

AFFIRMATIVE ACTION PLAN

for

Oracle America

January 2014

NOTICE: This document contains confidential information. Oracle will provide information on these plans as is legally required. Any release of the affirmative action plan, either in statistical or narrative form, is prohibited. This plan does not constitute a legal document. It is an analysis used as a management tool and for review by the federal government.

Exhibit No. 21

Witness name:
S. Holman-Harries
Date: 05/08/19

Robin L. B. Osterode, CSR, RPR

COMPANY IDENTIFICATION

Federal Identification Number: 94-2805249

Inclusive Dates of the Plan: 1/1/2014 - 12/31/2014

Individual Responsible
for Plan Implementation: Shauna Holman-Harries
Director Diversity Compliance
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STATEMENT OF CONFIDENTIALITY

This affirmative action plan contains confidential, trade secret, and commercial information that is subject to the provisions of 18 U.S.C. S 1905. Chrysler Corp. v. Brown, 441 U.S. 281, 19 FEP Cases 475 (1979).

Copies of this affirmative action plan and all related appendices, documents and supporting data are made available on a loan basis to the United States government upon the request of said government on the condition that the government hold them totally confidential and not release copies under any circumstances. This affirmative action plan, its appendices, and other supporting documents contain confidential information that may reveal Oracle's future business plans and strategies. This affirmative action plan is exempt from disclosure, reproduction and distribution under the Freedom of Information Act upon the grounds, among others, that such material constitutes (1) personnel information which is exempt from disclosure under 5 U. S. C.S 552 (b) (6); (2) confidential, commercial or financial information which is exempt from disclosure under 5 U.S.C.S 552(b)(4); (3) investigatory records compiled for law enforcement purposes, the reproduction of which is exempt from disclosure under 5 U.S.C. S 552(b)(7)(C); and (4) matters specifically exempt from disclosure by statute, which are exempt from disclosure under 5 U. S - C - S 552 (b) (3). Notice is hereby given pursuant to 41 C.F.R. 60-60.4(d) that Oracle intends this plan to be kept confidential.

Oracle does not consent to the release of any information contained in this affirmative action plan under the Freedom of Information Act or otherwise. If the United States government, or any agency or subdivision thereof, intends to breach the conditions under which this affirmative action plan is loaned to the government, or is considering a request for release of this plan under the Freedom of Information Act, request is hereby made that the government immediately notify Dorian Daley, General Counsel, 500 Oracle Parkway, Redwood Shores, CA 94065, making no such disclosure until a reasonable time for the Company to respond has been allowed.

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STATEMENT OF CONFIDENTIALITY (Cont'd)

Oracle expects that anyone who has any contact with this affirmative action plan, or its supporting appendices, documents and other data, treat such information as confidential and that such information not be disclosed for any purpose.

Oracle employees and consultants who have any contact with the information contained in or related to this affirmative action plan have signed proprietary information agreements, or other confidentiality agreements, and by contract cannot disclose such information without prior express written consent of the Company.

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SPECIAL TERMINOLOGY

Certain terminology is used throughout this plan to satisfy requirements of consistency and identification under applicable regulations and laws. The terms *utilization analysis*, *utilization problem area*, *adverse impact* and others appearing in this plan, are terms Oracle uses to be consistent with government regulations. These terms are not necessarily significant on a legal or factual level. Although these terms are used in connection with Oracle's affirmative action program, such usage does not necessarily indicate that Oracle agrees that these terms factually or legally describe any circumstance or situation at Oracle. This affirmative action plan is voluntarily adopted consistent with Oracle's obligation as a federal contractor. The plan in no way constitutes an admission that Oracle has, at any time, discriminated against any person or persons.

To the extent various goals are identified and established in this plan, these goals are derived from statistical analysis required by the government. It is not conceded that any such goal realistically establishes affirmative action parity. Nor should it be interpreted that in attempting to achieve such goals, Oracle will use them to discriminate in any inverse way against applicants or employees based upon any prohibited factor.

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ORACLE'S EQUAL EMPLOYMENT OPPORTUNITY

Policy Statement

We believe in treating each employee and applicant for employment fairly and with dignity. We base our employment decisions on merit, experience, and potential, without regard to race, color, national origin, sex, marital status, sexual orientation, gender identity, age, religion, disability, protected veteran status, or any other characteristic prohibited by federal, state or local law. Oracle's employment philosophy is to provide a working environment that inspires achievement without consideration to any prohibited factor. Oracle emphasizes achievement, self-motivation, and encourages high self-expectations.

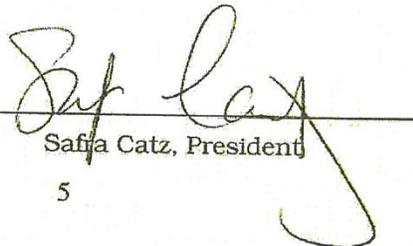
Oracle recruits, hires, trains, and promotes persons in all job groups without regard to race, color, national origin, sex, marital status, sexual orientation, gender identity, age, religion, disability, protected veteran status, or any other characteristic prohibited by federal, state or local law. Oracle strives to ensure that all personnel actions are administered consistently with Oracle's commitment to EEO and the furtherance of AA.

Oracle is committed to providing a work environment that is free of discrimination. Oracle does not tolerate harassment of any kind, including harassment based on race, color, national origin, sex, marital status, sexual orientation, gender identity, age, religion, disability, protected veteran status, or any other characteristic prohibited by federal, state or local law. Unlawful harassment may take many forms, including verbal, visual, or physical conduct that creates an offensive, hostile, or intimidating work environment.

Oracle has developed a written Affirmative Action Program for qualified individuals with disabilities and qualified protected veterans. This Affirmative Action Program is available for inspection by any employee or applicant for employment upon request, during normal business hours at Oracle offices. Interested persons should contact the Director Diversity Compliance at (650)506-7000.

Oracle has appointed the Director Diversity Compliance to manage the Equal Employment Opportunity function. These responsibilities include monitoring all Equal Employment Opportunity activities and reporting the effectiveness of this AA plan, as required by Federal, State, and Local agencies.

Date 3/05/2014


Safia Catz, President

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RESPONSIBILITY FOR IMPLEMENTATION

The Director Diversity Compliance administers the AA plan. Additionally, where appropriate or necessary, the Director may coordinate or consult with others at Oracle, including but not limited to Oracle's Human Resources and Legal Departments.

Implementation Guidelines

- Developing the EEO policy.
- Preparing and updating the AA plan and ensuring consistency with Oracle's EEO obligations.
- Implementing AA/EEO program and ensuring appropriate internal and external dissemination of the plan and policies.
- Assisting managers with AA/EEO challenges and ensuring regulatory and policy compliance.
- Designing and implementing systems to determine if Oracle's AA plan goals and objectives are met.
- Networking with community based organizations (CBO) that encourage employment opportunities of minorities, women, protected veterans, and disabled people.
- Communicating to executive management AA goals and action programs that provide solutions to address goals and deficiencies.
- Communicating AA goals to all members of Oracle's management to ensure that Oracle managers understand their responsibility and Oracle's commitment to AA/EEO.
- Working with relevant and applicable governmental enforcement agencies.
- Providing diversity career fair information to the Recruitment Department to assist in the recruitment of women, minorities, disabled individuals and protected veterans.
- Periodically reviewing personnel processes to ensure freedom from stereotyping against any applicants or employees, including on the basis

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of disability or protected veteran status, in a manner that limits access to jobs for which these individuals are qualified.

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DEVELOPMENT AND EXECUTION OF ACTION PROGRAMS

Oracle's primary and most effective program for the furtherance of Affirmative Action is its unswerving commitment to seeking out and hiring qualified individuals in a completely non-discriminatory fashion and to developing and promoting its employees wherever possible based upon individual merit and demonstrated potential.

Oracle's action oriented programs have been established to support the inclusion of women, minorities, protected veterans, and disabled workers in a number of ways including: recruitment; advancement and retention of talent (recruit, retain and advance the best talent); performance; talent optimization; and employee engagement. Oracle's management believes that diverse employee engagement drives results and is good for employees and the company.

Internal Communications

Employee Orientation

Oracle informs new employees of Oracle's EEO policy at the time of hire and during Oracle's *New Employee Orientation*. Additionally, Oracle provides employees access to its Employee Handbook and its Code of Ethics and Business Conduct, each of which includes additional details on EEO and related issues.

Job Posting

Oracle posts open positions up to and including Sr. Director level jobs using an online internal job post system. This process is regularly audited for compliance. All employees have full access to the job post system.

Dimensions of Diversity Newsletter

The value of employee differences is continually reinforced in the *Dimensions of Diversity Newsletter*. This newsletter is an exciting opportunity for Oracle U.S. employees to find out what Oracle is doing in the area of diversity and inclusion. It provides information on upcoming events, webinars, and other opportunities for

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development; information on community outreach; and is the primary employee communication for diversity news.

Job Posting Process

Oracle has fully integrated systems that promote diversity including:

- Online access to Job Posts through the internet and electronic links to Women, Minority, Disability, and Protected Veteran Organizations
- Posting with State Agencies
- Reasonable accommodation for persons with disabilities who may need extra assistance to apply for jobs at Oracle
- Automated Applicant Tracking Workflow & Manager Notification
- Resume and Applicant Tracking Software electronic record keeping

Diverse Recruiting and Hiring

Recruiters at Oracle seek out a diverse slate of candidates when possible by providing managers an expanded base of top quality talent of women, minorities, protected veterans and people with disabilities.

Recruitment resources such as job fairs are available through the recruiting team at Oracle that hiring managers can leverage and recruit from to address affirmative action goals. In addition to recruiting at these fairs, Oracle also promotes Oracle technology, reputation, value, and leaders as speakers on panels branding Oracle as a "Destination Employer/Employer of Choice" for minorities, women, protected veterans, disabled individuals, etc.

Internship Programs, Scholarships and Educational Outreach

Internships at Oracle are a recruitment source that can be used to increase the representation of diverse talent. For example, Oracle's 1-Year Internship Program and Injured Veterans Program have resulted in hires. Both of these programs are serving as diversity pipeline for Oracle. Oracle is also committed to opening access to technology education and closing the digital divide. We provide scholastic scholarships and educational outreach to underrepresented groups majoring in IT-related fields.

Career and Leadership Development Sessions and Conferences

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Career and Leadership development is a tool that can assist with promotions at Oracle. By equipping employees with development opportunities to grow and become more successful, the pool of top talent is expanded and diverse. More employees are available for their next career opportunity. Employees feel valued and supported which in turn increases their commitment to their company. This allows Oracle to keep top diverse talent and to increase it to meet its Affirmative Action goals.

Oracle Women's Leadership (OWL) program is an inclusive program created by women leaders at Oracle. OWL creates local and global opportunities that support, educate, and empower current and future generations of women at Oracle.

Branding, Community Outreach and Sponsorships

Oracle attracts top talent to work at Oracle by participating in community outreach and sponsoring diversity related events. By creating a strong community outreach and sponsorship program Oracle attracts applicants and retains employees that want to know that Oracle not only provides an inclusive environment internally but externally as well. Applicants and employees want to know that Oracle is involved in its communities and shares the differences it makes in all communities.

Cultural Awareness Celebrations

Rather than creating an environment where diversity isn't talked about, Oracle celebrates employee diversity with cultural awareness celebrations. These celebrations assist in increasing cultural awareness at Oracle by breaking down feelings of isolation that can occur due to differences created by race/ethnicity, disability, gender, protected veterans' status, etc. Some of the programs that are celebrated at Oracle are: Black History Month, Gay Pride Week, Hispanic Heritage Month, and Diwali, among others.

REPORTING AND INTERNAL AUDITING SYSTEM

The Director Diversity Compliance is responsible for implementing an effective auditing and reporting system. This includes analyzing the results of employment actions on a regular basis to determine their impact on Oracle's AA/EEO objectives. The Director Diversity Compliance reviews problem areas and progress, communicates with management and legal as appropriate, and makes recommendations regarding annual goals.

Oracle develops and analyzes Internal Audit Reports to assess performance in at least the following areas:

- Applicant Tracking
- Hires
- Promotions
- Terminations
- Compensation

Identification of Problem Areas

Oracle continues to make significant efforts in locating qualified minorities and women, and aggressively pursues qualified candidates in a competitive market. Oracle promotes diversity to attract and employ qualified minorities and women across the nation. Although the overall representation of women and minorities at Oracle is good, African American, Latino, and female utilization in some job groups needs improvement. Improvement of utilization in specific job groups is addressed through the development of recruiting strategies and mentoring programs, and is addressed by organization and location. Additionally, Oracle has a job posting system that makes all available vacancies known to applicants and employees.

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INDIVIDUALS WITH DISABILITIES, VETERANS OF THE VIETNAM ERA AND OTHER PROTECTED VETERANS

General Policy Statement

Oracle is committed to ensuring an environment for all employees that supports and rewards employee performance on the basis of merit and potential. Oracle prohibits discrimination against or harassment of an employee or candidate for employment because of a disability or protected veteran status. This policy is also incorporated into Oracle's overall Equal Employment Opportunity policy.

Oracle makes good faith efforts to attract and retain employees with disabilities, veterans, protected veterans, special disabled and other persons and creates partnerships with community based organizations to create inroads and foster understanding of issues faced by employees and applicants. A current list of partnerships and good faith efforts is available upon request. Applicants and employees are asked to voluntarily identify themselves if they have (or have had) a disability and/or are a protected veteran. Oracle's internal processes encourage consideration of the job qualifications of applicants with disabilities, known disabled veteran applicants, Vietnam Era veteran applicants, and other protected veteran applicants for job vacancies filled through hiring or promotion. Additionally, on at least an annual basis, Oracle reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans and qualified individuals with disabilities.

In offering employment to individuals with disabilities, Oracle does not reduce the amount of compensation offered because of any disability income, pension, or other benefit the applicant or employee receives from another source.

Reasonable Accommodations for Individuals with Disabilities

Oracle provides reasonable accommodations for applicants and employees with disabilities in accordance with individual needs, business realities, and applicable laws and regulations. Examples include, but are not limited to, job retraining, an adjusted work schedule, special equipment or transportation, medical leave or job modification to

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optimize job performance. Additional information about Oracle's reasonable accommodation process and policy are found in Oracle's Employee Handbook.

No Retaliation

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities:

- Filing a complaint or assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of:
 - (1) Section 503 of the Rehabilitation Act of 1973, as amended, its implementing regulations or any other federal, state, or local laws requiring equal opportunity for individuals with disabilities; or
 - (2) the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA) or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, Armed Forces service medal veterans, or other protected veteran; or
- Opposing any act or practice made unlawful by
 - (1) Section 503, as amended, its implementing regulations or any other federal, state, or local laws requiring equal opportunity for individuals with disabilities; or
 - (2) VEVRAA's affirmative action provisions, its implementing regulations, or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, Armed Forces service medal veterans, or other protected veteran; or
- Exercising any other right protected by Section 503 and/or its implementing regulations or VEVRAA and/or its implementing regulations.

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Audit and Reporting System

Oracle evaluates the effectiveness of its affirmative action program by:

- (1) Measuring the effectiveness of its affirmative action program;
- (2) Indicating any need for remedial action;
- (3) Determining the degree to which its objectives have been attained;
- (4) Determining whether disabled individuals and known protected veterans have had the opportunity to participate in all company sponsored educational, training, recreational and social activities;
- (5) Measuring its program's compliance with the affirmative action program's specific obligations;
- (6) Documenting the actions taken to meet its affirmative action obligations and retaining these documents as employment records subject to the recordkeeping requirements of §§ 60-300.80 and 60-741.80; and
- (7) Undertaking necessary action to bring its program into compliance when its affirmative action program is found to be deficient.

Implementation Responsibility

This policy and the company's affirmative action program are supported by Oracle's executives, including Larry Ellison, Chief Executive Officer, Safra A. Catz, President and Chief Financial Officer and Mark Hurd, President. The Director Diversity Compliance has been assigned and given senior management support to manage the overall responsibilities for the implementation of affirmative action activities at Oracle. These responsibilities include monitoring all affirmative action Equal Employment Opportunity activities and reporting the effectiveness of this affirmative action plan, as required by Federal, State, and Local agencies.

Development & Execution of Affirmative Action Programs

Oracle's personnel processes, including processes related to hiring, training and promotions, have been evaluated to ensure freedom from stereotyping protected veterans, disabled, special disabled and other persons in a manner which limits their access to jobs for which they are qualified. Oracle also periodically reviews its personnel processes to ensure this

obligation is carried out, and makes necessary revisions or implements new processes when appropriate.

Oracle will periodically review, including each time a job is posted, the physical and mental job qualifications to assure that they are job related and consistent with business necessity and do not necessarily exclude the disabled from employment opportunities. Information obtained regarding physical and/or mental conditions is maintained on a confidential basis.

Other Implementation of Affirmative Action Programs

- Oracle trains and disciplines personnel involved in recruitment, screening, selection, and promotion to ensure that Oracle's EEO policies are followed.
- Oracle at least twice a year disseminates information about affirmative action policies within the company in order to ensure greater employee cooperation and participation.
- Oracle monitors and reports on the effectiveness of its affirmative action program as a whole and for persons with disabilities, protected veterans, and veterans of the Vietnam era. Where its affirmative action program is found to be deficient, Oracle undertakes appropriate efforts to address deficiencies.

Oracle's Injured Veterans Internship Program

Oracle's Injured Veteran Internship Program is a 1 year paid internship created to enhance the professional and personal development of service members injured in Iraq and Afghanistan.

Oracle's original goal was to transition the interns from the Military into Corporate life by providing them with skills and coaches. Oracle has expanded the goal to transition veterans from interns to regular hires when a job opening is available that fits an intern's particular skills.

Interns are assigned internal coaches who are veterans from the cadre of Oracle managers and each line of business (LOB) that supports the program has an executive sponsor at the VP or above level. Veterans can engage in on the job training across the fields of information technology, technical/systems consulting, technical support, finance, human resources, sales, marketing, financials, and developmental training in sales and customer support.

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Managing Within the Law

Oracle provides all employees with the opportunity to take a course called *Managing within the Law* that provides training on the goals of Oracle's EEO/AA/Protected Veterans and Disabled. This course focuses on educating participants on the lawful treatment of employees at Oracle.

Online EEO/AA/ Compliance Training

Oracle expects all managers to be familiar with its EEO policy and practices, including Disabled and Protected Veterans AAP compliance. This online training is accessible to all employees.

Any employee who believes Oracle has not fulfilled its obligation under Section 503 of the Rehabilitation Act, the Vietnam Era Veteran Readjustment Assistance Act, or the Americans with Disabilities Act may file a complaint with Human Resources, or the Director Diversity Compliance.

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