

DEVON ENERGY

2021 Political Activity and Lobbying Report

SUMMARY

POLITICAL CONTRIBUTIONS

527 Contributions	\$	350,000
Total	\$	350,000

DECPAC CONTRIBUTIONS

DECPAC	\$	7,500
Total	\$	7,500

TRADE ASSOCIATIONS

Non-deductible Dues	\$	2,035,005
Total	\$	2,035,005

LOBBYING

State	\$	433,454
Total	\$	433,454

Consistent with its core values, Devon adheres to high ethical standards when it participates in government affairs and the political process, and accordingly provides this report of political contributions and lobbying expenditures for the benefit of the company’s stockholders, other stakeholders and the general public.

Devon’s political activities and lobbying are consistent with Devon’s public policy positions and business objectives, some of which are outlined below, and are not predicated on the personal views of Devon’s employees or board of directors. We advocate on matters of public interest and are committed to doing so in compliance with all applicable laws, rules and regulations. This includes financial

disclosures, which are extensive and publicly accessible, outlining our lobbying expenditures. **(See Devon’s Sustainability Report for additional detail)**

Corporate Political Contributions

The company may contribute its funds or assets (including property, services or use of facilities) as political contributions only if in accordance with applicable law and as authorized by our vice president - Public and Government Affairs, who regularly updates Devon’s executive committee (including the company’s president and CEO) and board on lobbying and political activities. **(See Devon’s Code of Business Conduct and Ethics)** Devon did not have any corporate contributions in 2021.

527 Contributions

From time to time, Devon also supports other tax-exempt organizations, including those organized under section 527 of the Internal Revenue Code, to help advance its public policy goals. Those public policy goals include, but are not limited to:

- **Encouragement of free and open markets for all products including oil and natural gas**
- **Supporting competitive state and federal tax rates**
- **Recognizing states’ rights to regulate oil and gas operations while opposing a federal “one size fits all” approach**
- **Growing U.S. energy production**



- **Supporting safe, science based and non-duplicative regulations for oil and gas activities**
- **Encouraging effectiveness and efficiency at all levels of government**

In 2021, Devon’s 527 contributions consisted of the following:

Senate Leadership Fund.....	\$	250,000
Republican Governor’s Assoc....	\$	100,000
Total	\$	350,000

Devon has not used corporate or DECPAC funds to make any direct independent expenditures on behalf of candidates running for public office.

Ballot Measures

When advisable, Devon may contribute corporate funds to ballot measures that could affect Devon’s business practices or the communities in which we operate. In 2020, Devon did not contribute to any ballot measures.

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DECPAC Contributions

Devon formed and pays the operating expenses of Devon Energy Corporation Political Action Committee (“DECPAC”), a voluntary, nonprofit, unincorporated, non-partisan political committee composed of members (eligible company employees and other persons) who make voluntary contributions.

Subject to approval of its board, DECPAC disburses contributions to political parties or candidates who support pro-business and pro-energy issues. In 2021, DECPAC contributed a total of \$7,500. A comprehensive list of all DECPAC contributions, giving criteria and board members, as well as a summary of DECPAC’s fundraising, are included in the [2021 DECPAC Annual Report](#).

2021 DECPAC Contributions

Federal candidates.....	\$ 7,500
Total	\$ 7,500

Contributions are also publicly reported pursuant to state and federal law to the following authorities:

Federal Election Commission

fec.gov

Oklahoma Ethics Commission

ok.gov/ethics

Texas Ethics Commission

ethics.state.tx.us

Wyoming Campaign Finance Disclosure

wycampaignfinance.gov

Trade Associations

Like its peers, Devon is a member of and actively engages in various industry and trade groups (organized under section 501(c)(6) of the Internal Revenue Code) in the United States. These associations engage in setting industry standards

promoting educational initiatives regarding issues that affect our industry, as well as engaging in lobbying activities that seek to promote legislative solutions that are sound and responsible, while generally advancing Devon’s business goals and interests.

In 2021, Devon paid approximately \$2 million in dues considered non-deductible by the IRS to 501(c)(6) organizations for lobbying, grassroots and industry advocacy activities.

Trade Associations	Non-deductible Dues
American Petroleum Institute.....	\$ 1,573,205
American Exploration and Production Council.....	\$ 206,500
Oklahoma State Chamber.....	\$ 82,300
Texans For Lawsuit Reform....	\$ 64,000
National Association of Manufacturers.....	\$ 32,208
The United States Chamber of Commerce.....	\$ 22,500
Petroleum Alliance of Oklahoma.....	\$ 18,000
Domestic Energy Producers Alliance.....	\$ 15,000
Texas Oil and Gas Association.....	\$ 10,191
Western Energy Alliance.....	\$ 4,500
Petroleum Association of Wyoming.....	\$ 3,250
National Petroleum Council..	\$ 2,601
Wyoming Business Alliance...	\$ 750
Total	\$ 2,035,005

Federal Lobbying

In past years, Devon reported federal lobbying expenses arising from the work of its employees and the activities of its trade associations. Following the closing of the Devon-WPX merger, Devon was no longer required to register under the Lobbying

Disclosure Act as no employees met the threshold for reporting under the Lobbying Disclosure Act. Accordingly, this report does not reflect federal lobbying expenses associated with our employees.

To ensure that all applicable activity and costs are accurately reported, Devon’s compliance system undergoes an annual internal audit. To ensure outside oversight, Devon periodically engages outside counsel for guidance on political compliance by public companies.

State Lobbying

In 2021, Devon engaged in lobbying activity at the state level in New Mexico, Oklahoma, Texas and Wyoming. These activities, including third-party lobbyists, totaled \$433,454, and were reported pursuant to state law.

New Mexico.....	\$ 105,260
Oklahoma.....	\$ 39,694
Texas.....	\$ 179,655
Wyoming.....	\$ 108,845
Total	\$ 433,454