dealing with Government Officials and Employees**.

If you deal with government or public sector employees and officials, you are required to complete the **Dealing with Government: Government Contracts and Political Compliance training course**. Both the supplemental policy and the training course are located on the **Compliance and Ethics website**.

Government Procurement Integrity

Our commitment to comply with government procurement rules extends to how we acquire relevant information. You must not attempt to obtain from any source

- Procurement-sensitive government information
- Confidential internal government information, such as pre-award, source selection information
- Proprietary information of a competitor including, for example, bid or proposal information, during the course of a procurement or in any other circumstances where there is reason to believe the release of such information is unauthorized

If such information is inadvertently communicated to you by another vendor, a consultant, or a government employee, you should promptly contact the **Oracle Legal Department**.

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Organizational Conflict of Interest (OCI)

You must ensure that when performing government contracts there is no actual or potential organizational conflict of interest (OCI) that would provide Oracle unequal access to nonpublic information, provide an unfair advantage in a competitive procurement, or impair your objectivity in providing assistance or advice to the government or in performing contract work for the government. All actual or potential OCIs must be disclosed by consulting the Oracle Legal Department.

Post-Government Employment Restrictions

Various laws impose requirements and restrictions on government employees related to post-government employment in the private sector. These laws restrict the former government employee's activities after he or she leaves the government and accepts employment with a private company. Before engaging in any discussions related to possible employment or entering into a business opportunity with a current or former government employee, you must obtain the appropriate approvals by consulting the Oracle Legal Department.

Lobbying of Government Officials

Our interactions with the government are generally governed by lobbying laws and regulations. Lobbying is any activity that attempts to influence laws, regulations, policies, and rules, but in certain jurisdictions can also cover sales and business development activity. These laws can apply to elected officials, as well as appointed officials and government employees. The company may have an obligation to register and/or report the company's lobbying activities under applicable law, including activities by employees and outside consultants or advisors on government relations. You are responsible for knowing when third parties' activities may be considered lobbying and should consult the Oracle Legal Department for guidance. For information on lobbying laws in North America and Oracle's policy, see the **Supplemental Policy on Government Contracting and Dealing with Government Officials and Employees**, which also is located on the **Compliance and Ethics website**.

Political Contributions

Oracle takes seriously our obligation to comply with the laws relating to political contributions. These laws vary greatly among jurisdictions and countries. All political contributions made by Oracle, including attendance, participation, and/or sponsorship of political candidates, parties, campaigns, and related events must be approved in advance by **Oracle's Government Affairs** and the Oracle Legal Department. In addition, in many instances corporations are prohibited from giving to political campaigns. Some campaign laws interpret use of corporate resources (such as equipment, email, stationery, or personnel) as corporate donations. You should obtain approval from the Oracle Legal Department before using any company resources for political campaigns or fundraising. For more information on Oracle's political activities policy in North America, see the **Supplemental Policy on Government Contracting and Dealing with Government Officials and Employees**, located on the **Compliance and Ethics website**.

Personal Political Activity

Oracle encourages its employees to participate personally in civic affairs and the political process. To do so, you must

- Make all personal political contributions with your own money
- Conduct any personal political activities on your own personal time
- Conduct all personal political activities in accordance with applicable laws
- Comply with Oracle policies

Guidelines regarding personal political activity:

- Your personal contributions to a candidate for elective office or a political party must not be—or appear to be—made with, reimbursed from, or facilitated by the company's funds or assets.
- You will not be paid by Oracle for any time spent running for public office, serving as an elected official, campaigning for a political candidate, or attending political fundraisers unless required by law and/or approved by the Oracle Legal Department.
- You can take reasonable time off without pay for personal political activities, if your Oracle duties permit and it is approved by your manager in accordance with current Oracle Human Resources policies. You also may use vacation time for your personal political activity.
- You may not use or permit any campaign, candidate, or political party to use any company facility or property, including a company trademark, without written approval from **Oracle's Government Affairs** and the **Legal Department**.
- You should make clear that your political activities reflect your own personal views. Any overt, visible, and partisan political activity that could cause someone to believe that your actions reflect the views or position of Oracle requires prior approval of Oracle's Government Affairs and the Oracle Legal Department.

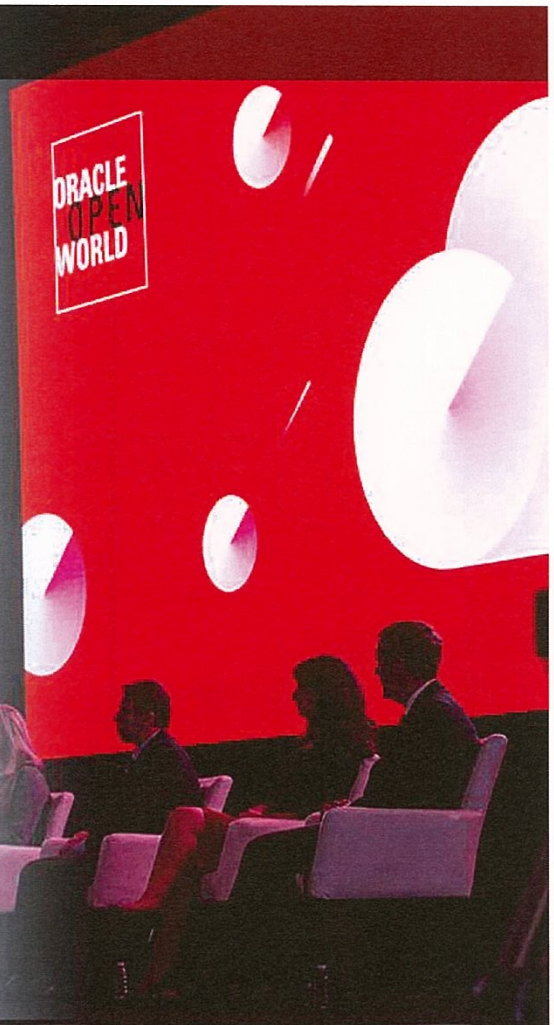
ORACLE

Influencing Others

In certain instances, Oracle may encourage employees to support or oppose legislative issues that affect the company's business. However, in no instance may you use your position of authority to make another employee feel compelled or pressured to

- Work for or on behalf of any legislation, candidate, political party, or committee
- Make contributions for any political purpose
- Support candidates or certain political causes
- Cast a vote one way or another

In the United States, the Federal Election Campaign Act (FECA) allows the company to establish a political action committee. Oracle established the Oracle Political Action Committee (Oracle PAC) to enable employees to pool personal funds to support candidates for federal, state, and local offices. Oracle PAC fundraising must comply with all applicable laws and must be directed to only those employees eligible to contribute. Contributions to Oracle PAC are voluntary. Oracle PAC fundraising may not be conducted in a coercive manner and all Oracle PAC fundraising communications must clearly include a statement that contributions are voluntary and that employees will not be favored or disadvantaged in their employment by reason of the amount of any contribution or any decision not to contribute. An employee's participation in Oracle PAC is kept confidential by Oracle PAC's administrator, except as required by law.



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Trade Compliance Laws and Regulations

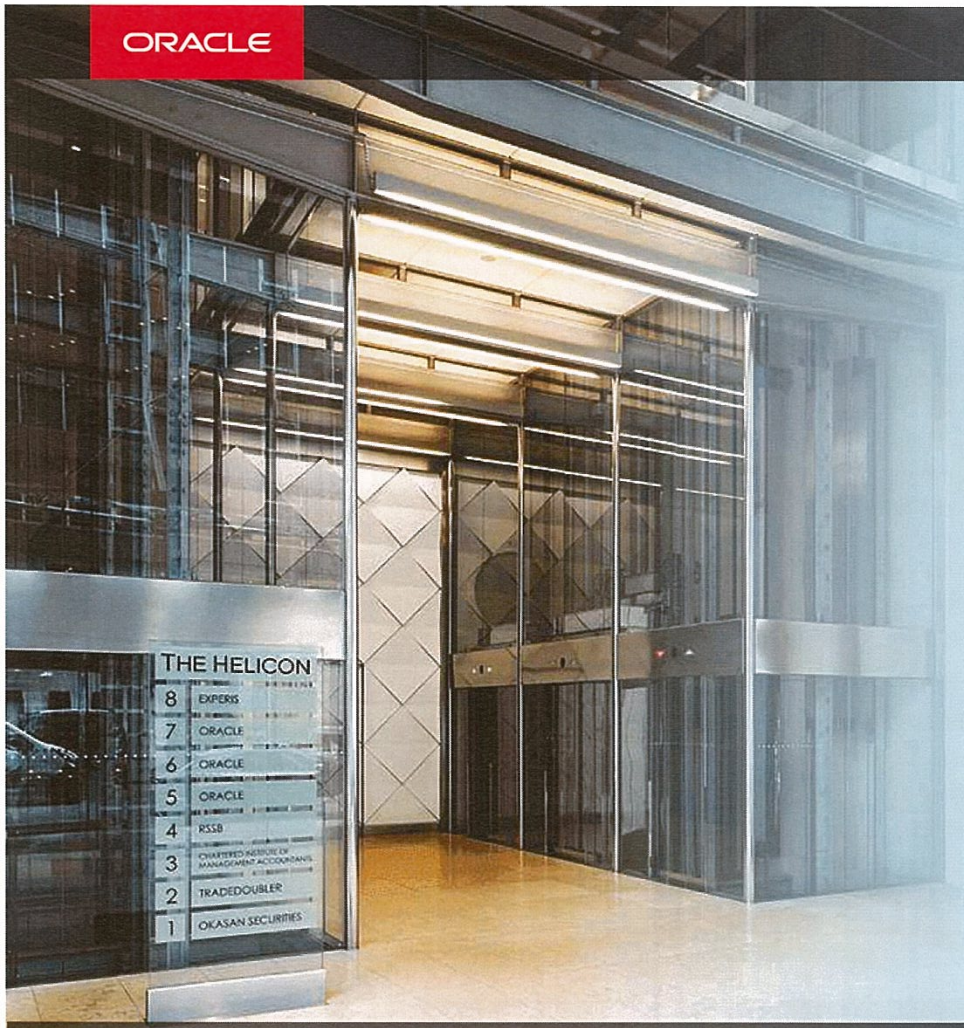
Oracle is committed to complying with all applicable global export, import, and economic sanctions, laws, and regulations. Compliance with global trade laws and regulations protects Oracle's ability to conduct international business. Failure to do so can result in disciplinary action for the company, serious supply chain disruptions, loss of sale and service opportunities, monetary penalties, fines and imprisonment for individual employees and their management chain, and the potential revocation of our trade privileges. You are responsible for understanding how trade compliance laws and regulations apply to your job, and strict adherence to these laws is required.

US trade compliance laws and regulations govern all exports and imports of commodities and technical data into and from the United States, which include

- Physical items (hardware, laptops, software media, and the like)
- Electronic or physical distribution of software and source code
- Written, electronic, or oral disclosure of technical data to a visitor outside of the United States or H1-B Visa worker whether it occurs within the US or abroad

Any oral or written disclosure of technical data to a visitor from outside of the United States must comply with the same export control restrictions that are applicable to the physical export of such data.

You may not ship Oracle commodities, including but not limited to hardware, software, documentation, source code, technical data, or technology, without processing the transaction through authorized Oracle order entry, distribution, export request, and support processes and/or through authorized Oracle subsidiary channels.



As part of Oracle's Global Trade Compliance program, Oracle maintains an **International Traffic in Arms Regulation (ITAR) Compliance Policy** to ensure all Oracle transactions involving the export or re-export of US-origin defense articles, defense services, and related technical data comply with the ITAR policy. The policy also establishes standards and procedures to ensure no transfer of covered defense articles, defense services, and related technical data takes place beyond what is authorized by the ITAR or by the terms of any export license or other approval granted by the US Department of State, Directorate of Defense Trade Controls.

Questions concerning trade compliance matters or any potential violation of these laws or regulations should be directed to **Oracle Global Trade Compliance**. Additional information may be found on the **Global Trade Compliance website**.

ORACLE

No Economic Boycotts

Oracle does not participate in any economic boycott not sanctioned by the United States government. Oracle and our employees are prohibited from discriminating against or refusing to do business with a country, its nationals, or companies that are the object of an unsanctioned boycott.

Additionally, Oracle and our employees may not furnish information concerning Oracle's or any other person's business relationships with a boycotted country or blacklisted company. If requested to supply any information, take any action, or refrain from taking any action to further or support a boycott of a country, you must immediately contact the Oracle Legal Department. For further information on identifying and handling boycott requests, please refer to Oracle's Foreign Economic Boycott Policy, which is available on the **Oracle Compliance and Ethics website**. This policy is intended to ensure that we comply with foreign economic boycott laws of the United States. Address questions or requests for information regarding **Foreign Economic Boycott Policy** or anti-boycott laws to the Oracle Legal Department.

ORACLE

Securities and Insider Trading

Oracle expects you to comply with applicable insider trading and securities laws. Oracle maintains an insider trading policy, which is applicable to all employees worldwide, non-employee directors, and the immediate family members of employees and directors. The **Insider Trading Policy**, which is available on the **Oracle Legal Department website**, sets forth your obligations under the law and as required by Oracle, regarding trading in the securities of Oracle and other companies. You are expected to understand the policy and comply with it.

If you trade in Oracle securities or the securities of any other company trading on a United States stock exchange, you are subject to United States securities laws, as well as any other securities or insider trading laws that may apply to you locally, including Oracle's Insider Trading Policy. Failure to comply with insider trading and securities laws may result in substantial civil and criminal penalties.

Under Oracle's Insider Trading Policy, if you possess **material**, **nonpublic information** (also referred to as "**inside information**") gained through your work at Oracle, you may not trade in Oracle **securities** or the securities of another company to which the information pertains. You also may not pass on to others (for example, a "tip") material, nonpublic information. These restrictions also apply to your immediate family members.

Material information is any information that a reasonable investor would consider important in a decision to buy, hold, or sell securities. It includes any information that could reasonably be expected to cause a change in the price of securities of Oracle or the securities of another company to which the information relates.

Examples of Material information

- Financial performance and operating metrics (especially quarterly and year-end earnings) or significant changes in financial performance, operating metrics, or liquidity (including forecasts)
- Potential or ongoing major mergers, acquisitions, joint ventures, divestitures, or other strategic transactions
- Award or cancellation of a major contract or strategic partnership
- Key management changes
- Changes in dividend or stock repurchase programs, offerings of securities, or credit transactions
- Changes in auditors, knowledge of a qualification in an auditor's opinion or report, or any change in the ability to rely on prior auditor reports
- Actual or threatened significant litigation or investigations
- Gain or loss of a substantial customer or supplier

Nonpublic information (or **inside information**) is material information that is not available to the general public. It is typically made public through the issuance of a press release or a filing with the US Securities and Exchange Commission. Generally, you must refrain from trading from the time you become aware of inside information through the first full trading day after Oracle has made the information public.

Securities include common stock, bonds, employee stock options, futures, derivatives, and other financial instruments. See **Oracle's Insider Trading Policy** for more information regarding how the policy applies to stock options, restricted stock units, and the Employee Stock Purchase Plan.

Oracle has established quarterly "no trading" periods for certain groups of Oracle employees and non-employee directors. In addition, individuals with knowledge of proposed strategic transactions must obtain preclearance prior to trading Oracle securities. All employees and non-employee directors are prohibited from engaging in speculative transactions in Oracle securities. Please refer to the Insider Trading Policy for details on these restrictions. If you have any questions about compliance with insider trading laws or Oracle's Insider Trading Policy, you should consult with the Oracle Legal Department.

ORACLE

Intellectual Property

Besides our people, Oracle's most important assets are its intellectual property rights, which include

- Copyrights
- Patents
- Trademarks
- Trade secrets

We are each responsible for protecting Oracle's intellectual property rights by complying with Oracle's policies and procedures for their protection. Maintaining the confidentiality of Oracle's trade secrets and proprietary information is an important element of such protection. This obligation continues even after you leave Oracle.

We also respect the intellectual property of others. Oracle will provide any software necessary for you to perform your functions adequately under appropriate licensing agreements with vendors. It is against Oracle policy to use, copy, display, or distribute third-party copyrighted software, documentation, or other materials without permission or approval from Oracle's Legal Department. For example, you may not post another entity's copyrighted content to any internal or external website or other electronic forum without first obtaining the necessary approvals. You are not permitted to use or copy software or documentation except to the extent that applicable license agreements allow.

Consult the Oracle Legal Department website for relevant policies and guidelines, some of which are

- **Information Protection Policy**
- **Employee Proprietary Information Agreement**
- **Copyright Compliance Policy**
- **Policy on Patent Communication and Searches**

ORACLE

Protecting Confidential Information

Oracle is committed, and you are required, to protect all confidential information that you have access to in connection with your Oracle employment. The **Oracle Information Protection Policy**, located on the Oracle Legal Department website, provides the requirements for treatment of confidential information. It also provides a description of the different categories of confidential information, which are

- Public
- Confidential—Oracle Internal
- Confidential—Oracle Restricted
- Confidential—Oracle Highly Restricted

The Information Protection Policy provides guidance on the proper handling of each information category, including restrictions on use, disclosure, storage, transmission, and deletion. All information related to Oracle's business that is not intended for public disclosure or any information identified as confidential by Oracle's customers, partners, prospective customers, and vendors should be considered confidential.

Confidential information includes

- Information customers provide to Oracle for the performance of cloud, technical support, consulting, and other services
- Source code
- Inventions or developments (regardless of the stage of development)
- Marketing and sales plans
- Competitive analyses
- Product development plans
- Pricing
- Potential contracts, mergers, or acquisitions
- Financial plans or forecasts
- Oracle employee and customer personal information

ORACLE

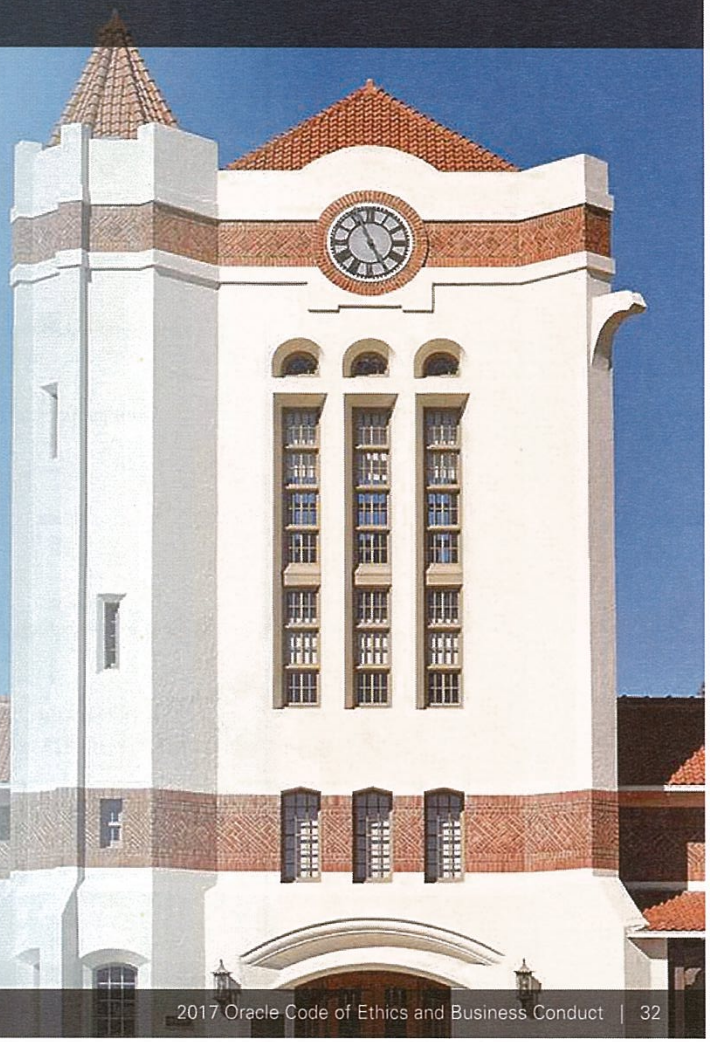
Security Policies and Practices

Oracle has required security policies designed to protect our confidential information, as well as Oracle's systems and resources. These are available on the **Corporate Security website**. Individual lines of business and organizations may have additional security practices in place to govern their operations. You are required to report any unauthorized access of an Oracle facility to Oracle's **Global Physical Security** and report any unauthorized access to or use of Oracle's networks, systems, or confidential information to Oracle's **Global Information Security**.

Your obligation to protect Oracle confidential information and personal information continues after you leave Oracle. Similarly, we expect you to abide by your obligations to protect the confidential information of your former employers. No confidential information obtained during or as a result of your work with former employers should be brought on Oracle premises or used in any form in your work at Oracle.

Privacy Policies

Oracle's external privacy policies located on **oracle.com** govern the collection, use, transfer, and security of personal, customer, and prospect information, and information Oracle may access or be provided in connection with the performance of services. Oracle's internal privacy policy located on **my.oracle.com** governs Oracle's treatment of Oracle employee and contractor personal information. You are required to abide by these policies when collecting, processing or handling this information.



ORACLE

Social Media

As a company, we encourage communication among our employees, customers, partners, and others—and web logs (blogs), social networks, discussion forums, wikis, video, and other social media can be a great way to stimulate conversation and discussion. The Oracle **Social Media Participation Policy**, located on the **Legal Department website**, sets forth the requirements for employee participation in social media.

It is particularly important to remember the following:

- The Oracle Code of Ethics and Business Conduct and Oracle's corporate and legal policies apply to your online conduct (blogging, liking, tweeting, commenting, and all forms of online activity) just as much as they apply to your offline behavior.
- Do not use social media for confidential, substantive, or direct Oracle business communications with customers.
- Do not discuss merger and acquisition activity, product roadmaps and future product offerings, or certain communications during **Closed Communications Periods** ("Quiet Periods"), public policy or legislation, and legal commentary, in accordance with the Social Media Participation Policy.
- Respect others' intellectual property rights, including copyrights and privacy/publicity rights, particularly when using photographs or video content.
- Unless you are an official Oracle spokesperson who has been trained by Oracle Public Relations and/or Oracle Analyst Relations, you are not authorized to speak on behalf of Oracle—or to represent that you do. Guidelines for external communications are provided in Oracle's Policy Regarding Communications with the Press and Analysts.
- When using your personal social media account(s) to discuss Oracle-related topics, identify yourself as an Oracle employee, and make it clear that your opinions are your own and do not necessarily reflect the views of Oracle.
- Disclose any material connections you have with Oracle or with the provider of any product or service you are reviewing.
- Do not disclose confidential information through any social media platform.
- Do not make abusive, objectionable, or inflammatory posts.

ORACLE

Conflicts of Interest

The term "conflict of interest" describes any circumstance that could cast doubt on your ability to act in Oracle's best interests and to exercise sound business judgment unclouded by personal interests or divided loyalties. The term also refers to situations in which it appears that your business judgment has been compromised. The **Conflict of Interest Policy** explains how to avoid financial, business, or other relationships that create conflict of interest issues and how to deal with those situations. You must read and understand this policy.

Conflict of interest situations may arise in many ways. Some actions that can create a conflict include, but are not limited to

- Family, friends, and romantic relationships – For example: a manager continues to supervise an employee with whom the manager has a romantic relationship, or approves discounts for a partner owned by the manager's brother, or engages a vendor or vendor organization owned by a close personal friend or a person with whom he/she has a romantic relationship.
- Personal financial interests – For example: an employee directs Oracle business to a vendor in which he/she has a financial interest.
- Corporate business opportunities – For example: an employee purchases real estate in which he/she knows Oracle plans to build a facility.
- Outside business activities – For example: an employee begins to serve on the board of a start-up company that is reasonably likely to compete with Oracle or is part owner of a reseller that is selling products and services.
- Public service or office – For example: an employee takes a position on the council of a city in which Oracle has an office.
- Public speaking, books, and other publications – For example: an employee agrees to conduct a series of lectures on the future of cloud security.

Other potential conflict of interest scenarios are outlined in the **Conflict of Interest Policy**. The presence of a conflict does not necessarily mean that an activity will be prohibited. If you feel that you have a potential conflict of interest, you must, first, refrain from the activity that creates the conflict, second, you must promptly disclose the conflict of interest or potential conflict of interest in writing via the **Conflict of Interest Disclosure Form** and submit it to a member of the Oracle Compliance and Ethics team. If you observe any situation involving another employee that you believe in good faith to be a conflict of interest, you must report the situation to your manager, your HR manager, your regional Compliance and Ethics Officer, or the Integrity Helpline. Reports from employees will be handled as confidentially as possible.

Oracle's senior officers—chief executive officer, chief technology officer, president, chief operating officer, chief financial officer, chief accounting officer, executive vice president, and senior vice president—are subject to additional reporting requirements, which are spelled out in detail in the Conflict of Interest Policy. Non-employee members of the Oracle Board of Directors are subject to the conflict of interest provisions of Oracle's Corporate Governance Guidelines in lieu of the conflict of interest provisions contained in this Code. Senior officers and members of the Oracle Board of Directors who have questions regarding this Code or other relevant policies should contact Oracle's General Counsel.

ORACLE

Gathering Information About Our Competitors or Other Third Parties

You may not seek to obtain proprietary information about Oracle competitors, and you may not seek to obtain any information about Oracle competitors or other third parties illegally or in a way that involves a lack of integrity or a breach of any confidentiality or employment agreement. You must always disclose your employment with Oracle and never misrepresent your identity when attempting to collect competitive information. In the event that you inadvertently obtain a third party's confidential or proprietary information without authorization, you must not disseminate the information within Oracle and you must immediately contact Oracle Legal at **legal_us@oracle.com**. Unless Oracle Legal instructs otherwise, you must promptly destroy all copies of such information in your possession.

We may make appropriate observations about competitors' products and activities when basing them on publicly available information, such as public presentations and marketing documents, journal and magazine articles, advertisements, and other published information.

ORACLE

Contracting

You are expected to compete fairly and ethically for all business opportunities. If you are involved in the purchase, sale, or licensing of products/services, the negotiation of agreements, or the delivery of services to customers, you are expected to understand and honor the terms of Oracle's contractual agreements. Also, you must ensure that all statements, communications, and representations to customers, suppliers, and internal approvers are accurate and truthful.

Oracle is committed to meeting all of our contractual obligations. You must obtain all appropriate approvals before executing, modifying, or amending any contract. Oracle prohibits unauthorized contracts or modifications of contracts, including side letters or oral agreements. A "side agreement" or "side letter" is any agreement, promise, or commitment (whether written or oral) by or on behalf of Oracle with a customer or partner from whom revenue has been or will be recognized, that is either undocumented or documented in agreements separate from the main contract. Such side agreements are prohibited under Oracle policy.

Spending and Signing Authority

Before acquiring any goods or services, signing any document, or making any other commitments on behalf of Oracle, you must ensure that you have spending authority equal to or greater than the total amount of payments or other concessions to which you are committing Oracle. You should aggregate the total cost of a purchase when making this determination. It is not permissible, for example, to open several purchase requisitions for a single vendor on the same project to avoid going outside the limits of your spending authority. If you do not have adequate spending authority, obtain approval from the manager in your chain of management who has the appropriate signing authority. If you have questions about your spending authority, consult your manager. You should also familiarize yourself with the **Global Spending Approval Policy**, **Global Source-to-Settle Policy**, and the **Document Signing Authority Policy**.

ORACLE

Use of Oracle Resources

We use a number of company and personal assets and resources to perform our jobs. These include Oracle facilities, computers, telephones, and email, as well as certain personal devices. It is critical that each of us fully understands the requirements for appropriate use of these resources.

You are required to comply with the **Acceptable Use Policy for Company Resources**, located on the **Legal Department website**. The topics covered include

- Personal use of Oracle resources and appropriate conduct
- Reporting data loss and security incidents
- Use of Oracle and third-party instant messaging, email, voicemail, mobile phones, removable media, and applications
- Use of passwords and prevention of viruses
- Protecting confidential information
- Issuing public statements
- Marketing and customer communications
- Investigations and access to resources and facilities

Oracle may employ security procedures at our facilities to monitor and maintain security, including the use of closed circuit television. Also, use of Oracle computers, systems, resources, and employee personal devices used for business purposes may be monitored or imaged for legal preservation to the extent permitted by applicable law.

In addition, Oracle requires you to comply with **Oracle's Information and Physical Security** policies at all times. Oracle property may not be sold, loaned, given away, or disposed of without proper authorization. Upon leaving employment with Oracle, all Oracle property—including keys, security badges, computer equipment, software, handbooks, and internal documents—must be returned.

ORACLE

Financial Integrity

Accurate and reliable financial and business records are of critical importance in meeting Oracle's financial, legal, and business obligations. Oracle's financial books, records, and statements must properly document all assets and liabilities and accurately reflect all transactions of the company. No false entries are ever permitted on Oracle's books or records, for any reason. Below are some helpful guidelines regarding financial record keeping.

- Billing of time or expenses by consultants, submission of Oracle timecards, entry of orders by sales administrators, and submission of travel and expense reports shall be made timely and accurately and in compliance with Oracle policy, professional standards, regulations, and laws.
- No documents shall be inappropriately altered or signed by those lacking proper authority. Please refer to **Oracle's Document Signing Authority Policy** on the Oracle Legal Department website for more information.
- Oracle funds or assets must not be used for any unethical, inappropriate, or illegal purpose.
- The handling and disbursement of funds related to an Oracle transaction must be pursuant to a duly authorized Oracle written contract with clearly defined procedures.
- No undisclosed or unrecorded fund or asset related to any Oracle transaction shall be established or maintained for any purpose.
- No payment on behalf of Oracle shall be made or approved with the understanding that it will or might be used for something other than the stated purpose.
- All approval requests for nonstandard discounts must be accurate and commercially justified. Margins derived from misleading and/or unjustified nonstandard discounts are inappropriate, and may not be used to pay or otherwise reward an Oracle customer, employee, or other third party.
- Placing an order with Oracle without the existence of a corresponding end user agreement (also known as "pre-loading" or "channel stuffing") is not an acceptable Oracle business practice and is prohibited. Oracle partner agreements require partners to provide a copy of the end user agreement (Proof of End User—POEU) documentation upon Oracle's request and such documentation is required for certain orders to be booked as outlined in **Oracle's Revenue Recognition Policy**.
- In working with Oracle partners (VADs, resellers, and the like), you are expected to maintain neutrality and take all reasonable measures to ensure partner adherence to Oracle policies and contractual obligations. Partners or other third parties should never be engaged to make or facilitate improper payments, misrepresent the nature or substance of a transaction, or structure deals in a manner intended to circumvent the design and intent of Oracle policies and controls. For further information, see **Oracle's Partner Engagement Guidelines** and **Guidelines for Working with Partners**.

ORACLE

Public Disclosures

As a public company, Oracle must disclose accurate and complete information regarding the company and the results of our operations. Our policy is to report Oracle's financial results and other significant developments fully, fairly, accurately, timely, and understandably. Oracle will not tolerate unauthorized "leaks" or disclosures of corporate information to third parties, including the press or financial community.

All communications with the press and financial community must be authorized by Oracle's Public Relations or Investor Relations organizations. Those organizations alone, at the direction of executive management, are responsible for determining the appropriate spokespersons for communicating with the press and analysts. Direct any inquiries from the press or financial community immediately to Oracle Public Relations or Oracle Investor Relations. For further information, see **Oracle's Policy Regarding Communications with the Press and Analysts** on the Oracle Legal Department website.

ORACLE

Records Retention

The **Oracle Records Retention Policy** ("Retention Policy") sets forth guidelines governing the retention and disposal of Oracle business records. The Retention Policy requires that you maintain records in accordance with the **Corporate Records Retention Schedule** ("Retention Schedule"). The Retention Schedule identifies the company records that we must retain and the retention period for each record type. You must not retain records that are not identified on the Retention Schedule, unless the records have a current business purpose or the Oracle Legal Department has instructed that the records be retained or preserved. You are responsible for reading and abiding by the Retention Policy and Retention Schedule. Please be advised that if you receive a **Legal Hold Notice**, the processes noted in the Retention Policy should be suspended regarding certain or all Oracle documents that you have in your possession. If you have any questions regarding a Legal Hold, refer to our **Legal Hold FAQs** or contact a member of the Oracle **Legal Department**.

The Retention Policy and the Retention Schedule cover both electronic (soft copy) and hard copy materials. They apply to all record types regardless of the medium in which they exist, including

- Paper
- Email
- Video
- Hard Drive
- Compact disc or other electronic storage device

You should give special care to ensure that records containing confidential information are retained and disposed of in accordance with both the Retention Policy and the **Information Protection Policy**.

If it appears that local circumstances require a record to be retained for a longer period, please contact the Oracle Legal Department or email **docretention@oracle.com**. If you have questions about the Retention Policy or the Retention Schedule, contact the **Legal Department**.

ORACLE

Charitable Donations

Oracle is committed to using our resources to advance education, protect the environment, and enrich community life. Each year **Oracle Giving** donates millions of dollars to nonprofit organizations around the world. Through grants and sponsorships, as well as Oracle Volunteers' support, we work to improve the quality of life in the communities where we do business. Additionally, our education programs—**Oracle Academy and Oracle Education Foundation**—prepare students for success in life and work.

Oracle does not make charitable donations to close deals or seek favor from decision makers. It is possible, however, for business units to support nonprofit organizations, as long as they approach it as part of an ongoing, positive business relationship and not to close business or otherwise secure favorable treatment on decisions affecting Oracle. All donations must be made in compliance with the **Policy for Cash Donations**. Raise questions about any potential **conflict of interest** issues that may arise from charitable donations to Compliance and Ethics.

ORACLE

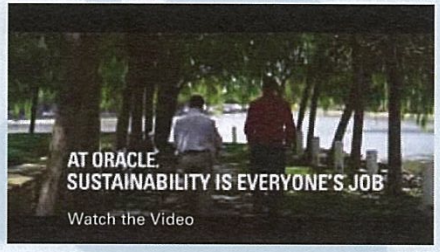
Corporate Social Responsibility

Oracle recognizes the important responsibility we have to respect universally recognized human rights throughout our operations and in the products and services we offer. As a global company, we address important human rights issues every day, including online privacy, **human trafficking**, **conflict minerals** and **labor rights**, freedom of expression, and **data privacy**.

We support and respect the protection of human rights and ensure that our business partners and suppliers do the same. We avoid involvement in human rights violations that could arise through our businesses actions. We require that child labor, prison or forced labor, and physical punishment are never permitted in any operation of Oracle. We similarly require that our business partners or suppliers not engage in such practices. We respect your right to organize in labor unions and collectively bargain in accordance with local laws and established practices.

Oracle is committed to using our technology and resources to advance education in innovative ways, promote diversity, enrich the life of communities, and protect the environment. In balancing the needs of our business with the needs of the environment, Oracle's policy is to maintain our facilities and run our business operations in a manner that minimizes any adverse impact on the environment. As an example, we seek to reduce, reuse, and recycle as many resources as we can.

We must comply with all applicable environmental laws and regulations. For additional information regarding Oracle's position on environmental management, please refer to **Oracle's Environmental Policy**.



ORACLE

Oracle's Relationships

ORACLE

Oracle and Our Employees

Oracle provides **regional employee handbooks** or regional HR sites that can be used to answer common questions around employee-related policies, practices, and programs. We encourage you to express ideas for improving the workplace and any concerns you may have about the workplace or specific job-related problems. We will not retaliate and will not tolerate retaliation against any employee who raises an issue, complaint, or concern in good faith. Our goal is to deal fairly and equitably with each employee.

Immigration Laws

You must ensure that you, and any employees that report to you, comply with all applicable immigration laws and/or the advice of Oracle's designated immigration service providers. At all times, Oracle employees must possess proper work authorization for the country in which they are working. If you travel internationally on business, you are responsible for obtaining the appropriate visa before attempting to enter a host country. Visa requirements apply to all Oracle employees who travel outside of their home countries for business purposes or who work on projects or international assignments outside of their home country for any duration. Oracle also prohibits you from allowing contractors or other employees to work on a project without the proper authorization or documentation.

If you need information on immigration issues, contact US Immigration for US-specific issues or the Mobility Group for countries other than the US through Global Human Resources website.

For US Immigration, including all US visa matters, contact **Oracle's US Immigration team.**

For Global Immigration (excluding US-inbound), contact **Oracle's Global Mobility group.** You can also review **Oracle's Working Worldwide** site for information related to Oracle's Global Mobility and Global Immigration program, including:

- **Global Immigration Program Policy & Guidelines**
- **Global Immigration Program Frequently Asked Questions (FAQs)**

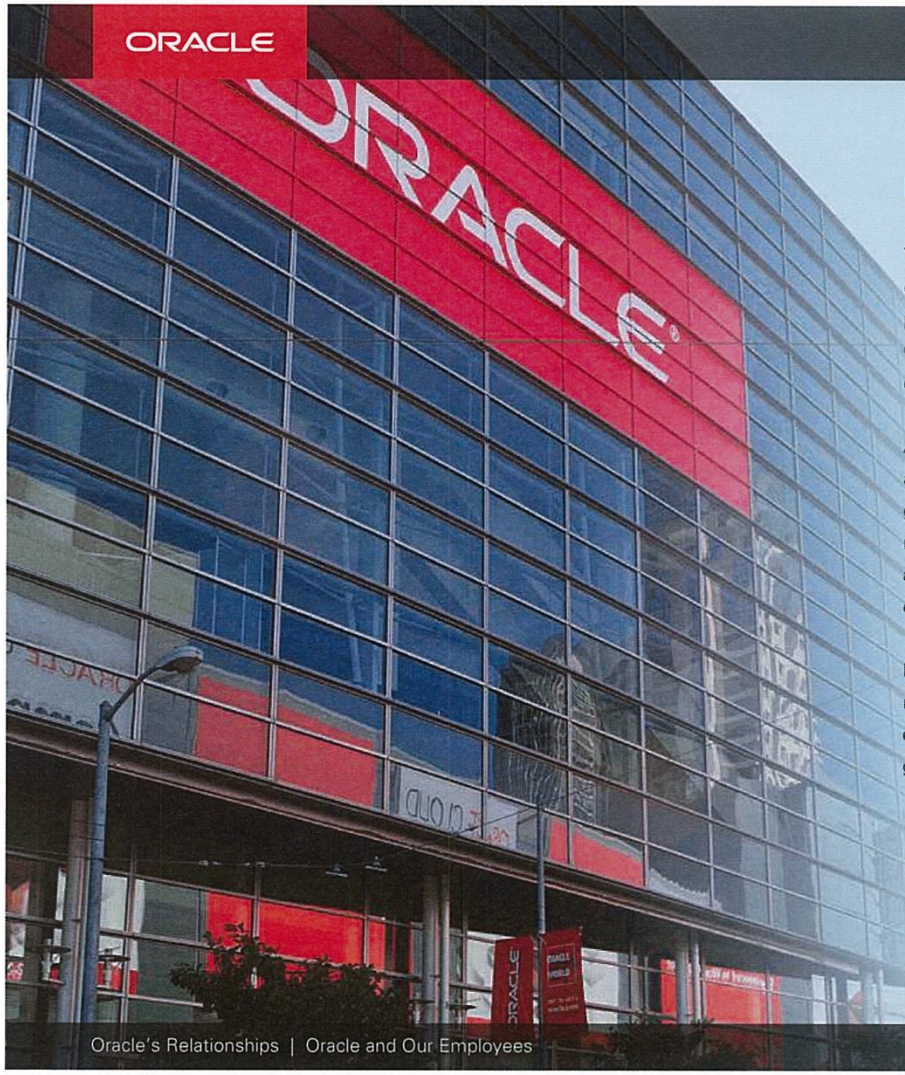
Diversity

Oracle affirms the principle of equal employment opportunity without regard to any protected characteristic, including but not limited to

- Race
- Religious creed
- National origin
- Color
- Sex or gender
- Gender identity or expression
- Age
- Mental or physical disability or medical condition
- Pregnancy
- Marital status
- National origin/ancestry
- Genetic information
- Political affiliation
- Military and protected veteran status
- Sexual orientation
- Any other characteristic protected under federal or state law or local ordinance

We practice and promote such policies in all locations as appropriate under the law. We affirm this principle of freedom from discrimination in all aspects of the employment relationship, from recruitment and hiring, through performance evaluations, compensation, and promotions, to the end of your employment relationship with Oracle.

We base personnel actions strictly on individual ability, performance, experience, and company need. We avoid actions influenced by personal relationships and discriminatory practices of any kind. Our goal is to compensate personnel—with wages, salaries, and other benefits—in relation to their responsibilities, performance, and experience. Oracle is also committed to adhering to wage, hour, and minimum-age guidelines provided by applicable laws. We strive to structure the content of jobs so that work provides personal satisfaction and challenge.



Harassment

You are expected to treat your fellow colleagues and/or employees with mutual respect and dignity. Oracle's policy is to provide a work environment free from harassment. Harassment is prohibited in any form: physical, verbal, and nonverbal. Harassment is prohibited by law and Oracle policy prohibits the berating or verbal abuse of employees. You may review our policy in detail by accessing the **Anti-Harassment Policy**.

Although "harassment" most frequently refers to sexual harassment, workplace harassment may also include harassment based upon a person's race, religious creed, national origin, color, sex or gender, sexual orientation, gender identity or expression, age, mental or physical disability or medical condition, pregnancy, marital status, national origin/ancestry, genetic information, political affiliation, military and protected veteran status, or any other characteristic protected under federal or state law or local ordinance.

Report instances of harassment to your manager, your Oracle Human Resources manager, your regional Compliance and Ethics team, or the **Oracle Integrity Helpline**. Your report will be kept confidential to the greatest extent possible and retaliation is not tolerated for any report made in good faith.

Safety and Security

Threats or acts of violence against you, temporary employees, independent contractors, customers, clients, partners, suppliers, or other persons and/or property will not be tolerated. Immediately report potential threats or acts of violence to Oracle Global Physical Security, which is responsible for defining, developing, implementing, and managing all aspects of physical security to ensure your protection, the business enterprise, and assets. **In case of an emergency, contact local law enforcement**.

You are obligated to provide accurate and complete information requested by Oracle Global Physical Security. This includes investigations regarding threats to persons or property, theft of Oracle assets, and theft of personal assets (where the theft occurred on Oracle property). Photography and videography of Oracle's property is prohibited without prior review and written approval from either Oracle Global Physical Security or your Regional VP of **Oracle Real Estate and Facilities**.

You must review and understand the **Global Badge Policy**, **Visitor Policy**, and **Real Estate and Facilities Emergency Response Plan**.

Environment, Health and Safety

Oracle is committed to conducting its business operations in a manner that protects the health and safety of its employees, visitors, contractors, and the public, while also minimizing the environmental burden of our operations and products. **Oracle's Global Environment, Health and Safety (EHS) Department** works with all lines of business and employees around the globe to comply with applicable EHS requirements. As an employer, Oracle has responsibilities and obligations in preventing workplace accidents and injuries and promoting safe and healthy workplaces. Immediately report any instances of noncompliance with environmental laws and regulations to your **local facilities manager**, your regional Compliance and Ethics Officer or, where permitted by law, the **Oracle Integrity Helpline**.

Oracle Global EHS

View the training Video

Taxation

We expect you to pay all applicable taxes on all income from Oracle, including taxes on income from the exercise of stock options.

ORACLE

Oracle and Our Customers

We prosper to the degree—and only to the degree—that we serve our customers well. Our appeal in the marketplace must be based on the quality of our products and services, the perception that our products and services are priced fairly to provide value to our customers, and the competence and honesty of our product and sales presentations. Accordingly, we prioritize pleasing our customers and anticipating and being responsive to their needs.

ORACLE

Oracle and Our Partners

Together, Oracle and its partners provide customers around the world with industry-leading solutions and services. These standards can only be met with our partners' cooperation. Oracle expects its partners to conduct business fairly and ethically, to comply with anti-corruption laws around the world, to cooperate with Oracle's requests for information, and to avoid engaging in any activity that involves even the appearance of impropriety. We require our partners to adhere to the standards of the **Oracle Partner Code of Ethics and Business Conduct**. We also expect our partners to comply with all applicable laws and regulations. Partners are encouraged to report concerns to the **Integrity Helpline**.

ORACLE

Oracle and Our Suppliers

We maintain open and frank business dealings with our suppliers and strive to develop mutually advantageous relationships. Oracle expects its suppliers to conduct business fairly and ethically, to comply with the anti-corruption laws around the world, to cooperate with Oracle's requests for information, and to avoid engaging in any activity that involves even the appearance of impropriety. We require our suppliers to comply with the **Oracle Supplier Code of Ethics and Business Conduct**. We also expect our suppliers to comply with all applicable laws and regulations and to ensure that all goods and services provided by them conform to all applicable legal standards. Suppliers are encouraged to report concerns or issues to the **Integrity Helpline**.

ORACLE

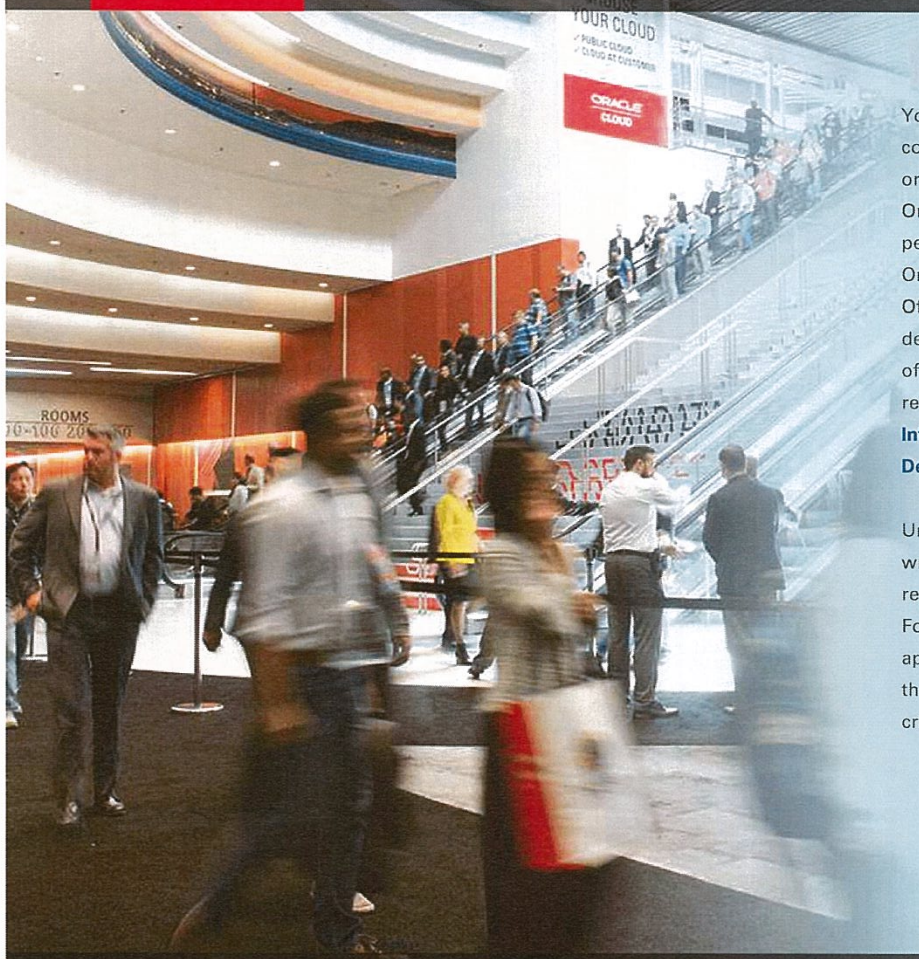
Enforcement

ORACLE

The Investigation Process

Oracle is committed to maintaining an internal investigations process focused on accuracy, precision, fairness, and respect for all parties involved. Your regional Compliance and Ethics Officer is responsible for addressing business conduct and ethical concerns, including directing the investigation of allegations of misconduct. Investigations are conducted in compliance with applicable law and Oracle policies and in such a manner that all parties receive ethical and fair treatment.

Oracle complies with applicable laws in conducting investigations. To the extent permitted by applicable law, and when appropriate, investigation methods may include interviews with the parties and witnesses, review of relevant financial, electronic, and other records, reviews of publicly available information, and monitoring and/or analysis of computers, systems, offices, and other resources.



You have a duty to fully cooperate with investigations and to promptly, completely, and truthfully comply with all requests for information, interviews, or documents during the course of an investigation. To the extent possible, Oracle treats all reports of alleged misconduct confidentially, and only those persons with a need to know are informed of and involved in an investigation. Only the Oracle Corporation General Counsel, Chief Compliance and Ethics Officer, a regional Compliance and Ethics Officer, or the Compliance Officer's designee may commence a Code of Conduct investigation relating to a Code of Conduct violation. All reports of misconduct and related investigative records are treated in accordance with the **Internal Privacy Policy** and **Information Protection Policy**, both of which are available on the **Legal Department website**.

Unsubstantiated allegations will have no effect on an employee accused of wrongdoing, and retaliation will not be tolerated against any employee who reports a concern in good faith or cooperates with a compliance investigation. For investigations in which misconduct occurred, Oracle calibrates the application of disciplinary and remedial actions to the conduct established through the investigation process. In addition, Oracle may report civil or criminal violations to the relevant authorities.

ORACLE

Related Policies and Websites

Listed below are the policies covered in the Code of Conduct and additional resources that may be of assistance.

Charitable Donations

- **Policy for Cash Donations**

Conflicts of Interest

- **Global Conflict of Interest Policy**
- **Conflict of Interest Disclosure Form**

Contracting

- **Document Signing Authority Policy**
- **Oracle Global Source-to-Settle Policy**
- **Oracle Global Spending Approval Policy**

Corporate Social Responsibility

- **Corporate Citizenship Report**
- **Oracle Academy**
- **Oracle Education Foundation**
- **Oracle's Environmental Policy**
- **Oracle's Policy Against Trafficking in Persons and Slavery**
- **Oracle's Sustainable Procurement Statement**
- **Oracle Volunteers**
- **Statement on Human Rights**
- **Sustainability**

ORACLE

Economic Boycotts

- Foreign Economic Boycott Policy

Financial Integrity

- Closed Communications Periods
- Oracle's Revenue Recognition Policy

Government and Public Sector

- Anti-Corruption Policy and Business Courtesies Guidelines
- Oracle's Government Affairs Website
- Supplemental Policy on Dealing with Government

Intellectual Property

- Copyright Compliance Policy
- Corporate Records Retention Schedule
- Employee Proprietary Information Agreement
- Information Protection Policy
- Policy on Patent Communication and Searches

Oracle and Our Employees

- Anti-Harassment Policy
- Global Badge Policy
- Global Human Resources Website
- Guidelines for Working with Partners
- Oracle's Corporate Governance Guidelines
- Oracle Global Physical Security
- Oracle's Partner Engagement Guidelines
- Real Estate and Facilities
- Real Estate and Facilities Emergency Response Plan
- US Immigration
- Visitor Policy
- Compliance and Ethics Website
- Meeting and Events Pre-Approval Guidance
- Oracle's Global Travel and Expense Policy

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Protecting Confidential Information

- Additional Use of Personal Information Policy
- Call Monitoring and Recording Policy
- Corporate Security Website
- Electronic Marketing and Customer Communication Policy
- Global Information Security
- Global Physical Security
- Internal Privacy Policy
- Oracle's Policy Regarding Communications with the Press and Analysts

Records Retention

- Corporate Records Retention Schedule
- Legal Hold Notice
- Oracle Records Retention Policy

Securities and Insider Trading

- Insider Trading Policy

Social Media

- Social Media Participation Policy

Supplemental Ethics Codes

- Partner Code of Ethics and Business Conduct
- Supplier Code of Ethics and Business Conduct

Trade Compliance

- Global Trade Compliance Website
- International Traffic in Arms Regulation (ITAR) Compliance Policy

Use of Oracle Resources

- Oracle Acceptable Use Policy for Company Resources

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Resources

Oracle provides various resources to assist you with compliance and ethical situations.

Compliance and Ethics

- **Compliance and Ethics Team**
- **Human Resources**
- **Integrity Helpline**
- **Members of the Legal Department**

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