

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.glenmedeim.com/> 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.

For 2024, we estimate that approximately 43% 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 1.8 cents of “soft dollar credit” per share traded. Glenmede anticipates utilizing similar amounts in 2025.

In 2024, Glenmede utilized primarily the following brokers to obtain brokerage and research services:

BNP Paribas
BTIG
Bank of America
Barclays
BIDS
BlockCross
Citadel
Citigroup
Cowen – TD Bank
Evercore ISI

Goldman Sachs
Instinet / Wolfe
Jane Street Execution Services, LLC
Janney Montgomery Scott
Jefferies
JP Morgan
Keefe Bruyette & Woods
Key Bank
Liquidnet
Morgan Stanley
Piper Sandler
Raymond James
RBC Capital
Robert Baird
Sanford Bernstein
State Street
Stifel Nicolaus
Stuart Frankel & Co.
Truist
UBS Securities, Inc.
Wells Fargo

In 2025, Glenmede anticipates utilizing primarily the following brokers to obtain brokerage and research services:

Bank of America
Barclays
Canaccord
Citigroup
Citadel
Cowen – TD Bank
Craig-Hallum
Evercore ISI Group
Goldman Sachs
Instinet / Wolfe
JP Morgan
Jefferies
Key Bank
Morgan Stanley
Piper Sandler
Raymond James
RBC Capital
Robert Baird
Sidoti & CO.
Strategas Securities, LLC
Stifel Nicolaus
Susquehanna
Truist
UBS Securities, Inc.
Wells Fargo

In 2024, brokers provided Glenmede with third-party research services primarily from the following providers:

As You Sow
Bell Potter Securities
Bloomberg
BMO
Boock Report
Cirrus Research

Cornerstone Macro
CreditSights
DataTrek
Dow Jones Newswire (FactSet Feeds)
Empirical Research
Equileap Investment Services
Factset Research Systems, Inc.
FMMI Inc- Empirical
Furey Research Partners
Gavekal (Daly)
Grant's Interest Rate Observer
Haver Analytics
ICE Data Services/ BondEdge
Institutional Investor - Trader Forum
Investortools CreditScope
Leerink
Melius Research LLC
Moody's
Morningstar
MSCI -ESG Data
Oppenheimer
OWL ESG, Inc.
Refinitiv - Thomson Reuters TM3 MMD
RENMAC
S&P Global
SASB Membership for Impact Investing
Smart Insider LLC (Muzea Insider)
Stephens Inc.
Strategas Securities, LLC
Tegus, Inc.
Trahan Macro Research (TMR)
Value Line
William Blair
Wolfe Research
Yardeni Research

In 2025, Glenmede anticipates that brokers will provide Glenmede with third-party research services primarily from the following providers:

Bell Potter Securities
Bloomberg
BMO
Boock Report
Cirrus Research
Cornerstone Macro
CreditSights
DataTrek
Dow Jones
Empirical Research
Equileap Investment Services
FMMI Inc - Empirical
Furey Research Partners
Gavekal Grant's Interest Rate Observer
Haver Analytics
IHS Markit
Leerink
Melius Research LLC
Morningstar

MSCI -ESG Data
Oppenheimer
OWL ESG, Inc.
Refinitiv - Thomson Reuters TM3 MMD
RENMAC
S&P Global
SASB Membership for Impact Investing
Smart Insider LLC / Muzea Insider
Stephens Inc.
Strategas Securities, LLC
Tegus, Inc.
Trahan Macro Research (TMR)
Value Line
William Blair
Wolfe Research
Yardeni 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 2024 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.