



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

February 4, 2016

Deborah L. Daisley
E. I. du Pont de Nemours and Company
deborah.daisley@dupont.com

Re: E. I. du Pont de Nemours and Company

Dear Ms. Daisley:

This is in regard to your letter dated February 3, 2016 concerning the shareholder proposal submitted by As You Sow on behalf of Andrew Behar for inclusion in DuPont's proxy materials for its upcoming annual meeting of security holders. Your letter indicates that the proponent has withdrawn the proposal and that DuPont therefore withdraws its December 28, 2015 request for a no-action letter from the Division. Because the matter is now moot, we will have no further comment.

Copies of all of the correspondence related to this matter will be made available on our website at <http://www.sec.gov/divisions/corpfin/cf-noaction/14a-8.shtml>. For your reference, a brief discussion of the Division's informal procedures regarding shareholder proposals is also available at the same website address.

Sincerely,

Evan S. Jacobson
Special Counsel

cc: Danielle R. Fugere
As You Sow
dfugere@asyousow.org



February 3, 2016

Deborah L. Daisley
Corporate Governance Associate
& Assistant Secretary
DuPont, CRP 730/5216
Tel: 302-999-5411
E-mail: deborah.daisley@dupont.com

[VIA E-MAIL \(shareholderproposals@sec.gov\)](mailto:shareholderproposals@sec.gov)

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

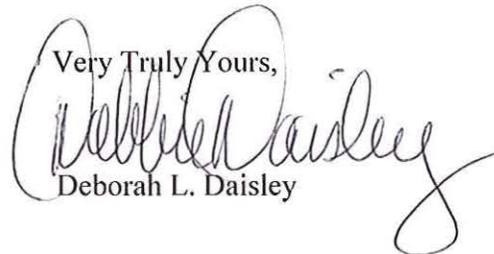
Re: E. I. DU PONT DE NEMOURS AND COMPANY PROXY STATEMENT
-2016 ANNUAL MEETING OF STOCKHOLDERS OMISSION OF
SHAREHOLDER PROPOSAL BY AS YOU SOW

Ladies and Gentlemen:

By letter dated December 28, 2015, DuPont requested that the above-mentioned shareholder proposal properly be omitted from DuPont's proxy materials to be distributed by DuPont in connection with its 2016 Annual Meeting of Stockholders. On February 1, 2016, Austin Wilson, on behalf of As You Sow, notified DuPont that he had formally withdrawn the resolution and notified the SEC of the same.

Accordingly, DuPont hereby withdraws its request for no-action relief.

If you have any questions or require additional information, please contact me at (302) 999-5411.

Very Truly Yours,

Deborah L. Daisley

cc: Austin Wilson



1611 Telegraph Ave, Suite 1450
Oakland, CA 94612

www.asyousow.org
BUILDING A SAFE, JUST, AND SUSTAINABLE WORLD SINCE 1992

February 1, 2016

Erik T. Hoover
Corporate Secretary
E. I. du Pont de Nemours and Company
1007 Market Street
Wilmington, Delaware 19898

Dear Mr. Hoover:

As You Sow greatly appreciates the ongoing dialogue with E. I. du Pont de Nemours and Company (DuPont) regarding political lobbying disclosure. Following As You Sow's submission of the enclosed shareholder proposal for inclusion in the 2016 proxy statement, and subsequent discussions with the company, As You Sow and DuPont have agreed to the following actions.

As You Sow has agreed to withdraw the resolution, filed on behalf of Andrew Behar, in recognition of the additional information DuPont has provided to improve disclosure of its political lobbying and oversight and in consideration of DuPont's agreement to continue, through November 1, 2016, good-faith dialogues regarding this matter. As You Sow believes that expanded political lobbying disclosure will increase the ability of shareholders to determine if DuPont's political lobbying serves shareholders' best interests.

This agreement will become effective on the date the last party below executes this agreement. As You Sow confirms that it is authorized to act on behalf of Andrew Behar, the stockholder proponent, in this matter.

As You Sow:

2/1/16

Danielle R. Fugere
President and General Counsel
As You Sow

Date

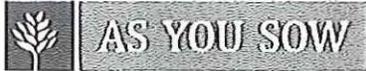
COMPANY:

Erik T. Hoover
Corporate Secretary
DuPont

2.1.16

Date

Enclosure:



- Shareholder Proposal

Whereas: We believe in full disclosure of our company's direct and indirect lobbying activities and expenditures to assess whether our company's lobbying is consistent with DuPont's expressed goals and in the best interests of shareowners.

Resolved: The shareowners of DuPont request the preparation of a report, updated annually, disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.
2. Payments by DuPont used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.
3. DuPont's membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of the decision making process and oversight by management and the Board for making payments described in sections 2 and 3 above.

For purposes of this proposal, a "grassroots lobbying communication" is a communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on the legislation or regulation and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation. "Indirect lobbying" is lobbying engaged in by a trade association or other organization of which DuPont is a member.

Both "direct and indirect lobbying" and "grassroots lobbying communications" include efforts at the local, state and federal levels. The report shall be presented to the Audit Committee or other relevant oversight committees and posted on DuPont's website.

Supporting Statement: As shareowners, we encourage transparency and accountability in the use of corporate funds to influence legislation and regulation, both directly and indirectly. Absent a system of accountability, company assets could be used for objectives contrary to DuPont's long-term interests.

DuPont is a member of the American Chemistry Council (ACC), which spent \$11.4 million lobbying in 2014. DuPont's lobbying through the ACC is controversial ("The Cancer Lobby," New York Times, 10/6/12; "Toxic Influence: How a Chemical Industry Trade Group You've Never Heard of Threatens Your Health," Huffington Post, 10/19/15). DuPont does not comprehensively disclose its trade association memberships, or payments, on its website.

DuPont spent \$9.2 million in 2014 on direct federal lobbying activities (opensecrets.org). DuPont's lobbying around genetically modified organism labeling has drawn scrutiny ("U.S. GMO Labeling Foes Triple Spending in First Half of This Year over 2013," Reuters, 9/3/14). The federal lobbying figure does not include lobbying expenditures to influence legislation in states where DuPont also lobbies, but disclosure is uneven or absent. For example, in 2014 DuPont spent \$164,000 lobbying in New Jersey, where disclosure is required (www.elec.state.nj.us), but disclosure of expenditures in other states may not be required. In addition, DuPont does not disclose membership in tax-exempt organizations that write and endorse model legislation, such as the American Legislative Exchange Council (ALEC).



We encourage our Board to require comprehensive disclosure related to direct, indirect and grassroots lobbying.



December 28, 2015

Erik T. Hoover
Corporate Secretary & Associate General Counsel
DuPont, CRP 730/5218
Tel: 302 999-5408
E-mail: erik.t.hoover@dupont.com

VIA E-MAIL (shareholderproposals@sec.gov)

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: E. I. DU PONT DE NEMOURS AND COMPANY
PROXY STATEMENT - 2016 ANNUAL MEETING OF STOCKHOLDERS
OMISSION OF SHAREHOLDER PROPOSAL BY AS YOU SOW

Ladies and Gentlemen:

I am writing on behalf of E. I. du Pont de Nemours and Company, a Delaware Corporation, ("DuPont" or the "Company"), pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended (the "Act"), to respectfully request that the Staff of the Division of Corporation Finance (the "Staff") of the Securities and Exchange Commission (the "Commission") concur with DuPont's view that, for the reasons stated below, the shareholder proposal (the "Proposal") submitted by As You Sow on behalf of Andrew Behar (the "Proponent") may properly be omitted from DuPont's proxy materials to be distributed by DuPont in connection with its 2016 Annual Meeting of Stockholders (the "Proxy").

This request is being submitted via electronic mail in accordance with Staff Legal Bulletin 14D (Nov. 7, 2008). Pursuant to Rule 14a-8(j), DuPont has: (i) sent a copy of this letter to the Proponent as notice of DuPont's intent to omit the Proposal from the Proxy; and (ii) submitted this letter to the Commission not less than eighty (80) days before the Company intends to file its definitive proxy statement. Rule 14a-8(k) requires proponents to send companies a copy of any correspondence that they submit to the Commission or the Staff. Accordingly, we take this opportunity to remind the Proponent that if the Proponent elects to submit additional correspondence to the Commission or the Staff with respect to the Proposal, a copy of that correspondence should be furnished concurrently to the Company.

THE PROPOSAL

The Proposal, attached hereto as Exhibit A, states:

Whereas: We believe in full disclosure of our company's direct and indirect lobbying activities and expenditures to assess whether our company's lobbying is consistent with DuPont's expressed goals and in the best interests of shareowners.

Resolved: The shareowners of DuPont request the preparation of a report, updated annually, disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.
2. Payments by DuPont used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.
3. DuPont's membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of the decision making process and oversight by management and the Board for making payments described in sections 2 and 3 above.

For purposes of this proposal, a "grassroots lobbying communication" is a communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on the legislation or regulation and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation. "Indirect lobbying" is lobbying engaged in by a trade association or other organization of which DuPont is a member.

Both "direct and indirect lobbying" and "grassroots lobbying communications" include efforts at the local, state and federal levels. The report shall be presented to the Audit Committee or other relevant oversight committees and posted on DuPont's website.

BASIS FOR EXCLUSION

DuPont respectfully requests the Staff concur with its view that DuPont may exclude the Proposal from the Proxy in reliance on Exchange Act Rule 14a-8(i)(10).

ANALYSIS

Under Rule 14(a)-8(i)(10) of the Exchange Act, a shareholder proposal may be excluded "if the company has already substantially implemented the proposal." In Release No. 34-12598 (1976), regarding proposed amendments to Rule 14a-8, the Commission noted that the exclusion for "moot proposals" (the predecessor rule) was "designed to avoid the possibility of shareholders having to consider matters which already have been favorably acted upon by the management." Exchange Act Release No.

34-12598 (July 7, 1976). As noted by the Commission in Release No. 34-20091 as an interpretive change (later reflected as a revision to 14a-8(i)(10) in Release No. 34-40018 (May 21, 1998)), to be excludable, a proposal need not be “fully effected” by the company, but rather it must only be “substantially implemented.” Exchange Act Release No. 34-20091 (Aug. 16, 1983). In that release, the Commission further noted that the former interpretation was “formalistic” and “defeated the provision’s purpose.” Exchange Act Release No. 34-20091 (Aug. 16, 1983).

Subsequent to that change, the Commission has concluded that a “determination that the company has substantially implemented the proposal depends upon whether particular policies, practices and procedures compare favorably with the guidelines of the proposal.” *Texaco, Inc.* (avail. Mar. 28, 1991); *McDonald’s Corp.* (avail. Mar. 26, 2014); and *Dollar General Corp.* (avail. Mar. 7, 2014). The Staff has employed this standard in permitting the exclusion under Rule 14a-8(i)(10) of proposals requesting the preparation of a report on public policy issues and processes where the company had already published the relevant information on its website. See, e.g. *General Electric Company* (avail. Feb. 24, 2011). The Staff has consistently permitted the exclusion of a proposal where the company has taken actions that satisfactorily address the underlying concern or met the essential objective of the proposal. See, e.g. *Exelon Corp.* (avail. Feb. 26, 2010); *Anheuser-Busch Companies, Inc.* (avail. Jan. 17, 2007); ConAgra Foods, Inc. (avail July 3, 2006); and *The Talbots Inc.* (avail. Apr. 5, 2002).

With regard to this Proposal, the Company recently posted on its website, and shared with the Proponent for its review, the report attached hereto as Exhibit B (“Report”). The Company believes that the Report compares favorably with the guidelines of the Proposal and satisfactorily addresses the Proposal’s underlying concern and essential objective.

The Proposal asks that the report disclose “[c]ompany policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.” The Report includes the following paragraph regarding Company policy and procedures on this topic:

Lobbying, defined as legislative and executive branch advocacy, is managed by our corporate function, Government Affairs. As expressed in the Company’s Code of Conduct, to assure compliance with company objectives, as well as applicable laws and regulations, Company employees engaging in influencing governmental decisions at the federal, state and local levels coordinate those contacts in advance through DuPont Government Affairs. This includes contacts with legislative and executive branch officials at the policy level and their staffs at the federal, state and local levels. Company employees including those in Government Affairs, take direction from business management on matters to focus upon. Lobbying and participation in advocacy associations, as with trade associations, is a business management responsibility following approved delegations of authority. The Company Code of Conduct applies to all activities of employees including lobbying and advocacy.

In addition to the foregoing discussion of lobbying policy and procedures above, the Report also addresses Company policy on political activity and contributions.

The Proposal also requests disclosure of “[p]ayments by DuPont used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.” The Report discloses this information. Specifically, the Report includes the following disclosure:

January 1, 2014 to December 31, 2014 Lobbying, Federal and State

DuPont uses the Internal Revenue Code (IRC) method in calculating lobbying expenses reported under the Lobbying Disclosure Act (LDA). Using the IRC methodology for its consolidated tax return, DuPont aggregates political expenditures and expenses including: (1) salary and expenses of Company personnel engaged in lobbying activities, at both the federal and state levels; (2) administrative expenses; (3) third party lobbyists; (4) political contributions to states that permit contributions by corporations; (5) ballot initiatives; (6) and nondeductible trade association dues attributed to lobbying. For 2014, the aggregate amount reported under the LDA was \$6,118,604. In addition to reporting this amount, DuPont reports its lobbying contacts and issues with respect to which it engage in lobbying efforts. All such information is publicly available in those reports. In addition, further detail is provided below with respect to items (3) through (6).

Political contributions to states that permit contributions to corporations are reflected on pages 3-6 of the Report. The Report includes disclosures regarding payments to third-party lobbyists (page 7) and advocacy groups (page 7), payments made in connection with a ballot initiative (page 7) and payments to trade associations receiving non-deductible lobbying payments in excess of \$25,000 per year (page 8). The Company does not engage in grass roots lobbying as described in the Report.

The Proposal also requests disclosure of DuPont's membership in and payments to any tax-exempt organization that writes and endorses model legislation. The Report discloses this information. Specifically, the Report discloses on page 7 payments to Fuels America, an Internal Revenue Code Section 501(c)(4) advocacy group that promotes legislation.

The Proposal also requires description of the decision-making process and oversight by management and the Board for making payments described in sections 2 and 3 above. The Corporate Governance Committee of the Board reviews the Report annually. The decision-making process of management is also disclosed in the Report as reflected above.

Based on the foregoing, the company believes that the Report compares favorably with the guidelines of the proposal and satisfactorily addresses the Proposal's underlying

concern and essential objective, and therefore, may be excluded from the Proxy under Exchange Act Rule 14a-8(i)(10).

CONCLUSION

For the foregoing reasons, DuPont respectfully requests the Staff concur with its view that DuPont may exclude the Proposal from the Proxy. If you have any questions or require additional information, please contact me at (302) 999-5408.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Erik Hoover", is positioned above the typed name.

Erik T. Hoover
Corporate Secretary & Associate General Counsel

Cc: Austin Wilson



November 18, 2015

Erik T. Hoover
Corporate Secretary
E. I. du Pont de Nemours and Company
1007 Market Street
Wilmington, Delaware 19898

Dear Mr. Hoover:

As You Sow is a non-profit organization whose mission is to promote corporate accountability. We represent Andrew Behar, a shareholder of E. I. du Pont de Nemours and Company stock.

To protect our right to raise this issue before shareholders, As You Sow is submitting the enclosed shareholder proposal for inclusion in the 2016 proxy statement, in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities Exchange Act of 1934.

A letter from Andrew Behar authorizing us to act on his behalf is enclosed. A representative of the filer will attend the stockholders' meeting to move the resolution as required. We are optimistic that a dialogue with the company can result in resolution of our concerns.

Sincerely,

Austin Wilson
Environmental Health Program Manager

Enclosures

- Shareholder Proposal
- Andrew Behar Authorization

Whereas: We believe in full disclosure of our company's direct and indirect lobbying activities and expenditures to assess whether our company's lobbying is consistent with DuPont's expressed goals and in the best interests of shareowners.

Resolved: The shareowners of DuPont request the preparation of a report, updated annually, disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.
2. Payments by DuPont used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.
3. DuPont's membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of the decision making process and oversight by management and the Board for making payments described in sections 2 and 3 above.

For purposes of this proposal, a "grassroots lobbying communication" is a communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on the legislation or regulation and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation. "Indirect lobbying" is lobbying engaged in by a trade association or other organization of which DuPont is a member.

Both "direct and indirect lobbying" and "grassroots lobbying communications" include efforts at the local, state and federal levels. The report shall be presented to the Audit Committee or other relevant oversight committees and posted on DuPont's website.

Supporting Statement: As shareowners, we encourage transparency and accountability in the use of corporate funds to influence legislation and regulation, both directly and indirectly. Absent a system of accountability, company assets could be used for objectives contrary to DuPont's long-term interests.

DuPont is a member of the American Chemistry Council (ACC), which spent \$11.4 million lobbying in 2014. DuPont's lobbying through the ACC is controversial ("The Cancer Lobby," New York Times, 10/6/12; "Toxic Influence: How a Chemical Industry Trade Group You've Never Heard of Threatens Your Health," Huffington Post, 10/19/15). DuPont does not comprehensively disclose its trade association memberships, or payments, on its website.

DuPont spent \$9.2 million in 2014 on direct federal lobbying activities (opensecrets.org). DuPont's lobbying around genetically modified organism labeling has drawn scrutiny ("U.S. GMO Labeling Foes Triple Spending in First Half of This Year over 2013," Reuters, 9/3/14). The federal lobbying figure does not include lobbying expenditures to influence legislation in states where DuPont also lobbies, but disclosure is uneven or absent. For example, in 2014 DuPont spent \$164,000 lobbying in New Jersey, where disclosure is required (www.elec.state.nj.us), but disclosure of expenditures in other states may not be required. In addition, DuPont does not disclose membership in tax-exempt organizations that write and endorse model legislation, such as the American Legislative Exchange Council (ALEC).

We encourage our Board to require comprehensive disclosure related to direct, indirect and grassroots lobbying.

November 2, 2015

Danielle Fugere
President
As You Sow Foundation
1611 Telegraph Ave., Ste. 1450
Oakland, CA 94612

Re: Authorization to File Shareholder Resolution

Dear Danielle Fugere,

As of November 2, 2015, the undersigned, Andrew Behar (the "Stockholder") authorizes As You Sow to file or cofile a shareholder resolution on Stockholder's behalf with DuPont, and that it be included in the 2016 proxy statement, in accordance with Rule 14-a8 of the General Rules and Regulations of the Securities and Exchange Act of 1934.

The Stockholder has continuously owned over \$2,000 worth of DuPont stock, with voting rights, for over a year. The Stockholder intends to hold the stock through the date of the company's annual meeting in 2016.

The Stockholder gives As You Sow the authority to deal on the Stockholder's behalf with any and all aspects of the shareholder resolution. The Stockholder understands that the company may send the Stockholder information about this resolution, and that the media may mention the Stockholder's name related to the resolution; the Stockholder will alert As You Sow in either case. The Stockholder understands that the Stockholder's name may appear on the company's proxy statement as the filer of the aforementioned resolution.

Sincerely,



Andrew Behar

E.I. du Pont de Nemours and Company
Disclosure of Corporate Lobbying and Political Expenditures - 2014

Lobbying

Lobbying, defined as legislative and executive branch advocacy, is managed by our corporate function, Government Affairs. As expressed in the Company's Code of Conduct, to assure compliance with company objectives, as well as applicable laws and regulations, Company employees engaging in influencing governmental decisions at the federal, state and local levels coordinate those contacts in advance through DuPont Government Affairs. This includes contacts with legislative and executive branch officials at the policy level and their staffs at the federal, state and local levels. Company employees including those in Government Affairs, take direction from business management on matters to focus upon. Lobbying and participation in advocacy associations, as with trade associations, is a business management responsibility following approved delegations of authority. The Company Code of Conduct applies to all activities of employees including lobbying and advocacy.

Policy on Political Activity

DuPont employees are encouraged to participate in the electoral process by voting and by making personal contributions to a political party, committee, or candidate of their choice as long as the donation does not directly or indirectly involve Company funds or other resources. No one may exert any direct or indirect pressure in any form on any employee to contribute money or effort to support a political party or a political candidate.

DuPont's business operations are directly impacted by extensive federal and state laws and regulations in environmental, tax, trade and other areas of importance to the Company. It is essential for DuPont to be involved in the political process by making prudent political contributions consistent with business objectives and in compliance with all federal, state and local laws.

We will not make corporate contributions to federal candidates, and will make corporate contributions to state and local candidates only where legally permitted under state and local laws. We will make corporate contributions or expenditures to political committees or other entities only to the extent allowed under applicable law. We will not use corporate funds to communicate to the general public advocating the election or defeat of political candidates. At the State level only, DuPont does engage in ballot initiatives. See below for data on ballot initiatives. Note, such payments are also reported as required by applicable law.

The Company reports contributions and other spending as required by both federal and state laws. Through our website, we disclose contributions made by the Company.

The DuPont Good Government Fund (DGGF), the political action committee authorized by federal law, enables eligible employees to engage in the political process by sharing resources and supporting elected officials who support issues important to DuPont. Through the DGGF we undertake federal campaign contribution activity using funds voluntarily contributed to the DGGF by employees permitted to contribute. We use the DGGF for state campaign contributions in those states that do not permit corporations to make campaign contributions.

E.I. du Pont de Nemours and Company
Disclosure of Corporate Lobbying and Political Expenditures - 2014

Procedures on Political Expenditures

To receive funds from the Company or the DGGF, political candidates must demonstrate honesty, integrity, effectiveness, and commitment to good governance; support private enterprise systems; be receptive to the DuPont view on economic and environmental issues of importance to the Company; and represent DuPont employees' business and site locations and/or hold key leadership or committee positions. The Company's Government Affairs group in conjunction with DuPont Legal reviews and makes recommendations regarding all proposed contributions by the Company or the DGGF. The Advisory Council of the DGGF, composed of senior Company leaders, reviews and approves all contributions and political activity by DuPont and the DGGF.

Trade Associations and other Tax-Exempt Associations

DuPont is a member of various industry organizations and trade associations (Associations) to which we pay dues. Our participation in trade associations is business driven based on issues and needs of the participating business. Trade associations may engage in political activity to the extent permitted by law. To the extent a trade association pursues lobbying activities, DuPont employees involvement is only as a member. DuPont does inquire and makes a reasonable effort to obtain from the Associations what portion of the Company's dues or payments are used for political expenditures or contributions that if made directly by DuPont would not be deductible under Section 162(e)(1) of the Internal Revenue Code.

DuPont has participated in tax-exempt advocacy associations that advocate for agency and legislative initiatives. Information on activities in 2014 is noted below. Participation in advocacy associations, as with trade associations, is a business management responsibility following approved delegations of authority. The Company Code of Conduct applies to all activities of employees including advocacy.

January 1, 2014 to December 31, 2014 Lobbying, Federal and State

DuPont uses the Internal Revenue Code (IRC) method in calculating lobbying expenses reported under the Lobbying Disclosure Act (LDA). Using the IRC methodology for its consolidated tax return, DuPont aggregates political expenditures and expenses including: (1) salary and expenses of Company personnel engaged in lobbying activities, at both the federal and state levels; (2) administrative expenses; (3) third party lobbyists; (4) political contributions to states that permit contributions by corporations; (5) ballot initiatives; (6) and nondeductible trade association dues attributed to lobbying. For 2014, the aggregate amount reported under the LDA was \$6,118,604. In addition to reporting this amount, DuPont reports its lobbying contacts and issues with respect to which it engage in lobbying efforts. All such information is publicly available in those reports. In addition, further detail is provided below with respect to items (3) through (6).

E.I. du Pont de Nemours and Company
Disclosure of Corporate Lobbying and Political Expenditures - 2014

January 1, 2014 to December 31, 2014 Political Corporate Contributions and Expenditures

The information which follows in this report identifies the recipients of political contributions or expenditures made by DuPont during the period beginning January 1, 2014 and ending December 31, 2014, the amount contributed to each recipient and the date on which it was made. For the purposes of this report, the term “political contributions and expenditures” includes all payments made to (i) individual candidates, (ii) party committees; (iii) Political Action Committees (“PACs”); (iii) Leadership PACs; (iv) ballot issue groups (state or federal); or (v) any 527 organizations. This term does **not** apply to money spent on lobbying or to charitable donations.

State	Lawmaker	Date	Total
AL	Alabamians for Luther Strange, Inc.	3/28/2014	\$ 500
		9/17/2014	\$ 1,000
AL Total			\$ 1,500
AR	ARKANSAS	10/24/2014	\$ 1,020
AR Total			\$ 1,020
CA	Anthony Cannella for Senate 2014	10/27/2014	\$ 1,500
	Kristin Olsen for Assembly 2014	8/1/2014	\$ 1,500
	Eggman for Assembly 2014	8/1/2014	\$ 1,500
CA Total			\$ 4,500
DE	Committee To Elect Keeley	11/7/2014	\$ 300
	Friend for Debra Heffernan	5/7/2014	\$ 100
		11/3/2014	\$ 200
	Committee to Elect Bethany Hall-Long	9/25/2014	\$ 300
		10/8/2014	\$ 125
	Friends Of Margaret Rose Henry	10/8/2014	\$ 300
	Friends of Valerie Longhurst	5/20/2014	\$ 100
	Friends of Nicole Poore	5/20/2014	\$ 100
	Friends to Elect Harvey R. Kenton	5/7/2014	\$ 100
	People for Paradee	5/7/2014	\$ 100
	Friends to Elect Danny Short	4/14/2014	\$ 100
	Friends to Elect Pete Schwartzkopf	3/4/2014	\$ 100
DE Total			\$ 1,925
FL	Pam Bondi, Republican, for Attorney General	3/28/2014	\$ 1,000
		9/17/2014	\$ 1,000
FL Total			\$ 2,000
GA	Sam Olens for Attorney General, Inc.	3/28/2014	\$ 1,000
		10/24/2014	\$ 3,060
GA Total			\$ 4,060
HI	HAWAII	7/17/2014	\$ 2,200
	David Ige for Governor 2014	7/17/2014	\$ 250
		10/20/2014	\$ 2,000
	Shan's Friends	10/20/2014	\$ 500
	Cindy Evans for State Representative	7/17/2014	\$ 250
	Friends For Brickwood	7/17/2014	\$ 250
	Friends of Linda Ichiyama	7/17/2014	\$ 150
	Friends of Jo Jordan	7/17/2014	\$ 150
	Friends of Sylvia Luke	7/17/2014	\$ 200
	Friends of Lauren Matsumoto	7/17/2014	\$ 350
	Bob McDermott for State House	7/17/2014	\$ 150
	Friends of John Mizuno	7/17/2014	\$ 200
	Friends for Richard Onishi	7/17/2014	\$ 300

E.I. du Pont de Nemours and Company
Disclosure of Corporate Lobbying and Political Expenditures - 2014

State	Lawmaker	Date	Total
	Friends of Karl Rhoads	7/17/2014	\$ 150
	Friends for Gil Riviere	7/17/2014	\$ 250
	Friends of Scott Saiki	7/17/2014	\$ 250
	Friends of Joseph Souki	7/17/2014	\$ 400
	Friends of Michelle Kidani	7/17/2014	\$ 500
	Friends for Donovan Dela Cruz	7/17/2014	\$ 600
	Good Friends of Kyle Yamashita	7/17/2014	\$ 200
	McKelvey for House	7/17/2014	\$ 250
	Friends of Clift Tsuji	7/17/2014	\$ 500
	Friends of D. Morikawa	7/17/2014	\$ 550
	Friends For Isaac W. Choy	7/17/2014	\$ 150
	Friends of James Kunane Tokioka	7/17/2014	\$ 500
	Friends of Jill Tokuda	7/17/2014	\$ 300
	Kouchi for Senate	7/17/2014	\$ 500
	Friends for Sam Slom	7/17/2014	\$ 400
	Friends for Suzanne Chun Oakland	7/17/2014	\$ 150
	Friends of Will Espero	7/17/2014	\$ 250
	Friends of Della Au Belatti	7/17/2014	\$ 250
	Friends of Gene Ward	7/17/2014	\$ 200
	Friends of Rosalyn Baker	7/17/2014	\$ 500
	Friends of Derek Kawakami	7/17/2014	\$ 400
	Friends of Glenn Wakai	7/17/2014	\$ 250
	Friends of Clarence Nishihara	7/17/2014	\$ 500
	Friends of Mark Hashem	7/17/2014	\$ 250
	Friends of Ryan Yamane	7/17/2014	\$ 150
	Friends of Scott Nishimoto	7/17/2014	\$ 200
	Friends of Tom Brower	7/17/2014	\$ 200
	Friends of Sharon Har	7/17/2014	\$ 400
	Friends of Ty Cullen	7/17/2014	\$ 300
	Friends for Say	7/17/2014	\$ 400
	Friends of Donna Mercado Kim	7/17/2014	\$ 250
	Friends of Gil Kahele	7/17/2014	\$ 200
HI Total			\$ 17,300
ID	Wasden for Attorney General	9/17/2014	\$ 1,000
ID Total			\$ 1,000
IL	Friends of Michael J Madigan	9/25/2014	\$ 1,500
	Friends of Verschoore	9/17/2014	\$ 1,000
	Citizens for John Cullerton for State Senate	9/17/2014	\$ 1,000
	Friends of John Sullivan	9/17/2014	\$ 1,000
	Citizens for Moffitt	9/17/2014	\$ 1,000
	Committee for Frank J. Mautino	9/17/2014	\$ 1,000
	Friends of Jason Barickman	9/17/2014	\$ 500
	Citizens for Hammond	9/17/2014	\$ 500
	Sam McCann for Senate	9/17/2014	\$ 500
	Citizens for Pritchard	8/1/2014	\$ 500
	ILLINOIS	8/1/2014	\$ 1,500
	Friends of Frerichs	6/30/2014	\$ 500
IL Total			\$ 10,500

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State	Lawmaker	Date	Total
IN	Hershman for Senate	8/1/2014	\$ 1,000
	Committee To Elect Brian Bosma	8/1/2014	\$ 1,500
	INDIANA	8/1/2014	\$ 2,500
	Jean Leising for State Senate	8/1/2014	\$ 1,000
	Committee To Elect Bob Cherry	8/1/2014	\$ 500
IN Total			\$ 6,500
KS	Schmidt for Attorney General, Inc.	6/21/2014	\$ 1,000
KS Total			\$ 1,000
MD	Citizens for Frosh	10/24/2014	\$ 550
MD Total			\$ 550
MO	MISSOURI	10/9/2014	\$ 1,020
MO Total			\$ 1,020
MS	Jim Hood for Attorney General	10/24/2014	\$ 1,000
MS Total			\$ 1,000
NE	NEBRASKA	9/23/2014	\$ 1,000
		10/24/2014	\$ 510
	Pete Ricketts for Governor	7/25/2014	\$ 2,500
NE Total			\$ 4,010
NH	Friends of Jeb Bradley	10/3/2014	\$ 500
NH Total			\$ 500
NJ	Burzichelli for Assembly	5/7/2014	\$ 500
		11/3/2014	\$ 500
	EFO Louis Greenwald for Assembly	5/7/2014	\$ 500
		10/8/2014	\$ 1,000
	Moriarty for Assembly	4/9/2014	\$ 350
		10/8/2014	\$ 350
	Steve Sweeney for Senate	10/8/2014	\$ 500
	Scott Rumana Organization Assembly	4/9/2014	\$ 600
		10/8/2014	\$ 600
	Election Fund of Kevin J. O'Toole	9/25/2014	\$ 500
	Committee to Re-elect Vincent Prieto to Assembly	5/20/2014	\$ 500
	Election Fund of Annette Quijano for Assembly	3/4/2014	\$ 350
NJ Total			\$ 6,250
NV	NEVADA	10/24/2014	\$ 1,000
NV Total			\$ 1,000
NY	Friends of Senator Patty Ritchie	5/7/2014	\$ 500
	Committee to Re-Elect Assemblyman Joseph D. Morelle	5/7/2014	\$ 500
	Friends of Harry Bronson	3/4/2014	\$ 500
	Citizens for Joseph Robach (Senate)	3/4/2014	\$ 500
	Citizens for Schimminger	2/24/2014	\$ 500
NY Total			\$ 2,500
SC	Wilson for Attorney General	3/28/2014	\$ 1,000
SC Total			\$ 1,000
VA	Friends of Ron Villanueva	12/22/2014	\$ 500
	Friends of Kirk Cox	12/19/2014	\$ 1,000
	Howell for Delegate	8/1/2014	\$ 1,000
VA Total			\$ 2,500
VE	McAllister for Senate	10/14/2014	\$ 500
	Sorrell Campaign Committee	3/28/2014	\$ 500
VE Total			\$ 1,000

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State	Lawmaker	Date	Total
WA	Jesse Young for State House	10/22/2014	\$ 500
	Committee to Elect JT Wilcox	10/22/2014	\$ 500
	Friends for Dan Kristiansen, GOP	10/22/2014	\$ 500
	Citizens for Vincent Buys	10/22/2014	\$ 500
	Friends of Steve O'Ban	10/22/2014	\$ 500
	Citizens for Andy Hill	10/22/2014	\$ 500
	Friends of Joe Fain	10/22/2014	\$ 500
	Mark Miloscia Campaign	10/22/2014	\$ 500
	Committee to Elect Doug Ericksen	10/22/2014	\$ 500
	WASHINGTON	5/24/2014	\$ 1,000
WA Total			\$ 5,500
	NEW MEXICO	10/24/2014	\$ 510
	NEBRASKA	4/17/2014	\$ 5,000
	HAWAII	7/17/2014	\$ 1,800
		7/24/2014	\$ 1,500
		10/20/2014	\$ 300
		10/24/2014	\$ 300
	Grisanti for Senate	10/22/2014	\$ 500
	Friends of Wayne Rosenthal	8/1/2014	\$ 500
	Friends for Michael Magaoay	7/17/2014	\$ 150
	Ohana for Awana	7/17/2014	\$ 200
	Friends of Malama Solomon	7/8/2014	\$ 500
	WASHINGTON	10/22/2014	\$ 3,000
	Citizens for Dennis E. Williams	4/9/2014	\$ 100
	OREGON	10/22/2014	\$ 5,000
	NEW JERSEY	5/14/2014	\$ 5,000
Total			\$ 24,360
Grand Total			\$102,495

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Ballot Initiative

Date	Ballot Initiative	Amount
July-14	Biotechnology Industry Organization	\$ 381,696
	Coalition Against the Misleading Labeling Initiative	\$ 38,500
	Council for Biotechnology Information	\$ 351,000
	Oregonians Against the Misleading Labeling Initiative	\$ 58,150
November-14	Council for Biotechnology Information	\$ 150,000
Grand Total		\$ 979,346

3rd Party Lobbyists

State / Federal	Lobbyists	Amount
State	FaistGovernment Affairs Group	\$ 32,533
	Messerli & Kramer	\$ 30,000
	Murtha Cullina LLP	\$ 18,857
	Parkowski Guerke & Swayze	\$ 20,000
	Spilman Thomas & Battle	\$ 30,000
Federal	The Glover Park Group, LLC	\$ 320,000
Grand Total		\$ 451,391

Advocacy Groups

Vendor details	PaymAmt
FUELSAMERICA, WASHINGTON	\$ 250,000
TRGROUP, WASHINGTON	\$ 40,000
Grand Total	\$ 1,040,000

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2014 Trade Association Expenditures

This provision applies to only the trade associations, classified as such for purposes of the tax rules at section 501(c)(6), receiving non-deductible lobbying payments in excess of \$25,000 per year. This information is collected once yearly and reflects expenditures 2014.

Trade Association	Amount
AMERICAN CHEMISTRY COUNCIL INC	\$ 387,608
CROPLIFE AMERICA	\$ 185,725
BUSINESS ROUNDTABLE	\$ 91,868
DEMOCRATIC GOVERNORS ASSOCIATION	\$ 25,000
NATIONAL ASSOCIATIO	\$ 18,920
TEXAS CHEMICAL COUN	\$ 9,384
RISE	\$ 7,933
UNITED STATES COUNC	\$ 6,598
Grand Total	\$ 733,036