

US corporate human rights index: Tracking changes in company commitments to human rights

Findings as of August 2025

Devon Energy

Indicator	Finding	Source	Source Link
Policies and commitments			
<u>General</u>			
Human rights policy - UNGPs	<p>"Operating our business in a way that is consistent with human rights expectations is Devon's responsibility, aligns with our core values and is a consideration in all relevant business decisions, plans and activities.</p> <p>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. Our core values embrace both social progress and economic growth, consistent with the United Nations Guiding Principles on Business and Human Rights, as well as the commitment to empower others. We're guided by the principles articulated in the International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights at Work, including the prohibition on child labor, forced labor and discrimination in the workplace."</p>	Webpage - Human Rights	https://www.devonenergy.com/sustainability/social/human-rights#:~:text=Respect%20and%20dignity&text=We're%20guided%20by%20the,and%20discrimination%20in%20the%20workplace
Human rights policy - ILO Core Labor Standards	See above		
Forced labor & prison labor	See above		
Human rights defenders & civic space	No evidence		
Gender equality and women's empowerment	<p>"We are also guided by the International Labor Organization's Declaration of Fundamental Principles and Rights at Work and adhere to the principles of internationally recognized human rights regarding the (i) protection of minority rights, including women's rights and the rights of indigenous people...</p> <p>...One of the ways in which Devon implements its human rights commitment is through our Code, which provides guidance on human rights issues such as non-discrimination, anti-harassment and equal employment."</p>	Statement on Human Rights	https://dvnweb.azureedge.net/assets/documents/Sustainability/Social/Human-Rights/DVN_Statement-on-Human-Rights_062424.pdf
Indigenous Peoples	<p>"As a U.S.-based company, Devon complies with all federal and state requirements to protect human rights and ensure the rights of indigenous peoples in the U.S. We are committed to the health and safety of our employees, contractors and communities, and to being a responsible steward of the air, land, water and biodiversity value across our operations.</p> <p>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. Devon takes proactive steps to maintain positive and productive relationships with indigenous communities, source indigenous businesses for local employment needs and invest back into indigenous communities. We respect the significance of indigenous heritage and culture. Where appropriate, we engage third parties to help assess our projects to prevent impact to cultural sites and sensitive wildlife habitat, and our internal Biodiversity Council works to preserve or restore biodiversity value."</p>	Webpage - Human Rights	https://www.devonenergy.com/sustainability/social/human-rights#:~:text=Respect%20and%20dignity&text=We're%20guided%20by%20the,and%20discrimination%20in%20the%20workplace

Natural resources

Land rights No evidence

Free, Prior, and Informed Consent (FPIC) No evidence

Living wage

Living wage, own operations No evidence

Living wage in supply chain No evidence

Human rights due diligence and supply chain

Process for assessing human rights risks and impacts No evidence

Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs) No evidence

Affected stakeholder engagement No evidence

Human rights requirements in supplier code/requirements	"Devon's employees who engage in our business activities are required to conduct such activities in accordance with the goals and principles set forth herein. Our contractors and suppliers are expected to enter into our standard Supplier Agreements whereby they agree to comply with Devon's comprehensive Supplier Qualification Requirements, which include a list of Devon policies, including this Statement, that approved suppliers must adhere to during the performance of any work. Devon expects that its vendors and suppliers adopt and adhere to internationally recognized human rights standards. In addition, Devon's suppliers that are party to our standard supplier agreements are obligated to comply with applicable laws and regulations, including human rights standards, and we reserve the right to audit our vendors' performance in this area."	Statement on Human Rights	https://dvnweb.azureedge.net/assets/documents/Sustainability/Social/Human-Rights/DVN_Statement-on-Human-Rights_062424.pdf
---	--	---------------------------	---

Access to remedy

Grievance mechanism for own employees	"Our 24-hour Ethics & Compliance Helpline is available for any stakeholder to report concerns regarding potential violations of our Code, including any adverse human rights impacts. 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."	Statement on Human Rights	https://dvnweb.azureedge.net/assets/documents/Sustainability/Social/Human-Rights/DVN_Statement-on-Human-Rights_062424.pdf
---------------------------------------	--	---------------------------	---

Grievance mechanism for workers - supply chain See above

Grievance mechanism for external individuals & communities See above

Governance and staffing

Board and/or C-Suite-level oversight No evidence

Senior level responsibility for human rights No evidence

Reporting and transparency

Human rights reporting (integrated or stand-alone)	Integrated into the sustainability report	2023 Devon Energy Sustainability report	https://www.responsibilityreports.com/HostedData/ResponsibilityReportArchive/d/NYSE_DVN_2023.pdf
--	---	---	---

Memberships

RBA	No	RBA	https://www.responsiblebusiness.org/about/members/
EITI	No	EITI	https://eiti.org/companies
VPI	No	VPI	https://www.voluntaryprinciples.org/the-initiative/
WEPs (signatory)	No	WEPs	https://www.weps.org/companies

Lobbying and ethics

Public statement or endorsement in support of mandatory human rights and environmental due diligence

No evidence

Anti-bribery and anti-corruption policy

"Wherever we do business, we will comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, as amended (the "FCPA"). The FCPA makes it a criminal offense to bribe or offer to bribe a foreign governmental or political official to obtain or retain business. The FCPA also requires that Devon maintain and keep records and accounts that fairly and accurately present our activities and transactions. Please refer to the Anti-Corruption Policy for additional information."

Code of Business Conduct and Ethics

https://dvnweb.azureedge.net/assets/documents/Sustainability/Governance/DVN_Code-of-Business-Conduct-and-Ethics.pdf

//END//