

The Glenmede Fund, Inc.
Environmental Accountability Portfolio
Women in Leadership U.S. Equity Portfolio

Shareholder Engagement Policy

While the Environmental Accountability Portfolio (formerly the Responsible ESG U.S. Equity Portfolio) and the Women in Leadership U.S. Equity Portfolio of The Glenmede Fund, Inc. (each a “Fund” and collectively, the “Funds”) are not permitted to invest for the purpose of exercising control over management of any company, the Funds may participate in shareholder advocacy activities that are not for the purpose of, or have the effect of, exercising control over management of a company, but rather encourage long term sustainability. Shareholder engagement, for purposes of this policy, is the process through which investors in publicly traded companies use their shares to create a constructive dialogue in order to promote change in corporate practices. Such shareholder advocacy generally relates to those topics that seek to support good corporate citizens while enhancing long-term shareholder and stakeholder value. As strategies utilizing quantitative data, permitted activity includes requesting disclosure of additional information on these topics, particularly when it appears companies have not adequately addressed shareholders’ previously articulated ESG questions. Shareholder proposals are typically non-binding, or advisory, meaning the company is not required by law to comply, regardless of the level of support for such proposals by shareholders. A non-binding proposal asks, recommends, or suggests that the company take or not take a specific action.

The Funds’ participation in shareholder engagement will generally be limited to shareholder proposals that:

- Request the company to furnish information and data helpful to shareholders in evaluating the company’s operations.
- Call for reports that enhance transparency and communication between shareholders and management.

The Funds may be part of a coalition of stakeholders that work with an organization that will file or co-file shareholder proposals.

A list of examples of shareholder proposals that the Funds may participate in is attached as Exhibit A. The Environmental Accountability Portfolio will generally focus on environmental topics but may consider other topics in Exhibit A where deemed relevant to its investment objectives or process by the majority of GIM’s Investment Stewardship Committee members. Similarly, the Women in Leadership U.S. Equity Portfolio will generally focus on diversity and equality issues but may consider other topics in Exhibit A where deemed relevant to its investment objectives or process by the majority of GIM’s Investment Stewardship Committee members.

At each quarterly meeting of the Funds’ Board of Directors, the Advisor shall provide a report to the Board that includes any shareholder proposals that are being considered for participation and any shareholder proposals that have been filed in which each Fund participated.

Exhibit A

Diversity and Equality

SEC disclosure rules require information in Proxy Statements on how boards factor diversity and equality into the director nomination process, as well as disclosure of how the board assesses the effectiveness of its diversity policy.

- Proposals asking for reports and data on board diversity.
- Proposals that seek greater disclosure of a company's programs and procedures on board and workforce diversity.
- Proposals requesting reports documenting the distribution of the stock option and restricted stock awards by race and gender of the recipient.
- Proposals requesting a company to make available, at a reasonable cost and omitting proprietary information, data the company includes in its annual report to the U.S. Equal Employment Opportunity Commission (EEOC), which outlines the make-up of its workforce by race, gender and position.
- Proposals requesting a company to report on its diversity and/or affirmative action programs.
- Proposals requesting reports on any efforts a company is making to advance representation of women and ethnic minorities in jobs in which they have been historically underrepresented, such as sales and management.
- Proposals requesting a company to report on pay data by gender or provide a report on its policies and goals aimed at reducing any gender pay gap.
- Proposals requesting a company report on its initiatives to create a workplace free of discrimination on the basis of sexual orientation or gender identity.
- Proposals requesting reports on any efforts a company is making to more carefully consider the symbols and images and the use of racial stereotypes in advertising campaigns.
- Proposals seeking information as to how a company is managing the risks related to the use of artificial intelligence (AI) with regards to human capital management

Labor and Human Rights

Efforts that seek greater disclosure on a company's labor practices and minimum labor standards for a company's operations.

- Proposals requesting reports on human rights standards and workplace codes of ethics.
- Proposals requesting reports on any efforts to publish a "Code of Conduct" to the company's foreign suppliers and licensees that, for example, requires such entities to satisfy all applicable standards and laws protecting employee wages, benefits, working conditions, freedom of association and other rights.
- Proposals requesting reports on a company's environmental and health impact on communities.
- Proposals requesting companies to report on risks associated with outsourcing or offshoring.
- Proposals seeking information as to how a company is managing risks related to the use of artificial intelligence (AI) in its business practices.

Environment

Efforts generally seek greater disclosure on an environmental issue or seek to improve a company's environmental practices.

- Proposals seeking greater disclosure on the company's environmental practices and/or environmental risks and liabilities.
- Proposals requesting information on whether a company reports in accordance with leading climate standards (e.g., Taskforce for Climate-related Financial Disclosures, the Paris Agreement, Science Based Targets Initiative).
- Proposals requesting a company's climate transition plans.
- Proposals requesting a company's sustainability report.
- Proposals seeking disclosure of liabilities or preparation of a report pertaining to global warming and climate change risk.
- Proposals requesting reporting on responses to regulatory and public pressure surrounding climate change.
- Proposals requesting disclosure of research that aided in setting company policies around climate change.
- Proposals requesting reports on greenhouse gas emissions from company operations and/or product and operations.
- Proposals requesting a report on a company's activities related to the development of renewable energy sources.
- Proposals requesting a report on a company's energy efficiency policies and/or goals.
- Proposals requesting reports on potential environmental damage as a result of a company's operations in protected regions.
- Proposals seeking greater disclosure of a company's natural gas hydraulic fracturing operations.
- Proposals requesting a report on a company's recycling efforts.
- Proposals seeking a report on a company's nuclear energy procedures.
- Proposals seeking a report on a company's risks linked to water use.
- Proposals requesting a report on any efforts a company is making to promote the United Nations' commitment to the "human right to water."
- Proposals requesting that companies report on policies for water use that incorporate social and environmental factors.
- Proposals seeking information as to how a company is managing its energy consumption related to the use of artificial intelligence (AI).

Before you invest in the Glenmede Funds please refer to the equity prospectus and/or bond prospectus and/or equity institutional class prospectus for important information about the investment company, including investment objectives, risks, charges and expenses. You may also obtain a hard copy of the prospectus by calling 1-800-442-8299. The prospectus should be read carefully before you invest or send money. Mutual fund investing involves risk. Principal loss is possible.

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