

Company Name Devon Energy Corp
Industry Extractives
UNGP Core Score (*) 2.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
0	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
0	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
2.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: General HRs commitment • Not met: UNGC principles 1 & 2 • Not met: UDHR: The Company states that 'At Devon, we are committed to the philosophy expressed in the Universal Declaration of Human Rights, as proclaimed by the United Nations General Assembly 70 years ago. Devon strongly endorses that recognition of the inherent dignity of all members of the human family is the foundation of freedom, justice and peace, which is a fundamental principle of the Universal Declaration of Human Rights'. However, it fails to state a clear commitment to Human Rights and the Universal Declaration. [Statement on human rights, 03/2019: devonenergy.com & Sustainability Report 2019, 2020: devonenergy.com] • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: The Company states that "Our core values embrace both social progress and economic growth, consistent with the United Nations Guiding Principles on Business and Human Rights". However, it fails to state a clear commitment to Human Rights. [Statement on human rights, 03/2019: devonenergy.com] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: ILO Core: The Company states 'We also are guided by the principles articulated in the Declaration of Fundamental Principles and Rights at Work, adopted 20 years ago by the International Labor Organization. These principles include prohibition on child labor, forced labor and discrimination in the workplace'. However, "guided" by the principles is not considered as a formal commitment according to CHRB wording criteria. [Sustainability Report 2019, 2020: devonenergy.com & Statement on human rights, 03/2019: devonenergy.com] • Not met: UNGC principles 3-6 • Not met: Explicitly list All four ILO apply to EX BPs <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core • Met: Respect H&S of workers: The code of conduct refers to the EHS Philosophy, which states that 'we will comply with all applicable environmental, health and safety laws and regulations and adopt best sound professional judgement where laws and regulations do not exist'. 'Occupational health and safety values will not be compromised'. In all Environment, health and safety the Philosophy document commits to job competency and contingency planning. [Code of Business Conduct and Ethics, 2018: s2.q4cdn.com & Health & Safety on website, N/A] • Met: H&S applies to EX BPs: Our commitment to protecting the environment and providing a safe and healthy workplace for our Covered Persons and other business associates is one of our core values. No job is so important, and no task is so urgent, that necessary steps cannot be taken to assure the safety and health of our Covered Persons and business associates. [Code of Business Conduct and Ethics, 2018: s2.q4cdn.com]
A.1.4	Commitment to engage with stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement: The Company states that 'As appropriate, we engage with and incorporate stakeholder input on our plans and activities. We continuously evaluate ways to enhance awareness of human rights issues and engage with our key stakeholders to continue to improve our approach'. However, it is not clear if the Company has a commitment to stakeholder

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			<p>engagement. [Statement on human rights, 03/2019: devonenergy.com & Sustainability Report 2019, 2020: devonenergy.com]</p> <ul style="list-style-type: none"> • Not met: Regular stakeholder engagement: The Company states in its Sustainability Report that 'We recognize that our actions can affect our neighbours, and we are dedicated to improving the compatibility of our operations within the communities where we do business. Through formal meetings and informal conversations, we engage regularly with shareholders, neighbours, landowners, mineral-rights holders, policymakers, legislators, suppliers, vendors, service companies, our employees and their families'. However, no evidence found of actual engagement. [Sustainability Report 2018, 11/06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The Company states that 'We are part of the communities in which we operate and actively engage with community members to understand the environmental and human rights impacts of our operations. When assessing and addressing the impacts of our operations, we will consult with those who may be affected, including indigenous peoples, where this is possible and appropriate'. However, it is not clear if the Company has a commitment to stakeholder engagement in the development or monitoring of its human rights approach. [Statement on human rights, 03/2019: devonenergy.com] • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company states that 'Should any risks be identified, Devon will investigate, address and respond to such concerns. Violations of our human rights standards are serious offenses that may result in termination, penalties or other legal remedies. We are committed to remaining proactive in our ability to address adverse human rights impacts that may arise'. However, it fails to state a clear commitment to remedy. [Statement on human rights, 03/2019: devonenergy.com & Sustainability Report 2018, 11/06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions • Met: Senior responsibility for HR: The Company has set up the Environmental, Social and Governance (ESG) Committee led by Chris Kirt, vice president corporate governance and secretary. [Sustainability Report 2018, 11/06/2019] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for EX BRs
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: The Company has a materiality assessment system, however, it is not clear if the company has a process in place that identify Human Rights risks. [Sustainability Report 2019, 2020: devonenergy.com] • Not met: identifying risks in EX business partners <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Action Plans to mitigate risks Not met: Including amongst EX BPs Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Comms plan re identifying risks Not met: Comms plan re assessing risks Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans Not met: Including EX business partners Score 2 <ul style="list-style-type: none"> Not met: Responding to affected stakeholders concerns Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company operates the 24-hour Ethics & Compliance Helpline, which is available to report concerns regarding potential violations of its Code, including any adverse human rights impacts. [Ethics & Compliance helpline, 02/2020: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved: The Company states: 'Devon investigates reports promptly, with 100% of cases initiated in 2018 closed by year-end at an average of 19 days from the opening of an investigation to its close. In 2018, 71% of reports were unsubstantiated or simple inquiries. We have not experienced a pattern of specific types of allegations or issues related to specific locations. ' No further details against complaints related to human rights were found. [Ethics & Integrity, N/A: devonenergy.com] Not met: Channel is available in all appropriate languages Not met: Expect EX BPs to have equivalent grievance system Not met: Opens own system to EX BPs workers: Although the EthicsPoint is on a public website, it is not clear whether it is open to other people beyond employees.
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Grievance mechanism for community: During the previous review, the ethics point website indicated who could make reports. No evidence found of such statement during this last review. [Ethics & Compliance helpline, 02/2020: secure.ethicspoint.com & Ethics & Compliance helpline FAQ, N/A: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> Not met: Describes accessibility and local languages Not met: Expects EX BPs to have community grievance systems Not met: EX BPs communities use global system
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Describes how remedy has been provided Not met: Says how it would remedy key sector risks

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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