



Corporate Giving Policy

Hierarchy Level: Policy	Document Type: Devon US	Page: 1 of 5
Owner: Executive Vice President Human Resources and Administration	Applies to: All Devon	Doc. ID: 112901668
Last Revised: 9/15/2022	Review Cycle: Every 1 Year	Implemented: 1/2/2005

1 Purpose

This Corporate Giving Policy (Policy) provides guidelines to determine which causes we consider to be consistent with our corporate giving philosophy.

2 Applicability

This Policy applies to all contributions made, or requested to be made, on behalf of Devon.

3 Company Assistance/Exceptions

If you have any questions about this Policy, please contact the Director of Community Relations in the Community Relations Department, at (405) 228-8701.

4 Policy Statement

4.1 General Guidelines

The following general guidelines will be used to determine which giving opportunities are consistent with our giving philosophy:

- Organizations must be registered charities or nonprofit organizations to receive funding.
- Contributions will be focused in Oklahoma City and other areas where Devon has a business presence.
- Devon does not discriminate against individuals on the basis of race, color, religion, gender, sexual orientation, gender identity, age, national origin, military status, veteran status, disability, or any legally protected characteristic. Devon expects the organizations we support to adhere to similar principles.
- The corporate giving program provides support in the following areas:
 - arts and culture;
 - community development;
 - social services;
 - education with an emphasis on Science, Technology, Engineering, and Math (STEM);
 - emergency response and preparedness (field); and
 - environment and conservation.

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- The corporate giving program does not generally support:
 - individuals and/or individual families;
 - advertising;
 - faith-based organizations or causes that are only evangelical in nature;
 - fraternal and/or partisan organizations;
 - causes that represent a conflict of interest or conflict with Devon's corporate values; and
 - professional trade groups outside of our industry.
- In-kind contributions, such as surplus vehicles and office furniture, may be made to organizations that meet the criteria for financial support. These contributions may not be made prior to appropriate notification and approval from the Community Relations Department.
- Political contributions, whether in the form of corporate campaign contributions, campaign contributions, or in-kind contributions to candidates or organizations for political purposes, are governed by our Code of Business Conduct and Ethics. Any such contribution shall be approved by our Vice President, Public and Government Affairs in accordance with and as limited by, applicable law.
- Requests for individual support will not be considered.
- Memberships and dues to trade groups and business and civic organizations, such as chambers of commerce, are not considered contributions for the purposes of this Policy.
- Contributions will generally be geared toward project-based funding for an organization versus support of general endowments.
- Contributions are awarded on a one-time basis, i.e., a contribution one year does not guarantee a contribution in subsequent years. However, multi-year commitments or pledges may be made with the approval of the Corporate Giving Committee or Chief Executive Officer (CEO).

4.2 Contributions Budgets

Devon's Corporate Giving Committee will approve the aggregate contributions budget annually.

The contributions budget will be included in the Community Relations Department budget. Individual departments and business units shall not budget for or code items as contributions within their respective cost centers, unless approved by community relations, the Corporate Giving Committee, or the CEO.



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4.3 Procedure for Approval and Payment of Contribution Requests

- All contribution requests should be sent to the Community Relations Department for handling. It is preferred that application come through Devon's online grant application.
- The Corporate Giving Committee or the CEO shall approve all capital campaign requests.
- Other contributions, occurring outside of the annually approved budget, will be approved by the Corporate Giving Committee or CEO and processed for payment by the Community Relations Department. This includes contributions made to trade groups and industry associations. In addition to specific contributions approved by the Corporate Giving Committee, the Corporate Giving Committee may approve a certain amount (the Discretionary Contributions Cap) to be used for discretionary contributions which will be distributed in accordance with this Policy's general guidelines.
- All charitable contributions in the amount of \$1 million or greater, whether one-time or multi-year commitments or pledges, must be reported annually to the Audit Committee of the Board of Directors.
- The annual Charitable Contributions Report should itemize any individual contribution representing more than 5% of the Company's overall charitable contributions for the year.
- All charitable contributions in the amount of \$10 million or greater shall be approved by the Governance, Environmental, and Public Policy Committee in a timely manner.
- Automated Clearing House Checks (ACH) payments or checks will be issued in Oklahoma City and mailed directly to the recipient or, if requested, returned to the field office or employment center for presentation purposes.
- A postage-paid tax information card will be mailed with all contribution checks, and recipients will return the card to Devon's Community Relations Department.

Subject to the Discretionary Contributions Cap, the following persons may approve contributions up to the respective amounts identified:

Business Unit Vice President, SVP or EVP..... \$ 50,000
Director, Community Relations \$ 10,000

In addition, the CEO and the Corporate Giving Committee may approve additional contributions.



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5 Consequences of Violation of Policy

Any violation of this Policy may result in disciplinary action, up to and including termination of employment.

6 Other Considerations

To meet the ever-changing needs of the communities in which we operate, the Community Relations Department welcomes feedback and suggestions to keep this Policy enlightened and relevant in today's environment. If you have any questions, please contact the Director of Community Relations in the Community Relations Department, at (405) 228-8701.

This Policy will be reviewed annually under the direction of the Policy Owner.

6.1 CORPORATE GIVING PHILOSOPHY

Devon is committed to supporting and strengthening vibrant, safe, and educated communities in areas where it operates. Devon invests in innovative initiatives that enhance communities and provide opportunities for people where we live and work. We focus our resources where we can have the greatest impact and on programs that align with our values and business goals. Working to improve the overall quality of life in the communities where we do business builds trust among our employees, builds goodwill in our communities, and makes us a stronger company. Devon designates a certain portion of its giving to supporting its employee's charitable and volunteer activities through a companywide Gift Matching Program.

Devon receives a large number of requests for contributions each year from a variety of worthy causes. Not surprisingly, there are far more requests than Devon has resources to fund. The goal of this Policy is to:

- ensure contribution requests go through Devon's corporate giving process;
- provide guidelines to determine which causes we consider to be consistent with our corporate giving philosophy; and
- establish a consistent process for responding to contribution requests. This will:
 - ensure that requests are reviewed by the Community Relations Department and if approved by the Corporate Giving Committee or the CEO, routed for payment as scheduled in a timely manner;
 - enable the tracking of all contribution requests – both approved and denied – to monitor our overall giving profile and track consistency within the established guidelines; and
 - support activities that relate closely to Devon's business values and goals.



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7 Definitions

Devon

Devon Energy Corporation and each of its direct and indirect wholly-owned subsidiaries. We, our, us, and similar terms refer to Devon.

You or you

And similar terms refer to Devon employees.