

V Part 2B – Brochure Supplement

Form ADV Part 2B – Brochure Supplement

Peter J. Zuleba, III
Glenmede Investment Management LP (“GIM”)
1650 Market Street, Suite 1200
(215) 419-6000

March 30, 2021

This Brochure Supplement provides information about Peter J. Zuleba, III 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 Peter J. Zuleba, III is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Born: 1966
Education: B.S., University of Delaware
M.B.A. University of Miami

Peter J. Zuleba, III, CFA, is President of Glenmede Investment Management, LP. Mr. Zuleba joined GTC in 2004 as a senior portfolio manager and has held various other positions within GTC and GIM, including Director of Equity Management and Director of Investment Management.

Prior to joining GTC, Mr. Zuleba had been employed at J.P. Morgan Chase and Co. for over fifteen years. Most recently, he created and managed the company's large cap growth equity strategy, with assets under management of over \$800 million. In addition, he managed discretionary assets for the company's private individual clients, endowments and foundations, communicating investment strategies and portfolio performance to existing and prospective clients.

Professional Designation:

Mr. Zuleba 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. Zuleba has no reportable disciplinary history.

Item 4- Other Business Activities

Mr. Zuleba 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. Zuleba reports to the Chief Executive Officer of GTC, Gordon Fowler (215) 419-6000. Mr. Zuleba oversees the business of GIM, but does not provide investment advice to GIM clients.

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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, Peter Zuleba, III (215) 419-6000. Advice provided by Mr. de Vassal to his institutional clients is monitored for adherence to GIM's investment philosophy and process.

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

March 30, 2021

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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, Peter Zuleba, III (215) 419-6000. Advice provided by Mr. Daly to his institutional clients is monitored for adherence to GIM's investment philosophy and process.

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

March 30, 2021

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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.

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

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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 Peter Zuleba, III, President of GIM. 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.

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

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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.

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

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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 Peter Zuleba, III, President of GIM (215) 419-6000. Advice provided by Mr. Heron to his institutional clients is monitored for adherence to GIM's investment philosophy and process.

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

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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.

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

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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, Peter Zuleba, III (215) 419-6000. Advice provided by Mr. Kichula to clients is monitored for adherence to GIM's investment philosophy and process.

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

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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, Peter Zuleba, III, (215) 419-6000. Advice provided by Mr. Irving to clients is monitored for adherence to GIM's investment philosophy and process.

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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 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, Peter Zuleba, III, (215) 419-6000. Advice provided by Ms. Gilbert to clients is monitored for adherence to GIM's investment philosophy and process.

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

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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, Peter Zuleba, III, (215) 419-6000. Advice provided by Mr. Livingston to clients is monitored for adherence to GIM's investment philosophy and process.

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

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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.

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Kaitlyn Jones
Glenmede Investment Management LP
1650 Market Street, Suite 1200
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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

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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.