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2022 Statement against Modern Slavery of Oracle Corporation Australia Pty Limited

The Board of Directors and Management of Oracle Corporation Australia Pty Limited ("**Oracle Australia**") are fully committed to a work environment and supply chain that is free from human trafficking and modern slavery. Oracle Australia will not tolerate or condone human trafficking or modern slavery in any part of our global organisation. It is for this reason, that the **attached** 2022 Oracle Statement against Modern Slavery ("**Modern Slavery Statement**") covering Oracle Australia's financial year 1 June 2021 to 31 May 2022 is approved by the Board of Directors of Oracle Australia on 23 December 2022 for the purposes of reporting under the Modern Slavery Act 2019 (Cth) ("**Act**").

It is the belief of the Board of Directors of Oracle Australia that the measures described in the Modern Slavery Statement are consistent with our core values to protect and advance human dignity and human rights in our global business practices and supply chains. Compliance with these measures will positively contribute to the performance of the organisation as a whole and demonstrate our support for the aims of the Act.

This Modern Slavery Statement of Oracle Australia will be reviewed each financial year and the policies, documentation and arrangements detailed will be reviewed and amended as necessary, and in the event of any significant changes to the legislation.

In signing this Modern Slavery Statement on behalf of the Board of Directors and Management of Oracle Australia, we also give our commitment to Oracle Australia supporting the measures described.

Related policies

Oracle Employee Code of Ethics and Business Conduct

Oracle Partner Code of Ethics and Business Conduct

Oracle Supplier Code of Ethics and Business Conduct

Policy against Trafficking in Persons and Slavery

RBA Code of Conduct 6.0

Responsible Labor Initiative

Oracle Corporation UK Ltd Modern Slavery Policy Statement 2020

Oracle's Conflict Minerals Report

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Finally, as noted above, and as required under the Act, the below attached Modern Slavery Statement was <u>**approved by the Board of Directors of Oracle Australia in their capacity as the principal governing body of Oracle Australia**</u> **on 23 December 2022 and the Board of Directors authorised Shane Congdon, Director of Oracle Australia, to sign this Modern Slavery Statement for and on behalf of Oracle Australia.**

<u>**This Modern Slavery Statement is signed by Shane Congdon, in his role/capacity as a Director of Oracle Australia on 23 December 2022.**</u>

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Shane Congdon

Director

Oracle Corporation Australia Pty Limited

Date: 23 December 2022

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2022 Oracle Statement against Modern Slavery

Oracle Corporation and its subsidiaries (collectively "Oracle") is committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible and ethical operations.

This statement describes the actions taken by Oracle during fiscal year 2022 (June 1, 2021 to May 31, 2022) to prevent modern slavery and human trafficking in its business and supply chain. Oracle is issuing this statement pursuant to applicable laws concerning modern slavery, including but not limited to the UK Modern Slavery Act, Modern Slavery Act 2018 Australia, and California Transparency in Supply Chains Act of 2010.

Any reference to "modern slavery" in this statement includes slavery, servitude, forms of child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage, and/or deceptive recruiting for labour or services.

Consultation with entities owned or controlled by Oracle

To prepare this statement, Oracle engaged with each of the reporting entities covered by this statement and consulted the entities it owned or controlled. A collaborative approach is undertaken in combating any modern slavery risks with engagement from senior management downwards through policies, education, and compliance.

Related policies

Oracle Employee Code of Ethics and Business Conduct

Oracle Partner Code of Ethics and Business Conduct

Oracle Supplier Code of Ethics and Business Conduct

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Oracle's organizational structure, operations, and supply chains

Oracle is headquartered in Austin, Texas with operations in 175+ countries including Australia, Brazil, Canada, France, Germany, India, Ireland, Japan, the Netherlands, Romania, the United Kingdom, and the United States.

As of May 31, 2022, Oracle employed approximately 143,000 full-time employees, including approximately 38,000 in sales and marketing, approximately 21,000 in our cloud services and license support operations, approximately 3,000 in hardware, approximately 25,000 in services, approximately 44,000 in research and development, and approximately 12,000 in general and administrative positions. Of these employees, approximately 48,000 were employed in the U.S. and approximately 95,000 were employed internationally. Oracle Corporation Australia Pty Limited (ACN 003 074 468) and Oracle Global Services Australia Pty Ltd (ACN 632 743 689) employ approximately 2,000 employees in Australia. Oracle Corporation UK Limited (Company Reg. No. 1782505) and Oracle Global Services Limited (Company Reg. No. SC246876) employ approximately 4,700 employees in the United Kingdom.

Oracle provides products and services that address all aspects of corporate information technology (IT) environments—applications, platform, and infrastructure. Oracle applications, platform, and infrastructure offerings are delivered to customers worldwide through a variety of flexible and interoperable IT deployment models which enable customer choice and flexibility. Oracle markets and sells globally to businesses of many sizes, government agencies, educational institutions, and resellers with a worldwide sales force positioned to offer the combinations that best meet customer needs.

Oracle has three businesses. One is the Cloud and Software business, which is comprised of (i) New Software Licenses, (ii) Software Support, and (iii) Cloud Services. The second is the Hardware business, which is comprised of (i) Hardware Systems Products and (ii) Hardware Systems Support. Oracle Cloud and Software and Oracle Hardware are collectively referred as "Oracle Solutions". The third business is Oracle Services, which is comprised of related services to end-user customers that have purchased Oracle Solutions and are seeking additional after sale services, such as Consulting, Managed Cloud Services, and Education. These businesses are supported by a significant amount of technical infrastructure, including data centers located in the U.S. and other countries.

To produce hardware products that Oracle markets and sells to third-party customers and that Oracle utilizes internally to deliver as a part of the Oracle Cloud operations, Oracle relies on both internal manufacturing operations as well as third-party manufacturing partners located in North America, Europe and Asia-Pacific countries including China, Japan, Malaysia, Singapore, South Korea, Taiwan, and Thailand.

Oracle's internal manufacturing operations consist primarily of materials procurement, assembly, testing, and quality control of Oracle Engineered Systems, certain enterprise and data center servers, and storage products. For all other manufacturing, Oracle generally relies on manufacturing partners to

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produce our hardware-related components and hardware products. Oracle may involve internal manufacturing operations in the final assembly, testing, and quality control processes for these components and products. Production of hardware products requires that Oracle purchase materials, supplies, product subassemblies, and fully assembled products from a number of suppliers. Oracle works closely with direct hardware manufacturing suppliers to understand and evaluate their supply chain practices.

Oracle's procurement team manages Oracle's indirect suppliers of goods and services. This team contracts with indirect suppliers that provide everything from advertising services to office supplies.

Oracle's policies in anti-slavery and anti-human trafficking

Oracle's Employee Code of Ethics and Business Conduct ("CEBC") defines our values and continued commitment to ethical business practices and legal compliance. The CEBC sets forth key rules and provides links to policies and resources to help employees understand Oracle's business values and responsibilities. All Oracle employees are required to comply with the CEBC in all countries where Oracle operates. Employees' understanding of the CEBC is reinforced through annual online training. The CEBC establishes Oracle's commitment to support and respect the protection of human rights and reinforces that Oracle's business partners and suppliers do the same.

This commitment is further described in Oracle's Human Rights Statement that references respect for specific international human rights instruments that prohibit all forms of modern slavery and human trafficking. The statement aligns with the United Nations Universal Declaration of Human Rights, the OECD, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Global Compact, the UN Guiding Principles on Business & Human Rights, and other relevant laws and regulations, which call for the elimination of forced or compulsory labour and of child labour and prohibits slavery, forced servitude and forced labour.

Oracle requires all suppliers and partners to embrace our commitment to integrity and ethical behaviour through the Oracle Supplier Code of Ethics and Business Conduct ("SCEBC") and Oracle Partner Code of Ethics and Business Conduct ("PCEBC").

Furthermore, as a member of the Responsible Business Alliance ("RBA"), Oracle's Supply Chain Operations ("SCO"), together with Oracle's Supply Chain Legal, manages and monitors the Social and Environmental Responsibility ("SER") program for our direct hardware supply chain in accordance with the RBA Code of Conduct ("RBA Code"), which is incorporated into Oracle's standard supplier agreements.

The CEBC, SCEBC, PCEBC and RBA Code ("Codes"), combined with Oracle's supply chain due diligence efforts and supplier capacity building programs, provide the key mechanisms used to prevent and mitigate risks of modern slavery and human trafficking in the supply chain. The Codes set standards designed to protect the

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health, safety, and treatment of workers, including the prohibition of any form of modern slavery, including forced, bonded, or indentured labour, involuntary prison labour, sex trafficking, and human slavery or trafficking. Any violation of these standards by an Oracle employee can result in disciplinary action, including termination of employment. Any violation by a supplier may result in contract termination.

Assessment of Risks of Modern Slavery and Management of those Risks

Responsible Sourcing and Human Rights initiatives across the company and its supply chains are managed by an internal core group whose members include the SER team, the Global Sustainability team, the Supply Chain Operations and Indirect Procurement teams, the Compliance and Ethics team, the Conflict Minerals compliance team, the Human Resources team, and the Government Affairs team. This group develops cross-company strategies, shares best practices, and builds awareness to facilitate continuous improvement of Oracle's human rights initiatives across the company and its supply chains.

Oracle continues to assess modern-slavery risks in its operations and supply chains, and of those entities it owns or controls. SCO assessment processes involve review and analysis to identify (a) strategic suppliers within the supply chain and (b) identify and rate the risk factors related to that supplier and their supply chain. These factors include, but are not limited to, country and sector risk profiles, external reports and standards, publicly available risk assessment ratings, membership in organizations where codes of conduct form part of the membership criteria, supplier self-assessment findings, and third party or Oracle audit results.

Such risks that Oracle may evaluate include the use of third-party supplier factories, third party mining of conflict minerals, and third party production of raw materials.

Oracle or RBA's third party auditors regularly audit the results of the risk assessment on hardware suppliers' facilities, and Oracle actively monitors the results of such audits and responds to any audits of concern involving our suppliers. The scope of these audits may include in-depth factory tours, meetings with management, on-site interviews, document reviews, and assessments of related areas such as dormitories, cafeterias, wastewater treatment facilities, and warehouses. The audit protocol is designed to assess high-risk suppliers' performance in the areas covered by the Codes, including modern slavery risk. Identified issues are investigated during the audit to determine root causes and develop corrective action plans. The auditors are trained to report any concerns they observe on an ongoing basis. In conjunction with RBA's audit closure activities and associated timelines, any priority or major findings are escalated to suppliers and monitored by Oracle via Supplier Management's quarterly Supplier Scorecards and quarterly Executive Supplier Business Reviews.

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Actions taken by Oracle to address risks including due diligence and remediation processes in relation to anti-slavery and anti-human trafficking

Oracle enforces its Codes and the Policy against Trafficking in Persons and Slavery through supplier contracts, supplier assessments and audits, and capability building programs. Together, these components comprise a due diligence process that identifies, monitors, and mitigates the risk of human trafficking or forced labour in Oracle's supply chains.

Oracle's SER team partners with Oracle's factory and sourcing managers to ensure that suppliers conform to the Codes' requirements, including labour rights, ethics, environmental protection, and occupational health and safety. Specifically, Oracle prohibits any form of human trafficking or involuntary labour through threat, force, fraudulent claims, or other coercion.

Oracle's hardware suppliers certify that the products, including the materials within the products, and supplier's manufacturing processes comply with all applicable laws and regulations, which include laws against human trafficking and slavery.

All new and directly contracted hardware suppliers for Oracle servers, devices, and their packaging material and components undergo initial risk and capability assessments and audits to assess their conformance, including risks of human trafficking and slavery. Oracle or third party auditors conduct these audits and assessments using a checklist composed of RBA and additional Oracle requirements. During the review process, auditors examine documentation, visit production lines, dorms, canteens, and waste storage facilities, and conduct face-to-face interviews with workers and factory management. After the initial baseline assessment, Oracle's SER team monitors the performance of all directly contracted suppliers. Subject to government and health safety restrictions, Oracle's SER team supplements these third party audits with onsite assessments of high- and medium-risk component suppliers' factories.

If non-conformances are detected, SER, Sourcing, and Manufacturing teams work closely with the supplier to develop corrective action plans to resolve detected issues, including building needed capabilities through education and training. The supplier is required to identify the root cause of the non-conformance, establish a corrective course of action, and implement preventive actions for all issues found. The Supplier must correct issues within specific deadlines based on the severity of the non-conformance or risk termination of its business relationship with Oracle.

Oracle complies with the reporting and other obligations under the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 in relation to Conflict Minerals. As part of this reporting obligation, Oracle has determined that components in its hardware products contain Conflict Minerals, and that the Conflict Minerals are necessary to the functionality of the hardware products. For additional details, please see Oracle's Conflict Minerals Report. Oracle drives responsible sourcing of raw materials through its extended supply chain by surveying in-scope suppliers' sourcing in their own upstream supply chains.

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Oracle also uses tools that include supplier and smelter capability building and supports broader industry efforts to promote responsible mining and sourcing. Finally, Oracle conducts audits of our directly contracted suppliers to verify conformance to Oracle requirements.

Effective action taken to address modern slavery and the results of these actions

In Fiscal Year 20212 Oracle completed 289 audits based on the RBA Code of Conduct at hardware supplier factory locations. Oracle did not identify any priority issues related to human trafficking or modern slavery. During these assessments and audits, improvement opportunities were identified in the areas of labour documentation, policy, contingency planning, or labour agency contracts. In these cases, corrective actions were developed and validated by the SER team with continuous monitoring for effectiveness.

Oracle established due diligence strategies and procedures as a basis for direct hardware supply chain management and disclosure compliance based upon the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Oracle is a member of the RBA's Responsible Labor Initiative (RLI), a multi-industry, multi-stakeholder initiative focused on ensuring that the rights of workers vulnerable to forced labour in global supply chains are consistently respected and promoted. Oracle is also a member of techUK's Responsible Business Conduct Group. Oracle is investigating the use of RBA's *Specialty Validated Assessment Program (SVAP) on Forced labor"* as a potential supplement to the current state VAP audits for suppliers with factories located in regions at high risk for Modern Slavery. RBA's Specialty Validated Assessment Program (SVAP) on Forced labor is an audit program based exclusively on identifying the risk of forced labor at an Employment Site (e.g., factory) or Labor Provider (e.g., labor agent or recruitment agency). The elements of the SVAP audit were carefully constructed to create a specialized assessment program, limited in scope to only focus on provisions related to forced labor. In addition, Oracle is researching third party sources / Datafox to scan for supplier risks searches, news alerts, press releases, and other public media, as well as evaluating automation opportunities for such alerts using existing Oracle tools.

Training on anti-modern slavery and anti-human trafficking

As part of the Oracle SER program, employees are trained on the risks and issues associated with human trafficking and slavery, including methods of mitigating risks within hardware supply chains. To increase awareness of human trafficking and modern slavery risks, Oracle provides annual training to its sourcing teams. Training on Codes reinforces the expectation that employees, temporary workers, and contractors (collectively, "workers") follow applicable laws and report concerns of illegal or unethical activity. Oracle trains workers to conduct due diligence to identify and avoid working with third parties that engage in modern slavery or other illegal practices.

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Oracle ensures accountability in these policies by providing multiple routes for employees, suppliers, rights holders and other stakeholders to report their concerns to Oracle. The Codes identify how concerns can be submitted, including anonymously through use of Oracle's Integrity Helpline. The Integrity Helpline allows employees and others to ask compliance questions and anonymously report concerns regarding Oracle's and its suppliers' business operations. Oracle investigates and, where appropriate, requires remedial action to address reported incidents.

Assessing the effectiveness and results of the actions being taken by Oracle to assess and address Modern Slavery risks

Oracle recognizes that its review and assessment of its actions to identify and address modern slavery risks in its operations and across its supply chain will be an ongoing and evolving process. Oracle will continue to monitor the effectiveness of the process and procedures, engaging with suppliers, and regularly undertaking internal governance and external assurance processes. Such efforts include reviewing Oracle's actions on at least an annual basis, regularly engaging with suppliers regarding compliance issues, tracking relevant metrics, and active memberships with industry groups on human trafficking and related issues. Oracle is committed to drive continuous improvement of its existing policies.

Conclusion

Oracle remains committed to its responsibility to respect human rights across all operations. In line with Oracle's ongoing efforts, it is committed to driving continuous improvement by building supplier engagement on topics related to slavery and human trafficking, furthering engagement with relevant industry groups and external stakeholders, and promoting collaboration and benchmarking to assess human rights risks.

For more information on Oracle's efforts to empower people, strengthen communities, and protect our planet, please visit www.oracle.com/citizenship.

This statement was reviewed by relevant internal teams and approved by Oracle Corporation.

Date: 26 October 2022
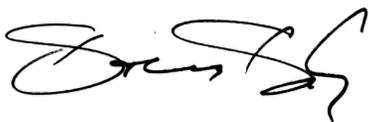
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