

► See separate instructions.

Part I Reporting Issuer

1 Issuer's name <u>DuPont de Nemours, Inc.</u>		2 Issuer's employer identification number (EIN) <u>81-1224539</u>	
3 Name of contact for additional information <u>Madeleine Barber</u>	4 Telephone No. of contact <u>+1 302-295-5783</u>	5 Email address of contact <u>Madeleine.Barber@dupont.com</u>	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact <u>974 Centre Road, CRP 730</u>		7 City, town, or post office, state, and ZIP code of contact <u>Wilmington, DE 19805</u>	
8 Date of action <u>11/19/2025</u>		9 Classification and description <u>Senior Notes due 2038 and Amended Senior Notes due 2038</u>	
10 CUSIP number <u>See attachment</u>	11 Serial number(s)	12 Ticker symbol	13 Account number(s)

Part II **Organizational Action** Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ► See attachment

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► See attachment

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► See attachment

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► See attachment

18 Can any resulting loss be recognized? ► See attachment

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► [See attachment](#)

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign
Here

Signature ▶ John Wesley, Jr.

Date ► 12-18-2025

Print your name ► **Madeleine Barber**

Title ► Vice President of Controllership & Tax

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ►			Firm's EIN ►	
	Firm's address ►			Phone no.	

DuPont de Nemours, Inc.

EIN: 81-1224539

Amendment of Senior Notes due 2038

Attachment to Form 8937, Report of Organizational Action Affecting Basis of Securities

The information in this document does not constitute tax advice and is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code of 1986, as amended (the “Code”). Holders of the Original 2038 Notes (as defined below) receiving the Support Fee (as defined below) should consult their own tax advisors regarding the particular tax consequences of the Exchange (as defined below) to them, including the applicability and effect of all U.S. federal, state and local and non-U.S. tax laws.

Part I

Box 10. CUSIP Number

Debt Instrument	CUSIP
Senior Notes due 2038	26078JAE0
Amended Senior Notes due 2038	26078JAE0

Part II

Line 14. Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action.

On November 3, 2025, DuPont de Nemours, Inc. (“**DuPont**”) formally solicited consents (the “**Consent Solicitation**”) from holders of the 5.319% Notes due 2038 (the “**Original 2038 Notes**”) to adopt proposed amendments to the indenture governing the Original 2038 Notes. On the same date, DuPont entered into a transaction support agreement with certain holders of the Original 2038 Notes (the “**Supporting Holders**”) entitling the Supporting Holders to a cash payment (the “**Support Fee**”) if the Supporting Holders provided consent as part of the Consent Solicitation.

On November 19, 2025, (the “**Amendment Date**”), after receiving the requisite consents, amendments to the Original 2038 Notes became effective.

DuPont has determined that the payment of the Support Fee to Supporting Holders triggered a “significant modification” within the meaning of Treasury Regulation § 1.1001-3(e) with respect to the Original 2038 Notes held by the Supporting Holders that received the Support Fee, resulting in a deemed exchange (the “**Exchange**”) of those respective Original 2038 Notes for new respective amended 2038 Senior Notes (the “**Amended 2038 Notes**”) for U.S. federal income tax purposes.

Line 15. Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis.

The exchange of the Original 2038 Notes for the Amended 2038 Notes pursuant to the Exchange should qualify as a “recapitalization” (within the meaning of Section 368(a)(1)(E) of the Code) for U.S. federal income tax purposes if the Original 2038 Notes and Amended 2038 Notes each constitute “securities” of DuPont for U.S. federal income tax purposes. The term “security” is not defined in the Code or in the Treasury Regulations issued thereunder and, as applied to debt obligations, the meaning of the term “security” is unclear.

If the Exchange qualifies as a recapitalization for U.S. federal income tax purposes, a holder’s aggregate tax basis in the Amended 2038 Notes received in the Exchange generally should equal such holder’s aggregate adjusted tax basis in its Original 2038 Notes immediately before the Exchange (excluding accrued but unpaid interest), increased by gain, if any, recognized and decreased by the amount of cash, if any, received (other than as payment of accrued but unpaid interest).

If the Exchange does not qualify as a recapitalization for U.S. federal income tax purposes, the Exchange would be a taxable transaction for U.S. federal income tax purposes. In that case, a holder’s aggregate tax basis in the Amended 2038 Notes received in the Exchange generally would equal the issue price of the Amended 2038 Notes (described below in Box 16).

Holders of the Original 2038 Notes receiving the Support Fee should consult their own tax advisors regarding the possible classification of the Original 2038 Notes and Amended 2038 Notes as securities and the tax consequences of the Exchange to them.

Line 16. Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates.

The basis in a holder’s Amended 2038 Notes is calculated in the manner described above in Line 15.

DuPont has concluded that, as of the Amendment Date, the Amended 2038 Notes were “traded on an established market” within the meaning of Treasury Regulation § 1.1273-2(f). Accordingly, DuPont has determined that the issue price of the Amended 2038 Notes as of the Amendment Date was as follows (expressed as a percentage of face amount):

Debt Tranche	Issue Price (%)
Amended 2038 Notes	101.873%

Holders of the Original 2038 Notes receiving the Support Fee should consult their own tax advisors to determine the tax consequences of the Exchange to them.

Line 17. List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

The applicable Internal Revenue Code sections upon which the tax treatment is based are sections 354, 356, 358, 368, 1001, 1012 and 1273.

Line 18. Can any resulting loss be recognized?

If the Exchange qualifies as a recapitalization for U.S. federal income tax purposes, no loss would be recognized for U.S. federal income tax purposes.

If the Exchange does not qualify as a recapitalization for U.S. federal income tax purposes, the Exchange may result in a loss to a holder that can be recognized for U.S. federal income tax purposes.

Line 19. Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The Exchange was consummated on November 19, 2025. As a result, the basis adjustments should be reported in the taxable year that includes this date. For calendar year taxpayers, the Exchange is reportable in the taxable year ending December 31, 2025.