

**The Glenmede Fund, Inc.**  
**Responsible ESG U.S. Equity Portfolio**  
**Women in Leadership U.S. Equity Portfolio**

**Shareholder Engagement Policy**

While the Responsible ESG U.S. Equity Portfolio and the Woman 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 environmental, social and governance (ESG) sustainability. Such shareholder advocacy generally relates to ESG topics that seek to support good corporate citizens while enhancing long-term shareholder and stakeholder value. They typically request disclosure reports that seek additional information on these topics particularly when it appears companies have not adequately addressed shareholders’ ESG concerns. Shareholder proposals are typically non-binding, meaning the company is not required by law to comply, regardless of the level of support for such proposals by shareholders. A non-binding, or advisory, 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 helpful to shareholders in evaluating the company’s operations.
- Call for reports that enhance 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.

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 into the director nomination process, as well as disclosure of how the board assesses the effectiveness of its diversity policy.

- Proposals asking for 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 reasonable cost and omitting proprietary information, data the company includes in its annual report to the Equal Employment Opportunity Commission (EEOC) outlining the make-up of its workforce by race, gender and position.
- Proposals requesting the company to report on its diversity and/or affirmation action programs.
- Proposals requesting reports on any efforts the 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 a report on a company's policies and goals to reduce any gender pay gap.
- Proposals requesting a company to 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 the company is making to take more careful consideration of the symbols and images and the use of racial stereotypes in advertising campaigns.

### 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 off-shoring.

### Environment

Efforts generally seek greater disclosure on an issue or seek to improve a company's environmental practices in order to protect the world's natural resources.

- Proposals seeking greater disclosure on the company's environmental practices and/or environmental risks and liabilities.
- Proposals requesting companies whether they report in accordance with the Global Reporting Initiative (GRI).
- Proposals to provide a sustainability report.
- Proposals to report on whether the company has studied or implemented the Coalition for Environmentally Responsible Economies (CERES) principles.
- Proposals to report on whether the company has studied or implemented the Equator Principles.
- 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, and for 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 company energy efficiency policies and/or goals.
- Proposals requesting reports on potential environmental damage as a result of company operations in protected regions.
- Proposals seeking greater disclosure of a company's natural gas hydraulic fracturing operations.
- Proposals requesting a report on the 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 to report on any efforts the company is making to promote the "human right to water" as articulated by the United Nations.
- Proposals requesting that companies report on policies for water use that incorporate social and environmental factors.