

E.I. du Pont de Nemours and Company  
Disclosure of Corporate Lobbying and Political Expenditures - 2015

**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.

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**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. DuPont employees do sit on boards and/or committees of our trade associations and actively engage to help shape their efforts and when possible to ensure that they are working in the best interest of DuPont and our priorities. DuPont is a diverse company with sometimes competing interest of positions, we work internally to ensure that we advocate for company positions independently and through our trade associations, when possible, to support those positions.

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 2015 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, 2015 to December 31, 2015 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 expenses including: (1) compensation and benefits of Company personnel engaged in lobbying activities, at both the federal and state levels; (2) general and administrative expenses (or "overhead"); (3) third party lobbying fees; (4) ballot initiatives; and (5) trade association dues attributed to lobbying that are not tax deductible. For 2015, DuPont reported a total of \$4,890,085 in lobbying expenses using the IRC method. DuPont uses its total lobbying expenses calculated for the previous year, taking into account its lobbying expenses historically and the extent of its current lobbying efforts, in order to estimate its lobbying expenses for any given quarter. DuPont also reports information regarding the Houses of Congress, federal departments, and federal agencies contacted, and the issues involved in its lobbying efforts. All such information is publicly available. To view our quarterly lobbying report, visit the lobbying disclosure database [here](#). In addition, further detail is provided below with respect to items (3) through (6).

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**January 1, 2015 to December 31, 2015 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, 2015 and ending December 31, 2015, 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.

| <b>State</b>       | <b>Campaign Committee</b>                           | <b>Date</b> | <b>Amount</b>    |
|--------------------|---|-------------|------------------|
| <b>DE</b>          | Friends of Nicole Poore                             | 10/13/2015  | \$ 200           |
|                    | Friend for Debra Heffernan                          | 5/27/2015   | \$ 100           |
|                    | Friends of Quinn Johnson                            | 5/27/2015   | \$ 100           |
|                    | People for McDowell                                 | 5/27/2015   | \$ 100           |
|                    | Friends to Elect Pete Schwartzkopf                  | 5/27/2015   | \$ 300           |
|                    | Friends to Elect Harvey R. Kenton                   | 4/21/2015   | \$ 100           |
|                    | Friends to Elect Danny Short                        | 4/21/2015   | \$ 200           |
|                    | Committee to Elect Patricia Blevins                 | 4/21/2015   | \$ 200           |
| <b>DE Total</b>    |   |             | <b>\$ 1,300</b>  |
| <b>LA</b>          | Mike Strain Campaign Fund                           | 11/9/2015   | \$ 1,000         |
| <b>LA Total</b>    |   |             | <b>\$ 1,000</b>  |
| <b>NJ</b>          | EFO Troy Singleton for Assembly                     | 10/26/2015  | \$ 500           |
|                    | Election Fund of Senator Nilsa Cruz-Perez           | 10/26/2015  | \$ 750           |
|                    | EFO Louis Greenwald for Assembly                    | 10/13/2015  | \$ 500           |
|                    | Sam Thompson for Senate                             | 10/13/2015  | \$ 500           |
|                    | Election Fund of Senator Joseph Vitale              | 10/13/2015  | \$ 500           |
|                    | Election Fund of John S. Wisniewski                 | 10/13/2015  | \$ 500           |
|                    | Election Fund of Kevin J. O’Toole                   | 10/13/2015  | \$ 500           |
|                    | Bramnick for Assembly                               | 10/13/2015  | \$ 500           |
|                    | Burzichelli for Assembly                            | 10/7/2015   | \$ 500           |
|                    | Scott Rumana Organization Assembly                  | 5/15/2015   | \$ 600           |
|                    | Burzichelli for Assembly                            | 4/21/2015   | \$ 500           |
|                    | EFO Senator Paul A. Sarlo                           | 3/23/2015   | \$ 500           |
|                    | NJ Organization for a Better State (NEW JOBS)       | 3/23/2015   | \$ 5,000         |
|                    | Robert Singer for State Senate                      | 1/8/2015    | \$ 650           |
| <b>NJ Total</b>    |   |             | <b>\$ 12,000</b> |
| <b>NY</b>          | Committee to Re-Elect Assemblyman Joseph D. Morelle | 4/30/2015   | \$ 500           |
|                    | Friends of Rich Funke                               | 3/23/2015   | \$ 500           |
|                    | Friends of Harry Bronson                            | 3/23/2015   | \$ 500           |
|                    | Citizens for Schimminger                            | 3/23/2015   | \$ 500           |
| <b>NY Total</b>    |   |             | <b>\$ 2,000</b>  |
| <b>Grand Total</b> |   |             | <b>\$ 16,300</b> |

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**3rd Party Lobbyists**

| <b>State / Federal</b> | <b>Lobbyists</b>               | <b>Amount</b>     |
|------------------------|--------------------------------|-------------------|
| <b>State</b>           | Faist Government Affairs Group | \$ 30,000         |
|                        | Joyce Consulting, Inc          | \$ 36,000         |
|                        | Murtha Cullina LLP             | \$ 18,000         |
|                        | Parkowski Guerke & Swayze      | \$ 20,000         |
|                        | Cookerly Public Relations      | \$ 90,000         |
|                        | Niemela Pappas & Associates    | \$ 82,000         |
|                        | Rosehill & Associates          | \$ 98,000         |
|                        | The Corydon Group              | \$ 45,000         |
|                        | Faegre Baker Daniels           | \$ 45,000         |
|                        | Public Strategies Impact       | \$ 50,000         |
|                        | Oklulitch & Associates         | \$ 8,000          |
|                        | Tower, Ltd                     | \$ 10,000         |
| <b>Federal</b>         | The Glover Park Group, LLC     | \$ 375,000        |
| <b>Grand Total</b>     |                                | <b>\$ 907,000</b> |

**Advocacy Groups**

| <b>Vendor details</b>      | <b>Amount</b>     |
|----------------------------|-------------------|
| FUELS AMERICA, WASHINGTON  | \$ 500,000        |
| AMERICA'S RENEWABLE FUTURE | \$ 250,000        |
| TRGROUP, WASHINGTON        | \$ 40,000         |
| <b>Grand Total</b>         | <b>\$ 790,000</b> |

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**2015 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 dues or contributions in excess of \$25,000 per year. This information is collected once yearly and reflects expenditures 2015.

| <b>Trade Association</b>                     | <b>Amount of Dues or Contributions<br/>that were used for Lobbying or<br/>Political Activity</b> |
|--|--|
| AMERICAN FUEL PETROCHEMICAL<br>MANUFACTURERS | \$ 22,525  |
| AMERICAN CHEMISTRY COUNCIL                   | \$ 258,514   |
| BIOTECHNOLOGY INNOVATION ORGANIZATION        | \$ 246,874   |
| BUSINESS ROUNDTABLE                          | \$ 91,868  |
| CROPLIFE AMERICA                             | \$ 209,553   |
| ERISA INDUSTRY COMMITTEE                     | \$ 8,750   |
| GROCERY MANUFACTURERS ASSOCIATION            | \$ 65,051  |
| NATIONAL ASSOICATION OF MANUFACTURERS        | \$ 18,911  |
| NATIONAL FOREIGN TRADE COUNCIL               | \$ 10,125  |
| SOUTHERN CROP PRODUCTION ASSOICATION         | \$ 11,880  |
| TEXAS CHEMICAL COUNCIL                       | \$ 7,858   |
| US ASEAN BUSINESS COUNCIL                    | \$ 610   |
| <b>Grand Total</b>                           | <b>\$ 952,522</b>  |

This report is reviewed on a yearly basis by the Corporate Governance committee of the DuPont Board of Directors. Please [click here](#) to see our previous year's reports.