



Country of Origin Compliance Procedure

Document Number and Revision: 917-1973 Rev 11

Overview

This document describes Oracle's country of origin management system, including supporting documentation, templates, and contacts.

Audience

This document is for Oracle's suppliers, Oracle's Repair Vendors and for anyone dealing with managing suppliers.

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Introduction

This Oracle Country of Origin compliance procedure ensures that Oracle has the necessary Country of Origin compliance information from External Manufacturers (EM), Original Equipment Manufacturers (OEM), distributors, repair vendors and other suppliers of hardware products to Oracle. All these types will be referred to as Suppliers.

All Suppliers must complete a Country of Origin statement and these Country of Origin statements must be stored in a centralized source for Country of Origin information. Oracle has selected the Edinburgh Chamber of Commerce as a central repository/source for the Country of Origin information. Country of Origin statements must be provided before first shipment of New Product Introduction (NPI), when the supplier is shipping products on Oracle's behalf, when a supplier or Country of Origin changes, or when the part is repaired or remanufactured.

Each sovereign state or trading group applies its own interpretation of Country of Origin. It must be ensured that only applicable local rules are applied, unless contractual requirements specify otherwise within the framework of the applicable law of the contract.

Where separate regulations are in place for preferential and non-preferential Origin Oracle only requires information and marking to satisfy the non-preferential criteria.

Definitions

Assemble to Order Product (ATO): made to order products typically after the customer has configured their system from an ATO model family. Only the ATO Model family marketing part number is recorded on the Country of Origin statement.

Pick to Order Product (PTO): components and subassemblies are manufactured and assembled, being held in stock until an order is made.

Field Replaceable Unit (FRU), Customer Replaceable Units (CRU), and Spares: component or sub-assemblies used to service/repair customer equipment. Oracle identifies an item as a Spare/FRU/CRU with the Fusion "Spare" Field with a value of "Spare-Physical", "Spare-Packaged", "Spare-Orderable" (Spare Marketing part number) or "Spare-SKU".

Description: Use the Oracle part description as listed Fusion/Supplier Portal Item or use BOM lookup

Country of Origin: use the ISO designator where the item that is sold to Oracle is manufactured. Country of Origin marking must be noted in ISO 3166-1 **alpha-2 code** format (2 character country code). For example: "United States" or "USA" must be noted as "US" on the Country of Origin statement.

Requirements

All Suppliers shipping product on Oracle's behalf shall:

- have an annual Country of Origin employee training program that includes understanding and compliance to Oracle's latest specifications and requirements including ISO 3166-1;
- submit the Country of Origin statement for every part number to the Edinburgh Chamber of Commerce before the first shipment occurs;
- have an internal system to verify the Country of Origin statements has been submitted to the Edinburgh Chamber of Commerce before any product part number is shipped;
- have a method to semi-annually self-audit all product part numbers have Country of Origin statements on file with the Edinburgh Chamber of Commerce;
- update and submit the Country of Origin statements when the product part number manufacturing country has changed;
- for every shipment, validate each item Country of Origin on the physical part, bag or box label, commercial invoice, packing list are the same before releasing the shipment. If any errors are detected by the carriers, agents, auditors, customs officials or Oracle, the Supplier must correct the labels and/or documents within one (1) business day and Supplier may be subject to any applicable penalties or fines incurred.

Completing the Country of Origin Statement

Use the Country of Origin statement (Template No: PROC-10107) to record all relevant Supplier details, as applicable to the supply contract. For details, refer to Country of Origin statement example.

The Country of Origin statement records all relevant part numbers, part descriptions and Country of Origins for each part listed. When listing part numbers, provide the part number information as applicable to the product types noted in Definitions section.

The supplier must ensure that part numbers, description and Country of Origin on the product must match those on the finished goods packaging and on any associated shipping documentation.

Where a part number has more than one Country of Origin, each part number/Country of Origin combination must have a separate line on the statement.

Please refer to process document 950-1419 Specification of Identification Labels for Packaged finished Goods and 950-4477 Identification, Labeling, and Bar-coding Standards for Assemblies.

The part number information required is as follows:

ATO product: Provide the marketing part number (Orderable part number), Oracle part description and Country of Origin of the product.

PTO Product: Provide the marketing part number (Orderable part number), the manufacturing part number, Oracle part description and Country of Origin of the product.

FRU or Spare product: Provide the marketing part number (Orderable part number), the manufacturing part number, the FRU or Spares physical part number (Primary in-box part number), Oracle part description and Country of Origin of the product.

Please refer to process document 950-1419 Specification of Identification Labels for Packaged finished Goods and 950-4477 Identification, Labeling, and Bar-coding Standards for Assemblies.

Example box labels in the below section showing the location of part numbers and country of Origin, and the relationship between the product label and the Country of Origin statement.

As shown in the examples, Country of Origin marking on the label must be noted on the Country of Origin statement using the ISO 3166-1 **alpha-2 code** format, (2 character country code). For example: "United States" will be noted as US on the Country of Origin statement.

ATO label example

Marketing Part Number	Manufacturing Part Number	FRU or Spare Physical Part Number	Description	Country of Origin
▲ 7602446			X10-2c Compute Optimized Rack Enclosure, 17 Servers: model family	US ▲

Marketing part number (Orderable ATO number)

7602446

PN: 7602446-16327

SN: 2244FT0123

VN: 27499

BOX 1 of 1

DOM (NSX): 2022-10-31

ASSEMBLED IN: UNITED STATES

PTO label example

Marketing Part Number	Manufacturing Part Number	FRU or Spare Physical Part Number	Description	Country of Origin
▲ 7113875	7019836 ▲		10 GBase QSFP Transceiver	SG ▲

Marketing part number (Orderable number)

7113875

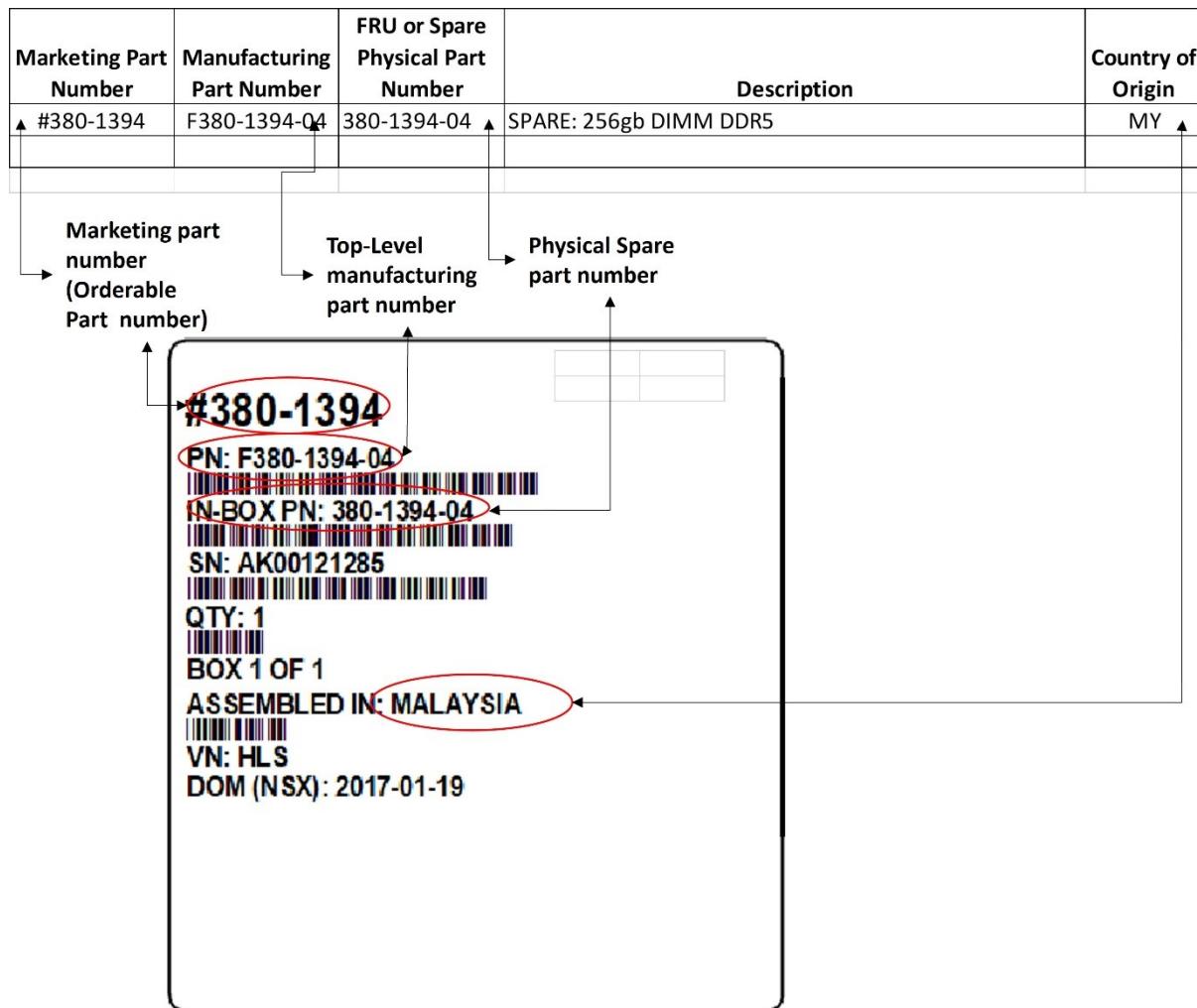
PN: 7019836

IN-BOX PN: 7012387

SN: 465767J+1117Q136C2

QTY: 1 ASSEMBLED IN: SINGAPORE

VN: 465767-0551 DOM (NSX): 2017-03-08

Spares label example

Alternate label example

In some cases, labels may contain more than 1 marketing part number (orderable part number) all referring to a single manufacturing part number. In these cases, each orderable part number must be listed on a separate line as indicated in the example below.

Marketing part numbers (Orderable numbers)

Marketing Part Number	Manufacturing Part Number	FRU or Spare Physical Part Number	Description	Country of Origin
7601130	8202411		Oracle MICROS Tablet 721P with 7-inch display, payment device mount compatible, 4 GB RAM, 64 GB flash, MSR, Li-polymer battery, and Windows 10 IoT Enterprise 2019 LTSC	→ MY
7601158	8202411		Spare: Oracle MICROS Tablet 721P with 7-inch display, payment device mount compatible, 4 GB RAM, 64 GB flash, MSR, Li-polymer battery, and Windows 10 IoT Enterprise 2019 LTSC	→ MY
7602057	8202411		Oracle MICROS Tablet 721P with 7-inch display, payment device mount compatible, 4 GB RAM, 64 GB flash, MSR, Li-polymer battery, and Windows 10 IoT Enterprise 2019 LTSC. Includes Oracle 3-year warranty	→ MY

Top-Level manufacturing part number

7601130 / 7601158 / 7602057
PN : 8202411
SN : 2176BAC20045452
QTY : 1 ASSEMBLED IN : MALAYSIA
VN : 24266 WO: 7255372 DOM(NSX): 2022-06-29

Submitting the Country of Origin statement

Ensure that the Country of Origin statement is signed by an authorized person.

The Country of Origin statement submission is electronic.

Send (email) the completed and signed portable document format (PDF) Country of Origin statement to the Origin Declaration Officers and Oracle COO Team Members alias (coo_compliance_grp@oracle.com) listed in the “Contacts” section of this document. Also attach the spreadsheet list of part numbers, descriptions and Countries of Origins.

Example Country of Origin statement template (Template No: PROC-10107)

The examples below demonstrate completed Country of Origin statements using the part numbers and descriptions from the label examples.

Example 1: Country of Origin statement template

The undersigned supplier certifies that the Country of Origin of the product/s as listed hereunder is as specified against product entry, such Country of Origin having been determined by the application of the rules of Country of Origin as officially adopted by our sovereign state.

This Country of Origin is based on the current manufacturing / process composition of each product as listed and supplied and will continue in force until such time as the undersigned supplier advises of any change in the manufacturing / process composition of any listed product.

Under this Statement of Origin, the undersigned supplier shall inform the Edinburgh Chamber of Commerce and Enterprise of any changes to the manufacturing or processing composition of products.

Marketing Part Number	Manufacturing Part Number	FRU, CRU or Spare Physical Part Number	Marketing Description	Country Of Origin
7602446			X10-2c Compute Optimized Rack Enclosure, 17 Servers: model family	US
7113875	7019836		10 GBase QSFP Transceiver	SG
#380-1394	F380-1394-04	380-1394-04	SPARE: 256gb DIMM DDR5	MY
7601130	8202411		Oracle MICROS Tablet 721P with 7-inch display, payment device mount compatible, 4 GB RAM, 64 GB flash, MSR, Li-polymer battery, and Windows 10 IoT Enterprise 2019 LTSC	MY
7601158	8202411		Spare: Oracle MICROS Tablet 721P with 7-inch display, payment device mount compatible, 4 GB RAM, 64 GB flash, MSR, Li-polymer battery, and Windows 10 IoT Enterprise 2019 LTSC	MY
7602057	8202411		Oracle MICROS Tablet 721P with 7-inch display, payment device mount compatible, 4 GB RAM, 64 GB flash, MSR, Li-polymer battery, and Windows 10 IoT Enterprise 2019 LTSC. Includes Oracle 3-year warranty	MY

Supplier:

Mr. C Chambers

Signed for and on behalf of

Supplier name: Widgets Incorporated

Signatory Name: Mr. C. Chambers

Address: 12100 N Thornydale Rd, Marana, AR 85658, US

Title: Chief Compliance Officer

Date: 14 February 2023

Example 2: Country of Origin statement template (Repair Vendor Submission)

The undersigned supplier certifies that the Country of Origin of the product/s as listed hereunder is as specified against product entry, such Country of Origin having been determined by the application of the rules of Country of Origin as officially adopted by our sovereign state.

This Country of Origin is based on the current manufacturing / process composition of each product as listed and supplied and will continue in force until such time as the undersigned supplier advises of any change in the manufacturing / process composition of any listed product.

Under this Statement of Origin, the undersigned supplier shall inform the Edinburgh Chamber of Commerce and Enterprise of any changes to the manufacturing or processing composition of products.

Marketing Part Number	Manufacturing Part Number	FRU, CRU or Spare Physical Part Number	Marketing Description	Country Of Origin
		380-1394-04	SPARE: 256gb DIMM DDR5	MY
		7010135	DR,3TB,3.5"SAS/7200,StingRay	SG, TH
		7010282	DRV,SEA,300GB,SAS,15K5	SG
		7010283	DRV,SEA,300GB,FCAL,15K5	SG
		7011782	ROBOT ASSY, SL3000	HU

Supplier:

Mr. C Chambers

Signed for and on behalf of

Supplier name: Repair Specialists

Signatory Name: Mr. C. Chambers

Address: 12100 N Round Rd, Marana, AR 85658, US

Title: Chief Compliance Officer

Date: 14 February 2023

Country of Origin Contacts

Address all questions and concerns first through your normal Oracle Materials Acquisition, Logistics, or Supplier Engineering contact.

You can get further help and support from your local Country of Origin authority, or the Edinburgh Chamber of Commerce.

There can be exceptions when you or your Oracle contact requires further information. Your Oracle contact can reach the appropriate Oracle Country of Origin experts, as shown in the table below:

Activity	Name	Email	Phone
Edinburgh Chamber of Commerce & Enterprise Origin declaration officer	Yvonne Alexander	yvonne.alexander@edinburghchamber.co.uk	+441313572736
Edinburgh Chamber of Commerce & Enterprise Origin declaration officer	Annette Kinghorn	Annette.Kinghorn@edinburghchamber.co.uk	+441312212984
Edinburgh Chamber of Commerce & Enterprise Origin declaration officer	Chloe Robertson	chloe.robertson@edinburghchamber.co.uk	
Global Customs Director	Peter Hull	Peter.Hull@Oracle.com	+441506672741
Global Customs Director	Linda Waney	Linda.Waney@Oracle.com	+17197572104
Oracle Country of Origin Support Team	COO Team Members	coo_compliance_grp@oracle.com	Not Available

Document History and Approvals

Dash	Rev	Date	Description of Change	Originator
01	A	28 Apr 2003	Initial Release.	N/A
02	A	29 Dec 2008	Updated contact info and specifications.	N/A
03	A	02 Nov 2011	Updated references to Oracle. Made minor simplification in some wording. Updated contact details.	N/A
Agile History				
Rev	Date	Description of Change		Originator
04	28 Oct 2014	Simplified Declaration templates, added Appendix E documenting process for managing parts without declaration.		N/A
05	26 Nov 2014	Corrected Table of Contents. Changed 1 of "X" to "x" of "n" on Origin form page 12 and continuation sheet page 13. Simplified instruction on page referencing in Origin form table page 12. Added note to page 11 in Appendix B bullet 2 at end of paragraph to refer to continuation sheet.		N/A
06	30 Sep 2015	Updated contacts' names in Section 2.3 and Appendix C. Updated title of 950-1419.		N/A
07	7 Dec 2016	Replaced WWOps Supply Chain references to Global Supply chain.		N/A
Fusion History				
08	09 Dec 2021	Extended to cover repair vendor, used wording Statements of Origin consistently throughout. Updated		N/A

Country of Origin Compliance Procedure

		ECC contact emails and telephone number removed reference to Fax. References to Commercial Invoice and pricing illustrations removed. Specific reference to supplier types added.	
09	22 Feb 2023	Procedure re-written. Kept the number and the titles changed.	N/A
10	14 Jun 2024	Added: New Edinburgh Chamber of Commerce contact. Removed postal mail submission requirement. Spec applies to suppliers shipping product on Oracle's behalf. Suppliers must verify COO statement has been submitted before shipping product. Added Repair Vendor Template Example. Added COO support team alias.	N/A
11	8 Jan 2025	Consolidated all requirements and created a Requirements section which includes supplier employee training, when to submit the first COO statement, internal verification and internal audit requirement, update and validation requirements.	N/A

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