



Equal Employment Opportunity Policy

Hierarchy Level: Policy	Document Type: Code of Conduct	Page: 1 of 3
Document Owner: Senior Vice President of Human Resources	Applies to: Devon US	112841070
Revision Date: 01/01/2018	Review Cycle: Every 1 Year	Effective 06/18/2014

I. 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.

II. APPLICABILITY

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

III. COMPANY ASSISTANCE/EXCEPTIONS

The Senior Vice President - Human Resources 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.

IV. 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, 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 and reporting to the CEO on the status of our Equal Employment Opportunity and Affirmative Action efforts.

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



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genetic information in a confidential manner and in a separate medical file so as to prevent any unlawful disclosure.

V. CONSEQUENCES OF VIOLATION OF POLICY

An employee who is found to have violated this policy by engaging in discriminatory conduct 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.

VI. 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 requested to put the complaint in writing. All allegations of discrimination must be reported to Human Resources immediately upon learning of the allegations. Human Resources shall promptly undertake an investigation of any complaints of discrimination. 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, 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.



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VII. DEFINITIONS

Devon	Devon Energy Corporation and each of its direct or indirect wholly-owned subsidiaries
We/Our/Us	The terms "we," "our," "us" and similar terms refer to Devon, and the terms "you" and "your" refer to Devon employees
Including	As well as any form of the term will not be limiting or exclusive