

DEVON ENERGY

2019 Political Activity and Lobbying Report

SUMMARY

POLITICAL CONTRIBUTIONS

Corporate	\$ 114,200
Trade Associations	\$ 2,030,057
Total	\$ 2,144,257

DECPAC CONTRIBUTIONS

DECPAC	\$ 83,500
Total	\$ 83,500

LOBBYING

Federal	\$ 718,337
State	\$ 459,480
Total	\$ 1,177,817

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 of Public and Government Affairs and as approved by Devon’s CEO and Chief Legal and Administrative Officer. The governance committee of our board of directors reviews all expenditures related to lobbying and political activities, trade association dues, as well as other political expenditures. A report is also provided to our board annually. (See [Devon’s Code of Business Conduct and Ethics](#)) Devon’s corporate contributions in 2019 went to support 23 state candidates and political organizations totaling \$114,200 and consisted of the following:

New Mexico	\$ 104,200
Tribal Elections	\$ 10,000
Total	\$ 114,200

(See detailed list of recipients)

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 2019, Devon paid approximately \$2 million in dues considered non-deductible by the IRS to 501(c)(6), which are detailed below.

Trade Associations	Non-deductible Dues
American Petroleum Institute.....	\$ 1,490,023
New Mexico Oil and Gas Association.....	\$ 146,640
The United States Chamber of Commerce.....	\$ 118,000
National Association of Manufacturers	\$ 100,766
Oklahoma State Chamber.....	\$ 77,963
Petroleum Alliance of Oklahoma.....	\$ 30,000
Texas Oil and Gas Association.....	\$ 28,039
American Exploration and Production Council	\$ 28,000
Western Energy Alliance.....	\$ 3,750
Petroleum Association of Wyoming.....	\$ 2,700
National Petroleum Council.....	\$ 2,601
Independent Petroleum Association of America	\$ 1,575
Total	\$ 2,030,057

(See full list of trade association dues – deductible and non-deductible)

2019 POLITICAL ACTIVITY AND LOBBYING REPORT

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 positions. In 2019, DECPAC contributed a total of \$83,500. 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 [2019 DECPAC Annual Report](#).

2019 DECPAC contributions

Federal candidates	\$ 45,000
Federal party committees	\$ 30,000
State candidates.....	\$ 8,500
Total	\$ 83,500

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

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:

- Encouraging 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 2019, Devon did not contribute to any 527 organizations.

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 necessary, Devon may contribute corporate funds to ballot measures that could affect Devon’s business practices or the communities in which we operate. In 2019, Devon did not contribute to any ballot measures.

Federal Lobbying

In 2019, the company’s federal lobbying expenses totaled approximately \$718,337.

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 lobbyingdisclosure.house.gov.

For 2019, Devon’s lobbying expenses consisted of the following:

Employee time.....	\$ 318,860
Contract lobbyists.....	\$ 27,431
Trade associations	\$ 372,046
Total	\$ 718,337

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 2019, Devon engaged in lobbying activity at the state level in New Mexico, Oklahoma, Texas, and Wyoming. These activities, including employee wages and third-party lobbyists, totaled \$459,480, and were reported pursuant to state and federal law to the following authorities:

Employee Wages.....	\$ 125,000
New Mexico Secretary of State	\$ 120,820
Oklahoma Ethics Commission	\$ 41,038
Texas Ethics Commission	\$ 143,984
Wyoming Secretary of State	\$ 28,638
Total	\$ 459,480

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.