

408(b)(2) Disclosure Document

The Glenmede Trust Company, N.A.

The Glenmede Trust Company, N.A. (“We” or “GTC”) 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, investment advisory and/or custodial agreement(s) applicable to the Plan’s account(s) with GTC (“Account”).

Status

We are acting as an ERISA fiduciary of the Plan with respect to the Account to the extent we provide investment management or investment advisory services.

Services

We provide investment management, investment advisory and/or custodial services for the Account as described in the applicable investment management agreement, investment advisory agreement or custodial agreement. Depending on your relationship with GTC, our affiliates may provide additional services to you. For example, Glenmede Investment Management LP (“GIM”) may manage certain of the Account’s assets in a separately managed account, and/or the Account may be invested in one or more mutual funds managed by GIM and to which GTC may provide certain services, as described in more detail below under “Other Compensation”.

Compensation

In return for our services, we are paid fees by the Plan as set forth in the relevant Account agreement. The fees generally are debited from the Account unless other arrangements have been made.

In addition, consistent with Section 28(e) of the Securities and Exchange Act of 1934, as amended, GTC and GIM (collectively, “Glenmede”) receive 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”). GTC and GIM 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
Sitifel 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
Sitifel 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
Moody's
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

Gifts and Entertainment

GTC 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. GTC has implemented policies and procedures to comply with applicable regulations intended to ensure that GTC and its employees avoid conflicts of interest and limiting both the amount of gifts and entertainment which is permitted. GTC 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. GTC 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. We sweep 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.

If the Account is invested in one or more mutual funds managed by GIM (the “Glenmede Funds”), an affiliate of GTC, then the Account also will be subject to the fees charged by such Funds, including but not limited to shareholder servicing fees paid by the Glenmede Funds to GTC pursuant to their agreement with GTC. In addition, GIM typically receives management fees from the Glenmede Funds for serving as investment adviser to the Funds, pursuant to their agreement with GIM. If the Plan is paying GTC a fee for managing the Account, and the Account is invested in one or more Glenmede Funds which pay management fees to GIM, then GTC will exclude the value of the Account’s assets invested in such Funds when calculating the Account fee payable to GTC. For more information on the Glenmede Funds, including but not limited to the fees associated with investing in the Funds, please see the Funds’ prospectuses which, together with other disclosure documentation, can be found online at <https://www.glenmede.com/glenmede-investment-management> (the fees charged by the Glenmede Funds are disclosed in the summary section located near the beginning of the prospectus). You also may request copies from your Glenmede Relationship Manager.

If the Plan is invested in one or more private funds sponsored by GTC, such as private equity or hedge funds, then it will be subject to any fees associated with such investments. GTC typically receives a management fee for managing such private funds, and may be entitled to other fees as well. A detailed description of the fees associated with a GTC private fund can be found in the Private Placement or Confidential Offering Memorandum you received at the time you invested in such fund. Please contact your Glenmede Relationship Manager if you require an additional copy.

Registered investment advisers not affiliated with GTC may be engaged as sub-advisors to manage a portion of the Account. The fees payable to such sub-advisors are described in the applicable agreement with the sub-advisor and in the Form ADV, Part 2A of the sub-advisor. You may request a copy of the Form ADV by contacting your Glenmede Relationship Manager, or you may view such ADV online at <https://www.adviserinfo.sec.gov/IAPD/>.

Third-Party Mutual Funds and Private Funds

Third-party mutual funds and/or private funds, not affiliated with Glenmede, may be used as investment vehicles for the Plan's assets. The fees and expenses associated with these investments are detailed in the applicable prospectus or offering documentation for such funds, copies of which you can obtain by contacting your Glenmede Relationship Manager.

Conclusion

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