



Equal Employment Opportunity Policy

Hierarchy Level: Policy	Document Type: Code	Page: 1 of 3
Owner: Executive Vice President – Human Resources and Administration	Applies to: All Devon	Doc. ID: 112841070
Last Revised: 6/4/2025	Review Cycle: Every 1 Year	Implemented: 10/1/2000

1 Purpose

The purpose of this Equal Employment Opportunity Policy ("Policy") is to communicate Devon's commitment to full compliance with all federal, state, and local laws and regulations concerning equal employment opportunity and affirmative action in the workplace.

Nothing in this Policy is intended to restrict communications considered to be protected and concerted activity by the National Labor Relations Board.

2 Applicability

This Policy applies to all employees of Devon and qualified applicants for employment with Devon.

3 Company Assistance/Exceptions

The Executive Vice President Human Resources & Administration shall act as Devon's AA/EEO Officer. The AA/EEO Officer has overall responsibility for ensuring adherence to this Policy, supporting the achievement of equal employment opportunity and affirmative action goals, and supporting management in the identification and resolution of problem areas. This policy has the support of Devon's Management, including the CEO. All managers, supervisors, and employees who are responsible for making employment decisions are charged with supporting this policy.

4 Policy Statement

It has been and will continue to be the policy of Devon to be an equal employment opportunity employer. Devon will abide by all applicable federal, state and local laws and regulations implementing equal employment objectives. Devon provides equal employment opportunities to all applicants and employees without regard to race, color, religion, gender, sexual orientation, gender identity, pregnancy, age, national origin, military status, veteran status, disability, or any legally protected characteristic. This policy applies to all terms and conditions of employment, including, but not limited to, recruitment, hiring, promotions, transfers, terminations, compensation, benefits, and participation in Devon sponsored training programs. Devon makes all such decisions by utilizing objective standards based on an individual's qualifications as they relate to the particular job opportunity, ensuring equal employment opportunity. Devon reports to the CEO on the status of our equal employment opportunity efforts.

Devon develops affirmative action plans in compliance with federal, state, and local regulations. The plans are monitored on an ongoing basis and reviewed, evaluated, and updated each year. Employees and applicants who wish to review these plans should contact Human Resources or the AA/EEO Officer.

PROPRIETARY INFORMATION

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Applicants who wish to voluntarily identify themselves for inclusion in any of Devon's affirmative action plans may do so by completing a self-disclosure form following their receipt of an unconditional offer of employment. Individuals already employed by Devon may self-identify by contacting Human Resources or the AA/EEO Officer and completing a self-disclosure form.

Devon respects all employees' privacy in their genetic information and enforces a strict policy of nondiscrimination on the basis of genetic information. Devon will never discriminate, harass, or retaliate on the basis of genetic information with respect to all terms and conditions of employment, including, but not limited to, recruitment, hiring, promotions, transfers, terminations, compensation, benefits, and participation in Devon sponsored training and social and recreational programs.

Devon maintains compliance with the federal Genetic Information Nondiscrimination Act ("GINA"), which generally makes it illegal for health insurance companies, group health plans, and employers to discriminate against employees based on the employee's genetic information. Devon will maintain all genetic information in a confidential manner and in a separate medical file so as to prevent any unlawful disclosure.

5 Consequences of Violation of Policy

An employee who is found to have violated this policy will be subject to disciplinary action, up to and including termination of employment. The AA/EEO Officer shall be notified in all instances in which evidence of discrimination is found.

6 Other Considerations

An individual who feels he or she has been denied an equal employment opportunity must immediately bring the matter to the attention of his or her supervisor, manager, department head, or any member of Human Resources (405.235.3611). Information of this nature may also be reported through the use of the Helpline (800.882.8622). The complainant may be asked to put the complaint in writing. All allegations of discrimination will be reported to Human Resources, which shall promptly undertake an investigation of the complaints. All complaints will be kept confidential to the maximum extent possible. Upon completion of the investigation, the complainant shall be advised of the conclusion reached in the investigation.

All employees have a duty to report any conduct that they believe violates this policy. In addition, every employee has a duty to cooperate with any investigation conducted by Devon, regardless of whether the investigation is being conducted by Devon officials or outside parties retained by Devon for this purpose.

Retaliation against an employee because of his or her use of Devon's complaint procedure is strictly prohibited. Employees and applicants shall not be subjected to harassment, intimidation, threats,

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coercion, or discrimination because they have (i) engaged or may engage in filing a complaint or assisting or participating in an investigation, evaluation, hearing or other activity relating to a violation of this policy or any U.S. federal, state or local law requiring equal employment opportunity, or (ii) opposed any act or practice made unlawful by such laws, or (iii) exercised any right protected under such laws. However, because of the serious nature of the alleged offense, employees who knowingly allege a false claim against any other employee may be subject to disciplinary action, up to and including termination of employment.

The Policy Owner will review this policy annually.

7 Definitions

Devon

Devon Energy Corporation and each of its direct or indirect wholly-owned subsidiaries

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