

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Devon Energy Corp
Sector Extractives
Overall score 4.8 out of 100

Theme score	Out of	For theme
0.2	10	A. Governance and Policy Commitments
0.0	25	B. Embedding Respect and Human Rights Due Diligence
3.0	20	C. Remedies and Grievance Mechanisms
0.7	25	D. Performance: Company Human Rights Practices
1.0	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2022 Methodology document for the sector concerned. 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

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

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: Score 1</p> <ul style="list-style-type: none"> • Not Met: General HRs commitment: The Human Rights statement indicates that 'Devon operates its business in a manner that is consistent with human rights expectations, including the philosophy expressed in the Universal Declaration of Human Rights. Devon strongly endorses that recognition of the inherent dignity of all members of the human family is the foundation of freedom, justice and peace'. However, the expression 'consistent with' is not considered a formal statement of commitment to respect human rights. It also indicates that 'Devon's commitment to protect human rights is reflected in our Code of Business Conduct and ethics'. However, no explicit commitment to respect human rights was found. [Statement on human rights, N/A: dvnweb.azureedge.net] • Not Met: Universal Declaration of Human rights (UDHR): See above. In addition, the Sustainability report indicates that 'we strongly endorse the Universal Declaration of Human Rights' recognition that the inherent dignity of all members of the human family is the foundation of freedom, justice and peace'. However, this seems to be a commitment to a specific bit of the Declaration rather than the Declaration itself. In addition, it is expected that policy commitments are placed in formal policy documents. [Statement on human rights, N/A: dvnweb.azureedge.net] & [2022 Sustainability report, N/A: dvnweb.azureedge.net] • Not Met: International Bill of Human Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to UNGPs: The Human Rights statement indicates that 'Our core values embrace both social progress and economic growth, consistent with the United Nations Guiding Principles on Business and Human Rights'. However, no evidence found of formal, direct commitment to follow the Guiding Principles. [Statement on human rights, N/A: dvnweb.azureedge.net] • Not Met: Commitment to OECD MNE Guidelines
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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: Commitment to ILO core principles: The Human Rights statement indicates that 'We are also guided by the principles articulated in the International Labor Organization's Declaration of Fundamental Principles and Rights at Work'. However, 'guided by' is not considered a formal commitment to the ILO Declaration according to CHRB wording criteria. [Statement on human rights, N/A: dvnweb.azureedge.net] • Not Met: Explicitly lists all four ILO core principles: The Human Rights statement indicates that 'We are also guided by the principles articulated in the International Labor Organization's Declaration of Fundamental Principles and Rights at Work, including the prohibition of child labor, forced labor and discrimination in the workplace'. No further evidence found, including commitments to respect the rights to freedom of association and collective bargaining. [Statement on human rights, N/A: dvnweb.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects BPs/JVs to commit to ILO core principles • Not Met: Explicitly lists all four ILO core principles for BPs/JVs
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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"> • Met: Commitment to respect H&S of workers: The Code of conduct states that '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, N/A: dvnweb.azureedge.net] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to H&S of workers: See above. Similar indication is given in contractor qualification requirements: 'No job is so important and no task is so urgent that the necessary steps cannot be taken to perform it safely. The safety and health of our employees, contractors and the public are at the core of Devon's management philosophy. Everyone on a Devon location, including contractor personnel, have the authority and responsibility to stop unsafe work, regardless of job description, industry experience or time spent on the location'. [Code of Business Conduct and Ethics, N/A: dvnweb.azureedge.net] & [Supplier Qualification Requirements on website, 2019: devonenergy.com] • Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	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: Commitment to respect land ownership/natural resources as in VGGT • Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards • Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Human Rights statement indicates that 'Devon incorporates human rights considerations in all relevant business decisions and, as a U.S. domestic company with assets solely in the U.S., complies with all federal and state requirements to protect human rights and ensure the rights of indigenous people in the U.S.'. However, this indicator looks for either a direct commitment to respect indigenous peoples rights, or to the ILO 169 convention or the UN Declaration on the rights of indigenous peoples. [Statement on human rights, N/A: dvnweb.azureedge.net] • Not Met: Expects EX BPs to make these commitments <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing • Not Met: Commitment to respect the right to water: The Company's EHS philosophy states that 'we will prioritize the conservation, reuse, and recycle of water in our operations, encouraging the use of water that would not otherwise be consumed for drinking or other public uses. We will execute a sustainable water

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			management strategy by focusing on our water principles -stakeholder engagement, water management planning, technology evaluation and deployment, and best practices development'. However, no formal policy commitment found to respect the right to water (not negatively affect access to safe water). [EHS Philosophy, N/A: dvnweb.azureedge.net] • Not Met: Expects EX BPs to make these commitments
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commitment to Voluntary Principles on Security and HRs • Not Met: Uses only ICoCA members as security providers • Not Met: Commits to International Humanitarian Law Score 2 • Not Met: Expects EX BPs to commit to these rights
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commitment to remedy adverse HRs impacts: 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 any adverse impacts on human rights that it has caused or contributed to. [Statement on human rights, N/A: dvnweb.azureedge.net] • Not Met: Expects EX BPs to make this commitments Score 2 • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with EX BPs on remedy
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects BPs to make this commitment Score 2 • Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board level responsibility for HRs: The Company has a Environmental, Social and Governance (ESG) Committee, however, it is not clear if a Board member is involved in the committee. [Environmental, Social, and Governance Steering Committee: dvnweb.azureedge.net] • Not Met: Describes HRs expertise of Board member Score 2 • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Process to review HRs strategy at board level • Not Met: Example of HRs issues/trends discussed in last reporting period Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: At least one board member incentive linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board process to review business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model Score 2 • Not Met: Meets both requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Example of actions resulting from reviews

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HRs implementation and decision making Score 2 • Not Met: Describes day-to-day responsibility for implementing HRs commitments • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation with EX BPs
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Senior manager incentives linked to HRs commitments: The Company indicates it incorporates safety and other ESG metrics into its executive compensation structure, however, no specific metrics were found. [2022 Sustainability report, N/A: dvnweb.azureedge.net] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: HRs risks integrated as part of enterprise risk system: The Company states that the board's four standing committees consider the current and emerging risks inherent in their areas of oversight and update the full board. Its management team oversees and reports to the board on the company's day to day efforts to manage strategic, financial, operational, market, ESG, EHS and other risks to our business. In addition, management executes the board's and committees' risk management directives. However, it is not clear if human rights related risks are included and/or which are these. [2022 Sustainability report, N/A: dvnweb.azureedge.net] • Not Met: Provides an example Score 2 • Not Met: Risk assesment by Audit Committee or independent third party
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations Score 2 • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Describes steps to communicate HRs policies to EX BPs: The Company states that 'Before beginning work, contractors are responsible for reviewing all of the below documents, including those referenced in Devon's agreements, and reviewing them during the performance of any work', which includes the Company's Human Rights Statement. However, this does not comprise all business partners and the Company also indicates that 'Devon may change the documents listed below from time to time without notice'. [Supplier Qualification Requirements on website, 2019: devonenergy.com] Score 2 • Not Met: Describes how HRs policies are contractual/binding for suppliers: The Company states that its 'vendors and suppliers are expected to adopt and adhere to human rights standards, including those in our standard supplier agreements, and we reserve the right to audit our vendors' performance in this area'. However, no further details were found. [2022 Sustainability report, N/A: dvnweb.azureedge.net] • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.5	Training on 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: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: The Company states on its statement on human rights that one of the ways in which Devon implements its human rights commitment is through its Code of Conduct, which provides guidance on human rights issues such as non-discrimination, anti-harassment, and equal employment opportunities. In addition to other training programs, the Company requires all employees to complete periodic training sessions on various aspects of the Code through an annual certification process. However, these seem to be the only human rights-related aspects covered in the code. No evidence found of details of trainings going beyond discrimination/harassment, including other aspects covered by the Company's HR statement. [Statement on human rights, 03/2019: devonenergy.com] • Not Met: Trains relevant managers including security on HRs <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains BPs to meet HRs commitments • Not Met: Discloses % suppliers trained
B.1.6	Monitoring and corrective actions	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: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and EX BPs • Not Met: Discloses % of EX BP's monitored • Not Met: Describes how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process • Not Met: Discloses findings and number of correction action processes
B.1.7	Engaging and terminating business relationships	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: HRs performance affects selection EX BPs • Not Met: HRs performance affects ongoing BPs relationships: The Company states that its vendors and suppliers are expected to adopt and adhere to human rights standards, including those in its standard supplier agreements, and the Company reserves the right to audit its vendors' performance in this area. However, it is not clear whether, and how, extractive business partners' human rights performance affects on-going business relationship with the Company. [2022 Sustainability report, N/A: dvnweb.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Not Met: Works with EX BPs to meet HRs requirements
B.1.8	Approach to engagement with affected 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: Describes how workers and communities identified and engaged in the last two years: The Company states that: 'We actively engage with community members where we operate to understand the safety, environmental and human rights impacts of our operations. When assessing and addressing these impacts, we consult with those who may be affected, including indigenous peoples, where possible and appropriate'. However, no information related to the process of identification of the affected stakeholders was found. [2022 Sustainability report, N/A: dvnweb.azureedge.net] • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholder views influenced company's HRs approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	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: Describes process of identifying risks in own operations • Not Met: Describes process for identifying risks in EX BPs <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes how risk identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing 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: Describes assessment process and discloses salient HRs risks • Not Met: Describes how process applies to EX BPs • Not Met: Public disclosure of results of HRs risk assessment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to EX BPs • Not Met: Example of actions decided on at least 1 salient HRs issue <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
B.2.4	Tracking the effectiveness of actions to respond to 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: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.2.5	Communicating on human rights 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: Provides two examples of comms with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company states that 'Our Ethics and Compliance Helpline is available at all times for any stakeholder to report concerns and potential violations of our code, including any adverse human rights impacts. We will investigate, address and respond to any concerns with the utmost attention.' [2022 Sustainability report, N/A: dvnweb.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Company states that its Ethics Helpline service is available in multiple languages, and reports can be made through the phone or website. However, no information found about how the workers are made aware of the helpline. [Ethics & Compliance helpline, 02/2020: secure.ethicspoint.com] • Not Met: Describes how workers in EX BPs access grievance mechanism • Not Met: Expects EX BPs to convey expectation to their BPs
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The Company states that its Ethics and Compliance Helpline is available at all times for any stakeholder to report concerns and potential violations of its Code of Conduct, including any adverse human rights impacts. [2022 Sustainability report, N/A: dvnweb.azureedge.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Not Met: Describes how external individuals/communities access grievance mechanism • Not Met: Expects EX BPs to convey expectation to their BPs
C.3	Users are involved in the	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: Describes how users engaged on design and performance

Indicator Code	Indicator name	Score (out of 2)	Explanation
	design and performance of the mechanism(s)		<ul style="list-style-type: none"> • Not Met: Provides user engagement examples (at least two) on design and performance Score 2 <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes procedure and timescales for managing complaints or concerns: The Company states that it will investigate, address, and respond to any concerns with the utmost attention. However, no evidence was found about response timescales and how complainants will be informed. [2022 Sustainability report, N/A: dvnweb.azureedge.net] Score 2 <ul style="list-style-type: none"> • Not Met: Describes technical, financial, advisory support to enable equal access • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators
C.5	Prohibition of retaliation for raising complaints or concerns	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states that 'To help us maintain our relationships and reputation, Devon employees have an obligation to enforce the code and report potential violations. We do not allow retaliation for making a report in good faith.' [2022 Sustainability report, N/A: dvnweb.azureedge.net] • Met: Describes practical measures to prevent retaliation: The Company states that it uses an independent and objective company, EthicsPoint, to handle all reports. People may report information anonymously and confidentially. [Ethics & Compliance helpline, 02/2020: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified Score 2 <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) 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: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The Company discloses some 'Ethics and compliance hotline metrics', but it does not disclose exact numbers of grievances filed, addressed or resolved. [2022 Sustainability report, N/A: dvnweb.azureedge.net] • Not Met: Example of how lessons from mechanism improved HRs management system Score 2 <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays living wage or sets time-bound target • Not Met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not Met: Achieved paying living wage • Not Met: Reviews definition living wage with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Member of EITI • Not Met: Reports of taxes and revenues beyond legal minimums Score 2 <ul style="list-style-type: none"> • Not Met: Reports taxes and revenue by country • Not Met: Steps taken to promote transparency in non EITI countries • Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Measures to prohibit violence/retaliation against workers for joining trade union • Not Met: Discloses % of total direct operations covered by CB agreements Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: The Company states that 'We prepare our people to work safely with comprehensive orientation and training, on-the-job guidance and tools, safety engagements, recognition and other resources. Employees and contractors are accountable for stopping at-risk work, immediately reporting incidents and near-miss events, and informing visitors of emergency alarms and evacuation plans. Devon uses proven best practices, technologies, tools and materials throughout our operations to safeguard the people working at our worksites and neighbors nearby.' [Safety & Security Website, N/A: devonenergy.com] • Met: Discloses injury rate or lost days for last reporting period: The Company reports that Lost Time Rate (DART) was 0.29 for its employees and 0.17 for its contractors in 2021. [2022 Sustainability report, N/A: dvnweb.azureedge.net] • Met: Discloses fatalities for last reporting period: The Company reports that the fatalities for employees and contractor workforce were 0 in 2021. [2022 Sustainability report, N/A: dvnweb.azureedge.net] Score 2 <ul style="list-style-type: none"> • Not Met: Discloses occupational disease rate for last reporting period • Not Met: Set targets for H&S performance • Not Met: Met targets or explains why not or actions to improve H&S management systems
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Process to identify/recognise indigenous rights holders: The Company states that it incorporates human rights considerations in all relevant business decisions and, complies with all federal and state requirements to protect human rights and ensure the rights of indigenous people in the U.S. When assessing and addressing the impacts of operations, it consults with those who may be affected, including indigenous peoples, where this is possible and appropriate. It takes steps to maintain positive and productive relationships with indigenous communities, including utilizing indigenous-owned businesses for local employment needs and investing back into indigenous communities through community repairs, events, and expansion projects. However, no details were found about process to identify and recognise affected indigenous people. [Statement on human rights, 03/2019: devonenergy.com] Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to FPIC • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes approach to indentifying lang tenure rights holders and negotiating compensation Score 2 <ul style="list-style-type: none"> • Not Met: Describes approach to compensation including valuation • Not Met: Describes steps to meet IFC PS 5 in state deals
D.3.7	Security (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes security implementation (incl. VPs or ICOC) and provides an example • Not Met: Ensures Business Partners/JVs follow security approach Score 2 <ul style="list-style-type: none"> • Not Met: Security and HRs assessment includes input from local communities • Not Met: Two examples of working with local communities to improve security
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes preventative/corrective action plans for water and sanitation risks: The Company states that 'We require reliable access to water used or produced in our drilling and completions operations, and the ability to safely dispose of it. Our water management strategy seeks to balance environmental, economic, operational and social needs, and to mitigate physical risks associated with regional water stress. [...] we've collaborated with government, industry and community stakeholders to find innovative ways to conserve water in our drilling and completions activities across the company. [...] We work to identify and develop alternative sources of water for operational activities and have invested significant capital to reduce our reliance on freshwater. [...] To conserve, we strive to use water that is not suitable for drinking and other public uses and, wherever possible, we use recycled produced water in our drilling and production activities.' However, there are no mentions related to sanitation. [2022 Sustainability report, N/A: dvnweb.azureedge.net] Score 2 <ul style="list-style-type: none"> • Not Met: Sets targets on water stewardship that consider water use by local communities: The Company states that 'Devon established a target to advance our recycled water rate and use 90% or more non freshwater for completions activities in our most active operating areas within the Delaware Basin.' However, it is unclear whether this considers water use by local communities. [CDP Water Security Questionnaire 2022, 04/08/2022: dvnweb.azureedge.net] • Not Met: Reports progress in meeting targets and trends demonstrating progress: The Company states that 'We increased the volume of recycled water consumed by 10% in 2020 compared to 2019.' and 'Since 2015, we have reused over 150 million barrels of water from our water treatment facilities.' However, it is unclear if this relates to public targets set by the Company. [2022 Proxy statement & notice of Annual meeting, 2022: s2.q4cdn.com]
D.3.9	Women's rights (in own extractive operations, which include JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes processes to stop harassment and violence against women: The Company states that 'We have developed a separate policy that stresses Devon's strong opposition to harassment of any type. That separate policy establishes complaint procedures and disciplinary penalties that may be imposed for violation of the policy by any Devon employee.' However, this 'Zero Tolerance Anti-Harassment Policy', was not found to be publicly available. [Code of Business Conduct and Ethics, 2018: s2.q4cdn.com] • Not Met: Working conditions take into account gender issues • Not Met: Measures and steps to address gender pay gap at all levels of employment: The Company states that 'Devon offers equitable pay. Salaries of female and minority employees are, on average, positioned equivalently (+/-2% relative to the applicable pay grade) to those of male and non-minority peers.' However, it is not clear if it has any measures in place to address the gender pay gap where it still exists. [2022 Sustainability report, N/A: dvnweb.azureedge.net] Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap

E. Performance: Responses to Serious Allegations (20% of Total)

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, and so the score of 3.85 out of 80 points scored in themes A-D has been applied to produce a score of 0.96 out of 20 points for theme E.

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