Item 1 – Cover Page

Glenmede Investment Management LP

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As of March 31, 2022

This Brochure provides information about the qualifications and business practices of Glenmede Investment Management LP ("GIM"). If you have any questions about the contents of this Brochure, please contact the Chief Compliance Officer at (215) 419-6000 and/or compliance@glenmede.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Glenmede Investment Management LP is a registered investment advisor. Registration of an investment advisor does not imply any level of skill or training.

Additional information about Glenmede Investment Management LP also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

SEC Rules require that you receive, annually and free of charge, 1) an updated Brochure (with the material changes from the previous Brochure summarized in this Item) 2) within 120 days of the close of our business' fiscal year (December 31). We may provide a new Brochure or other ongoing disclosure information about material changes as necessary at no charge to you. If we have not amended the Brochure since the last annual update, and the Brochure continues to be accurate in all material respects, we will not redeliver the Brochure or prepare or deliver a summary of material changes. GIM's last annual update was as of March 31, 2021. GIM has the below material changes for the reporting period as of March 30, 2022:

- The fee schedule in Item 5 has changed, and we have added discussion of new products in Item 8.

Other changes have been made which may not be deemed material, including typographical changes and clarifications relating to existing practices in disclosures. Currently, our Brochure may be requested by contacting Maria R. McGarry, Chief Compliance Officer at (215) 419-6092 or maria.mcgarry@glenmede.com. Additional information about Glenmede Investment Management is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with GIM who are registered as investment advisor representatives of GIM.

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Item 4 – Advisory Business

Glenmede Investment Management LP ("GIM"), successor to Glenmede Advisers, is a subsidiary of The Glenmede Trust Company, N.A. ("Trust Company"). GIM offers an array of equity, fixed income and some liquid alternatives portfolios that invest primarily in U.S. markets. GIM is headquartered in Philadelphia, Pennsylvania. As of December 31, 2021, GIM managed a total of $13,966,975,376in assets of which $13,635,778,657 was on a discretionary basis and $ 331,196,719 was on a non-discretionary basis.

GIM's services are provided on a discretionary basis to institutional investors, including registered investment companies (The Glenmede Fund, Inc. and The Glenmede Portfolios, collectively, the "Glenmede Funds") corporations, pension plans, charitable institutions and to high net worth investors. In addition, GIM serves as sub-advisor to high net worth individuals who are wealth management clients of the Trust Company.

GIM does not provide tactical asset allocation or full-service investment advice; rather, clients select from among GIM's offered products. From time to time, GIM may accept certain client restrictions, for example, with respect to investing in certain companies or industries. Clients should be aware, however, that some restrictions can limit GIM's ability to act and as a result, the account's performance may differ from and be less successful than that of other accounts that have not limited its discretion.

GIM offers several of its strategies to wrap platform sponsors (typically broker-dealers or investment advisers). A wrap program is an investment advisory program under which a client typically pays a single fee to the sponsor based on assets under management. Fees paid are not based directly upon transactions in the client's account or in the execution of client transactions. Wrap program clients typically select GIM's strategy from a list of investment advisors and strategies presented to clients by the sponsor. Wrap program clients are generally high net worth individuals but can sometimes include institutional investors. The program sponsor has primary responsibility for client communications and service, and GIM provides investment management services to the clients. The program sponsor typically executes the client's portfolio transactions and, in most cases, provides custodial services. The only exception to this is where our taxable fixed income managers provide services to wrap clients. GIM is paid a portion of the wrap fee for its services by the program sponsor.

GIM also advises model only investment programs where program sponsors utilize a GIM portfolio to implement an investment program for investors ("overlay programs" or "UMA Programs") and such sponsors ("overlay sponsors" or "UMA Sponsors"). In overlay or UMA programs, GIM receives a management fee from the sponsor based on the assets managed by the sponsor in accordance with the model portfolio. For equity investment programs, these accounts and assets are considered non-discretionary portfolios, because GIM does not execute the trades and has no control over whether they are in fact executed. All clients who enroll in these types of accounts or programs should carefully review the fee structure and other program documents provided by the sponsor.

Investment decisions for wrap program clients and other non-wrap accounts are managed in the same investment style. There may be differences, however, at the individual account level due to (1) restrictions or limitations imposed on GIM by the wrap program account holder or sponsor; (2) differences between taxable and tax-exempt accounts; (3) differences in cash flow in or out of the account; or (4) the use of a fixed rotation schedule or timing of trade communications to overlay managers.

A list of those sponsors to whom GIM provides investment management services is contained in Part 1 of Form ADV.

Item 5 – Fees and Compensation

GIM's fees are typically charged based on a percentage of the value of the client's assets under management on a suggested minimum account size as indicated in the chart below. While it is generally GIM's policy to charge fees in accordance with the fee schedules in effect at the time the investment management agreement is signed, fees are subject to negotiation. GIM may waive its minimum fee or account size, or charge fees different from those set forth below depending on facts and circumstances; for example, fees may vary based upon certain criteria such as anticipated growth of investable assets, relationship with the Trust Company, other historic relationships, related accounts, account composition, and the outcome of any client negotiations.

The details of all fee arrangements are set forth in the investment management agreement with GIM. GIM generally bills its fees on a quarterly basis, in arrears. For accounts held in custody at the Trust Company, clients may elect to have fees debited directly from their accounts. Accounts held in custody elsewhere are billed separately. A client may terminate its investment advisory agreement by providing written notice within the parameters set forth in the management agreement. Upon termination, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Management fees charged to the Glenmede Funds are set forth in the prospectus, and the management fee charged in a wrap or overall program is subject to negotiation with the relevant Sponsor. GIM's standard fee schedule for Separately Managed Accounts is set forth below:

Product Type: **Small Cap**	Fee Schedule:
Small Cap Equity*	First $50 million 0.80% on market value
Quantitative U.S. Small Cap Equity*	Next $50 million 0.70% on market value
Mid Cap Equity	Next $150 million 0.60% on market value
SMID Cap Equity	Thereafter 0.50% on market value
	Minimum investment = $ 25 million
	< $25 million 1.00% on market value

Product: **Large Cap**	Fee Schedule:
Quantitative U.S. Large Cap Value Equity*	First $100 million 0.45% on market value
Quantitative U.S. Large Cap Growth Equity*	Next $100 million 0.40% on market value
Quantitative U.S. Large Cap Core *	Thereafter 0.30% on market value
Quantitative U.S. Large Cap Environmental Equity	Minimum investment = $25 million
Quantitative U.S. Large Cap Low Carbon Equity	< $25 million 0.75% on market value
Quantitative U.S. Large Cap Socially Responsible Equity	

Responsible ESG U.S. Equity *	
Equity Income*	
Strategic Equity*	
Women in Leadership U.S. Equity*	
Quantitative International Strategy*	

Product: **Liquid Alternatives**	Fee Schedule:
Quantitative Large Cap 130/30 and Quantitative U.S. Total Market *	1.00% on market value
	Minimum investment = $25 million
Quantitative U.S. Long Short Portfolio*	First $25 million 1.25% on market value
	Thereafter 1.00% on market value
	Minimum investment = $25 million
Secured Options*	First $10 million 0.55% on market value
Global Secured Options*	Next $40 million 0.45% on market value
	Thereafter 0.35% on market value

Product: **General Fixed Income**	Fee Schedule:
Intermediate Government/Credit Fixed Income*	First $10 million 0.30% on market value
Core Fixed Income*	Next $35 million 0.25% on market value
Enhanced Cash	Over $50 million negotiable
Short Term Tax Aware Fixed Income*	Minimum Investment = $5 million

* Available as a mutual fund investment. Please ask for a prospectus for minimum investment, fee and expense information. All fees are subject to negotiation.

In addition to the fees described above, clients may bear other costs associated with investments or account maintenance including but not limited to: (1) custodial charges, brokerage fees, commissions and related costs (see Item 12 for more detail regarding brokerage); (ii) interest expenses; (iii) taxes, duties and other governmental charges; (iv) transfer and registration fees or other similar expenses and (v) if relevant, external management fees and costs; which, if imposed by an unaffiliated Fund, are disclosed in that Fund's prospectus.

In connection with the sale of the Glenmede Funds through certain institutions ("fund supermarkets" or "fund platforms"), GIM may pay, from its advisory fee, between 5 and 40 basis points to such platforms in return for their provision of administrative services and client account maintenance which GIM or its affiliates would otherwise be required to provide. These payments are not made for the purpose of obtaining any preferred status at those institutions.

Clients of the Glenmede Funds who are also Trust Company clients are not assessed duplicate management fees for the mutual fund and account management. If a client owns a Glenmede mutual fund which charges a management fee, that fee is collected at the fund level, but the fund's value is excluded when determining the account management fee. If the fund does not charge a management fee but is owned in a GIM or Trust Company client portfolio, then it is subject to the general fee arrangement.

Item 6 – Performance-Based Fees and Side-By-Side Management

GIM does not currently charge performance fees in any of its accounts. If it does charge performance fees in the future, GIM will do so consistent with the requirements of Section 205(a)(1) of the Investment Advisers Act of 1940 (The "Advisers Act") and Rule 205-3 thereunder.

Item 7 – Types of Clients

GIM offers its services to corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, foundations, endowments, municipalities, corporations and the Glenmede Funds. In addition, GIM provides its services to high net worth individuals through sub-advisory contracts with its parent company, the Trust Company. GIM generally requires its separate account clients to have a minimum new account size consistent with the schedule contained in Item 5, but will waive that requirement because of long-standing relationships with that client or its affiliates, because of that client's relationship with the Trust Company, anticipated client additions to assets under management or for a variety of other reasons.

GIM also offers its investment advisory services to clients of Wrap Sponsors. In accounts introduced to GIM by a Sponsor, the client either enters into agreements directly with both GIM and the Sponsor, or solely with the Sponsor, or related entity. Minimum account size in these arrangements is typically $100,000.

GIM also provides model investment portfolios to overlay or UMA sponsors for negotiated fees. Under these arrangements, all or a portion of the securities transactions for accounts of the overlay sponsor's clients are implemented by the overlay sponsor or its agent on the basis of the model furnished. Minimum account size in these arrangements is set by the sponsor.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

GIM offers an array of equity, fixed income and liquid alternatives strategies in separately managed accounts and mutual fund products. Fundamental equity strategies include large and small-cap stocks using a blend of growth and value styles. GIM also features quantitatively oriented domestic and foreign equity strategies. The International Strategy primarily used American Depositary Receipts (ADRs) which are receipts issued in registered form by a U.S. bank or trust company evidencing ownership of underlying securities issued by foreign companies and which trade on U.S. exchanges through 2020. Beginning in 2021, that strategy has begun to execute also in local shares traded on the stock exchanges in the relevant jurisdiction.

Fixed income strategies include core fixed, intermediate and short duration approaches suitable for taxable and tax-exempt investors. These strategies use corporate bonds, municipal bonds, asset backed obligations and U.S. government obligations.

Liquid Alternatives include long/short strategies (Quantitative U.S. Total Market and Quantitative U.S. Long/Short) and secured options strategies (Secured Options and Global Secured Options). Glenmede believes that an equally weighted portfolio using long and short-equity positions based on multi factor stock ranking models, overlaid with upside and downside risk screens, can contribute to long-term capital appreciation consistent with reasonable risk to principal. In addition, Glenmede believes there are advantages to option investments both domestically and globally as long as implied volatility trades at a premium to subsequent realized volatility.

Both the equity and fixed income strategies may buy mutual funds or exchange traded funds, although typically they will do so subject to the limits in the Investment Company Act of 1940, whether or not the purchases are made within a Glenmede Fund.

GIM's selection of investments is based upon an investment process that utilizes technical, fundamental and charting techniques based upon information obtained from financial publications, direct corporate data, proprietary and third-party research reports, proxy, 10K, 10Q and other SEC filings. The Quantitative Equity products managed by GIM identify certain ESG considerations as a matter of course. The ESG specific products have particular strategies as described in detail below.

GIM seeks to integrate ESG factors into its fundamental equity and fixed income strategies through both an assessment of data provided by third parties and through the development of its own proprietary materiality framework. Analysts help to identify whether issuers are managing ESG risk exposures adequately, whether they are exposed to excessive risk through their business activities, and whether a relative ESG opportunity could make an investment more attractive from a risk-adjusted return perspective. GIM evaluates data as provided by third parties to determine whether it is financially material with respect to that company.

GIM strategies may utilize long and short-term trading, short sales and options trading (in the Secured Options and Global Secured Options products only) to meet their articulated investment objectives.

This section contains a discussion of the primary investment strategies used by GIM and the primary risks associated therewith. It is not possible to identify all of the risks associated with investing for a particular client. While GIM seeks to manage its strategies so that risks are appropriate thereto, it is not always possible or desirable to eliminate risks. Any investment includes the risk of loss and there can be no guarantee that a particular level of return will be achieved. Clients should be prepared to bear the risk of such potential losses.

The Principal Risks of the strategies are set forth in Section C. below.

Fuller discussions of both the investment objectives and risks of the strategies which are also available through the Glenmede Funds are contained in the prospectus and the Statement of Additional Information for those Funds. Investors with interest in those products should read those documents prior to investment.

A. Domestic Equity Strategies

1. **Quantitatively Oriented Strategies**

   a. **Quantitative U.S. Large Cap Core, Quantitative U.S. Large Cap Growth, Quantitative Large Cap Value and Quantitative Small Cap Equity**

In the quantitatively-oriented investment strategies (Quantitative U.S. Large Cap Core, Quantitative U.S. Large Cap Growth, Large Cap Value and Small Cap Equity), GIM utilizes a disciplined methodology to create a portfolio that seeks superior long-term performance as compared to the relevant index with reasonable risk to principal. The relevant index for a portfolio is based primarily on market capitalization and style. GIM utilizes proprietary quantitatively-oriented models based on long-term fundamentals and valuations to differentiate among securities within each sector of the market and then applies optimization models to provide broad diversification across sectors, industries and companies. The models include factors addressing ESG Risk and how it is addressed. GIM's managers review optimization results and have final decision with respect to which securities are to be included in the portfolio. This process is designed to result in a portfolio of securities with an attractive combination of valuation, fundamentals, earnings and technical characteristics.

   b. **Sustainable Large Cap Strategies**

The investment objective of the sustainable large cap strategies (Environmentally Sensitive, Low Carbon, Socially Responsible, Responsible ESG and Women in Leadership) is to seek superior long-term performance with reasonable risk to principal while investing consistent with a client's environmental, social and governance (ESG) interests. These strategies reflect quantitative approaches similar to those used in the Large Cap Growth and Large Cap Core strategies; that is, the use of multi-factor models to select stocks which the models identify as having reasonable prices and good fundamentals. In addition, these strategies involve a combination of positive and negative screening to preference companies that meet certain predefined criteria. The Environmentally Sensitive strategy seeks to employ screens to exclude companies that have poor environmental practices as determined by third party ratings system. Low Carbon seeks to identify and exclude the largest carbon emitters based on third party ratings, and therefore excludes most of the energy and chemicals sector (with specific exceptions) airlines, and cruises. The Socially Responsible and Responsible ESG strategies use a process to identify companies that satisfy certain ESG criteria (including but not limited to key performance indicators around climate change, corporate governance and ethics and adherence to international norms and principles around human rights). The Responsible ESG strategy seeks to invest in companies whose scores in these regards are improving. The Women in Leadership strategy seeks to identify those companies that meet its criteria by including women in significant roles, including but not limited to, board chair, female executive officer, and/or at least 33% of its management positions. It may also take into account data relating to pay, access to benefits and anti-harassment policies.

Fundamental Strategies

Equity Income, Small Cap and Strategic Equity Strategies

   a. **Equity Income Strategy**

GIM's Equity Income strategy seeks to construct a portfolio of companies that can generate not only income, but growth in income. The strategy attempts to provide a yield that is superior to the S&P 500, while generating a competitive total return over a market cycle. The strategy employs a quantitative ranking system to identify candidates, from which the portfolio manager selects individual names based on fundamental factors.

b. Small Cap Strategy

GIM offers a Small Cap strategy which seek to provide investors with superior returns compared to the relevant index (the FTSE Russell 2000) with reasonable risk to principal. The investment philosophy underlying this strategy is that a diversified portfolio of inexpensive stocks which are exhibiting company-specific positive trends will outperform the market as a whole. GIM uses a blend of quantitative and fundamental approaches to portfolio construction. The quantitative portion involves using a proprietary model in an effort to identify a list of attractive securities having revenue and earnings growth potential with reasonable valuations. The portfolio managers then apply fundamental research to select which securities to buy and sell.

c. Mid Cap Strategy

GIM's Mid-Cap strategy seeks to provide investors with superior returns compared to the FTSE Russsell Midcap Index with reasonable risk to principal. The investment philosophy underlying this strategy is that a diversified portfolio of inexpensive stocks which are exhibiting company-specific positive trends will outperform the market as a whole. GIM uses a blend of quantitative and fundamental approaches to portfolio construction. The quantitative portion involves using a proprietary model in an effort to identify a list of attractive securities having revenue and earnings growth potential with reasonable valuations. The portfolio managers then apply fundamental research to select which securities to buy and sell.

d. SMID Cap Strategy

GIM's SMID Cap strategy includes ideas from both the Small Cap and Mid Cap strategies discussed above in a concentrated portfolio of approximately 25 stocks. The investment objective is to create a portfolio invested in undervalued, higher-value stocks with specific catalysts which seeks to outperform over a full market cycle.

e. Strategic Equity Strategy

The Strategic Equity strategy seeks to invest primarily in large-cap stocks of well-managed companies with durable business models that can be purchased at attractive valuations. The strategy combines GIM's proprietary quantitative model with the insight of our fundamental research analysts. GIM has developed a list of characteristics it believes help identify companies that create shareholder value over the long term and manage risk. While few companies possess all of these characteristics at any given time, we search for companies that demonstrate a majority or an appropriate mix of these characteristics.

B. Liquid Alternatives

Secured Options, Global Secured Options, Quantitative U.S. Long Short, Large Cap 130/30 and Quantitative U.S. Total Market Strategies

Secured Options Strategy and Global Secured Options Strategy

The investment objective of both the Secured Options Strategy and the Global Secured Options Strategy is to achieve long-term capital appreciation and obtain income from option premiums consistent with reasonable risk to principal. In Secured Options, GIM seeks to achieve this objective by investing, under normal market circumstances, in a diversified portfolio of equity securities (either by buying such securities directly, or by owning stock index exchange traded funds "ETFs") while also using option writing strategies in an effort to obtain option premiums and reduce risk. The strategy attempts to balance the upside potential of the underlying securities with downside risk management. The strategy seeks to provide positive risk adjusted returns relative to the S&P 500 and outperform the CBOE PutWrite Index (PWT). In Global Secured Options, GIM seeks to achieve this objective by investing, under normal market circumstances, in a diversified portfolio of US and non-US stocks or ETFs while also using option writing strategies in an effort to obtain option premiums and reduce risk. This strategy seeks to provide positive risk-adjusted returns relative to the MSCI ACWI index.

Quantitative U.S. Long Short, Large Cap 130/30 and Quantitative U.S. Total Market Strategies

Using quantitative analysis, the Quantitative U.S. Long Short strategy invests long (short) in companies with an attractive (unattractive) combination of valuation, fundamental, earnings and technical characteristics. Generally speaking, the strategy is based on proprietary, multi-factor models which rank stocks within each sector. The Quantitative U.S. Long Short Strategy uses a portfolio-optimization process. Initial buy screens are based on our quantitative multi-factor GIM Long Buy Model identifying stocks in the top three deciles of each sector. GIM takes long positions in securities that the models identify as undervalued and more likely to appreciate, and takes short positions in equity securities that GIM identifies as overvalued and more likely to depreciate. GIM uses portfolio optimization tools to determine the size of each long or short position and its impact on the risk to the overall portfolio. The frequency and size of short sales will vary substantially in different periods as market opportunities change. Under normal circumstances, the Portfolio will generally have an operating target of 60-140 long positions that may range from 75% to 100% of net assets and 40-120 short positions that may range from 50% to 95% of net assets from time to time.

The Large Cap 130/30 and Quantitative U.S. Total Market Equity strategies invest in U.S. large cap stocks using long equity positions that GIM believe may have superior appreciation potential, with an attractive combination of valuation, fundamental, earnings, and technical characteristics. The short equity positions include stocks that have inferior appreciation potential with an unattractive combination of valuation, fundamentals, earnings, and technical characteristics.

The stock ranking models and industry group indicators are based on deep research with the objective of seeking to provide consistent performance through different economic/market cycles and minimizing downside risk (excess return per unit of downside risk). The strategy utilizes a multi-factor approach favoring stocks with cheaper valuations, higher quality characteristics (stronger fundamentals, positive earnings estimate trends, etc.), and attractive technicals. In addition, the strategy targets benchmark agnostic long and short stock positions within sectors which we believe may result in a lower average market capitalization relative to the cap-weighted benchmark index. The strategy utilizes indicators based on a combination of economic and market factors to over or underweight industry groups (GICS) relative to benchmark weightings. These indicators are intended to allow the strategy to reflect biases based on the prevailing stage of the economic/market cycle.

C. Quantitative International Equity Strategy

The investment objective of the Quantitative International Equity Strategy is maximum long-term total return consistent with reasonable risk to principal. GIM uses proprietary multi-factor models to select foreign companies that have reasonable prices, good fundamentals and rising earnings expectations. These models rank securities based on certain criteria, including valuation ratios, profitability and earnings-related measures. Unlike some other purely quantitative strategies, GIM's managers review optimization results and have final decision with respect to which securities are to be included in the portfolio. This process is designed to result in a portfolio of securities with an attractive combination of valuation, fundamentals, earnings and technical characteristics. Under normal market circumstances, this strategy will invest in ADRs or local direct shares of companies based in at least eight countries other than the United States, in primarily developed markets.

D. Fixed Income Strategies

GIM offers a number of Fixed Income strategies, which utilize a long-term and disciplined culture of risk management for investment. The foundation of our investment discipline lies in our Fixed Income investment process where the main characteristics are: 1) Establishing Investment themes; 2) Idea Generation; 3) Risk Budgeting; 4) A disciplined portfolio construction framework; and 5) Ongoing Risk Management. GIM builds portfolios in seeking to generate attractive risk-adjusted returns in a disciplined risk budgeted framework. Each of these strategies has different investment objectives, which include a focus on investment time horizon, liquidity and risk tolerance. Holdings throughout the fixed income strategies may include U.S. Treasuries and Agencies, investment grade corporate bonds, Agency-issued Mortgage-Backed Securities (MBS) and municipal securities. As a general matter, GIM seeks to include securities which are readily tradable and liquid. GIM seeks to integrate macro, sector and security selection into the investment process. Three of the main return sources are sector allocation, security selection and duration/curve/ macro positioning. GIM also engages in sector allocation rotation in its fixed income portfolios, meaning that it seeks to move investments from one industry sector to another in order to outperform market trends. Investment decisions as to sector and security are driven by a combination of fundamental and quantitative technical analysis incorporating firm proprietary investment models, dealer and vendor provided portfolio analytic models, and sell-side investment research.

1. Core Fixed

This strategy invests primarily in mortgage-backed securities, instruments issued or guaranteed by government or its agencies, and corporate debt of foreign and domestic entities. It can also invest in private mortgage-backed securities and enter into repurchase agreements under certain circumstances.

2. Muni Intermediate

The investment objective of this strategy is to obtain as high a level of current income exempt from federal income tax as is consistent with preservation of capital. It normally invests in intermediate and long-term obligations of the states, territories and possessions of the United States and their subdivisions agencies and authorities that are exempt from regular federal tax (but not necessarily the federal alternative minimum tax). The strategy may also invest in US Government issued or guaranteed obligations. It expects to maintain a dollar weighted average maturity of 3 to 10 years. It purchases obligations that the Advisor believes have the best value compared to similar securities in terms of credit and maturity. Normally it invests in securities with the three highest credit ratings in Moody's or S&P (AAA, AA, A) although it may invest in unrated securities if they are deemed to be of comparable quality at the time of purchase.

3. Short Term Tax Aware

This strategy seeks the maximum total return consistent with reasonable preservation of capital. It invests primarily in investment grade short-term municipal securities, investment grade corporate bonds, exchange traded funds ("ETFs") and closed end funds that invest in fixed income or U.S. Government Securities. It may also invest in preferred stocks. The portfolio targets a dollar weighted average maturity of one to 3 years. It seeks to balance investment considerations to achieve a best net after-tax yield and total return opportunities. GIM uses multi-factor models to analyze general economic and market conditions and expected returns and then applies fundamental research to select securities for purchase and sale.

E. Principal Investment Risks of Strategies

1. Risks of Equity and Options Strategies

Market Risk: This risk exists in all of our strategies. The price of securities in a market, a sector, or an industry will fluctuate, and those movements might reduce the value of an investment.

Frequent Trading Risk: Applicable to all equity strategies, but particularly to the quantitatively-oriented strategies. The strategies may trade actively to achieve their respective investment objectives. A high rate of portfolio turnover involves correspondingly high transaction costs, which may adversely affect the strategies' performance over time. High turnover may also result in the realization of short-term capital gains. Distributions derived from such gains will be treated as ordinary income for Federal income tax purposes.

ADR/Foreign Securities Risk: The Secured Options, Global Secured Options and Strategic Equity strategies may invest in ADRs, which are depositary receipts issued in registered form by a U.S. bank or trust company evidencing ownership of underlying securities issued by a foreign company. This permits Americans to buy interests in foreign-based companies in U.S. markets and entitles a holder to obtain dividends and capital gains. The Quantitative International Portfolio invests both in ADRs and in local direct shares in foreign companies. Investments in ADRs involve risks similar to those accompanying direct investments in foreign securities. Foreign investments may be riskier than U.S. investments because of factors such as foreign government restrictions, changes in currency exchange rates, incomplete financial information about the issuers of securities, and political or economic instability. Foreign stocks may be more volatile and less liquid than U.S. stocks. Investments outside the United States may also be subject to different settlement and accounting practices, and different regulatory, legal and reporting standards and may be more difficult to value than those in the United States.

IPO Risk: The Small Cap, Equity Income, and Strategic Equity strategies have the ability to invest in IPOs, although historically they have not done so. The market value of IPO shares could fluctuate considerably due to factors such as the absence of a prior public market, unseasoned trading, potentially a small number of shares available for trading and limited information about the issuer. When a strategy's asset base is small, a significant portion of the performance could be attributable to investments in IPOs, because such investments would have a magnified impact on the strategy.

Dividend Paying Security Risk: Income provided by the strategies may be affected by changes in the dividend policies of the companies in which the strategies invests and the capital resources available for such payments at such companies. Issuers that have paid regular dividends or distributions to shareholders may not continue to do so at the same level or at all in the future. Dividend paying securities can fall out of favor with the market, causing the strategies during such periods to underperform funds that do not focus on dividends.

Preferred Stock Risk: Preferred stock generally does not exhibit as great a potential for appreciation as common stock, although it ranks above common stock in its claim on income for dividend payments. In the event an issuer is liquidated or declares bankruptcy, the claims of owners of bonds take precedence over the claims of preferred and common stock owners. Preferred stock may also be subject to optional or mandatory redemption provisions.

Tax Managed Risk: Some of the strategies (or versions of the strategies) are designed to reduce the impact of Federal and state income taxes on shareholder's returns. As a result, the strategies may forego the opportunity to realize gains or reduce losses.

Short Sales Risk: The Large Cap 130/30, Quantitative U.S. Long/Short and Quantitative U.S. Total Market strategies are permitted to short securities as part of their strategies. Short sales are transactions in which an investor sells a security it does not own but can borrow in the market. Short selling allows the strategy to profit from a decline in market price to the extent such decline exceeds the transaction costs and the costs of borrowing the securities and to obtain a low cost means of financing long investments. If a security sold short increases in price, the strategy may have to cover its short position at a higher price than the short sale price, resulting in a loss. Other risks include the potential inability to borrow a security that GIM needs to deliver or be unable to close out a short position at an acceptable price and may have to sell related long positions earlier than it had expected. Because losses on short sales arise from increases in the value of the security sold short, such losses are theoretically unlimited. By contrast, a loss on a long position arises from decreases in the value of the security and is limited by the fact that a security's value cannot decrease below zero. By investing the proceeds received from selling securities short, the strategies could be deemed to be employing a form of leverage, which creates special risks. The use of leverage may increase exposure to long securities positions and make any change in the overall value of the strategy larger than it would be without the use of leverage. This could result in increased volatility of returns. Due to these risks, GIM's strategies seek to limit the amount of short selling in each strategy.

Small Cap Risk: The Small Cap, Mid Cap and SMID Cap strategies invest in stocks of smaller and sometimes newer issuers which may be more volatile and speculative than the stocks of larger issuers. Smaller companies tend to have limited resources, product lines and market share. As a result, their share prices tend to fluctuate more than those of larger companies. Their shares may also trade less frequently and in limited volume, making them potentially less liquid. The price of small company stocks might fall regardless of trends in the broader market.

Options Risk: The Secured Options and Global Secured Options Strategies use options writing strategies. Writing and purchasing call and put options are highly specialized activities and entail greater than ordinary investment risks. The successful use of options depends in part on the future price fluctuations and the degree of correlation between the options and the securities markets. The value of the strategy's positions in options fluctuates in response to changes in the value of the underlying security or index, as applicable. The strategy also risks losing all or part of the cash paid for purchasing call and put options. Strategy assets covering written options cannot be sold while the option is outstanding, unless replaced with similar assets. As a result, there is a possibility that segregation of a large percentage of the strategy's assets could affect its portfolio management as well as the ability of the strategy to meet redemption requests or other current obligations. Unusual market conditions or the lack of a ready market for any particular option at a specific time may reduce the effectiveness of this strategy's option strategies, and for these and other reasons the option strategies utilized may not reduce the strategy's volatility to the extent desired. The strategy may reduce its holdings of put options resulting in an increased exposure to a market decline.

Sustainable Strategies and ESG Risks: The application of social environmental and governance standards will affect exposure to certain issuers, industries, sectors, regions and countries and may impact the relative financial performance of any such strategy – positively or negatively – depending on whether such investments are in or out of favor An investment's ESG performance or the investment adviser's assessment of such performance may change over time, which could cause strategies to temporarily hold securities that do not comply with their articulated ESG investment criteria. In evaluating securities, GIM is dependent upon information and data that may be incomplete, inaccurate or unavailable, which could adversely affect the analysis of the ESG factors relevant to a particular investment. Successful application of investment strategy will depend on the investment adviser's skill in properly identifying and analyzing material ESG issues.

Value Style Risk. Although these strategies take long positions in stocks GIM believes to be undervalued, there is no guarantee that the prices of these stocks will not move even lower. In addition, the value investment style can shift into and out of favor with investors, depending on market and economic conditions. As a result, value-oriented portfolios may at times outperform or underperform other funds that invest more broadly or employ a different investment style.

Model Risk. All our quantitative products use proprietary models that incorporate quantitative analysis. Investments selected using these models may perform differently than as forecasted due to the factors incorporated into the models and the weighting of each factor, changes from historical trends, and issues in the construction and implementation of the models (including, but not limited to, software issues and other technological issues). There is no guarantee that use of these models will result in effective investment decisions. The information and data used in the models may be supplied by third parties. Inaccurate or incomplete data may limit the effectiveness of the models. In addition, some of the data uses is historical data, which may not accurately predict future market movement. There is a risk that the models will not be successful in selecting investments or in determining the weighting of investment positions that will enable strategies to achieve their investment objectives.

2. **Risks of Fixed Income and Cash Management Strategies**

Interest Rate Risk: The value of fixed income securities tends to fluctuate with changes in interest rates. Generally, their value will decrease when interest rates rise and increase when interest rates fall. Fixed income securities with longer maturities are more susceptible to interest rate fluctuations than those with shorter maturities. Therefore, the risk of interest rate fluctuation is greater to the extent that the strategies invest in long-term securities.

Credit Risk: Fixed income securities are also subject to the risk that an issuer will be unable to make principal and interest payments when due. Although generally GIM seeks to invest in obligations rated A or better at the time of purchase, the strategies may invest in shares of registered investment companies (primarily ETF's) rated BBB- or higher by S&P or Baa[3] or higher by Moody's or if unrated, determined to be of comparable quality at the time of purchase. Securities rated BBB- or Baa[3] are considered medium-grade obligations with speculative characteristics and are more vulnerable to adverse business or economic conditions than higher rated securities.

Government Agency Risk: Direct obligations of the U.S. Government such as Treasury bills, notes and bonds are supported by its full faith and credit. Indirect obligations issued by Federal agencies and government-sponsored entities generally are not backed by the full faith and credit of the U.S. Treasury. Accordingly, while U.S. Government agencies and instrumentalities may be chartered or sponsored by Acts of Congress, their securities are neither issued nor guaranteed by the U.S. Treasury. Some of these indirect obligations may be supported by the right of the issuer to borrow from the Treasury; others are supported by the discretionary authority of the U.S. Government to purchase the agency's obligations; still others are supported only by the credit of the instrumentality.

Prepayment Risk: The strategies are subject to prepayment risk. Prepayment risk is the risk that a debt security may be paid off and the proceeds returned to the strategies earlier than anticipated. Depending on market conditions, proceeds may be reinvested at lower interest rates.

Frequent Trading Risk: The strategies may actively trade portfolio securities to achieve the principal investment strategies. A high rate of turnover involves correspondingly high transaction costs, which may adversely affect the strategies' performance over time. High turnover may also result in the realization of short-term capital gains. Distributions derived from such gains will be treated as ordinary income for Federal income tax purposes.

Default Risk: The strategies may make loans through collateralized repurchase agreements. They may also borrow money through reverse repurchase agreements. Although loans made by the strategies are collateralized with the borrower's securities, the strategies could suffer a loss if the borrower defaults on its obligation to buy the securities back under the terms of the repurchase agreement.

Municipal Obligation Risk: Municipal security prices can be significantly affected by political changes as well as uncertainties in the municipal market related to taxation, legislative changes or the rights of municipal security holders. Because many municipal securities are issued to finance similar projects, especially those relating to education, healthcare, transportation and utilities, conditions in those market sectors can affect municipal bond prices.

2. Risks Applicable to All Strategies

Cybersecurity Risks —As Internet usage has increased in the conduct of business, the strategies and GIM have become potentially more susceptible to operational and information security risks. A cybersecurity breach can result from either a deliberate attack or an unintentional event. Cybersecurity breaches may involve such items as viruses or other malicious code, or unauthorized access to information systems, networks or devices through "hacking" or other means, for the purpose of misappropriating assets or sensitive information (including, for example, clients' personal information), corrupting data or causing operational disruption or failures in the physical infrastructure or operating systems used by GIM. These risks could result in increased costs associated with corrective measures or other financial loss. GIM has business continuity plans and a cybersecurity program designed to prevent or reduce the impact of such attacks, but the tactics are constantly changing, and there is a possibility that certain risks will not be avoided Cybersecurity risks may also impact issuers of securities in which GIM invests, which may cause those investments to lose value.

Pandemics and Other Disease Risks – Events such as health pandemics or outbreaks of disease, such as COVID-19, may lead to increased short-term market volatility and may have longer term effects on U.S. and global economies and markets generally. Both diseases themselves and efforts to remediate health risks, such as government-imposed closures and travel restrictions, could result in general economic decline regionally or globally, depending on where outbreaks occur, how long they persist, and how they spread. Pandemics can adversely affect securities markets, issuers, credit risks and more, all of which could result in declines in performance. In addition, pandemics and efforts to address their effects could adversely affect GIM's ability to provide services, depending on their severity and government action. GIM maintains a pandemic and Business Continuity Plan to mitigate these risks, but there is a possibility that these plans will not avoid all risk.

Operational Events – To the extent that a strategy relies on proprietary and third party data analysis and systems to support investment decision making, there is a risk of software or other technology malfunctions or programming inaccuracies that may impair the performance of these systems, and therefore affect investment performance.

Loss of investment — An investor may lose money by investing in any strategy. The likelihood of loss may be greater if the investor invests for a shorter period of time.

Investments are not guaranteed — Investments the strategies are not bank deposits and are not insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency, entity or person.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of GIM or the integrity of GIM's management. GIM has no information about the firm applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

GIM's affiliate, the Trust Company, is a trust company chartered under the National Bank Act and supervised by the Office of the Comptroller of the Currency (OCC). The Trust Company provides trust and investment advisory services to high net worth individuals and institutions. It also acts as non-member manager of several alternative investment pools exempt from registration under the Investment Company Act of 1940 pursuant to Sections 3(c)(1) or 3(c)(7) (hedge funds, real estate and private equity funds). None of those pools own or trade the same types of securities as GIM uses for its strategies.

GIM and the Trust Company provide services to one another and share various resources. For example, the Trust Company provides custodial, back office, valuation, IT and legal support to GIM and GIM clients, while GIM provides equity trading services and investment management services to Trust Company clients in SMAs. In addition, GIM and the Trust Company share office space and the services of certain vendors, such as ISS, which is used to analyze and vote proxies by both GIM and the Trust Company. GIM relies on the Trust Company's Business Continuity and Disaster Recovery facilities and plan, which incorporates provisions to meet GIM's needs. The Trust Company and GIM periodically assess the services provided to one another to determine whether and in what magnitude payments from one to the other should be made.

GIM serves as advisor to the Glenmede Funds, which are registered investment companies, for management fees described in the relevant prospectus. The Trust Company also provides anti-money laundering, sub-transfer agent and other services to the Glenmede Funds. Both GIM and the Trust Company waive fees to the Glenmede Funds under certain circumstances articulated in the prospectus. Trust Company clients comprise a significant portion of the Funds' assets.

If GIM recommends the purchase or sale of Glenmede Funds in an account it manages, it will not collect a double fee. Rather, the value of the mutual fund holding is excluded when calculating the account-level management fee where the fund has collected a management fee on GIM's behalf.

GIM also may, from time to time, support various seminars or training programs for Wrap Sponsors.

GIM is not a broker-dealer, does not receive transaction-related compensation and is registered with no federal regulator other than the SEC. It is registered with the Ontario Securities Commission, but does not actively solicit business in that jurisdiction. It files exemptions with the CFTC and NFA as a Commodity Pool Operator on behalf of the funds it advises which do use (or might use) options. GIM does not actively solicit business outside of the United States.

Item 11 – Code of Ethics

GIM has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition on rumor mongering, restrictions and reporting requirements with respect to gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at GIM must acknowledge the terms of the Code of Ethics annually, or as amended.

GIM manages most of its accounts on a discretionary basis. From time to time, GIM may cause such accounts to purchase or sell securities (or recommend that a prospect purchase or sell securities) in which GIM or its related persons have a financial interest. These types of transactions present a conflict of interest in that employees or related persons might benefit from market activity by a client in a security held by such employee or related person. In order to reasonably prevent such conflicts, GIM monitors the personal trading of employees and other associated persons. The Code of Ethics requires pre-clearance of most securities transactions, and restricts trading in close proximity to client trading activity. GIM also has a guideline minimum holding period of 30 days for most personal securities transactions.

GIM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting the Chief Compliance Officer at (215) 419-6000.

Item 12 – Brokerage Practices

A. Selection of Brokers, Dealers and Other Trading Venues.

GIM will generally select brokers and dealers that will execute transactions initiated by GIM for an Account and select the markets in which the portfolio transactions will be executed in accordance with its best execution policies and procedures. Best execution consists of seeking the most favorable result, considering a full range of services provided, under prevailing market conditions. Best execution is not necessarily measured by the circumstances surrounding a single transaction, but may be measured over time. While GIM seeks competitive pricing or commission rates, it does not necessarily pay the lowest spread or commission available. As a result, in selecting broker-dealers, GIM may take into account many factors, including but not limited to the following: size of the order, price of the security; execution difficulty; liquidity; market and exchange conditions; macro-economic conditions; current news events; order flow information; speed of execution; broker ability to execute a large or small trade; ability or inability of electronic communication network to handle transactions; value of brokerage and research services provided to GIM and commission cost. GIM periodically reviews execution performance of the broker-dealers used to execute trades.

As described further in Section D below, GIM generally executes equity trades for wrap accounts at the platform sponsor or its affiliate because those clients are typically paying a fee which includes trade execution. Accordingly, the factors described above may not be relevant to determination of best execution for such clients. All execution decisions relating to overlay accounts, including the decision regarding whether to trade at all, are made by the platform sponsor or custodian.

B. Payments for Research and Other Services ("Soft Dollars").

GIM may direct client brokerage to broker-dealers who provide research and brokerage services to GIM and its affiliates. Such arrangements are subject to GIM's best execution policies, and are intended to comply with the safe harbor of Section 28(e) of the Securities Exchange Act of 1934 which permits the payment of commissions that exceed commissions other broker-dealers may charge if GIM determines that such commissions are reasonable in relation to the research or brokerage services provided. Generally, the research provided may include technology, macroeconomic, strategy or specialty research that takes the form of subscriptions, data and analysis provided either orally, electronically or in writing. Research and brokerage services received may include proprietary research generated by the broker-dealers that execute the transactions as well as research generated by third parties.

A broker-dealer might also furnish GIM or its affiliates with a mixed-use product or service that is useful both in making investment decisions for managed accounts and in performing administrative or other non-research functions. Where this occurs, GIM allocates the cost of the product or service such that the portion or specific component that assists in the investment decision-making process is obtained with commissions and the portion or specific component that provides non-research assistance is paid for in "hard dollars" by GIM or its affiliates.

GIM may select a broker-dealer based on its or its affiliate's interest in receiving the research or other products or services, rather than on its clients' interest in receiving the most favorable execution. Also GIM may incur obligations to pay for research with its own funds to the extent that the services are not fully paid for by client brokerage. Such obligation presents a conflict between GIM's interest in avoiding payment for research services with its own funds and GIM's interest in seeking best execution for client transactions.

GIM believes that the investment research and information provided by brokers or dealers and their ability to achieve quality executions and other brokerage services is important to all GIM's clients. Therefore, GIM does not attempt to put a specific dollar value on the brokerage or research services of any broker or dealer or to allocate the relative costs or benefits of those services among clients. Thus, the research received for an account's brokerage commissions may or may not be useful to GIM or its affiliates with respect to investment management of any particular client's account, but may be useful as to accounts of other clients. Similarly, the research received for the commissions of accounts of other clients of GIM or its affiliates may be useful to GIM with respect to investment management of a given account. As it is generally difficult to trade fixed income instruments in a fashion which generates soft dollars, fixed income research is acquired using soft dollars that have been garnered from equity executions.

The Best Execution Committee reviews quarterly the firm's trading, including the use of client commissions to obtain research and brokerage services. It evaluates such matters as the types and costs of services received, the commissions used to obtain such services and the allocation of any mixed-used items.

C. Brokerage for Client Referrals.

In selecting broker-dealers, GIM does not consider whether it receives client referrals from the broker dealer or third party. GIM may, however, execute transactions through wrap or overlay sponsors or other broker-dealers that may themselves or through their affiliates bring or refer clients to GIM or GIM products. Additionally, a client may direct GIM to use the services of a particular broker-dealer in executing transactions for that client's account. In some cases, the directed broker may have recommended GIM as a manager for that account.

D. Directed Brokerage and Other Client Restrictions.

GIM may accept a client's instructions for direction of a portion of the client's brokerage transactions to a particular broker-dealer, although it rarely does so. For any such directed brokerage arrangement, GIM will not be responsible for negotiating commissions, may not obtain volume discounts or price improvements, and best execution may not be obtained.

Clients who instruct GIM to direct brokerage business are responsible for negotiating commission rates. Higher commission costs, transaction and other fees may apply, even though similar services may be obtained from other broker dealers at lower costs. Directing GIM to use a particular broker-dealer might also affect the timing of a client's transaction, and not all broker-dealers have the systems or expertise to effectively process transactions.

Investment decisions are generally applied to all accounts participating in a particular investment strategy. These decisions may take into account specific client restrictions or instructions, as well as cash balance requirements and tax related issues. Disparities are possible among clients in the strategy for securities purchased, pricing, and commissions paid as a result of these restrictions.

Wrap programs or other sponsor accounts may direct GIM to direct trades through or with the Sponsor or other broker or dealer. In such cases, clients may pay higher commission rates. If GIM effects transactions through a non-Sponsor broker-dealer, the client may pay commissions or commission equivalents in addition to any trade execution compensation already agreed upon between the client and the Sponsor as part of the Sponsor's fee. Due to this additional cost, GIM will typically cause the vast majority of trades for clients who have already agreed to such compensation to be executed by the Sponsor.

E. Trade Aggregation and Allocation.

When buying or selling the same security for multiple clients, GIM will generally aggregate client orders in an effort to achieve a timely and fair execution. An order will not be aggregated if there is a specific account or client limitation, such as investment guidelines, tax status, or brokerage direction, which would prevent it.

GIM's policy is to allocate securities to its clients in a fair and equitable manner in order to assure that no client is routinely favored or disfavored. Accordingly, each client participating in an aggregated order that has been fully filled will receive the full pro-rata allocation at the average price for the transaction. Transaction costs are shared on a pro-rata basis. Allocations are generally made on the day the order was executed. If an allocation is not completed the same day, the remaining amount will be executed pro-rata on the next day.

Partial fills are generally allocated pro rata based on the client's participation in the aggregated order at an average price. Orders are allocated to the appropriate accounts by the end of the day the order was executed. A partial fill may not be allocated pro rata if such a small amount has been transacted that pro rata allocation among accounts would result, in GIM's judgment, in a non-meaningful allocation. In these cases, GIM will use best efforts to allocate such de minimis amounts to the accounts in an equitable manner.

F. Trade Rotation.

GIM does not negotiate fees or brokerage commissions with wrap sponsors on behalf of wrap clients. These commissions are generally included in the "wrap" fee charged by the sponsor. Typically, GIM executes orders for equity wrap accounts separately from transactions for its institutional accounts due to operational constraints.

For fixed income wrap accounts, no trade rotation is currently required based on limited number of platforms. This is continuously evaluated to determine whether some other rotation is required to ensure the fair treatment of all customers. For equity wrap accounts, GIM has adopted a trade rotation policy to assure that orders executed for equity wrap clients and communicated to overlay sponsors are fair and equitable to all clients. GIM employs equity "wrap traders" who are responsible for communicating model changes to overlay clients and/or executing trades for equity wrap clients. The equity wrap desk maintains a fixed rotation schedule for each product which includes each equity wrap sponsor and GIM's trading desk. Certain wrap platforms may be bundled together at the discretion of the equity wrap trade desk in order to assure that all platforms obtain the most efficient execution. As dictated by that schedule, the wrap desk executes the required transactions on behalf of the equity wrap program or informs the GIM trade desk that it can trade. To the extent that Sponsor accounts are traded on the Sponsor's system, GIM may be unable to execute orders for such accounts at the time otherwise dictated by the fixed rotation schedule if the Sponsor's system is unavailable. The equity wrap desk communicates trades to overlay sponsors typically upon conclusion of the fixed rotation schedule. GIM makes every effort to treat all its wrap and overlay clients fairly; however, it does not guarantee that any wrap or overlay program will be in the market by itself when trades are communicated to or executed for other such programs.

G. <u>Trade Errors.</u>

GIM's policy is to identify and resolve trade errors promptly. Consistent with its fiduciary duty to its clients, GIM seeks to put the client in the same position that the client would have been in if the error had not occurred.

Generally speaking, a trade error is the result of action or inaction by a GIM employee which prevents an account from being traded in a manner consistent with instructions provided by the manager or the client, results in the execution of an unintended trade or causes a violation of any applicable policy or law; such as buying or selling the wrong securities in the wrong quantities or failing to trade as required.

GIM will determine on a case-by-case basis whether any remuneration is required and how it is calculated. As the goal is to put clients in the same position had the error not occurred, Clients will neither absorb losses nor ordinarily receive gains as the result of an error or its correction. Clients will not ordinarily be notified of an error unless the error is, in GIM's sole view, material.

H. <u>Opposite Direction Trades.</u>

GIM may sometimes trade the same securities in opposite directions for multiple accounts. This means that GIM may be buying the same security for a strategy and selling that same security in another; or holding a security in one transaction and selling long or short in another. This may be due to having different strategies with different objectives managed by different teams, or may occur in accounts with similar investment strategies due to differing cash flows or restrictions. A manager may even choose to short sell a security as a hedge on a long position absent a specific restriction. As part of its overall review of trading, Compliance will review to assure that no products or accounts are unfairly benefitting from such trades.

Item 13 – Review of Accounts

GIM reviews client accounts continually as portfolio managers and others track individual securities, economic sectors, countries (if applicable), and overall strategy performance. The performance and characteristics of all client accounts are periodically reviewed by portfolio managers. In addition, all strategies are subject to an annual Strategy Review conducted by the Strategy Review Committee which, among other things, investigates the investment process used by the portfolio managers for consistency with its stated investment objectives. Additionally, the President of GIM conducts a regular review on each strategy to confirm compliance with or enhancements to the investment philosophy and process along with corresponding performance.

Discrepancies in performance across accounts are reported and discussed regularly.

GIM provides transaction and performance reports monthly, quarterly or annually as requested by the client. Most clients receive written account statements monthly, but not less than quarterly. In addition to a regular statement, clients receive information regarding their holdings, portfolio manager commentary, and GIM's periodic Newsletter. Statements for wrap or overlay clients are produced by the Sponsor and/or its affiliate custodian on a monthly or quarterly basis as agreed between the Client and the Sponsor.

Item 14 – Client Referrals and Other Compensation

GIM does not currently compensate any third party for client referrals. In the event that practice changes, it will happen only in accordance with applicable rules, requiring a written solicitation agreement and appropriate disclosure to the prospect. GIM may provide investment management services to clients of consultants who introduce such clients. Though GIM does not pay for such introductions, GIM may purchase products or services from such consultants, or may pay to attend conferences hosted by such consultants.

Item 15 – Custody

GIM itself does not generally have custody of clients' assets, but it is deemed to have custody because its parent, the Trust Company, acts as custodian for certain accounts managed by GIM and clients may have GIM fees debited therefrom. Clients should receive at least quarterly statements from Trust Company, the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. GIM urges you to carefully review such statements and compare such official custodial records to any account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

The standard investment management agreement which GIM clients are required to sign gives GIM discretionary authority to manage investments, consistent with the stated investment objectives for the particular client account. As GIM is not a full-service wealth manager providing customized account service, clients typically do not impose limitations on GIM's investment discretion.

GIM may choose to accept clients who have provided specific written investment guidelines or restrictions; though these limitations may result in performance differing from that of clients who did not restrict GIM's discretion. GIM's authority to trade securities on behalf of the Glenmede Funds may also be limited by the prospectus or certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Item 17 – Voting Client Securities

GIM generally votes all voting securities held in discretionary accounts unless otherwise directed by a client. To assist in doing so, GIM engages the services of a third-party proxy processor, currently ISS, to evaluate, recommend and vote shares consistent with those recommendations. GIM evaluate the summary of ISS voting policies annually to assure that they are consistent with firm views of the long-term interests of clients and investors. Currently, Glenmede utilizes ISS's Sustainability Policy for all but one product. The Women in Leadership product utilizes a custom guideline developed with ISS to further the product's investment objectives. Proxy voting and shareholder activity is governed by an Investment Stewardship Committee which evaluates periodically whether proxy votes cast are consistent with the articulated policies of the ESG products.

This use of varying policies may result in one product voting differently from another product on a particular issue, although such conflict seems relatively rare historically. ISS is provided with holdings information and votes all securities unless they identify a conflict; for example, where ISS they have equity ownership in the issuer, or where GIM otherwise determines that it is important and in the interest of GIM's clients to vote directly.

Where there is such a conflict, GIM's President will decide how to vote, after consultation with relevant personnel. Clients may request information regarding specific proxies voted by contacting the Chief Compliance Officer, at 215-419-6000. Proxy voting records of the Funds are public and available on Form N-PX, available through the SEC's EDGAR database.

Item 18 – Financial Information

Registered investment advisors are required to provide you with certain financial information or disclosures about their financial condition. GIM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. GIM does not require prepayments of fees in excess of $1200 more than six months in advance of services rendered.

Item 19 – Privacy Policy

Aspects of GIM's privacy policy are carried out on its behalf by the Trust Company (collectively for these purposes, "Glenmede"). Glenmede is committed to the confidentiality and privacy of our clients' non-public personal information. This commitment extends to all clients with whom Glenmede has a relationship, including former clients.

Categories of information

Glenmede comes into possession of and/or collects non-public personal information about our clients (the "Information"):

- from applications, correspondence, account contracts, fiduciary documents and other documents and forms;
- from client transactions with us, account activity and holdings; and,
- from third parties from which clients have authorized us to obtain Information.

Disclosures to Third Parties
Glenmede does not disclose Information about our clients or former clients to third parties except as permitted by law. Third party processors or service providers may have access to Information of clients in order to provide or assist Glenmede in providing services to Glenmede clients. In all cases, such third parties are prohibited from using, disclosing or releasing Information outside the scope of providing such services and have executed contracts containing confidentiality provisions.
We may share certain client information with government agencies as permitted or required by laws such as the Federal Right to Financial Privacy Act or the Bank Secrecy Act and other Anti-Money Laundering regulations. These disclosures are usually made for specific circumstances, for example, verifying identities to reduce fraud and identity theft or for prompt credit approval or as required by law, such as in response to a subpoena or court order. Depending on the kind of request, we may be required by law to contact a client and obtain the client's specific consent to this disclosure.

Opt Out Provisions
In the event that Glenmede intends to disclose Information to a third party that is not providing services to Glenmede, Glenmede will notify all affected clients of such intended disclosure. Each such client will be advised of the nature of the disclosure and given instructions on how to opt out. At present Glenmede has no intention of disclosing Information to third parties beyond the necessary disclosures to processors and service providers and as otherwise permitted by law.

Security
Glenmede restricts access to Information about clients to those employees who need to know that Information to provide services to such clients. Glenmede maintains physical, electronic and procedural safeguards that comply with state and federal regulations to guard client Information. Glenmede's independent auditor examines the control objectives established by Glenmede related to Investment Management, Trust and Custody services and performs testing to determine whether those controls tested were operating with sufficient effectiveness to provide reasonable assurance that the control objectives were achieved.

V Part 2B – Brochure Supplement

Form ADV Part 2B – Brochure Supplement

Vladimir de Vassal
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Vladimir de Vassal that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Vladimir de Vassal is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born:	1959
Education:	B.S., Drexel University
	M.B.A., Drexel University

Vladimir de Vassal, CFA, is Portfolio Manager for several strategies. He provides proprietary research and analytical support to domestic and international institutional funds and strategies, and certain other support to the Glenmede Trust Company ("GTC"). Mr. de Vassal and his team manage several quantitatively based equity portfolios, including multiple long-only mutual funds and long / short strategies. Mr. de Vassal joined GTC in 1998 after serving as vice president and director of quantitative analysis at CoreStates Investment Advisors and as vice president of interest rate risk reporting/analysis, at CoreStates Financial Corp.

Professional Designation:

Mr. de Vassal has earned the Chartered Financial Analyst ("CFA") designation.

To earn the CFA designation, an individual must satisfy the following requirements: (i) have **either** an undergraduate degree and four years of professional experience involving investment decision making, **or** four years of qualified work experience; (ii) pass an examination on each of three course levels; (iii) pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis; and (iv) establish membership with a local CFA member society.

Item 3- Disciplinary Information

Mr. de Vassal has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. de Vassal is not actively engaged in any other investment-related business or occupation.

Item 5- Additional Compensation

Glenmede maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. de Vassal is supervised by the President of GIM, Kent Weaver, and its CIO, Stacey Gilbert (215) 419-6000. Advice provided by Mr. de Vassal to his institutional clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Form ADV Part 2B – Brochure Supplement

Robert M. Daly
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Robert M. Daly that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Robert M. Daly is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born: 1981
Education: B.A., Dartmouth College; M.B.A. Columbia Business School

Robert Daly is Director of Fixed Income for The Glenmede Trust Company, N.A. (GTC) and Glenmede Investment Management LP (GIM). He is responsible for the management of tax-exempt and taxable fixed income strategies for institutions, consultants and private clients. Daly works closely with a team of traders, portfolio managers, credit analysts and other professionals to broaden exposure to GIM's fixed income suite. He also serves as a member of GTC's Investment Policy Committee.

Prior to joining Glenmede, Mr. Daly served as a senior portfolio manager for U.S. and global fixed income strategies at BlackRock in New York. In this role, he was instrumental in establishing and managing a team responsible for asset allocation development, portfolio construction, risk budgeting and formulating investment process. Previously, Daly managed multi- sector and investment grade credit fixed income portfolios for institutional clients.

Professional Designation:

None.

Item 3- Disciplinary Information

Mr. Daly has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Daly is not actively engaged in any other investment–related business or occupation.

Item 5- Additional Compensation

Glenmede maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. Daly is supervised by the President of GIM, Kent Weaver, and its CIO Stacey Gilbert, (215) 419-6000. Advice provided by Mr. Daly to his institutional clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Stephen Mahoney
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Stephen Mahoney that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Stephen Mahoney is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born:	1962
Education:	B.S., Widener University
	M.B.A., Saint Joseph's University

Stephen J. Mahoney is taxable Fixed Income Manager for Glenmede Investment Management, LP ("GIM"). He is primarily responsible for management of tax-exempt, institutional fixed income portfolios. He joined GIM's affiliate The Glenmede Trust Company, N.A. ("GTC") in 1999 to contribute his specialized knowledge of corporate bonds to GTC's institutional, tax-exempt portfolios. Prior to joining GTC, Mr. Mahoney was a fixed income portfolio manager with 1838 Investment Advisors. Before that, he spent ten years with The Vanguard Group's fixed income trading desk. Throughout his career, Mr. Mahoney has managed an assortment of fixed income securities, including money market instruments, U.S. Treasuries, corporate securities, Agency securities and derivative products.

Professional Designation:

None.

Item 3- Disciplinary Information

Mr. Mahoney has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Mahoney is not actively engaged in any other investment–related business or occupation.

Item 5- Additional Compensation

Glenmede maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. Mahoney is supervised by the Director of Fixed Income, Rob Daly (215) 419-6000. Advice provided by Mr. Mahoney to his institutional clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Christopher Colarik
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Christopher Colarik that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer, if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Christopher Colarik is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born: 1972
Education: B.S., The University of Delaware

Christopher J. Colarik is a Portfolio Manager for Glenmede Investment Management, LP ("GIM"). His primary responsibility is managing the Small Cap Equity products. Mr. Colarik joined GIM's affiliate, The Glenmede Trust Company, N.A. ("GTC") in 1997 as head of the institutional portfolio analytics group. His responsibilities included portfolio analysis and the oversight of AIMR compliance. In 2000 he joined the portfolio management team of the Large Cap Value product, and in 2001, he assumed responsibilities with the Small Cap Equity product. Prior to joining GTC, he was at Brandywine Asset Management.

Professional Designation:

None.

Item 3- Disciplinary Information

Mr. Colarik has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Colarik is not actively engaged in any other investment–related business or occupation.

Item 5- Additional Compensation

Glenmede maintains a new business incentive plan that provides cash compensation to employees of GIM or GTC when they refer new business to GTC.

Item 6 - Supervision

Mr. Colarik is supervised by Kent Weaver, President of GIM, and Stacey Gilbert, the CIO. Both can be reached at (215) 419-6000. Advice provided by Mr. Colarik to institutional clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Paul Sullivan
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Paul Sullivan that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer, if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Paul Sullivan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born:	1968
Education:	B.S., Bloomsburg University
	M.B.A., Saint Joseph's University

Paul Sullivan is a Portfolio Manager for Glenmede Investment Management, LP. His principal responsibilities include managing several quantitatively based equity portfolios, including multiple long-only mutual funds and long / short strategies and managing separate accounts for institutional clients. Mr. Sullivan joined The Glenmede Trust Company, N.A. ("GTC") in 1994. Prior to joining GTC, Mr. Sullivan was with SEI Investments where he was a supervisor in the mutual fund accounting department.

Professional Designation:

Mr. Sullivan has earned the Chartered Financial Analyst ("CFA") designation.

To earn the CFA designation, an individual must satisfy the following requirements: (i) have **either** an undergraduate degree and four years of professional experience involving investment decision making, **or** four years of qualified work experience; (ii) pass an examination on each of three course levels; (iii) pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis; and (iv) establish membership with a local CFA member society.

Item 3- Disciplinary Information

Mr. Sullivan has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Sullivan is not actively engaged in any outside investment–related business or occupation.

Item 5- Additional Compensation

Glenmede maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. Sullivan is supervised by the Portfolio Manager, Vladimir deVassal (215) 419-6000. Advice provided by Mr. Sullivan to his institutional clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Sean Heron
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Sean Heron that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer, if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Sean Heron is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born:	1978
Education:	B.A., LaSalle University
	M.B.A, LaSalle University

Sean Heron, CFA, is a Portfolio Manager for Glenmede Investment Management, LP. In addition to managing the Secured Options products, he leads a team responsible for providing clients of The Glenmede Trust Company, N.A. ("GTC") with a full range of hedging and diversification strategies which incorporate the use of options, futures and other structured products. Mr. Heron began his career as an Options Specialist with a firm that was purchased by Goldman Sachs. In 2003, he left Goldman to help former Goldman Sachs Managing Director Thomas McGowan launch McGowan Investors, LP. Mr. Heron joined Glenmede in 2006.

Professional Designation:

Mr. Heron has earned the Chartered Financial Analyst ("CFA") designation.

To earn the CFA designation, an individual must satisfy the following requirements: (i) have **either** an undergraduate degree and four years of professional experience involving investment decision making, **or** four years of qualified work experience; (ii) pass an examination on each of three course levels; (iii) pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis; and (iv) establish membership with a local CFA member society.

Item 3- Disciplinary Information

Mr. Heron has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Heron is not actively engaged in any outside investment–related business or occupation.

Item 5- Additional Compensation

Glenmede maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. Heron is supervised by Kent Weaver, President of GIM and Stacey Gilbert, CIO at (215) 419-6000. Advice provided by Mr. Heron to his institutional clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Alexander R. Atanasiu
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Alexander R. Atanasiu that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer, if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Alexander R. Atanasiu is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born:	1983
Education:	B.A., Swarthmore College
	M.B.A., New York University

Alexander R. Atanasiu, CFA, is a Portfolio Manager for Glenmede Investment Management LP (GIM), a wholly-owned subsidiary of The Glenmede Trust Company, N.A. (GTC). Mr. Atanasiu provides support in the management of several quantitatively-based equity strategies, including long/short funds. Additionally, his responsibilities include stock ranking screens, multifactor stock optimizations, leading indicator analysis, and developing tools for analysts and portfolio managers. Mr. Atanasiu began his professional career as an intern at GTC during in 2005 and was subsequently hired as a full-time analyst. He holds a B.S. in engineering and a B.A. in physics from Swarthmore College and an M.B.A. with distinction from the Stern School of Business at New York University, with concentrations in quantitative finance and business analytics. He received the Chartered Financial Analyst® designation in 2009.

Professional Designation:

Mr. Atanasiu has earned the Chartered Financial Analyst ("CFA") designation.

To earn the CFA designation, an individual must satisfy the following requirements: (i) have **either** an undergraduate degree and four years of professional experience involving investment decision making, **or** four years of qualified work experience; (ii) pass an examination on each of three course levels; (iii) pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis; and (iv) establish membership with a local CFA member society.

Item 3- Disciplinary Information

Mr. Atanasiu has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Atanasiu is not actively engaged in any outside investment–related business or occupation.

Item 5- Additional Compensation

Glenmede maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. Atanasiu is supervised by the Portfolio Manager, Vladimir de Vassal (215) 419-6000. Advice provided by Mr. Atanasiu to clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

John R. Kichula
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about John R. Kichula that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer, if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about John R. Kichula is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born: 1969
Education: Sc.B., Brown University

John R. Kichula is Director of Equity Research for Glenmede Investment Management LP (GIM), an affiliate of The Glenmede Trust Company, N.A. He manages a team of equity research analysts and helps ensure consistency is maintained within the fundamental equity investing process. He also conducts equity research, focusing on companies in the financial services, telecommunications and utilities industries. Mr. Kichula joined GTC in 2002 as a research analyst. Prior to joining GTC, Mr. Kichula was a vice president and member of the emerging value team at BlackRock, Inc., managing small- and mid-cap equity funds with primary responsibility for the financial services industry. He has also been employed by Palisade Capital Management, LLC, M.A. Schapiro & Co., and Salomon Brothers Inc. At each institution, Mr. Kichula assumed increasing responsibilities while focusing on the financial services industry.

Professional Designation:

Mr. Kichula has earned the Chartered Financial Analyst ("CFA") designation.

To earn the CFA designation, an individual must satisfy the following requirements: (i) have **either** an undergraduate degree and four years of professional experience involving investment decision making, **or** four years of qualified work experience; (ii) pass an examination on each of three course levels; (iii) pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis; and (iv) establish membership with a local CFA member society.

Item 3- Disciplinary Information

Mr. Kichula has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Kichula is not actively engaged in any outside investment–related business or occupation.

Item 5- Additional Compensation

Glenmede maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. Kichula is supervised by the President of GIM, Kent Weaver and its CIO, Stacey Gilbert (215) 419-6000. Advice provided by Mr. Kichula to clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Jordan L. Irving
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Jordan L. Irving that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer, if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Jordan L. Irving is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born:	1973
Education:	B.A. Yale University Special Diploma Oxford University

Jordan L. Irving is a Portfolio Manager for Glenmede Investment Management LP (GIM) an affiliate of The Glenmede Trust Company, N.A. His primary responsibility is managing the Small Cap Equity and Mid Cap Equity portfolios. Mr. Irving joined GIM in 2018 as a Portfolio Manager. He most recently served as a founding partner and portfolio manager at Irving Magee Investment Management LLC. Previously, Mr. Irving worked as a Senior Portfolio Manager for both large and small capitalization value equity strategies at Macquarie Investment Management (formerly Delaware Investments). He began his career in 1998 with the U.S. Active Large-Cap Value team within Merrill Lynch Investment Managers where he worked for six years.

Professional Designation:

None

Item 3- Disciplinary Information

Mr. Irving has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Irving serves as a Director for an unaffiliated hedge fund complex trading products which do not compete with any sponsored by GIM.

Item 5- Additional Compensation

GIM maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. Irving is supervised by the President of GIM, Kent Weaver, and its CIO, Stacey Gilbert (215) 419-6000. Advice provided by Mr. Irving to clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Stacey Gilbert
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

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Additional information about Stacey Gilbert is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born: 1975
Education: B.A. Dartmouth College

Stacey Gilbert is the Chief Investment Officer and a Portfolio Manager for Glenmede Investment Management LP (GIM) an affiliate of The Glenmede Trust Company, N.A. Her primary responsibility is managing derivatives (equity options) portfolios. Prior to joining Glenmede, Ms. Gilbert served as the Head of Derivative Strategy at Susquehanna Financial Group. In this role, she led a team responsible for providing market commentary, actionable ideas and trading strategies driven by catalyst events, breaking news, and sector analysis. During her more than two decades at Susquehanna, she held several leadership positions, including key senior positions on the trading desk and the American Stock Exchange, trading both options and ETFs. Gilbert also led the company's Education department.

Professional Designation:

None

Item 3- Disciplinary Information

Ms. Gilbert has no reportable disciplinary history

Item 4- Other Business Activities

Ms. Gilbert has no outside business activities.

Item 5- Additional Compensation

GIM maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Ms. Gilbert is supervised by the President of GIM, Kent Weaver (215) 419-6000. Advice provided by Ms. Gilbert to clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Mark Livingston
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Mark Livingston that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer, if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Mark Livingston is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born:	1978
Education:	B.B.A. University of Michigan
	MBA New York University

Mr. Livingston is a Portfolio Manager with primary responsibility for the Strategic Equity strategy. He also serves as an equity analyst for the firm. Prior to joining Glenmede in 2010, Mr. Livingston was an Associate Director of Equity Research at UBS, focusing on the gaming and leisure industries. Prior to UBS, Mr. Livingston was an Associate in Equity Research at Lehman Brothers in New York City, covering the machinery industry.

Professional Designation:

Mr. Livingston holds the Certified Financial Analyst ("CFA") designation.

Item 3- Disciplinary Information

Mr. Livingston has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Livingston is not actively engaged in any outside investment–related business or occupation.

Item 5- Additional Compensation

GIM maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. Livingston is supervised by the President of GIM, Kent Weaver, and its CIO, Stacey Gilbert (215) 419-6000. Advice provided by Mr. Livingston to clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Doug Wilson
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Doug Wilson that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer, if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Doug Wilson is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born:	1968	
Education:	BA	University of Akron
	MBA	New York University

Mr. Wilson is a Portfolio Manager with primary responsibility for fixed income strategies. Prior to joining Glenmede, Mr. Wilson served as a Bond Trader for Alliance Bernstein. In this role, he worked on a team that led all over-the-counter trading for $10.7 billion mutual fund assets and $14 billion private client assets. Previously, he worked as a Bond Trader for Money Markets, where he identified and executed on opportunities for private client accounts and long duration funds generated by the collapse of the Municipal Auction Rate market.

Professional Designation:

None.

Item 3- Disciplinary Information

Mr. Wilson has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Wilson is not actively engaged in any outside investment–related business or occupation.

Item 5- Additional Compensation

GIM maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. Wilson is supervised by the Director of Fixed Income, Rob Daly at (215) 419-6000. Advice provided by Mr. Livingston to clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

Kaitlyn Jones
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Kaitlyn Jones that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer, if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Doug Wilson is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born:	1990	
Education:	BA	Drexel University

Ms. Jones is a Portfolio Manager with primary responsibility for taxable fixed income strategies. Prior to joining Glenmede, Ms. Jones served as a High Yield Trader and Portfolio Administrator at PENN Capital Management Company, Inc. She traded high yield corporate bonds, convertible bonds and leveraged loans for institutional accounts. Previously, she worked in trade operations at BlackRock, Inc. in Wilmington, Delaware, and as a business analyst at Level 3 Communications in Bala Cynwyd, Pennsylvania.

Professional Designation:

None.

Item 3- Disciplinary Information

Ms. Jones has no reportable disciplinary history.

Item 4- Other Business Activities

Ms. Jones is not actively engaged in any outside investment–related business or occupation.

Item 5- Additional Compensation

GIM maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Ms. Jones is supervised by the Robert Daly, the head of fixed income. (215) 419-6000. Advice provided by Mr. Livingston to clients is monitored for adherence to GIM's investment philosophy and process.

Form ADV Part 2B – Brochure Supplement

David M. Joyce
Glenmede Investment Management LP
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about David Joyce that supplements the Glenmede Investment Management Brochure. You should have received a copy of that Brochure. Please contact Maria McGarry, Chief Compliance Officer, if you did not receive Glenmede Investment Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about David Joyce is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born:	1978	
Education:	BA	Pennsylvania State University

Mr. Joyce is an Associate Portfolio Manager in the non-taxable fixed income area**.** Prior to joining Glenmede, Mr. Joyce served as Senior Vice President of Fixed Income at WNJ Capital. In this role, he focused on both the trading and underwriting of municipal securities. Previously, he worked as a Municipal Bond Trader for Susquehanna International Group, where he was responsible for Investment Grade trading within the firm's proprietary strategies.

Professional Designation:

None.

Item 3- Disciplinary Information

Ms. Joyce has had one reportable event. At a prior firm, in 2010, FINRA alleged that he engaged in an inappropriate round-trip transaction and misrepresented the circumstances. Details can be found at http://disciplinaryactions.finra.org/CaseDetailRecords.aspx?CaseNB=2010023883601.

Item 4- Other Business Activities

Mr. Joyce is not actively engaged in any outside investment–related business or occupation.

Item 5- Additional Compensation

GIM maintains a new business incentive plan that provides cash compensation to employees when they refer new business to GTC.

Item 6 - Supervision

Mr. Joyce is supervised by the Robert Daly, the head of fixed income. (215) 419-6000. Advice provided by Mr. Joyce to clients is monitored for adherence to GIM's investment philosophy and process.

GLENMEDE INVESTMENT MANAGEMENT, LP CLIENT RELATIONSHIP SUMMARY
March 30, 2022

Glenmede Investment Management, LP ("GIM") is an investment adviser registered with the Securities and Exchange Commission. We provide advisory services and not brokerage accounts or services. Brokerage and investment advisory services and fees differ, and it is important for you to understand the difference. Free and simple tools are available to research firms and financial professionals at investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

<u>What investment services and advice can you provide me?</u>

GIM offers investment advisory services to retail clients through platforms ("wrap" "SMA" or "model" accounts) offered by other advisors or brokers. GIM focuses on making investment decisions within particular investment strategies involving publicly traded securities. Most of our accounts (wrap and SMA) are discretionary, meaning we direct the purchase or sale of investments in your account in accordance with a strategy that has been selected by you or your financial professional. Where we offer a "model," we propose how much of each security should be in the strategy, but your adviser or broker decides whether to follow these proposals for your account ("non-discretionary accounts.") The performance and characteristics of all client accounts are periodically reviewed by portfolio managers. We generally offer services to you through platforms (other advisors and/or broker dealers) if you invest a minimum of $100,000. Direct (non-platform) investors typically are required to have a minimum of $10,000,000 though we may negotiate that. For more information about our advisory services, see Item 4 of our Firm Brochure (Form ADV, Part 2A).

Questions to Ask Us: **Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do those qualifications mean**?

<u>What fees will I pay?</u>

We receive an asset-based fee based on the value of investments in your account. Our fee schedule varies from .30% to 1.00% depending on the strategy selected and the amount of assets invested. Fees are negotiable. Our incentive is to increase the value of your account over time which will increase our fees over time. You will pay fees and costs whether you make or lose money on your investments and all these fees and costs reduce the return to you. Please make sure you understand what fees and costs you are paying.

Your account will also be charged for purchases and sales if you invest with us directly; if you are investing through a platform, you may be paying a separate fee for trading done by your broker or advisor. For more information about our fees and compensation, see Item 5 in our Firm Brochure.

Questions to Ask Us: Help me understand how these fees and costs will affect my investments? If I give you $10,000 to invest, how much will go to fees and costs and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have a fiduciary duty to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. For example; we do pay for research that benefits the firm and all our clients generally with commissions generated from making purchases and sales in accounts we trade directly. Our personnel also may invest in the same securities purchased and sold for the strategies in which your account may participate. For more information about our conflicts of interest, see Item 11 and Item 12 of our Firm Brochure.

Questions to Ask Us: How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our financial professionals are paid a fixed monthly salary and may also receive discretionary bonuses based upon the success of the firm and specifically upon the contributions of the employee; bonuses are related to meeting certain criteria including performance of products managed.

Do you or your financial professionals have legal or disciplinary history?

Our firm has no legal or disciplinary history. One of our professionals does. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Questions to Ask Us: As a financial professional, do you have any disciplinary history? For what type of conduct?

Additional Information

You can find additional information about our firm's investment advisory services on the SEC's website at www.adviserinfo. sec.gov by clicking on the FIRM tab and then searching CRD #108165.

If you would like additional, up-to-date information or a copy of this disclosure, please call (215) 419-6627.

Questions to Ask Us: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

408(b)(2) Disclosure Document

GLENMEDE INVESTMENT MANAGEMENT LP

Glenmede Investment Management LP ("We" or "GIM") is providing you with this disclosure document to give you an overview of various aspects of our relationship with your employee benefit plan (the "Plan"), including a written statement of our "status," the services we provide to the Plan, and the compensation we receive in connection with providing such services. This document is intended to include information required by the Department of Labor's regulation under Section 408(b)(2) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). Please review this document and any additional documents referenced herein, including the investment management agreement(s) applicable to the Plan's account(s) with GIM ("Account"). Additional information also is contained in GIM's Form ADV, Part 2A, which is available on Glenmede's website at https://www.glenmede.com/glenmede-investment-management, or on the website of the U.S. Securities and Exchange Commission at https://adviserinfo.sec.gov/. You also may request a copy by contacting your Glenmede representative.

Status

We are acting as a registered investment adviser and an ERISA fiduciary of the Plan with respect to the Account.

Services

We provide investment management services for the Account as described in the applicable investment management agreement. Depending on your relationship, our affiliates may provide additional services to the Plan. For example, The Glenmede Trust Company, N.A. ("GTC") may provide custodian or other services for the Account.

Compensation

In return for our services, we are paid fees by the Plan as set forth in the investment management agreement. The fees generally are debited from the Account unless other arrangements have been made. Fees paid to GTC for custodian or other services provided by GTC are paid separately to GTC in accordance with the Plan's applicable agreement with GTC.

If the Account is managed by GIM through a platform sponsored by a third party not affiliated with GIM, then the Plan does not pay GIM directly. Rather, we are paid by the platform sponsor in accordance with our agreement with the sponsor and you should contact the relevant sponsor for further information about the fees paid to GIM.

In addition, consistent with Section 28(e) of the Securities and Exchange Act of 1934, as amended, GIM and, if applicable, GTC (collectively with GIM, "Glenmede") receives brokerage and research services (including proprietary and third-party research services) and/or credits from certain broker-dealers that execute trades for clients of Glenmede under "soft dollar" or commission sharing arrangements ("CSAs"). GIM and GTC share the services and/or credits they receive, although that allocation generally is not on a transactional basis.

In 2021 approximately 46.4% of the brokerage commissions generated by Glenmede in effecting transactions for its client accounts were allocated to pay for proprietary and third-party research services, with an average of approximately 1.5 cents of "soft dollar credit" per share traded. Glenmede anticipates utilizing similar amounts in 2022.

In 2021, Glenmede utilized primarily the following brokers to obtain brokerage and research services:

Bank of America
Barclays
BIDS
Citigroup
Cowen
Craig-Hallum
Evercore ISI
Goldman Sachs
Jefferies

JP Morgan
Keefe Bruyette & Woods
Key Bank
Liquidnet
Morgan Stanley
Piper Sandler
Raymond James
RBC
Robert Baird
Sanford Bernstein
Sitfel Nicholas
Truist (formerly SunTrust)
UBS Securities Inc.
Virtu
Wells Fargo
Wolfe Research

In 2022, Glenmede anticipates utilizing primarily the following brokers to obtain brokerage and research services:

Bank of America
Barclays
BIDS
Citigroup
Cowen
Craig Hallum
Credit Suisse
Evercore ISI
Goldman Sachs
Jefferies
Janney Montgomery Scott
JP Morgan
Keefe Bruyette & Woods
Key Bank
Liquidnet
Morgan Stanley
Piper Sandler
Raymond James
RBC
Robert Baird
Sanford Bernstein
State Street
Sitfel Nicholas
Truist (formerly SunTrust)
UBS Securities, Inc.
Virtu
Wells Fargo
Wolfe Research

In 2021, brokers provided Glenmede with third-party research services primarily from the following providers:

13 D Research
BCA
Benchmark
Bloomberg
BMO
Bond Edge (Interactive Data)
Boock Report FI & E trading
Canaccord Genuity
Cirrus

Cornerstone
Credit Sights
Dow Jones
Emp Re FMMI
Empirical Re
Evestment Local Premium
Furey Research Partners
Gavekal
Guggenheim
Haver
HIS Markit PMIs
Leerink
Melius Research
MoffettNathanson
Moodys
Morningstar (data fund)
Morningstar Direct
MSCI
MSCI ESG
Nomura
Northfield
OPCO
PCS Smart Muzea Insider
Perform CreditScope
Renmac
S&P Global (compustat) via FS
S&P Global (point in time) FS
S&P Global Ratings
S&P Index Data
Stephens
Strategas
Thomas Reuters (TM3)
Yardeni

In 2022, Glenmede anticipates that brokers will provide Glenmede with third-party research services primarily from the following providers:

Bell Potter Securities
Bloomberg
BMO
Boock Report / Peter Bookvar
Cirrus Research
Cornerstone Macro
CreditSights
Dow Jones
Empirical Research
Equileap Investment Services
eVestment Local Premium 3*
FMMI Inc - Empirical
Furey Research Partners
Gavekal
Guggenheim Securities, LLC
Haver Analytics
ICE Data Services/ BondEdge
IHS Markit
Investortools CreditScope
Leerink
Melius Research LLC
Moody's

Morningstar Direct Licenses
MSCI -ESG Data
Nomura
Oppenheimer
Refinitiv - Thomson Reuters TM3 MMD
RENMAC
S&P Compustat via FactSet
S&P Global Ratings Direct
S&P Index data via FactSet/CRIMS
SASB Membership for Impact Investing
Smart Insider LLC / Muzea Insider
Stephens Inc.
Strategas Securities, LLC
Trahan Macro Research (TMR)
Value Line
William Blair
Wolfe Research

More information about GIM's brokerage practices can be found in its Form ADV, Part 2A, Item 12.

Please note that If the Account is managed by GIM through a platform sponsored by a third party, GIM typically effects trades at the platform's designated broker because the fee paid by clients to the sponsor typically covers execution costs for trades executed by such broker. In such a case, GIM would not generate any soft dollar credits or receive any compensation from that broker in connection with its execution of trades for the Account.

Gifts and Entertainment

GIM occasionally receives gifts or entertainment from persons with whom it does or seeks to do business, including brokers, investment advisors or others. These gifts may include non-monetary and promotional items (such as mugs, calendars or gifts baskets) or entertainment such as meals, sporting events or access to conferences. GIM has implemented policies and procedures, which are described in its Form ADV, Part 2A, to comply with applicable regulations intended to ensure that GIM and its employees avoid conflicts of interest and limiting the amount of gifts and entertainment which is permitted. GIM has not received gifts or entertainment exceeding the U.S. Department of Labor Form 5500 Schedule C reporting thresholds for any plan investor in 2021 and does not anticipate exceeding such thresholds in the future. GIM does not anticipate receiving gifts and entertainment valued in excess of $250 with respect to any particular plan.

Other Compensation

Indirect compensation may be received by GTC on "float" if and when GTC has custody of the Account. GTC may earn interest on cash items posted to the Account in those circumstances when the cash is not immediately swept into a money market fund. GTC sweeps to the last whole $1 on a daily basis. Similarly, checks issued from the Account may generate interest earnings to GTC from the time when the transaction is posted in the Account until presented for payment by the recipient. These earnings received by GTC are generally at money market rates.

Conclusion

If you have any questions about the information contained in this document, please contact your Glenmede representative. You may also contact our Compliance Department at 215-419-6092.