

DEVON ENERGY

2020 Political Activity and Lobbying Report

SUMMARY

POLITICAL CONTRIBUTIONS

Candidate	\$ 5,000
527 Contributions	\$ 250,000
Total	\$ 255,000

DECPAC CONTRIBUTIONS

DECPAC	\$ 131,000
Total	\$ 131,000

TRADE ASSOCIATIONS

Non-deductible Dues	\$ 1,978,729
Total	\$ 1,978,729

LOBBYING

Federal	\$ 404,858
State	\$ 338,134
Total	\$ 742,992

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’s corporate contributions in 2020 went to support 1 state candidate.

New Mexico candidate*.....	\$ 5,000
Total	\$ 5,000

* Crystal Diamond (R)

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 2020, Devon’s 527 contributions consisted of the following:

Senate Leadership Fund.....	\$ 250,000
Total	\$ 250,000

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.

2020 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 issues. In 2020, DECPAC contributed a total of \$131,000. 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 [2020 DECPAC Annual Report](#).

2020 DECPAC Contributions

Federal candidates.....	\$ 59,500
Federal party committees.....	\$ 15,000
State candidates.....	\$ 56,500
Total	\$ 131,000

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 2020, 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.....	\$ 1,405,196
New Mexico Oil and Gas Association.....	\$ 281,640
The United States Chamber of Commerce.....	\$ 22,500
National Association of Manufacturers.....	\$ 25,766
Oklahoma State Chamber.....	\$ 82,641
Petroleum Alliance of Oklahoma.....	\$ 54,000
Texas Oil and Gas Association.....	\$ 9,810
American Exploration and Production Council.....	\$ 84,000
Western Energy Alliance.....	\$ 9,000
National Petroleum Council..	\$ 2,601
Independent Petroleum Association of America.....	\$ 1,575
Total	\$ 1,978,729

Federal Lobbying

In 2020, the company’s federal lobbying expenses totaled approximately \$404,858.

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 2020, Devon’s lobbying expenses consisted of the following:

Employee time.....	\$ 218,245
Trade associations.....	\$ 186,613
Total	\$ 404,858

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 2020, Devon engaged in lobbying activity at the state level in New Mexico, Oklahoma, Texas and Wyoming. These activities, including third-party lobbyists, totaled \$338,134, and were reported pursuant to state and federal law to the following authorities:

New Mexico Secretary of State	\$ 103,560
Oklahoma Ethics Commission...	\$ 39,600
Texas Ethics Commission.....	\$ 126,352
Wyoming Secretary of State.....	\$ 88,622
Total	\$ 338,134

Subsequent Reports

In January 2021, Devon merged with WPX Energy. In future years, we expect to publish reports that reflect the activities and lobbying of the integrated company.