

OFCCP V. ORACLE AMERICA, INC.
OALJ CASE NO. 2017-OFC-00006
OFCCP No. R00192699

DEPOSITION ERRATA SHEET FOR THE DEPOSITION OF
KATE WAGGONER, TESTIFYING ON BEHALF OF ORACLE AMERICA, INC.
TAKEN ON July 19, 2019

| PAGE(S): LINE(S) | CURRENT TEXT | CORRECTED TEXT | REASON FOR CHANGE |
|-----------------------------|---|--|--------------------------|
| 9:8-11 | A. I have -- I actually recently just gained a large team from Romania, so I have another 24 that I don't even know their names yet, because I've been on vacation the last couple of weeks. | A. I have -- I actually recently just gained a large team from Romania, so I have another 24 that I don't even know their names yet, because I've been on vacation the last couple of weeks. | Transcription error. |
| 9:13-17 | A. But my -- my main direct reports for the last many years at Shannon Montgomery, Nicki Hussain, Qwynh Phan, Kris Crawford, and Amie Santone, and they all take care of -- they all handle one of those different areas. | A. But my -- my main direct reports for the last many years are Shannon Montgomery, Nicki Husain, Quynh Phan, Chris Crawford, and Amie Santone, and they all take care of -- they all handle one of those different areas. | Correction for accuracy. |
| 16:17-18 | A. I reviewed it in detail yesterday in written, but we reviewed it over the phone on Monday. | A. I reviewed it in detail yesterday in written form, but we reviewed it over the phone on Monday. | Correction for accuracy. |
| 60:16 | Sometimes maybe, never. | Sometimes? Maybe? Never? | Correction for accuracy. |
| 74:10-13 | A. Those -- those other ones typically are compensation -- there are compensation people involved, and then we get maybe subject matter experts from HR, maybe our HR comms team. | A. Those -- those other ones typically are compensation -- there are compensation people involved, and then we get maybe subject matter experts from HR, maybe our HR communications team. | Correction for accuracy. |

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| 80:22-25 | More recently, we have moved from this PowerPoint platform to a different -- a different, a little more tech -- more technical and more -- just, we moved it to today's instead of 2011. | More recently, we have moved the training from PowerPoint slides to a new platform that is more technologically advanced and user friendly. | Correction for clarity. |
| 86:17 | A. Or -- or -- and position and range. | A. Or -- or -- and position in range. | Transcription error. |
| 89:16-20 | But since we have moved it to an On Demand, and so all of the modules themselves are available to managers in their time at their -- basically, on - - when they need it, and so we don't have a person behind it. | But since we have moved it to on demand, and so all of the modules themselves are available to managers in their time at their -- basically, on -- when they need it, and so we don't have a person behind it. | Correction for accuracy. |
| 99:18-22 | So we -- we set our foundation and our -- and the basics first and then face -- and that was -- for budgetary reasons, we -- we could only bite off a little bit last fiscal year, and then this fiscal year well go on in a little bit more detail. | So we -- we set our foundation and our -- and the basics first and then phase -- and that was -- for budgetary reasons, we -- we could only bite off a little bit last fiscal year, and then this fiscal year well go on in a little bit more detail. | Transcription error. |

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| 108:20-25 | And in return, we get data back on our peer groups. And so we -- we can find, from that market data, a software developer 3 in -- and again, location plays a huge role in this, but software developer 3 in the Bay Area, compared to our 26 peers, has peer companies, has a market 50 th percentile of X dollars. | And in return, we get data back on our peer groups. And so we -- we can find, from that market data, a software developer 3 in -- and again, location plays a huge role in this, but software developer 3 in the Bay Area, compared to our 26 peers, Oracle has peer companies, has a market 50 th percentile of X dollars. | Correction for accuracy. |
| 109:10-12 | So in -- in that range could be the software developer 3, the HR consultant for the legal person 3 or -- or the IT person M-2. | So in -- in that range could be the software developer 3, the HR consultant 4, the legal person 3 or -- or the IT person M-2. | Transcription error. |
| 131:11-13 | A. But they do have to - - I mean, their next-level is going to ask and the CEO office would ask, "This is outside of range, why not?" | A. But they do have to -- I mean, their next-level is going to ask and the CEO office would ask, "This is outside of range, why?" | Correction for accuracy. |
| 266:6-7 | A. So the very top level pool, as I said, is decided with our CEO in finance. | A. So the very top level pool, as I said, is decided with our CEO and Finance. | Transcription error. |
| 312:5-9 | A. So the factors to give a raise, they -- position and range, whether there's an increase -- if there's a -- in a transfer, maybe it is somebody who is -- who is applying for a higher-level position and they've been selected for a higher-level position. | A. So the factors to give a raise, they -- position in range, whether there's an increase -- if there's a -- in a transfer, maybe it is somebody who is -- who is applying for a higher-level position and they've been selected for a higher-level position. | Transcription error. |

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| 316- 317:23-1 | A. There is a team of people. They -- there is someone on my team, the -- Nicki Hussain, I mentioned her earlier. Nicki is the global consultation M&A consultant. | A. There is a team of people. They -- there is someone on my team, the -- Nikki Husain, I mentioned her earlier. Nikki is the global Compensation M&A consultant. | Correction for accuracy. |
| 317:12-18 | So they -- Nicki's job is to gather the information on all of the compensation-related offerings at -- at a company, and then as a team and as a committee, they decide how they're going to go about, you know, whether base salaries might be necessary for them or some sort of equity to buy out some sort of bonus that's going to go away. | So they -- Nikki's job is to gather the information on all of the compensation-related offerings at -- at a company, and then as a team and as a committee, they decide how they're going to go about, you know, whether base salary increases might be necessary for them or some sort of equity to buy out some sort of bonus that's going to go away. | Correction for accuracy. |

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| 319:6-15 | If, for example, they are paid at the 90 th percentile of the India midpoint, the starting reference point for their HQCA salary would be about -- it would be the 90 th , but then on top -- that's where you would start, and then you would look at where -- who's the internal peer group, who is going -- who -- who does -- who comes with the same -- is on our team already with a similar background, skills, experience, competencies, and performing the same duty at the same -- the same duties at the same level. | If, for example, they are paid at 90% of the India midpoint, the starting reference point for their HQCA salary would be about 90% of that midpoint. That's where you would start, and then you would look at who's the internal peer group on our team with similar background, skills, experience, competencies, and performing the same duties at the same level. | Correction for clarity. |
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I believe that the transcription of my July 19, 2019 deposition is correct, subject to the changes listed in this errata sheet.

Date: 21e Aug 2018


Kate Waggoner