2017 Political Activity and Lobbying Report





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.

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 <u>Devon's Corporate Social</u> Responsibility Report for additional detail.)

SUMMARY

Political Contributions

 Corporate
 \$ 62,000

 DECPAC
 \$ 137,000

 PACs & 527s
 \$ 1,000,000

 Total
 \$ 1,199,000

Lobbying

 Federal
 \$ 1,526,250

 State
 \$ 16,142

 Total
 \$ 1,542,392

Corporate Political Contributions

The company may contribute as political contributions its funds or assets (including property, services or use of facilities) 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 <u>Code of Business Conduct and Ethics</u>.) Devon's corporate contributions in 2017 to support state candidates and political organizations totaled \$62,000 and consisted of the following:

New Mexico	\$ 37,000
Virginia	\$ 25,000

DECPAC Contributions

Devon formed and pays the operating expenses of Devon Energy Corporation Political Action Committee ("DECPAC"), a voluntary, nonprofit, unincorporated, nonpartisan 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 2017, DECPAC contributed a total of \$137,000. 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 2017 DECPAC Annual Report.

2017 DECPAC contributions

Federal candidates	\$ 81,750
Federal party committees	\$ 30,000
State candidates	\$ 25,250

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 Di	clocuro

Wyoming Campaign Finance Disclosure

wycampaignfinance.gov

527 Contributions

From time to time, Devon also supports other taxexempt organizations, including those organized under section 527 of the Internal Revenue Code, to help advance its public policy goals. In 2017, Devon contributed a total of \$1,000,000 to these organizations. Devon has not used corporate or DECPAC funds to make any direct independent expenditures on behalf of candidates running for public office.

Federal Lobbying

In 2017, the company's federal lobbying expenses totaled approximately \$1,526,250.

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

As required by the Lobbying Disclosure Act (LDA), Devon files quarterly reports that describe issues lobbied and the amount spent on lobbying activity. Because Devon uses "Method A" reporting (as defined in the LDA), this amount includes lobbying expenses incurred by trade associations supported by Devon. These reports are publicly available at lobbying disclosure.house.gov.

For 2017, Devon's lobbying expenses consisted of the following:

Employee time	\$	242,364
Contract lobbyists	\$	122,931
Trade associations	\$ 1	L,160,955

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 2017, Devon engaged in lobbying activity at the state level in New Mexico, Oklahoma, Texas and Wyoming. These activities totaled \$16,141, and were reported pursuant to state and federal law to the following authorities:

New Mexico Secretary of State	\$ 3,562
Oklahoma Ethics Commission	\$ 587
Texas Ethics Commission	\$ 4,005
Wyoming Secretary of State	\$ 7,987

Subsequent Reports

Devon expects to annually publish a Political Activity and Lobbying Report, which will include a summary of contributions and lobbying expenses for the prior year.



