Offer Packet Content

READ ME FIRST

The Offer Packet contains the following documents documents for your review

1) Disclosure of Interest - Return to Local HR on Start Date
2) Code of Ethics - For your Information Only.

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DISCLOSURE OF INTERESTS
-CONFIDENTIAL-

(This form should be used to list the interests of Oracle employees where such interest may potentially lead to any conflict between the Interests of the employee and the business of Oracle Corporation, its subsidiaries or partners)

TO: General Counsel, ORACLE ASIA PACIFIC
FAX: +61.2.9900.1615

This Disclosure of Interests is made by:

Name: LOCATION

JOB TITLE: REPORTING TO:

EMPLOYER CORPORATION: **ORACLE INDIA PRIVATE LTD**

CONTACT DETAILS: TEL:
                    FAX:
                    EMAIL-ID:

SCHEDULE 1
(All of your personal interests, such as shareholdings in organisations with which Oracle is or may be likely to do business; partnerships; appointments to any Board of Directors or a holding of any other office by you which may give rise to a conflict of interest with Oracle's business)

SCHEDULE 2
(Include all known interests of family, close personal friends and relatives, and other persons as known to you who may derive a benefit or entitlement from doing business with Oracle where that benefit or entitlement is connected in any way with, and which may conflict with the performance of your duties or employment with Oracle)

The contents of this Disclosure of Interest are complete and to the best of my knowledge and belief are fully accurate at the date of signing. I understand that if any other interest or matter not disclosed above arises whilst I am employed by Oracle, I will promptly update this Disclosure of Interest and provide it to my Senior Manager.

SIGNED: ……………………………..   DATED: ………………………..

CODE OF ETHICS
AND BUSINESS CONDUCT

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Dear Oracle Employee:

As an Oracle employee, you are an influential part of a global organization with a worldwide presence. We are leaders of our industry because we quickly adapt to changes in a competitive, dynamic environment while adhering to business values that go well beyond minimal legal requirements. As such, every employee globally is expected to review and comply with *The Oracle Code of Ethics and Business Conduct*.

The Oracle Code of Ethics and Business Conduct is one of Oracle's most important documents. The Code defines standards and references policies and resources throughout to help you understand Oracle's business values and your responsibilities. Read it carefully and in its entirety. Keep it with you and reference it frequently as a guide to help you make the right decisions and locate important sources of information. Although the Code makes it easy for you to understand your obligations, it cannot anticipate every ethical dilemma you may face. Ultimately, we are each individually responsible for asking questions if we do not understand how to handle a particular situation. Remembering that we are personally accountable for our actions, all Oracle employees are expected to adhere to the standards described in this Code. Oracle will not tolerate retaliation against any employee who in good faith reports misconduct or cooperates with a compliance investigation.

Our reputation and our success depends upon the personal commitment that each of us makes to uphold Oracle's values and practice ethical behavior in all of our business dealings. All of us, regardless of employment level, position, or geographic location, are expected to make this commitment daily, both individually and collectively, to uphold the standards of business conduct outlined in this Code.

Lawrence J. Ellison
Chief Executive Officer

The Oracle Code of Ethics and Business Conduct

Oracle provides you with *The Oracle Code of Ethics and Business Conduct* (the "Oracle Code" or the "Code") for guidance in addressing the legal and ethical issues encountered while conducting Oracle business. We use "Oracle" throughout to refer to Oracle Corporation and each of its subsidiaries.

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 organization-wide standards set forth in this Code. This Code is not a contract, and no contract is implied. If any part of this Code conflicts with applicable law, the law will prevail. If any part of this Code is deemed invalid, the validity and enforceability of its other provisions shall not be affected. Oracle may interpret the Code at its sole discretion.

Oracle recognizes and respects regional and local legal differences in employment, privacy, and other applicable laws. We will comply with regional and local requirements concerning the matters discussed in this Code, as appropriate, including those concerning use of the Compliance and Ethics Helpline/reporting of misconduct, employee monitoring, application of certain rules to temporary employees, and application of certain penalties.

Understanding this Code

The Oracle Code sets forth Oracle's standards of ethics and business conduct. It has been prepared to aid you as you go about your daily work. These standards supplement and may go well beyond compliance with laws and regulations.

Although we operate in many countries and are subject to many different rules, regulations, customs, and practices, we can only succeed if we adhere to a common set of values and standards. It is essential that we each make a personal commitment and recognize that we are responsible and accountable for understanding and meeting the standards described in this Code because Oracle's success and reputation depend upon the performance of each of us.

The Oracle Code starts with a summary of the core business values that are essential to Oracle's success. They are the foundation of all that we do, and we each are expected to adopt these values in our day-to-day business activities. Widespread adherence to these values will enhance our long-term success by improving our ability to serve customers, increasing our competitiveness, and promoting our pride in being part of the Oracle team.

The Oracle Code then describes how we should interact with each other, with other companies and individuals, and with the countries, cultures, and governments that make up the world in which we operate. Specifically, it addresses four areas:

- **Compliance:** Our responsibility to abide by the laws, regulations, and Oracle policies that apply to our business wherever we operate.

- **Business Conduct:** Our obligation to conduct internal and external business fairly and ethically.

- **Oracle's Relationships:** Our responsibility to interact fairly and respectfully with each other, our customers, our partners, our suppliers, and our host communities.

- **Enforcement:** Our commitment to conduct investigations in an ethical and legal manner, and to promote consistent disciplinary action for violations of our policies or business conduct standards.

Applicability of This Code

Employees

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, "employees").

Oracle Senior Officers and Non-Employee Members of the Oracle Corporation Board of Directors

Oracle's senior officers (Chief Executive Officer, President(s), Chief Operating Officer, Chief Financial Officer, Chief Accounting Officer, General Counsel, each Executive Vice President, and each Senior Vice President) are subject to both this Code and Oracle's Supplemental Conflict of Interest Policy for Senior Officers, which among other things contains certain supplemental procedural measures designed to identify and address potential conflicts of interest involving senior officers. Non-employee directors are also subject to this Code in their capacity as members of the Oracle Corporation Board of Directors (the "Oracle Board"), except that they 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. The Supplemental Conflict of Interest Policy for Senior Officers and the Corporate Governance Guidelines are

posted on the Corporate Governance section of Oracle's Investor Relations Web site. Senior officers and members of the Oracle Board who have questions regarding this Code or other relevant policies should contact Oracle's General Counsel.

Any waiver of this Code for any executive officer of Oracle Corporation or member of the Oracle Board must be approved by the Oracle Board. Such waivers, and the reasons for such waivers, shall be promptly disclosed to Oracle's stockholders.

A Summary of Oracle Values

Certain core values comprise the foundation of our company. The following are essential to Oracle's business:

Integrity

Oracle employees demonstrate honesty and sound ethical behavior in all business transactions and personal integrity in all dealings with others.

Mutual Respect

Oracle employees consistently treat individuals with respect and dignity.

Teamwork

Oracle employees work together as a team for the collective interests of Oracle.

Communication

Oracle employees share information effectively with each other. We balance the need to share information alongside the need for confidentiality regarding certain information.

Innovation

Oracle employees seek innovative and creative approaches to problem solving.

Customer Satisfaction

Oracle employees consistently treat customer satisfaction as a top priority.

Quality

Oracle employees make excellence and quality a part of day-to-day work processes and seek continuous improvement in all that they do.

Fairness

Oracle employees commit to dealing fairly with customers, suppliers, partners, and one another.

Compliance

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

Ethics

Oracle employees observe the standards that have been established by Oracle and act ethically in their approach to business decisions.

COMPLIANCE

Compliance with Laws, Regulations, and Oracle Policies

We must each operate within the bounds of all laws, regulations, and internal policies applicable to Oracle's business, wherever we conduct it. Where local laws are less restrictive than this Code, you must comply with the Code, even if your conduct would otherwise be legal. On the other hand, if local laws are more restrictive than the Code, you must always, at a minimum, comply with those laws.

Oracle expects its employees to:

- Act ethically and with integrity in all business dealings;

- Comply with the law, this Code, Oracle policies, and Oracle business practices;

- Report known or potential violations using available reporting channels;

- Cooperate with compliance investigations; and

- Complete all mandatory compliance education courses and other Compliance and Ethics Program requirements in a timely manner.

Further, Oracle expects its managers to:

- Promote and support ethical behavior and business practices that comply with this Code;

- Act as a leadership model for this Code;

- Ensure that employees who report to them directly or indirectly understand where and how to report violations of this Code;

- Ensure that employees who report to them directly or indirectly complete all mandatory compliance education courses and other Compliance and Ethics Program requirements in a timely manner;

- Maintain an "open door" policy with regard to employee questions, including those of business conduct and ethics, and ensure availability of compliance and ethics resources and support, such as printed materials and relevant contact information;

- Encourage employees to challenge and report questionable conduct; and

- Encourage open, honest, and confidential dialogue without retaliation.

From time to time, we may revise this Code. If and when this happens, Oracle will notify you. You will then be responsible for becoming familiar with such revisions. For the most current version, always refer to the online Code, located on the Compliance and Ethics Program Web site. If you have questions on how to interpret or comply with this Code, Oracle policies, or applicable law, contact the Oracle Compliance and Ethics Program or Oracle Legal Department.

Where to Go for Help

The Oracle Compliance and Ethics Program

The Oracle Compliance and Ethics Program, with the support of Oracle's Executive Management and Board of Directors, aims to ensure that all Oracle employees, business partners, and suppliers adhere to high ethical business standards.

With general oversight from the General Counsel, the Compliance and Ethics Program is led globally by the Chief Compliance & Ethics Officer. Regional Compliance & Ethics Officers manage day-to-day operations of the Compliance and Ethics Program, including Code of Conduct investigations, and apply the Compliance and Ethics Program's initiatives at the regional level.

A major objective of the Compliance and Ethics Program is the enforcement of the *Oracle Code of Ethics and Business Conduct* and related policies. We work closely with other lines of business and outside advisors, as appropriate.

The Oracle Compliance and Ethics Program:

- Provides support to help employees comply with the *Oracle Code of Ethics and Business Conduct;*
- Seeks to prevent and detect unlawful or unethical business conduct;
- Manages the administration of mandatory compliance education training courses;
- Oversees internal compliance investigations;
- Promotes consistency in the application of disciplinary action;
- Provides quarterly updates to the Finance and Audit Committee of Oracle's Board of Directors regarding investigations and disciplinary action taken; and
- Provides the entire Board of Directors with a full briefing on the Compliance and Ethics Program at a minimum annually.

Please visit the Oracle Compliance and Ethics Program Web site, which can be found through the Oracle Legal Department Web site, to become familiar with our policies, training requirements, and periodic updates.

We count on each of you to set the right tone and lead by example.

Reporting Code Violations

Oracle fully commits to maintaining high standards of ethical and professional conduct for the company and its employees. To do so, we provide multiple resources for reporting, investigating, and resolving allegations of employee misconduct as well as for determining and enforcing related disciplinary action. Report any conduct that you reasonably believe may be a violation of this Code and other activities that could affect Oracle's or its employees' compliance with legal and ethical obligations. If at any time you have even a suspicion that Oracle's obligations relating to financial integrity, auditing and accounting, insider trading, anti-corruption policies, or political contributions have been compromised, you are expected to immediately report it.

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 found to be unsubstantiated.

You have multiple options for reporting allegations of misconduct. Depending on the circumstances, these include:

- Your manager;
- Human Resources;
- Your Regional Compliance & Ethics Officer;
- The Chief Compliance & Ethics Officer;
- Your employee representative (where applicable);
- The Oracle Compliance and Ethics Helpline: and
- The Oracle Compliance and Ethics Incident Reporting Web site.

Regional Compliance & Ethics Officers and other Compliance and Ethics Program contacts are listed on the Oracle Compliance and Ethics Program Web site.

Q: My manager asked me to do something that I think violates this Code. Should I do it anyway?

A: No. First, make sure that your manager knows you are concerned and that there is not a misunderstanding. If that doesn't resolve the problem, you should seek advice from your next-level manager or your Regional Compliance & Ethics Officer. The wrong answer is to do nothing or to simply follow your manager's request. Disciplinary action will be taken against any employee who is found to have participated in, condoned, or concealed an actual or potential violation of the Code, even if he or she did not directly initiate it.

The Oracle Compliance and Ethics Helpline and Incident Reporting Web site

If you feel uncomfortable reporting a concern to your manager, Human Resources, or a member of the Compliance and Ethics Program, or if you feel that your concern has not been addressed properly, you also may report allegations anytime via telephone, using the Oracle Compliance and Ethics Helpline, or online, through the Oracle Compliance and Ethics Incident Reporting Web site. Both the Helpline and the Incident Reporting Web site are confidential resources available to all Oracle employees worldwide to raise concerns or seek guidance regarding issues of ethics and business conduct and violations of our Code. The Oracle Compliance and Ethics Incident Reporting Web site is accessible through the Compliance and Ethics Program Web site.

To submit a telephone report, dial the Helpline at 800-679-7417. To submit a report regarding a facility or employee based in the European Union, dial the EU Helpline at 866-455-1215. When calling 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. You may find your country's access code at http://www.usa.att.com/traveler/index.jsp.

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, and the Incident Reporting Web site is available in multiple languages. The Helpline does not record or trace calls, and the Incident Reporting Web site does not use any identity tracking technology.

You may remain anonymous where permitted by local law, whether you call the Helpline or use the Incident Reporting Web site. Certain jurisdictions limit topics that may be reported anonymously through the Helpline or Incident Reporting Web site. Oracle's processes incorporate any local limitations, and the Helpline and Incident Reporting Web site alert employees from affected countries if special reporting rules apply to them.

When you report incidents through the Helpline, an operator will ask questions to better detail your concerns and then will document the call. Web site reports are forwarded directly to Oracle without review or modification. In either case, you will receive a report number, which you can use later to add details or to check the status of your report.

The Helpline is operated by a third-party service provider in the United States, and reports to the Helpline and Incident Reporting Web site are provided to the Oracle Compliance and Ethics Program for investigation and processing. All reports are handled in accordance with Oracle's Internal Privacy Policy, which is available on the Oracle Legal Department Web site.

Business Practices

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 competitors against unfair business practices and to promote and protect healthy competition. Oracle commits rigorously to observing applicable antitrust or competition laws of all countries or organizations.

Q: At a trade association meeting, you overhear an informal group of Oracle competitors discussing future product pricing. May you join the conversation to gain some excellent competitive intelligence?

A: No. Oracle is only interested in competing honestly and fairly.

You must avoid all discussions and the exchange of information with competitors involving topics such as pricing, supplier or customer relationships, or market allocation, because they are, in fact, illegal. Disassociate yourself from any such discussions immediately and report the incident to the Oracle Legal Department.

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

• Fix or control prices;

• Structure or orchestrate bids to direct a contract to a certain competitor or reseller (bid rigging);

• Boycott specified suppliers or customers;

• Divide or allocate markets or customers; or

• Limit the production or sale of products or product lines for anti-competitive purposes.

Agreements of the type listed above are against public policy and are against Oracle policy. Employees must never engage in discussions of such matters with representatives of other companies. You should report to the Oracle Legal Department any instance in which other companies initiate such discussions.

Contracts or other arrangements that involve exclusive dealing, tie-in sales, price discrimination, and 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.

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

Unfair methods of competition and deceptive practices are also prohibited. Examples of these include:

• Making false or misleading representations about Oracle's products;

• Falsely disparaging a competitor or its products;

• Making product claims without facts to substantiate them; and

• Using another company's trademarks in a way that confuses the customer as to the source of a product.

Because of the complexity of antitrust and competition laws, seek advice from the Oracle Legal Department on any related question.

No Improper Payments

You are prohibited from receiving, offering, promising, authorizing, directing, or making any bribes, kickbacks, or payments of money or anything of value to improperly obtain business or any other advantage for Oracle or yourself.

The above prohibition applies whether such payments go to:

• Government or public international organization employees or officials;

• Political parties or candidates for political office;

• Business entities partially or wholly owned by government interests;

• Privately-held commercial companies;

• Oracle employees; or

• Any other third party.

Oracle strictly prohibits giving money or anything of value directly or indirectly to a government official for the purpose of corruptly influencing a foreign government. This prohibition includes corruptly giving money or anything of value to any third party where there is reason to believe that it will be passed on to a government employee or official. Refer to the "Dealing with Government" section for more information regarding government entities.

For more information, refer to Oracle's Anti-Corruption Policy, located on the Compliance and Ethics Program Web site.

Q: An Oracle partner offers me a percentage of the partner's margin in exchange for encouraging a major customer to purchase the partner's services and products. Can I accept such a payment?

A: No. This is a kickback, which is prohibited by Oracle's Code of Conduct and Anti-Corruption Policy. Both the Code of Conduct and Oracle's Anti-Corruption Policy apply to dealings with both public and private entities.

No Economic Boycotts

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

Additionally, Oracle and its 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, 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 Program Web site. 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 the Foreign Economic Boycott Policy or antiboycott laws to the Oracle Legal Department.

Q: Oracle received an order from a company in a country that has imposed a government sponsored economic boycott not sanctioned by the U.S. government. The customer's purchase order states that the supplier (in this case Oracle) agrees not to conduct business with a blacklisted company or country. May the order be accepted?

A: No. Accepting this order may subject Oracle to criminal and tax sanctions. It is Oracle's policy to comply with antiboycott provisions of U.S. law. The division receiving this request should immediately seek Oracle Legal Department and Oracle Corporate Tax Department advice on how to proceed.

Export Laws

United States Export Control Laws govern all exports of commodities and technical data from the United States, including:

- Physical items;
- Items that are hand-carried as samples or demonstration units in luggage;

- Electronic or physical distribution of software and source code; and
- Written, electronic, or oral disclosure of technical data to a foreign visitor or H1-B Visa worker.

Failure to comply with U.S. export control laws could result in the loss or restriction of Oracle's export privileges, which, in turn, could damage or even destroy a significant portion of our business. Violation of these laws may also result in fines and imprisonment for individual employees and their management chain. You are responsible for understanding how the export control laws apply to your job and for conforming to these laws.

Q: I understand that there are restrictions on the export of certain strategic goods and technical data unless an appropriate export license is obtained. Are there any such restrictions on disclosing technical information to foreign nationals visiting Oracle in the U.S.? After all, the information isn't really crossing any border.

A: Yes. Any oral or written disclosure of technical data to a foreign visitor must comply with the same export control restrictions that apply to the physical export of such data.

You may not ship Oracle software, documentation, source code, technical data, nor technology without processing the order and shipment through authorized Oracle order entry, distribution, and support processes

and/or through authorized Oracle subsidiary channels.

Compliance with export control laws is essential to our continued ability to do business in the international marketplace.

United States and foreign governments maintain strict rules regarding the methodology for goods exchanged across their borders. Local export laws may also apply to shipments to or from the country in which you operate. False or misleading statements made on export documentation could jeopardize Oracle's global operations and lead to audits and fines, which would damage our ability to conduct business. All managers and employees must integrate export control procedures into their regular business processes for Oracle to have continued success in the international marketplace.

Questions concerning export compliance matters or any violation of these laws or regulations should be directed to the Oracle Legal Department.

Q: Is it true that software must physically leave a country's border for an export to have taken place?

A: No. An export can take place at any location when technical data or software is made available to anyone who is a foreign national. You must obtain proper export authorization before sharing technical data or software in any manner with a foreign national.

Immigration Laws

You must ensure that you, and any employees who work for you, comply with all applicable immigration laws and/or the advice of Oracle's designated immigration service providers. Oracle employees who travel internationally on business are responsible for obtaining appropriate work authorizations before attempting to enter a host country. Visa and work permit 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. Moreover, Oracle prohibits its employees from knowingly allowing contractors or other employees to work on a project without the proper authorization or documentation.

If you need advice on immigration issues, contact the Mobility Group through the Global Human Resources Web site.

Q: During a tour of a customer's facility, I became aware of the possibility that some of the company's employees might be in the country illegally. I don't know this for sure, however. Should I speak up?

A: Yes. You should speak up in any situation in which the potential for a violation of our policies exists. If, in fact, the customer is using illegal workers, then we would certainly be in violation of our own policies – and possibly the host country's immigration laws – by allowing the situation to continue.

Securities and Insider Trading

Oracle expects all its employees to comply fully with applicable insider trading and securities laws. Oracle has issued an Insider Trading Policy, which is applicable to all employees worldwide, and which more fully sets forth your obligations regarding trading in the securities of Oracle and other companies. The Insider Trading Policy is available on the Oracle Legal Department Web site. You are expected to become familiar with the policy and comply with it.

Insider trading and securities laws provide substantial civil and criminal penalties for individuals who fail to comply. 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, any other securities or insider trading laws that may apply to you locally, and Oracle's Insider Trading Policy.

Securities include:

- Common stocks;
- Bonds;
- Employee stock options;
- Futures;
- Derivatives; and
- Other financial instruments.

Oracle employees who possess material, nonpublic information gained through their work at Oracle may not trade in Oracle securities or the securities of another company to which the

information pertains. Employees may not engage in any other action to take advantage of or pass on to others (i.e., "tip") material information before its release to the public at large and for a period of time after it is publicly disclosed. These restrictions also apply to spouses and 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.

Such information may include financial performance or significant changes in financial performance or liquidity (including forecasts); potential or ongoing major mergers, acquisitions, joint ventures, or divestitures; award or cancellation of a major contract; changes in key management; 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; and gain or loss of a substantial customer or supplier.

Oracle prohibits employees who have access to earnings and revenue information from directly or indirectly trading in Oracle securities during certain periods. Directors, Section 16 Officers (a small group of Oracle's most senior executives), and certain groups and individuals are also prohibited

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from directly or indirectly trading in Oracle securities during certain periods. Additional restrictions on speculative transactions in Oracle stock apply to Senior Vice Presidents, and Section 16 Officers are entirely prohibited from engaging in speculative transactions. Please refer to the Insider Trading Policy for further information. 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 and your personal legal advisor.

Q: I have become aware that we will likely exceed our quarterly revenue guidance estimates, but we have not yet made a public announcement. I stand to make a lot of money once this gets out. May I buy more shares of Oracle stock?

A: No. What you are considering is insider trading. This is a violation of Oracle policy and a violation of applicable insider trading and securities laws. You may buy or sell Oracle stock only after such an announcement is made public and after a period of time has elapsed to allow the financial markets to absorb this information. Consult Oracle's Insider Trading Policy for more detailed guidelines.

Q: Through my job at Oracle, I have become aware of nonpublic financial information received from one of Oracle's customers that indicates the customer is in better financial condition than most people realize. I wish to purchase the customer's stock. May I do so?

A: No. The customer may have provided this information in trust to help Oracle determine how to best meet the customer's needs. Using this information for personal purposes or disclosing it to others is a violation of that trust, a violation of Oracle policy, and may be a violation of applicable insider trading and securities laws. Accordingly, you should not purchase this stock until after the financial information has been made known to the public and disseminated broadly in the financial markets.

Q: Through my job at Oracle, I have learned that Oracle is acquiring a publicly traded company. May I buy stock in that company right now?

A: No. This would violate Oracle's Insider Trading Policy and applicable securities laws. Be aware that regulatory organizations routinely investigate trading activity leading up to a significant change in a security's price.

Q: I understand why I shouldn't reveal inside information to an outsider, but may I discuss this type of information with members of my immediate family? What about other Oracle employees who are not aware of the same information I am?

A: No. You should be careful about inadvertently or casually revealing material inside information about Oracle to your family or any person who doesn't have a legitimate business need to know it. If members of your family trade in securities while in possession of material inside information that you

have revealed to them about Oracle, you may be exposing them and yourself to criminal and civil liability, even if you do not take advantage of this information personally.

If you ever inadvertently let slip material, nonpublic information to a family member or any other person without a legitimate business need to know it, inform a member of the Oracle Legal Department immediately.

General Contracting Issues

Oracle requires its employees to compete fairly and ethically for all business opportunities. Employees involved in the sale or licensing of products/services, the negotiation of agreements, or the delivery of services to customers are expected to understand and honor the terms of Oracle's contractual agreements. In addition, each employee must ensure that all statements, communications, and representations to customers are accurate and truthful. Oracle is committed to meeting all of its contractual obligations.

You must obtain all appropriate approvals before executing, modifying, or amending any contracts. Oracle prohibits unauthorized contracts or modifications of contracts, including "side letters" or oral agreements.

Only certain Oracle employees have authority to sign contracts, commit Oracle to acquiring products or services, or obligate Oracle to third parties.

Before acquiring any goods or services 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 does. If you have questions about your spending authority, consult your manager. You should also familiarize yourself with the Oracle Global Spending Approval Policy.
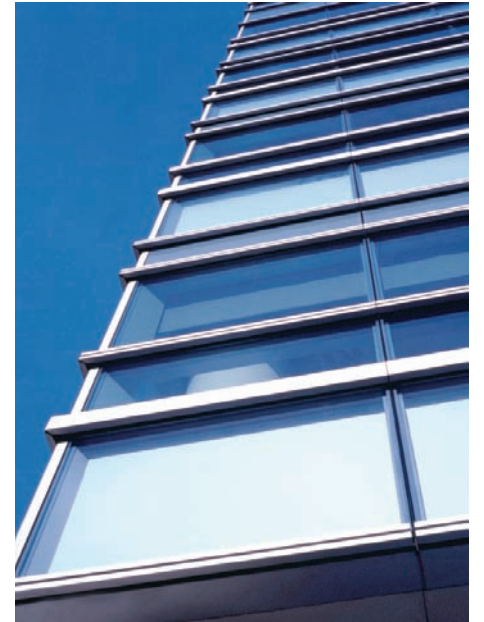
Before signing any document committing Oracle to acquire goods or services or undertaking any other obligation, you must ensure that you have the required signing authority. Oracle has issued a Document Signing Authority Policy, which identifies the individuals with authority to sign documents on behalf of Oracle and its subsidiaries. This policy may be found on the Oracle Legal Department Web site. Consult this policy if you have questions about your signing authority or who should sign a particular document. If you are still uncertain, contact your manager or the Oracle Legal Department. If you have the authority to sign documents on behalf of Oracle, you may not delegate this authority to another employee without the approval of Oracle's CEO or General Counsel.

Q: A customer asks you to write a letter confirming that it is entitled to use its software in a way that is not expressly allowed by the Oracle license agreement. You note that the Oracle license agreement does not expressly prohibit the use intended by the customer, and you are certain that Oracle would not object. May you write the letter?
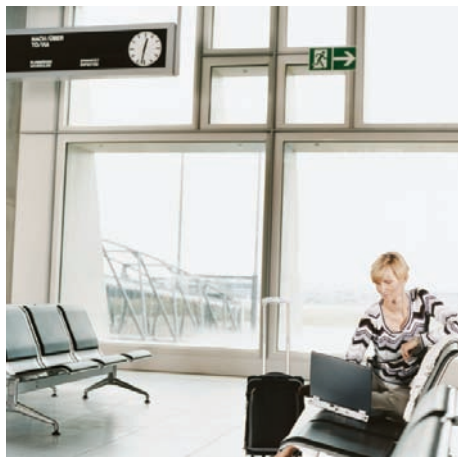
A: No. Oracle may be willing to modify the contract to allow the use desired by your customer, but such a change to the contract requires the necessary business review and approval. Treat the request as one for a formal contract amendment and process the request in compliance with Oracle's Business Practices guidelines.

Q: Your customer is ready to sign the contract, but it needs board approval. The customer assures you that its board will approve the transaction when it meets in ten days and asks you to allow it 15 days within which to return the software in the unlikely event that the board does not approve. May you send a letter confirming that the customer has 15 days to return the software?

A: No. This would constitute an unauthorized "side letter" modifying the terms of the contract. Execution of unapproved side letters is grounds for disciplinary action, including termination.

Dealing with Government

Government Contracting

Oracle strictly observes the laws, rules, and regulations that govern the acquisition of goods and services by any governmental entity of any country and the performance of government contracts. Activities that may be appropriate when dealing with non-government customers may be improper and even illegal when dealing with government. The penalties of failing to adhere to these laws are severe and include substantial civil and criminal fines and imprisonment, and Oracle could be prohibited from doing business with the government. Oracle employees who deal with any governmental 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. See Oracle's Supplemental Policy on Government Contracting and Dealing with Government Officials and Employees, located on the Government Sector Legal & Compliance Web site.

Procurement Integrity

No Oracle employee shall attempt to obtain, from any source:

• Procurement-sensitive government information;

• Confidential internal government information, such as pre-award, source selection information; or

• 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.

Oracle employees must strictly observe all laws and regulations regarding classified information.

the approval of a contracting officer. To knowingly deliver a product to the government that does not meet the contract specifications, without specific prior approval from the customer for any change in specification, could be considered fraud and a violation of law.

Organizational Conflict of Interest (OCI)

Oracle employees must ensure that in performing government contracts there is no actual or potential organizational conflict of interest (OCI) that would provide Oracle unequal access to non-public information or an unfair advantage in a competitive procurement, or impair the objectivity of Oracle employees in providing assistance or advice to the government or in performing contract work for the government; or, to the extent there is any actual or potential OCI, that any such actual or potential OCI is addressed through an appropriate OCI mitigation plan.

Post-Government Employment Restrictions

Various laws impose requirements and restrictions on government employees and private companies related to discussions regarding post-government employment in the private sector. In addition, 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 a business opportunity with a current or former government employee, you must obtain approval from the Oracle Legal Department.

employee about employment opportunities at Oracle, consult with the Oracle Legal Department to ensure compliance with applicable laws.

Anti-Corruption

No one shall corruptly give or offer, directly or indirectly, anything of value to a government official to obtain or maintain business or any other advantage for Oracle. It is a violation of the U.S. Foreign Corrupt Practices Act (FCPA) and other similar international anti-corruption laws to engage in any form of bribery. Penalties for violating the FCPA and other anti-corruption laws are severe and can include large fines and prison time.

Bona fide expenses may be paid, and gifts provided, only if done so without corrupt intent and pursuant to Oracle's Anti-Corruption Policy, which is located on the Compliance and Ethics Program Web site. Oracle's Anti-Corruption Policy provides specific guidelines to ensure that Oracle complies with applicable anti-corruption laws, including the FCPA.

Address questions or requests for information regarding Oracle's Anti-Corruption Policy, the FCPA, or other anti-corruption laws to the Oracle Legal Department.

Q: A government "consultant" offers to assist an Oracle salesperson secure an important government deal in exchange for a success fee of 10% of the value

of the government contract. Can the employee agree to this payment?

A: No. Oracle employees are prohibited from offering or giving money or anything of value to government officials directly or indirectly through third parties. This prohibition generally includes the use of success fees or utilizing unapproved or ad hoc consultants. You should consult the Oracle Legal Department before you hire any third-party sales consultants to obtain, procure, or close government deals.

Gifts, Meals, and Entertainment

Government employees and international organizations generally are governed by laws and regulations concerning their acceptance of entertainment, meals, gifts, gratuities, and other things of value from firms and persons with whom those departments and agencies do business or over whom they have regulatory authority. In dealing with employees of government agencies and departments, it is Oracle's 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 Officials and Employees. Refer to the "Business Courtesies You May Extend" section of this Code for information regarding non-government entities. If you have any questions, contact the Oracle Legal Department.

Q: A high-level group of government officials is making a goodwill tour of Oracle facilities. I wish to give them a memento of the visit with an Oracle logo. Is this against Oracle policy?

A: It depends. Oracle policy prohibits giving anything of value to government employees unless applicable law and Oracle policy permit it. See the "Business Courtesies You May Extend" section and consult with the Oracle Legal Department to determine the proper conduct.

Q: A high-level Oracle employee meets with a high-ranking local government official to discuss Oracle's plans to open a shared service center. In appreciation, the government official offers the employee a gift of substantial monetary value. Can the employee accept the gift?

A: No. Oracle employees generally may accept unsolicited gifts or other business courtesies provided they are not of material value and are not given with the purpose of influencing one's judgment. It is never appropriate to solicit gifts or other courtesies directly or indirectly. If an employee is offered a gift or other business courtesy of material value from an individual, firm, or representative of a firm who has or seeks a business relationship with Oracle, the employee must demonstrate that the gift could not be construed as an attempt by the offering party to secure favorable treatment. Additionally, the employee must obtain written approval from the Senior Vice President of his or her

organization and from the Regional Compliance & Ethics Officer before accepting the gift.

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 procurement and business development activity. These laws can apply to elected officials as well as appointed officials and career government employees. The company may have an obligation to register and/or report the company's lobbying activities under applicable law. These include activities by employees and outside consultants or advisors on government relations. Employees are responsible for knowing when their activities may be considered lobbying, and should consult the Oracle Legal Department for guidance. For information on lobbying laws in the United States and Oracle's policy, see the Supplemental Policy on Government Contracting and Dealing with Government Officials and Employees, located on the Government Sector Legal & Compliance Web site.

Political Contributions

Oracle takes seriously its obligation to comply with the laws pertaining to political contributions. These laws vary greatly among jurisdictions and countries and are, in many cases, subject to interpretation and circumstance.

Therefore, 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 office in Washington, D.C. and the Oracle Legal Department. In addition, corporations are prohibited in many cases from giving to campaigns. Some campaign laws interpret use of corporate resources (e.g., equipment, email, stationery, or personnel) as corporate donations. You should therefore 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 the United States, see the Supplemental Policy on Government Contracting and Dealing with Government Officials and Employees, located on the Government Sector Legal & Compliance Web site.

Q: A customer has asked me to join him at a fundraising dinner for the elected head of his government agency. May I attend and expense the ticket cost to Oracle?

A: It depends. Sales activity should be kept separate from any political activity. In addition, donations – including attendance at political fundraisers – are never to be expensed. Rather, for an activity that has been approved by the Oracle Legal Department, you must submit a check request.

Personal Political Activity

Oracle encourages employees to participate personally in civic affairs and the political process. However, employees must:

• Make all personal political contributions with their own money;

• Conduct any personal political activities on their own personal time;

• Conduct all personal political activities in accordance with applicable laws; and

• Comply with Oracle policies.

The following are 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 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 office and the Oracle Legal Department.

• Any overt, visible, and partisan political activity that could cause someone to believe that your actions reflect the views or position of Oracle requires the prior approval of Oracle's Government Affairs office and the Oracle Legal Department.

Q: I am working on a political campaign and need to attend an out-of-town fundraiser during work hours. May I go if I get my manager's permission?

A: Yes. However, the day off may not be charged to Oracle. You'll have to use vacation or unpaid time off to attend this event.

Influencing Others

You may not use your position to coerce nor pressure other employees to make political contributions or support candidates or political causes. In certain instances, Oracle may encourage employees to support or oppose legislative issues that affect the company's business. In no instance, however, 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; or

• Cast a vote one way or another.

In the United States, the Federal Election Campaign Act 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 shall 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.

Q: My manager asked me to make a contribution to her daughter's campaign for city council. Is that appropriate?

A: No. Even if your manager is not pressuring you, the request is inappropriate. If you are not comfortable speaking to your manager about this, speak with his or her manager, Human Resources, or your Regional Compliance & Ethics Officer, or contact the Oracle Compliance and Ethics Helpline or Incident Reporting Web site.

Public Service

Oracle encourages employees to be active in the civic life of their communities. However, such service may, at times, place you in a situation that poses a conflict of interest with Oracle. As a board or committee member, you may, for example, be confronted with a decision that involves Oracle. It might be a decision to purchase Oracle equipment or services, or it might be a decision by a board of tax assessors or a zoning board that affects Oracle property. In such circumstances, your interest in Oracle and your obligation to the civic organization might pull you in opposite directions and create a conflict of interest or the appearance of a conflict. Accordingly, you must withdraw from any community or civic activity that involves any decision related to Oracle. If you have any questions whether your community or civic activity may create a conflict of interest with Oracle or even the appearance of a conflict, you should contact your Regional Compliance & Ethics Officer to review the activity and to obtain direction regarding your participation.

Intellectual Property

Besides its people, Oracle's most important assets are its intellectual property rights, including its:

• Copyrights;

• Patents;

• Trademarks; and

• 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 the employ of Oracle.

We also respect the intellectual property of others. Oracle will provide any software necessary for employees to perform their 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 Web site 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 Web site for relevant policies and guidelines, including:

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

Q: I am working with a third-party consultant on an Oracle project, and he needs access to the Oracle network to complete his work. May I share my user ID and password with him?

A: No. Oracle employees may not allow third parties to access Oracle computer systems without appropriate authorization. Moreover, you should safeguard your passwords to Oracle systems, change them regularly, and not disclose them to any other person. Follow Oracle's Network Access Policy to obtain authorization for this consultant, and be sure that you have completed all necessary paperwork and obtained all necessary approvals for retention of an outside consultant.

Q: I often work from home or at a customer site, and I need access to my Oracle email. May I autoforward my Oracle email to my personal email account with a third-party ISP so that I may access my email at home?

A: No. You may not auto-forward your Oracle email to a personal email account outside the Oracle domain without approval from Global Information Security. Auto-forwarding your email would allow Oracle confidential information to pass outside the Oracle network and be accessible by third parties.

Q: Can proprietary data provided by a supplier for a specific program within Oracle be shared with other Oracle organizations outside that program or released outside the company?

A: It depends on whether the supplier has authorized the release of that proprietary information outside the specific program. Oracle must comply with the restrictions that the supplier has placed on the use of its proprietary information. Contact the Oracle Legal Department if you are uncertain whether this is the case.

BUSINESS CONDUCT

Financial Integrity

Financial and Other Records

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 shall properly document all assets and liabilities and accurately reflect all transactions of the company. No false entries shall be made 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 nor shall they be signed by those lacking proper authority. Please refer to Oracle's Document Signing Authority Policy, located on the Oracle Legal Department Web site, for more information.
- Oracle funds or assets shall 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.

Q: Your customer signed and returned an order form but inadvertently forgot to sign one of the attachments. Now he has left town for vacation. May you sign on behalf of the customer and process the order?

A: No. Altering documents or signing them without proper authority is against Oracle policy. Return the order form and attachment to the customer for signature.

Records Retention

The Oracle Records Retention Policy ("Retention Policy") sets forth the 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. You can access the Retention Policy and Retention Schedule through the Oracle Legal Department Web site.

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; and
- 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.

Q: During the course of your job, you come across some invoices that are two months old. All were marked paid and the files are taking up valuable space. Can you shred them to make room for more recent information?

A: No. Records such as invoices represent expenses, which will eventually have to be reported, reviewed, and audited in connection with the company's periodic reporting to the Securities and Exchange Commission and Oracle's investors. Please see the Retention Schedule for guidance on how long to keep the invoices.

Q: The accounting department receives a letter from a customer's attorney, demanding that Oracle fulfill certain oral promises that Oracle allegedly made. Your manager asks you to review your email to determine whether you have any email messages that would support such a promise. You identify one email that could be construed as constituting a promise to a person who was unfamiliar with the customer relationship but you believe, in good faith, that no such promise was ever made to the customer. Should you delete the email?

A: No. Oracle's Records Retention Policy requires employees to preserve all records that may be relevant to a matter in which Oracle reasonably anticipates litigation. You should immediately contact the Oracle Legal Department to help determine whether, under the circumstances, there is a reasonable anticipation of litigation.

If it appears that local circumstances require a record to be retained for a longer period, please contact the Oracle Legal Department through local legal counsel or by emailing docretention @oracle.com.

If you have questions about the Retention Policy or the Retention Schedule, contact the Oracle Legal Department.

Public Disclosures

As a public company, Oracle must disclose accurate and complete information regarding the company and the results of its 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 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, located on the Oracle Legal Department Web site.

Q: You receive a call from an investment analyst who heard that Oracle is having a bad quarter. Having just sat through a forecasting call, you know that the opposite is true – Oracle is about to have an amazing quarter. May you set this investment analyst straight? After all, isn't it a good idea to correct such misinformation?

A: No. You should not speak with this analyst. Only spokespersons authorized by Oracle Investor Relations, at the direction of Executive Management, are allowed to speak with the financial community about Oracle or its financial prospects. Oracle commits to providing full, fair, understandable, timely, and accurate public information about its financial prospects, and it does so openly, rather than selectively. Refer any such inquiries to Oracle Investor Relations. Other than that, make no comment.

Q: You receive a call from a reporter who wants more information about a recent Oracle product announcement. You are very familiar with the product. May you speak with this reporter?

A: No, at least not without first obtaining permission from Oracle Public Relations. Oracle Public Relations must approve in advance all communications with the press. Oracle Public Relations may conclude that you are the best spokesperson for the company on this issue, but they – not you – must make that decision.

Business Courtesies You May Extend

Furnishing meals, refreshments, entertainment, and event access in conjunction with business discussions with non-government personnel is a commonly accepted practice. You may do so when it is appropriate to the circumstances. Such practices, however, must not violate the standards of conduct of the recipient's organization, any contractual agreement with a customer, or Oracle's Global Travel and Expense 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 make, facilitate, and/or approve expenditures for meals, refreshments, or entertainment must use discretion and care to ensure that such expenditures are in the ordinary and proper course of business and could not reasonably be construed as bribes or improper inducement.

Q: A commercial customer with whom I do business occasionally visits our facility. May I buy lunch?

A: Yes, you may buy lunch. However, some limitations exist. As long as this does not violate any of the customer's regulations or any contractual obligations between the customer and Oracle, and the expenditures are reasonable considering the business relationship involved, it is permissible. Remember, the rule is not the same for government employees or officials, even if they are existing customers. Various rules and regulations prescribe the guidelines for giving anything of value to government personnel. You must become familiar with these rules and regulations and comply with them if you are interacting with a government entity.

Oracle's standards and the applicable laws for dealing with government employees and officials are more stringent than standards for commercial 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, located on the Compliance and Ethics Program Web site, and the Supplemental Policy on Government Contracting and Dealing with Government Officials and Employees, located on the Government Sector Legal & Compliance Web site. You are responsible for being familiar with the rules and regulations of the government agencies and departments with which you interact. Contact the Oracle Legal Department if you have any questions about your activities and interactions with the government.

In any case, business courtesies must be nominal enough not to appear to influence the judgment of the recipient to secure unfair preferential treatment or gain 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

Gifts

Oracle employees generally may accept unsolicited gifts or other business courtesies from actual or potential customers, suppliers, or other business partners provided they are not of material value and are not given with the purpose of influencing one's judgment. It is never appropriate to solicit gifts or other courtesies directly or indirectly. If you are offered a gift or other business courtesy of material value from an individual, firm, or representative of a firm who has or seeks a business relationship with Oracle, you must demonstrate that the gift could not be construed as an attempt by the offering party to secure favorable treatment. You must obtain written approval from the Senior Vice President of your organization and from your Regional Compliance & Ethics Officer before accepting the gift. Oracle recognizes that in some parts of the world gift giving is common practice and not accepting a gift could reflect badly on Oracle. Even

in those instances, however, where the gift is of more than nominal value, you must obtain the written approval of your Senior Vice President and your Regional Compliance & Ethics Officer before accepting the gift.

Neither you nor any member of your family may accept any loan, guarantee of loan, or payment from an individual or firm doing or seeking business with Oracle. Exceptions to this include only loans from recognized banks and financial institutions that are generally available at market rates and terms. Similarly, you may not accept finders' fees, referral fees, or other incentive payments or perquisites from third parties to whom Oracle may refer business, including, for example, Oracle Alliance members and leasing companies. Generally, incentive programs offered by third parties are discouraged. The Executive Vice President of the relevant organization and the Senior Vice President of Human Resources must first approve any such incentive programs.

Q: May I accept travel expenses to attend or speak to a user group or professional meeting?

A: It depends. Oracle policy requires that all suppliers be treated fairly and impartially. Therefore, you should accept nothing from a supplier that could give even the appearance of favoritism. However, you can more readily accept reimbursement for expenses from associations and professional groups because such organizations are generally

not comprised of vendors who might be using a speaking invitation as a device to secure favorable treatment. In any case, written approval from your Senior Vice President and Regional Compliance & Ethics Officer is required.

Q: I'm a Senior Practice Director with Oracle Consulting, and a consulting client has asked if it can pay cash bonuses directly to our consulting team. Is this allowed?

A: Probably not. Generally, bonuses to Oracle consultants from a client are not allowed under Oracle policy. Any such incentive payments must be approved by the Executive Vice President of the relevant organization and the Senior Vice President of Human Resources.

Q: If a representative of a supplier, vendor, or customer presents me with a pen and pencil set with the supplier's logo as a token of appreciation, may I accept it?

A: Yes. As long as the item is not of a material value and is widely available to others under similar circumstances, you may keep it for your personal use. If the item does not meet these criteria and if you have not otherwise received the requisite approval, politely return it to the donor.

Q: It is the holiday season and I have just received from a vendor, at home, a gift certificate worth the equivalent of U.S. $500 for a local department store. May I keep the gift certificate?

A: No. You may receive only gifts that are not of material value. Five hundred dollars is material and might be perceived as inducing favoritism. You should return the gift certificate immediately, with a note explaining that Oracle policy does not allow you to accept such a gift.

Q: I have been offered a discount on a product sold by one of Oracle's suppliers. May I take advantage of the discount?

A: It depends. You may accept the discount only if it exists under a program generally available to Oracle employees. Accepting discounts not generally available to Oracle employees may create the appearance of favoritism to the donor, or may imply that there will be favoritism in the future.

Entertainment

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 or routine, you must obtain the written approval of your Senior Vice President and your Regional Compliance & Ethics Officer before accepting. Every employee

is personally responsible for ensuring that acceptance of any business courtesies, gifts, or entertainment is proper and does not reasonably appear to be an attempt by the offering party to secure favorable treatment.

Q: May I accept a business meal from a representative of a supplier or vendor?

A: Probably. In most circumstances, modest and infrequent business meals may be accepted by Oracle employees. On other occasions, it may be more appropriate for Oracle or the employee to pay for the meal. Whenever a vendor pays for a meal, always consider the specific circumstances and whether your impartiality could be compromised or even appear to others to be compromised.

Q: I am responsible for organizing various meetings, including the selection and bookings of hotel reservations for extensive Oracle marketing meetings. May I ask the hotel manager for a complimentary room for my personal use, since we are giving so much Oracle business to the hotel?

A: No. Your request would violate Oracle policy. Your solicitation of a complimentary room would be using your position to obtain preferential treatment and could also affect your impartiality in arranging hotel accommodations for future meetings.

Conflicts of Interest

The term *conflict of interest* describes any circumstance that could cast doubt on an employee's ability to act with total objectivity with regard to Oracle's interests. Oracle wants its employees' loyalty to come easily, free from any conflicting interests.

All employees have a duty to avoid financial, business, or other relationships that might be opposed to the interests of Oracle or might cause a conflict with the performance of their duties. Employees should conduct themselves in a manner that avoids even the appearance of conflict between their personal interests and those of Oracle.

Conflict of interest situations may arise in many ways. Examples of improper actions by Oracle employees when acting in conflict with Oracle include, but are not limited to, the following:

• Employment by a competitor, regardless of the nature of the employment, while employed by Oracle;

• Placement of business with any company in which an employee, or any member of the employee's family, has a substantial ownership interest or management responsibility;

• Ownership of, or substantial interest in, a company that is a competitor with or a supplier of Oracle by an employee, or any member of the employee's family;

- Acting independently as a consultant to an Oracle competitor, customer, or supplier;

- Engaging in any activity or employment that interferes with or detracts from an employee's work at Oracle, or requires an employee to disclose Oracle proprietary information; or

- Service on a board of directors or as a technical advisor to an actual or potential competitor, customer, partner, or supplier of Oracle.

Sometimes, a conflict of interest will develop accidentally or unexpectedly, and the appearance of a conflict of interest can also easily arise. If you feel that you have a conflict, actual or potential, report all pertinent details in writing to your manager. The presence of a conflict does not necessarily mean that the proposed activity will be prohibited. Your responsibility is to fully disclose all aspects of the conflict to your manager and remove yourself entirely from the decision making process.

With respect specifically to any request to serve as a director or technical advisor to another company, again you must be very sensitive to an actual or potential conflict of interest. Generally, no conflict is presented if your service as a director or advisor would (1) require at most a very minimal commitment of time during your normal Oracle work hours and would not otherwise detract from your job responsibilities at Oracle,

(2) not cause you to disclose Oracle proprietary information, and (3) not be for an actual or potential Oracle competitor, customer, supplier, or other business partner. Regardless of whether you perceive a conflict, before serving as a director or technical advisor to any company, or engaging in any activity that may involve a conflict, you must first fully disclose the opportunity to your manager and obtain his or her written approval, as well as the written approvals of the Executive Vice President and Regional Compliance & Ethics Officer for your organization.

Additionally, if you observe any situation involving another employee that you believe in good faith to be a conflict of interest, report the situation to your manager. Your manager will be responsible for referring the matter to a Regional Compliance & Ethics Officer, as appropriate, for resolution. You may also report conflicts of interest directly to the Regional Compliance & Ethics Officer for your organization, if appropriate. Reports from employees will be handled as confidentially as possible.

Oracle's senior officers (Chief Executive Officer, President(s), Chief Operating Officer, Chief Financial Officer, Chief Accounting Officer, General Counsel, each Executive Vice President, and each Senior Vice President) are subject to both this Code and Oracle's Supplemental Conflict of Interest Policy for Senior Officers. Non-employee members of the Oracle Board are subject to the conflict of interest provisions of Oracle's Corpo-

rate Governance Guidelines in lieu of the conflict of interest provisions contained in this Code. The Supplemental Conflict of Interest Policy for Senior Officers and the Corporate Governance Guidelines are posted on the Corporate Governance section of Oracle's Investor Relations Web site. Senior officers and members of the Oracle Board who have questions regarding this Code or other relevant policies should contact Oracle's General Counsel.

Q: I want to start a consulting business that will primarily target small businesses, which may include Oracle customers. Could this be a conflict of interest under Oracle policy?

A: Yes. This activity will be a conflict of interest if:

- *Your new business keeps you from doing your Oracle work;*

- *The service you offer is similar to a service Oracle provides;*

- *The customers of your new business are also actual or potential Oracle customers, suppliers, or competitors; or*

- *Oracle proprietary information could be used.*

You should review the matter with your manager and obtain his or her approval, as well as the approval of your Regional Compliance & Ethics Officer and Executive Vice President.

Q: I have been approached by friends to invest in a company that will be producing a product that could eventually be sold to Oracle. If this is purely an investment interest and I will not take part in the management of the company or provide any advice, will this be a conflict of interest?

A: It depends. Whether or not this activity could constitute a conflict of interest depends on:

- *The position you hold with Oracle;*

- *The influence others may believe you have in the selection of Oracle suppliers;*

- *The amount of your investment; and*

- *The importance of Oracle as a prospective customer.*

You should review the matter with your manager and obtain his or her approval, as well as the approval of your Regional Compliance & Ethics Officer and Executive Vice President.

Q: A current Oracle customer has asked me to be its consultant in developing a product that would be of no interest to Oracle. I often deal with this customer on the job. Could this be a conflict of interest?

A: Yes. This could create a conflict of interest because other vendors, suppliers, or customers of Oracle might suspect you of favoritism to this particular company even though none may be present. The objectivity of your business decisions could be questioned. In addition, this would create a conflict

of interest if you are performing services for the customer personally that Oracle might otherwise have been retained to perform.

Q: Can an Oracle employee teach a course at a local university for pay?

A: Yes. It is permissible for an Oracle employee to teach at an educational institution with the written approval of his or her manager, Regional Compliance & Ethics Officer, and Executive Vice President.

Q: I have been asked to take a seat on the board of directors of a start-up company. May I accept?

A: Not without approval. If you wish to serve on a board of directors, you must receive the written approval of the Executive Vice President and Regional Compliance & Ethics Officer for your organization. The company for which you serve should not be in a competitive position with Oracle and should not be a customer, partner, or supplier of Oracle, and the time required to serve on the board should not be substantial. You may receive compensation when serving in an approved position.

Q: May a software developer, on his or her own time and without using any Oracle equipment or proprietary information, utilize engineering knowledge and skills to design, develop, and market for profit a product or service that does not compete with Oracle products or services?

A: Yes. As long as the product or service does not relate in any way to Oracle business, and is not a product or service that Oracle would likely offer in the future, the software developer may undertake such an endeavor.

Q: I am a software developer and am considered an expert in my field. The university at which I teach a course after hours and with Oracle's concurrence has asked me to write a book about my field of expertise. I would be entitled to compensation for the book. Can I do this?

A: It depends. You may author books in your field of expertise only if the text does not relate in any way to Oracle's business and if writing the book will not interfere with your work at Oracle. If the text does relate to Oracle's business, you must obtain the written approval of the Oracle Legal Department and any other required approvals before undertaking the project. Consult the Oracle Legal Department for more detailed guidelines on this subject.

Q: An Oracle employee whose husband owns a graphic design firm needs to retain a graphic artist to assist in the creation of Oracle marketing collateral. May she select her husband's firm if the cost is comparable to alternative graphic design firms?

A: Not without approval. This situation presents a direct conflict of interest and the employee should not proceed without approval. The employee must fully disclose the situation to and obtain the approval of her manager, Executive Vice President, and Regional Compliance & Ethics Officer. The employee must remove herself entirely from the selection and decision-making process.

Charitable Donations

We are committed to using our technology and resources to advance education in innovative ways, promote diversity, enrich the life of communities, and protect the environment. We are proud that the same innovative spirit behind Oracle's technological success also drives the creation of innovative global corporate citizenship initiatives that benefit our communities. Examples of this commitment include Oracle Education Initiatives, Oracle Volunteers, and Oracle Giving.

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. Raise questions about any potential conflict of interest or appearance issues that may arise from charitable donations. For more information please see Oracle's Corporate Contributions Policy, located on Oracle's Corporate Citizenship Web site.

Q: I serve on the board of directors of a nonprofit organization. Can I guarantee the Board that Oracle will donate to the organization?

A: No. You must make clear to the nonprofit organization that your participation on its board is in your individual capacity, that you are representing yourself only, and that it is extremely unlikely that you will be able to secure any donation from Oracle. If the nonprofit organization has historically received donations from Oracle or has any formal relationship with Oracle, approval from your Executive Vice President and Regional Compliance & Ethics Officer is required before you may serve on the board. See also the "Conflicts of Interest" section.

Protecting Confidential Information

You are required to protect confidential information to which you have access in connection with your Oracle employment. Oracle's privacy policies govern the collection, use, transfer, and security of employee data, customer and prospect data, and data Oracle may access in connection with services. You are required to abide by these policies when collecting or processing the relevant personal information.

The Oracle Information Protection Policy, located on the Oracle Legal Department Web site, sets forth the requirements for treatment of confidential information. It provides a description of different categories of confidential information, such as:

- Public
- Confidential – Oracle Internal
- Confidential – Oracle Restricted
- Confidential – Oracle Highly Restricted

The Information Protection Policy provides guidance on the proper handling of each category of information, including restrictions on use, disclosure, storage, transmission, and deletion.

All information related to Oracle's business that is not intended for public disclosure should be considered confidential. Confidential information includes:

- Software and other inventions or developments (regardless of the stage of development);
- Marketing and sales plans;
- Competitive analyses;
- Product development plans;
- Pricing;
- Potential contracts, mergers, or acquisitions;
- Business and financial plans or forecasts; and
- Employee information.

Third-party systems should not be used to record Oracle financial, sales, marketing, or other data. Record or process Oracle's confidential business data with Oracle systems only.

In addition, information concerning Oracle's customers, partners, prospective customers, and vendors that was provided to Oracle in confidence is considered confidential information. This includes any data customers provide to Oracle to provide hosting, support, consulting, or other services.

The Services Privacy Policy, located on the Oracle Legal Department Web site, states Oracle's obligations for protection of personal information contained in customer data provided to us to perform hosting, support, consulting, and other services.

Protection of Oracle source code is particularly essential to our business. Oracle source code is treated as Confidential – Highly Restricted information. Any disclosure of source code outside of Oracle must be approved in advance by the Executive Vice President of the applicable product group and by HQAPP/the CEO. Prior to disclosing any source materials, contact the Oracle Legal Department for the appropriate agreements.

Oracle also expects employees to abide by all security policies. Do not access or attempt to access systems or physical areas without appropriate authorization. Similarly, you may not allow third parties to access Oracle systems or physical areas without obtaining appropriate authorization. See Oracle's Network Access Policy, located on the Oracle Legal Department Web site, for further information on this topic. Report any

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unauthorized access of an Oracle facility to Global Physical Security and report any unauthorized access of Oracle's networks or systems to the Oracle Legal Department or Global Information Security.

Your obligation to protect company confidential information and personal information continues after the end of your employment with Oracle. Moreover, just as we expect employees to abide by their obligations not to disclose this information after they leave, we expect employees to abide by their obligations to protect the confidential information of their 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.

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 Oracle Legal Department Web site, 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 or other online discussions) just as much as they apply to your offline behavior;
- Stay away from discussing future product offerings;
- Respect others' intellectual property rights, including copyrights;
- Make it clear that your opinions are your own and do not necessarily reflect the views of Oracle;
- Refrain from making objectionable or inflammatory posts.

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 breach of integrity or breach of any confidentiality or employment agreement. You must 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 immediately contact Oracle Legal, which can be reached 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.

Q: I have just received a copy of proprietary competitive information in the mail from an unknown source. Can I use it?

A: No. Instead, immediately contact Oracle Legal, which can be reached at legal_us@oracle.com. Unless Oracle Legal instructs otherwise, you must promptly destroy all copies of such information in your possession. Proper intelligence gathering is a legitimate marketing strategy, but Oracle will never approve use of apparent proprietary information that it receives from unknown sources.

Q: A competitor is holding a conference for its customers to announce future product plans. May I register for the conference under a false name to gain entrance to the conference?

A: No. You may not misrepresent your identity when attempting to gather any information. Oracle may face liability for theft of trade secrets or corporate espionage or be restricted from pursuing its own business plans to the extent those plans may have been tainted by unauthorized access to a competitor's trade secrets. Legitimate fact gathering through public sources is permissible. Lying to gain access to proprietary competitive information is never acceptable.

Q: I used to work for a customer of one of Oracle's competitors. In my capacity in that job, I learned a lot about how the competitor operates. I even still have a copy of one of their contracts on my personal computer. Can I share this information with Oracle?

A: No. It's tempting to use information about a competitor that you obtained during your prior employment to Oracle's advantage but, in this case, we have policies against it. We expect our employees to protect confidential knowledge obtained from their former employers.

Use of Oracle Resources

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

You are required to comply with the Oracle Acceptable Use Policy for Company Resources, located on the Oracle Legal Department Web site. The topics covered include:

- Personal use of Oracle resources and appropriate conduct;
- Use of instant messaging, email, voicemail, mobile phones, removable media, P2P networks, encryption, and wireless LANs;
- Securing connections to the Oracle network;
- Use of passwords and prevention of viruses;
- Protection of confidential information;
- Issuance of public statements;
- Marketing activities;
- Third-party use of Oracle systems; and
- Monitoring use of company resources and facilities.

Oracle may employ security procedures at its facilities to monitor and maintain security, including the use of closed circuit television. Also, use of Oracle computers, systems, and resources may be monitored to the extent permitted by applicable law.

In addition, Oracle requires its employees 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 to Oracle.

Q: Oracle has purchased numerous software programs to assist employees in performing their work. I have been asked to copy some of these computer programs for use by other Oracle employees because the software program is needed immediately and they cannot wait for their copies to be purchased. May I do this?

A: It depends. If the programs are copyrighted or otherwise protected and Oracle has not negotiated a company-wide license, the copying of such programs would not only be in violation of Oracle policy but could subject Oracle to a civil lawsuit. You should never make copies of software unless you are certain that you have a legal right to do so.

ORACLE'S RELATIONSHIPS

Oracle and Its Employees

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 nor 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.

Diversity

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

- Race;
- Religion;
- National origin;
- Color;
- Gender;
- Gender identity;
- Age;
- Disability;
- Pregnancy;
- Marital status;
- National origin/ancestry;
- Military status; or
- Sexual orientation.

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 service. Oracle is also committed to adhering to wage, hour, and minimum age guidelines provided by applicable laws. We endeavor to structure the content of jobs so that work provides personal satisfaction and challenge.

Harassment

Oracle's policy is to provide a work environment free from harassment. Although "harassment" most frequently refers to sexual harassment, workplace harassment may also include harassment based upon a person's race, religion, national origin, gender, sexual orientation, gender identity, age, disability, or other protected characteristic. Oracle prohibits harassment in any form, whether physical, verbal, or non-verbal.

Report instances of harassment to your manager or, as appropriate, to your Human Resources Representative. Your report will be kept confidential to the greatest extent possible, and no complainant nor witness will suffer retaliation because of a report made in good faith.

Q: Most of your work is physically performed around a specific person who appears to be interested in you romantically. He/she often makes flirtatious remarks that make you a little uncomfortable and this individual tends to get a little too personally close to you. Up until now you've been able to ignore his/her behavior, but lately, he/she has taken to calling you at home late into the night. Then one day, he/she asks you for a date. Should you report his/her behavior?

A: Yes, you should report this behavior. Part of your supervisor's job is to listen to complaints regarding the actions of people under him/her and to act on the information available. In cases such as harassment, that includes reporting the matter to Human Resources to initiate a review and, if necessary, an investigation.

Q: You reported what you feel is harassment to your supervisor, but he doesn't appear to take your concern seriously. Do you have other options?

A: Yes. You can take the matter directly to Human Resources. If you prefer not to speak about such an issue face-to-face, you can utilize the Oracle Compliance and Ethics Helpline or the Oracle Compliance and Ethics Incident Reporting Web site.

Health and Safety

We are committed to protecting the health and safety of our employees, visitors, and the public. Our policy is to maintain our facilities and run our business operations in a manner that does not jeopardize the occupational health and safety of employees. Compliance with health and safety laws and Oracle policy is expected of all employees. Threats or acts of violence against Oracle employees, 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. In case of an emergency, contact local law enforcement.

Taxation

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

Oracle and Its 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.

Oracle and Its 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 adhere to high ethical standards, to conduct business fairly and ethically, and to avoid engaging in any activity that involves even the appearance of impropriety. We expect our partners to adhere to the standards of the Oracle Partner Code of Conduct and Business Ethics. We also require our partners to comply with all applicable laws and regulations.

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Oracle and Its Suppliers

We maintain open and frank business dealings with our suppliers and strive to develop mutually advantageous relationships. We expect our suppliers to adhere to high ethical standards and to avoid engaging in any activity that involves even the appearance of impropriety. We expect 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.

Oracle and Its Host Communities

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 its business with the needs of the environment, Oracle's policy is to maintain its facilities and run its 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. Immediately report

any instances of noncompliance with environmental laws and regulations to your local Facilities Manager, your Regional Compliance & Ethics Officer, or where permitted by law, the Oracle Compliance and Ethics Helpline, or the Oracle Compliance and Ethics Incident Reporting Web site.

ENFORCEMENT

The strength of Oracle is its people. Oracle is fortunate to have a talented group of employees throughout the world. We trust that each of you will recognize that we must adhere to the standards of this Code and uphold Oracle's business values if we are to continue as leaders in our industry.

Though we are confident that we can count on every member of the Oracle team to do his or her part, we would be remiss if we did not state categorically that deviations from our policies or business conduct standards will not be tolerated.

The Investigation Process

Your Regional Compliance & Ethics Officer is responsible for addressing business conduct and ethical concerns and for the investigation and resolution of allegations of misconduct. Investigations will be conducted in an ethical manner and in compliance with applicable law and Oracle policies.

Oracle may employ a variety of methods to conduct investigations. To the extent permitted by applicable law, investigation methods may include interviews with the parties and witnesses, review of relevant financial and other records, criminal and background checks, and monitoring and/or analysis of computers, systems, offices, and other resources. Inappropriate investigative techniques (e.g., pretexting and other social engineering activities) are prohibited.

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. Oracle treats as confidential all reports of alleged misconduct, 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 & Ethics Officer, or a Regional Compliance & Ethics Officer may commence a Code of Conduct investigation and/or a forensic investigation relating to a Code of Conduct violation. All reports of misconduct and related investigative records are treated in accordance with Oracle's Internal Privacy Policy and Oracle's Information Protection Policy, both of which are available on the Oracle Legal Department Web site.

Disciplinary Action

We promote consistency in the application of disciplinary action. Factors considered in determining appropriate disciplinary action may include whether any laws were violated; whether the *Oracle Code of Ethics and Business Conduct* or any other company policies were violated; Oracle's response to similar situations; whether the law in the relevant jurisdiction requires a particular action; and the employee's tenure, performance, and disciplinary history. Regional Compliance & Ethics Officers, in consultation with other appropriate departments, review relevant factors of each case in determining appropriate disciplinary action.

At the end of an investigation, appropriate disciplinary action will be taken, or no disciplinary action may be necessary, based on the findings. In addition, Oracle may report civil or criminal violations to the relevant authorities.

Oracle will take disciplinary action against any individual violating these standards. Specifically, it will take disciplinary action against any employee or manager who is found to have:

- Authorized, condoned, participated in, or concealed actions that are in violation of Oracle policies or business conduct standards;

- Disregarded or approved a violation;

- Through lack of diligence in supervision, failed to prevent or report violations; or

- Retaliated, directly or indirectly, or encouraged others to retaliate, against an employee who reported a potential violation of Oracle policies or business conduct standards.

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.

The Oracle Code of Ethics and Business Conduct places Oracle in the forefront with those corporations throughout the world that emphasize the importance of honest business conduct and solid business ethics. We can meet these standards only with the cooperation of our employees, long recognized as Oracle's most valuable asset.

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