2026 PUBLIC ACCOUNTABILITY QUESTIONNAIRE

This Questionnaire Covers Calendar Year 2025.
Please return your response to starshine.chun@afslaw.com no later than Tuesday, June 30, 2026.

OWNERSHIP AND ORGANIZATIONAL STRUCTURE

1. **Describe the ownership structure of your GPO and/or its parent or affiliated companies,including details regarding the following:**

   - **Person(s) or entities that control the majority of voting interests in your GPO;**

     HealthTrust is organized as a limited partnership. A wholly-owned, indirect subsidiary of HCA Healthcare, Inc. is the general partner and operates the partnership.

   - **The types of equity holders of your GPO (e.g., publicly-held company, healthcare providers, individuals, for-profit and/or not-for-profit entities);**

     The limited partners and the general partner are all healthcare providers or are owned by healthcare providers. They are listed below:

     General partner:
     - HPG Enterprises, LLC (a wholly-owned indirect subsidiary of a publicly traded company - HCA Healthcare, Inc.)

     Limited partners:
     - HPG Solutions, LLC (a wholly-owned indirect subsidiary of a publicly traded company - HCA Healthcare, Inc.)
     - CHS/Community Health Systems, Inc. (a subsidiary of a publicly traded company - Community Health Systems, Inc.)
     - LifePoint Hospitals Holdings, LLC (a for-profit company, not publicly traded)
     - Tenet Health System Medical, Inc. (a subsidiary of a publicly traded company - Tenet Healthcare Corp.)
     - Franciscan Alliance, Inc. (a non-profit company, not publicly traded)
     - Hospital Sisters Health System (a non-profit company, not publicly traded)
     - Trinity Health Corporation (a non-profit company, not publicly traded)

     HealthTrust is not publicly traded.

   - **The corporate form of your GPO and/or its parent or affiliated companies – such ascorporation, partnership, limited liability company, co-op;**

HealthTrust is organized as a limited partnership. It has a subsidiary in Birmingham, United Kingdom, called HealthTrust Europe, which is a group purchasing organization that serves the UK market. In addition, HealthTrust has a Representative Office in Shanghai, China. The responses in this questionnaire are limited to the US portion of HealthTrust's business relating to GPO programs for healthcare providers.

- **Whether the GPO is organized as a for-profit or not-for-profit organization; and**

  HealthTrust is organized in Delaware as a for-profit limited partnership.

- **Location of corporate headquarters.**

  1100 Dr. Martin L. King Jr. Blvd., Suite 1100, Nashville, Tennessee 37203

2. **Describe the composition of your Board of Directors or other governing body and reflectany changes from the previous HGPII reporting year. Include the following in your response:**

   - **Number of individuals serving on your Board;**

     As a limited partnership, HealthTrust does not have a Board of Directors, and instead has an advisory group ("Partner Advisory Committee") comprised of a representative of each partner listed above in Item 1 for a total of approximately eight partner representatives. In addition, there are approximately seven HealthTrust employees who regularly attend Partner Advisory Committee meetings. The number of HealthTrust employee attendees varies depending on the agenda.

   - **Percentage of Board representing GPO customers;**

     All standing attendees of Partner Advisory Committee meetings (other than HealthTrust employees) in 2025 were representatives of the limited partners, all of which participate in HealthTrust's GPO program.

   - **Percentage of Board that are employees of the GPO; and**

     The percentage of attendees at Partner Advisory Committees who are employees of HealthTrust varies, depending on the meeting agenda.

   - **Percentage of Board members also serving as employees, officers, or directors of a participating vendor.**

     None

3. **Indicate whether any equity holder of your GPO and/or its parent or affiliated companies is a physician (or an immediate family member of a physician).**

   No HealthTrust general or limited partner is a physician or an immediate family member of a physician.

CONFLICT OF INTEREST

4. Describe the GPO's policies and procedures that address conflicts of interest for:

- **Employees in a position of influence with regard to contracting decisions;**
- **Clinical Advisory Members; and**
- **Members of the GPO's Board of Directors or other governing body.**

As part of your response, provide details about reporting requirements for conflicts and provide a copy of written policies.

HealthTrust has a Conflict of Interest policy that addresses conflicts relating to HealthTrust employees, representatives of members who serve on HealthTrust's Partner Advisory Committee or Advisory Boards (as described in Item 16 of this Questionnaire and at this link: Advisory Boards), and general or limited partner entities.

HealthTrust's Conflict of Interest policy provides that there may be a conflict if an individual in the capacity described in the paragraph above (or family member of such person) has an interest in a vendor or potential vendor, or a HealthTrust competitor, such as the following:

- a financial interest such as an investment interest, or compensation arrangement
- a personal interest such as employment of a family member
- being an advisor such as a board member or consultant
- being a current employee, or a former employee within the past 3 years
- being a speaker for, or accepting honoraria or other monies from, a vendor

If such circumstances exist, and the individual has influence over the HealthTrust contracting process or other HealthTrust decisions with respect to such vendor, the individual must either remove the conflict by divesting the interest (if applicable), or the conflict must be disclosed to the relevant HealthTrust leadership. The conflicted person's participation in matters relating to the conflict will be curtailed or restricted in accordance with the policy.

As to conflicts reporting, all of the described individuals must complete a Conflict of Interest Statement annually in which they disclose any conflicts or potential conflicts and reaffirm their understanding of and compliance to HealthTrust's Conflict of Interest policy. HealthTrust's Ethics and Compliance Officer follows up on each matter disclosed with the individual who reported it as well as his or her manager or Advisory Board lead, as applicable, to ensure that the conflict is mitigated.

Acceptance of gifts from vendors is discouraged and the dollar value of gifts that may be accepted is limited under HealthTrust's policy on Business Courtesies Received by HealthTrust Colleagues from Others . The total value of all gifts from any one vendor in any calendar year that may be accepted by a member of HealthTrust's Partner Advisory Committee, any Advisory Board member or any HealthTrust employee must be modest, reasonable and customary for the location, and cannot exceed a total of $75 per person per year, from any one source.

That policy also provides that those individuals may accept business entertainment or food/beverages from a vendor if the cost does not exceed $150 per person per instance, with a maximum of $500 per year for events in the U.S. from any one vendor or vendor division. Offers to provide or pay costs of travel or lodging may not be accepted, with very limited exceptions.

HealthTrust's Policy entitled Business Courtesies Given by HealthTrust to Others provides corresponding limits on the ability of HealthTrust representatives to offer business entertainment, food, beverages or gifts to others, such as current or potential members, clients, vendor representatives, or any source of referrals of new members or vendors. HealthTrust may offer or give business entertainment, food and beverages to a business contact if the cost does not exceed $150 per person per instance, with a maximum of $500 per year for events in the U.S. The dollar value of gifts given by HealthTrust to any business contact cannot exceed a total of $75 per year.

5. Describe actions the GPO takes to avoid conflict of interest issues for members of the Board of Directors (e.g. disclosure and/or prevention of equity investments in participating vendor relationships and acceptance of gifts/ meals/ travel/entertainment paid for by vendors).

See response to Item 4 above as to conflicts that members of HealthTrust's Partner Advisory Committee or Advisory Boards may have as individuals, and Item 6 below as to conflicts that the general or limited partner entities may have.

6. Describe the GPO's policies and procedures that address activities, including other lines of business of the GPO and/or its affiliates (including non-GPO services and strategic investments) that might constitute conflicts of interest to the independence of its purchasing activity. [1]

As of this writing, and except as it relates to ROi as described in Item 7, HealthTrust does not have an investment interest in any vendor. Its conflict of interest policy reiterates that it does not intend to do so, unless HealthTrust concludes that the acquisition would benefit members or clients, for example by creating or maintaining a source for a product or service where there is no other source or very limited sources available.

HealthTrust also remains alert to the possibility of its general or limited partner entities having a direct or indirect (for example through a venture capital fund or an affiliate) investment in a current or potential HealthTrust vendor. If any such potential institutional conflict is reported to HealthTrust, the participation of the representative of the conflicted partner in HealthTrust's decision making process (such as an Advisory Board or Partner Advisory Committee role) as to that vendor would be curtailed or restricted in accordance with HealthTrust's Conflict of Interest policy.

[1] Business concerns, organizations, or individuals are affiliates of each other if, directly or indirectly, (1) either one controls or has the power to control the other, or (2) a third party controls or has the power to control both. (See 48CFR, Section 9.403 (2007): Securities Act, Sec. 16, 15 USC 77p(f)).

HealthTrust's general partner company is owned by HCA Healthcare, Inc. HCA Healthcare has several indirect, wholly-owned entities that operate business lines providing services available under HealthTrust GPO vendor contracts or in conjunction with HealthTrust service lines. The GPO contracts are made available to HealthTrust members on an optional basis as described in Item 18, and members are under no obligation to procure any such services. These business lines are described below:

- Parallon. Offers revenue cycle, billing, collections, Medicaid eligibility and related services.
- HealthTrust Workforce Solutions. Offers workforce contingent labor and scheduling technology services.
- CereCore. Offers EHR implementation, application support, IT managed services, technical staffing and strategic IT consulting services.
- Valify, Inc. Exclusively dedicated to controlling purchased services expenses, Valify offers a proprietary web-based technology platform allowing healthcare organizations to quickly identify, benchmark, analyze and manage expense and savings in over 1,400 categories.
- HealthPlus. A joint venture between a subsidiary of HCA Healthcare and a longstanding manufacturing partner, HealthPlus owns and operates a manufacturing facility in North Carolina currently producing high-quality PPE products available as part of ROi's Regard® brand product line.

OTHER LINES OF BUSINESS

7. Describe other lines of business or investments of the GPO and its affiliates. We are interested in hearing about new as well as nontraditional GPO services that your company and its affiliates are involved with.

For purposes of this Item, HealthTrust interprets "affiliate" to mean subsidiaries of HealthTrust but not affiliates of HealthTrust's general partner or limited partners.

HealthTrust's mission is to strengthen provider performance and clinical excellence by delivering total spend management advisory solutions. In addition to the HealthTrust GPO program (which focuses on acute care healthcare providers) and the AdvantageTrust GPO program (which focuses on non-acute care healthcare providers), HealthTrust offers its GPO members and other clients certain services that are complementary to group purchasing activities. These services include consulting services that address all aspects of supply and operating expense including procurement, inventory management and accounts payable; services related to sourcing of medical devices; purchased services and energy services; consulting on clinical resource management, distribution and logistics; shared services; management services such as CRM/Rx; and spend analytics. Through HealthTrust Workforce Solutions, HealthTrust's GPO members and other clients receive consulting services, technologies and staffing services focused on helping them enhance productivity and manage labor costs. For complete details on HealthTrust's offerings, see HealthTrust's web page at HealthTrustpg.com. HealthTrust also offers a variety of consulting and outsourcing services to its members through Parallon, an affiliate of HealthTrust's general partner, as noted in Item 6.

HealthTrust also owns and operates Resource Optimization & Innovation, LLC ("ROi"), a St. Louis-based group purchasing and supply chain management organization, which, among other things, maintains a private label products program under its proprietary Regard® brand, giving providers high-quality products at an affordable price.

Finally, in June 2020, HealthTrust launched Valify Solutions Group ("VSG"), the first tech-enabled GPO program dedicated to managing and reducing the expenses in purchased services categories. Leveraging the largest data-driven market intelligence platform through an exclusive arrangement with Valify, Inc. (see Item 6) with a best-in-class Purchased Services contract portfolio from HealthTrust, VSG is a proven model for generating savings on purchases services for its members. Membership in VSG is non-exclusive, allowing any healthcare system to participate regardless of other GPO affiliations.

8. What policies or guidelines does the GPO have to address potential conflicts of interest with regard to other lines of business engaged in by the GPO and/or its parent or affiliated companies?

See response to Item 6 above.

MONIES FROM VENDORS

9. Describe the GPO's policy with respect to the receipt of sponsorship funds, grants for research or other educational programs, or any other source of non-administrative fee revenue from vendors. What policies does the GPO have to guard against any potential conflict of interest relating to such payments?

HealthTrust does not accept non-administrative fee revenue of any sort from vendors except as noted under Item 10 (funds that may be received from vendors in return for opportunities to sponsor or exhibit their products or services at HealthTrust events), Item 11 (advertising fees), and Item 13 (Global Sourcing Fee).

On occasion, a supplier will secure a speaker to conduct a continuing education webinar or participate as a presenter at one of HealthTrust's conferences or summits. Any fee offered is between the supplier and that presenter; no money is provided to HealthTrust in exchange for that speaker's participation.

10. Does the GPO and/or its parent of affiliated companies accept vendor fees relating to conference sponsorship or exhibit booth space? What policies does the GPO have to guard against a potential conflict of interest relating to vendor participation in industry trade shows, and donations in general?

For purposes of this Item, HealthTrust interprets "affiliate" to mean subsidiaries of HealthTrust but not affiliates of HealthTrust's general partner or limited partners.

HealthTrust accepts fees from vendors that choose to participate in HealthTrust conferences, programs or summits. These conferences may include educational presentations, trade shows, summits and similar activities. HealthTrust chooses the content, methods, educational objectives, materials, speakers, invitees, location and activities for its

conferences. The policy governing such activities and guarding against potential conflicts is HealthTrust Events. No vendor is required to participate.

A vendor's participation in a HealthTrust conference may include a purchase of exhibition booth space; conference sponsorship, sponsorship of a meal, refreshments, education sessions or entertainment; sponsorship of a time block for an informational session, a keynote address or general session; or similar activities. The requirements of participation are as follows:

(a) unless otherwise approved by HealthTrust, only vendors that have a national contract with HealthTrust available to all HealthTrust members at the time of the event may participate;

(b) a vendor's participation cannot be otherwise conditioned on HealthTrust's conduct of business with the vendor, or the volume of HealthTrust members' purchases from the vendor; and

(c) the vendor must receive something of value, such as promotional benefits and/or exhibition booth space with exposure to existing or potential customers.

With regard to vendor- or industry-sponsored conferences or trade shows, HealthTrust also has a policy guarding against potential conflicts in those situations: HealthTrust Colleague Participation in Educational, Training and Promotional Events of Others. This policy provides that a HealthTrust colleague may not accept free or reduced event registration, meals or entertainment at such an event unless the same free or reduced terms are offered to all attendees. If not offered to all attendees (for example if a small group of HealthTrust colleagues is offered dinner by a vendor), then they may accept, subject to the requirements of HealthTrust's policy, Business Courtesies Received by HealthTrust Colleagues from Others.

11. Describe any services or products the GPO or its affiliates provide to vendors on a fee-for-service basis (e.g. data, claims processing, etc.).

The only services or products that HealthTrust provides to vendors for a fee not discussed elsewhere in this document are advertising services that vendors may elect to purchase for publication in HealthTrust's quarterly magazine, *The Source*.

12. Does the GPO make annual disclosures of administrative fees received from vendors for contracting activities with respect to the member's purchase of products and services (e.g. safe harbor reports)? If this document is publicly available, provide an electronic link to this information.

Yes, HealthTrust makes an annual disclosure to each member or former member participating in either the HealthTrust or AdvantageTrust GPO programs of the amounts of administrative fees received from vendors with respect to the member's purchase of products and services ("GPO Fees") in conformance with the GPO Safe Harbor. An example of the current form of the disclosure can be viewed at this link: Form of Annual Disclosure Statement.

13. Does the GPO disclose to members all payments other than administrative fees the GPO receives from any vendor in the course of the GPO's group purchasing activities (e.g. boothspace, educational grants, marketing fees, honoraria, etc.) whether from the purchasing activity of those members or not? Describe your disclosure practices.

In the same annual disclosure letter to members described in Item 12, HealthTrust also discloses names of vendors that paid fees for booth rentals and other promotional opportunities at HealthTrust seminars, meetings and conferences, as well as names of vendors that purchased advertisements in HealthTrust's *The Source* magazine.

In addition to GPO fees, HealthTrust may receive fees in connection with sourcing products directly from manufacturers in various parts of the world (a "Global Sourcing Fee"). HealthTrust has established a Global Sourcing group staffed by HealthTrust personnel in the US and Shanghai, China. They assist in identifying vendors for the Global Sourcing program. They monitor those vendors, engage in quality assurance activities, and provide other services to help ensure that HealthTrust members can purchase high quality, clinically acceptable products from these vendors at very competitive pricing. For these efforts, HealthTrust receives a Global Sourcing Fee based on sales to HealthTrust members of the products jointly sourced through this program. Members are notified of this additional fee in their Participation Agreement. In addition, the amount of Global Sourcing Fees received and attributable to a particular Global Sourcing vendor contract are disclosed to members as part of the letter described in Item 12.

14. Describe the GPO's policy with respect to returning administrative fees to an ineligible vendor.

For purposes of this item, HealthTrust interprets "ineligible vendor" to mean a vendor with which HealthTrust has no current GPO agreement, including no ongoing member-level agreements that survive the terms of an underlying GPO agreement. HealthTrust returns all material fees received from ineligible vendors.

MEMBER FEES

15. Does the GPO pay fees or offer equity to members upon the signing or re-signing of a participation agreement with the GPO or the joining or renewal of membership in the GPO Program?

HealthTrust does not charge a membership fee or other fee to any entity to become a member of HealthTrust. HealthTrust does not pay a signing bonus to members upon signing or re-signing a participation agreement under which a member joins the HealthTrust GPO. Equity grants are a rare occurrence, requiring approval from partners whose equity interest in HealthTrust would be diluted by such grants.

BID AND AWARD/CONTRACTING ISSUES

16. Does the GPO have a publicly-available description of its bid and award process? If

so, provide a link and written description of your bid and award process. If not, describe how it may be obtained.

HealthTrust's bid and award process is described in its Contracting Process Policy available on its public website. The process includes the principles described below, many of which are generally consistent with those embodied in the U.S. Competition in Contracting Act.

As described in the policy, HealthTrust operates a member-driven contracting process. Advisory Boards are engaged to determine the clinical, technical, operational, conversion, business and other criteria important for that specific bid category. The boards are comprised of representatives from HealthTrust's membership who have appropriate experience, credentials/licensures, and decision-making authority within their respective health systems for the board on which they serve. Advisory Boards as of this writing include Surgery, Cardiology, Nursing, Radiology, Laboratory, Information Technology, Food and Nutrition, Pharmacy and Construction and Facilities. Certain categories may require additional specialized subject matter expertise and warrant the forming of a Specialty Committee. Examples of Specialty Committees include Advanced Wound Care, Cardiovascular OR, Infection Prevention, Perinatal, Pharmacy Clinical, Pharmacy Operations, Treasury, Energy, and Respiratory Therapy. HealthTrust also operates a Supply Chain Board comprised of representatives of HealthTrust members who have appropriate responsibility for supply chain within their organizations. Contract award decisions are evaluated and recommended by the applicable HealthTrust Advisory Board and/or the Supply Chain Board. The Supply Chain Board reviews Advisory Board recommendations and may provide additional business requirements for bid categories.

HealthTrust's requirements for specific products and services are published on its Contract Schedule on its public website, as described in Item 17 below. HealthTrust's requirements for vendors are outlined in its Supplier Criteria Policy. A listing of the minimum supplier criteria is also published on HealthTrust's public website at this link: Supplier Criteria; click "Benefits of Becoming a Supplier". The website also contains an on-line form that interested vendors may complete and submit to HealthTrust; see the Supplier Form. Information submitted via the Supplier Form is reviewed and retained in our system. Suppliers are expected to update their information as needed so HealthTrust can have the latest information available to determine eligibility for consideration for inclusion in the bidding process of a sourcing event. All vendors that meet the criteria and that have submitted the required form may be eligible to be considered for inclusion, although completion of the Supplier Form does not guarantee that a vendor will be invited to bid or receive an award.

The Contracting Process Policy documents the procedures followed by HealthTrust's contracting team to select vendors for consideration. HealthTrust's Advisory Boards, Supply Chain Board, and other decision-making boards and committees may provide additional requirements or other criteria that would be incorporated into the RFP (request for proposals) process, where appropriate.

HealthTrust's process includes a preference for competitive procurement. HealthTrust uses an RFP process whereby bids may be requested from vendors that meet the criteria specified in the Supplier Criteria Policy. Vendor proposals are analyzed using an extensive clinical/technical review as described above, as well as a financial/operational review.

Please note that there are limited exceptions to HealthTrust's standard RFP process. Such exceptions usually relate to products or services that are currently under contract with a vendor for which member and Advisory Board feedback is positive, the vendor's pricing is competitive in the market, the category is relatively low in spend, there is no new technology in the category, or for which a conversion to another vendor's product or service would be operationally difficult and/or costly. In these cases, renewal of an existing agreement may be recommended to the Advisory Board for its consideration. In addition, this process may be used for those products/services that are only available from a single qualified vendor. Under this process, the HealthTrust contract manager obtains price comparisons (if available) from HealthTrust's financial review team, and researches products/services under current contracts in conjunction with the applicable Advisory Board lead. The research process is described in the Contracting Process Policy. If the Advisory Board has recommended approval of the vendor in such a situation, the contract manager will complete the contract without resubmitting the matter to the Advisory Board.

HealthTrust maintains appropriate documentation of the bid process, engagement with its boards, and awarded vendor bid information such as copies of financial analyses, price files, communications, voting records and contract documents. This helps to verify that the criteria defined in HealthTrust policies and procedures are followed when contract award decisions are made.

17. Describe the GPO's requirements for how products or services are published so they are accessible to potential vendors. If a bidder is not awarded a contract, is that bidder able to review the decision criteria used to evaluate the bid? Include in your response a general description of the GPO's criteria for vendor selection.

HealthTrust's Contract Schedule provides a description of the products and services on its annual contracting work plan, and the time period in which the respective projects are expected to take place. It is regularly updated and published on HealthTrust's public website at the link shown above, where it is accessible to current and potential vendors.

General details on HealthTrust's criteria for consideration of a vendor in the contract bid process are documented in HealthTrust's Supplier Criteria Policy, also on the public website. For example, a vendor's products and services must meet or exceed the quality, durability and cost effectiveness of similar items currently under contract with HealthTrust; the vendor's distribution system must be national in scope and able to accommodate the volume of orders from HealthTrust members; the vendor must provide transparency and share supply chain information to support supply chain resilience efforts; and the vendor must demonstrate financial stability and long-term viability. Additional bid criteria or requirements specific to an individual project are outlined in the specific category bid documents that are sent to bidding vendors for a particular project.

Bidders that are not awarded a contract are notified in writing via a letter or email from the HealthTrust contract manager. Bidders are provided the contract manager's contact information and, if desired, may contact the contract manager if they would like to have a more detailed understanding of why they did not receive the award. See HealthTrust's Process for Addressing Supplier and Bidder Grievances.

18. Describe the GPO's policy with regard to the use of single, sole, dual, and multi-source procurement and provide an example or two to support use of these contracting tools.

HealthTrust's Contracting Process Policy includes definitions of "sole", "dual", "multi-source" and "optional" award types and explains when each strategy should be considered. There is no set target or goal with respect to number of sole source or dual source awards. The award of sole, dual, multi-source or optional contracts are evaluated and recommended by HealthTrust Boards.

Sole Source: Under a sole source award, HealthTrust awards a contract to one vendor for a particular product or service. The expectation for a sole source agreement is that it will deliver exceptional value to HealthTrust's members, and that the membership has the ability to drive compliance and market share to the awarded vendor. In some cases, a product may be a proprietary technology where a sole source award is the only available contract option. More typically, products under a sole source award are commodity-type products for which there is no clinical or physician preference. In most cases, sole source contracts may be terminated for convenience by HealthTrust.

Dual Source: HealthTrust awards dual source contracts for particular products or services to two vendors. The expectation for a dual source agreement is that it will deliver significant value to HealthTrust members, and that each member has the ability to standardize to one of the awarded vendors.

Multi-source: HealthTrust awards multi-source contracts for particular products or services to three or more vendors. Multi-source is typically used when clinical or operational requirements dictate a need for choice. Standardization may still be achievable at the facility or IDN level but standardizing to a sole or dual contract at the HealthTrust GPO level may not be achievable. It is expected that members will utilize one or more of the multi-source vendors.

Optional Source: Under an optional source award, HealthTrust contracts with one or more vendors, and it is the member's choice whether to use the contract(s). If a member chooses not to use an optional contract, it will not count against the member's compliance with the HealthTrust portfolio as further described in Item 33. These vendors go through the same qualification process as any other HealthTrust vendor.

Carve-outs: HealthTrust contract templates include certain "carve-out" provisions (i.e., an exception to the award status) that allow HealthTrust to contract with an additional vendor, including that if (a) as compared to existing products a new technology product offers significant technological advancements and will significantly improve clinical outcomes or patient care or will significantly streamline clinical and/or operational work processes, as further described in Item 30; or (b) it provides an environmental benefit not available from other contracted vendors; or (c) in conjunction with HealthTrust's Community Supplier Development Program.

19. Does the GPO permit bundling of unrelated products or services from the same vendor or from different vendors? If so, under what circumstances would the GPO consider bundling to be appropriate?

HealthTrust generally believes it is inappropriate to bundle unlike, dissimilar or unrelated products. Its preference is to treat each unique contracting product line/category as its own project. There are two exceptions to this general approach:

i. As of this writing, HealthTrust has one contract for two unrelated products from a particular vendor. Under this contract, members receive better pricing if they purchase both of the products.

ii. HealthTrust may, based on clinical direction, consider products that are closely related or that work together as a *system project* rather than a single product line, in an effort to provide the best overall value for its members. For example, IV Therapy that is considered a system project would include IV sets, solutions and pumps together, instead of having a separate contracting project for each category. This is referenced in HealthTrust's Contracting Process Policy.

20. Describe the process for contracting for clinical preference items. Describe the GPO's policy guiding the appropriate length/term of contracts for clinical preference products.

There are two basic contracting processes for clinical or physician preference products, one process for a vendor contract that all members can access (a national contract), and a second process for contracting for a specific member. The process for a national contract for clinical preference items is the same standard process as described above in Item 16 for engaging the appropriate Advisory Board(s) and the Supply Chain Board. Many agreements for such clinical preference items are either Multi-source or Optional Source agreements, but such agreements could be Sole or Dual Source if the applicable Advisory Board so recommends. Typical contract terms are for 3 years, but ultimately HealthTrust also relies on recommendations of its Advisory Board and Supply Chain Board on the contract term length.

Contracts for clinical preference products for a specific member are typically negotiated by HealthTrust in collaboration with the particular member and reflected either in an amendment to the applicable national contract that applies just to that member, or in a stand-alone contract for that member.

ADMINISTRATIVE FEES

21. What is the GPO's practice regarding the amount of administrative fees accepted? If there is a written policy, please provide an electronic link or copy of the GPO's policy regarding these fees.

With respect to accepting administrative fees from vendors, HealthTrust complies with the exceptions to the Medicare and Medicaid Anti-Kickback statute set forth at 42 U.S.C. § 1320a-7b(b)(3) (A) and (C), as well as with the "GPO Safe Harbor" regulations regarding payments to group purchasing organizations set forth in 42 C.F.R. § 1001.952(j). HealthTrust's current policy and practice is not to accept administrative fees in excess of

3% from any vendor or service provider, or 1% from any distributor as set forth in the response to Item 22 below.

22. Describe the conditions in which the GPO accepts administrative fees beyond 3 percent, requiring specific (not blanket) disclosure under the Federal Regulatory Safe Harbor provisions?

HealthTrust does not enter into new contracts with any vendor or service provider for an administrative fee in excess of 3%.

For products that are purchased through distributors, HealthTrust may receive a GPO fee on distribution services of up to 1%, but in no event will the total GPO fee from the vendor or service provider and the distributor exceed 4%.

These additional fees are disclosed in the annual GPO fee disclosure provided to all member facilities, and in the HealthTrust membership agreements, in compliance with the GPO Safe Harbor.

23. Describe the range of administrative fees accepted and examples of the types of contracts(without specifying specific proprietary information) that have administrative fees greater than 3 percent.

Administrative fees from vendors and service providers as opposed to distributors are typically 3%. See response to item 22 regarding administrative fees greater than 3%.

PRIVATE LABEL PROGRAMS

24. Describe whether the GPO has a private label program and if so, describe the products the private label program covers.

On October 1, 2019, HealthTrust completed the acquisition of Resource Optimization & Innovation, LLC ("ROi"), a St. Louis-based group purchasing and supply chain management organization which, among other things, maintains a private label products program under its proprietary Regard® brand, which intends to give providers an alternative source of high-quality products that lower costs, improve supply chain resiliency, or bring innovative products to the market. The Regard® brand portfolio includes dozens of products across a wide range of categories. ROi competes in the HealthTrust GPO bid process, the same way other potential suppliers compete, adhering to appropriate firewalls in place between the private-label business and the GPO business. To learn more about Regard®, please visit https://roiscs.com/products.

25. Describe the GPO's practice regarding administrative fees derived from a private label program.

At this time, there are several agreements between HealthTrust and ROi for a variety of products available as part of ROi's Regard® brand. ROi pays an administrative fee to HealthTrust for sales of these products pursuant to GPO contracts, in the same manner as

other suppliers. Administrative fees are handled as described in the "Administrative Fee" section of this document.

VENDOR GRIEVANCE PROCESS

26. Describe the GPO's policy and process with respect to responding to a vendor's grievance regarding the bid/award process.

HealthTrust has a Process for Addressing Supplier and Bidder Grievances that addresses steps a vendor or bidder may take to report any grievance to HealthTrust. If a company is notified that it will not receive a contract award or believes the contract award was made inappropriately, it may submit a letter or email detailing its concerns to the responsible HealthTrust Strategic Sourcing Director (copy to appropriate Strategic Sourcing AVP and HealthTrust's Ethics and Compliance Officer). The grievance will be reviewed and investigated as appropriate with a written response presented to the Supplier or Bidder within ninety (90) days from receipt of the original grievance. If the company remains unsatisfied, a complaint may be submitted through the Independent Evaluation Process established by HGPII, a copy of which is attached to the referenced policy HT.014.

Also, vendors and bidders are invited, in HealthTrust's Code of Conduct which is available on the HealthTrust website, to report any legal or ethical concerns to HealthTrust's toll-free Ethics Line at 1-800-345-7419 (where reports may be made anonymously if desired), or to the HealthTrust Ethics and Compliance Officer.

27. Did any supplier, since submission of the last GPO's Public Accountability Questionnaire, request an evaluation pursuant to the HGPII Independent Evaluation Process? If so, please provide information regarding the outcome of such evaluation.

As of this writing, no supplier has pursued an evaluation pursuant to the HGPII Independent Evaluation Process. While suppliers have inquired regarding the availability and structure of the process, no evaluation has been initiated.

28. Does the GPO participate in HGPII's Independent Evaluation Process?

Yes, as a member of HGPII, HealthTrust does participate in HGPII's Independent Evaluation Process.

29. Is the HGPII Independent Evaluation Process displayed on the GPO's public website? If so, please provide an electronic link to this information.

Yes, it is displayed as an attachment to the policy at this link: Process for Addressing Supplier and Bidder Grievances.

INNOVATION

30. Describe the GPO's policy and process to evaluate and provide opportunities to contract for innovative products and services.

HealthTrust utilizes several processes to ensure that its Advisory Boards are aware of and have an opportunity to evaluate innovative technologies. HealthTrust contracts for these products and services at the direction of the Boards. Activities in this area are described below:

- HealthTrust is dedicated to empowering members with new technology information and guidance that assist clinicians in their continual pursuit of better treatments and therapies, while minimizing the financial impact often associated with a new technology. HealthTrust experts, with the appropriate clinical, technical and operational expertise, research new and innovative products and services to identify, evaluate and communicate at multiple levels the pertinent information on emerging technology that could have significant clinical and/or financial impact on the operations of HealthTrust's members.

- HealthTrust utilizes physician advisors in their respective specialties to assist internal experts in evaluating innovative technology. This input is incorporated into clinical evidence reviews and the contracting process for HealthTrust membership. This work is done under the direction of HealthTrust's Chief Medical Officer.

- HealthTrust has a number of Advisory Boards as described in Item 16 that provide critical feedback on the practical usability and desirability of all products and services in HealthTrust's portfolio including potential innovative clinical product offerings.

- HealthTrust has developed a process for consideration of innovative clinical products as described in its New Technology Introduction policy. Products that possess certain characteristics that improve upon the applicable standard of care, resulting in improved clinical outcomes based on sound empirical clinical evidence, are considered in this process.

- HealthTrust has an online Innovation Center that serves as an avenue for current and prospective suppliers with new technology to present their products for HealthTrust review.

31. Does the GPO have the right to enter into a GPO contract for innovative technology at anytime during its bid and award cycle? Describe the process the GPO has for fostering the development of GPO contracts for innovative products.

HealthTrust's supplier contracts contain provisions that allow HealthTrust to award a contract for new technology if the product provides technology and/or clinical breakthrough benefits.

32. Are GPO members allowed to evaluate products and/or communicate with vendors, regardless of whether a vendor has a contract with the GPO?

Yes. HealthTrust does not restrict its members from communicating with any vendor on any matter, regardless of whether such vendor has a contract with HealthTrust. Members are encouraged to provide information on new and existing products and vendors to HealthTrust and are encouraged to direct vendors to our Innovation Center Portal.

33. Are GPO members allowed to purchase non-contracted products or services directly from non-participating vendors?

Yes. While HealthTrust members are required under their membership agreements to make a certain aggregate percentage of their purchases under HealthTrust vendor contracts, there is sufficient flexibility to allow them to purchase products and services not covered by a HealthTrust vendor contract. HealthTrust recognizes that there will be situations where, for clinical and patient care issues, its members may wish to obtain products outside of a HealthTrust vendor contract, and HealthTrust allows for this in its compliance expectations with its members.

ENVIRONMENTALLY-PREFERRED PRODUCTS AND SERVICES

34. Have members of your GPO expressed a preference for environmentally-preferred products and services?

Yes, many of our members have an interest in environmentally-preferred products and services with individual goals and strategies varying by health system.

35. Describe your GPO's approach in identifying and satisfying the desires of your various members for environmentally-preferred products and services. Provide examples of environmentally-preferred products and services within your current portfolio.

HealthTrust's sustainability leader regularly communicates and collaborates with members to understand their environmental sustainability goals and objectives and to align our contract portfolio to support their objectives. In addition, we facilitate a Sustainability Council (SC) made up of sustainability experts from within our membership. This group is instrumental in a variety of ways, including but not limited to:

- establishing or confirming environmentally-preferred product/service requirements
- identifying, assessing, or evaluating sustainable products/services that have an impact on the health and environment of patients, employees and communities
- contributing to the sourcing process (e.g. feedback on sustainability considerations, opinions on sustainable opportunities, etc.)
- sharing best practices
- participating in educational events that benefit the entirety of the membership
- being early adopters or promoters of sustainability opportunities

Some examples of environmentally-preferred products and services within our current portfolio include:

- Reprocessing
- In the food and nutrition space:

- cage-free eggs (liquid and shell), reduced antibiotic chicken, rBGH free milk, sustainability seafood, rBGH free yogurt, Eco/Fair trade coffee, reduced antibiotic turkey, plant-based/meatless protein options. In addition, we have food waste tracking platforms available to the membership.

- Product options that allow for reduction in PVC/Phthalates

- Waste segregation and recycling options

- Facility engineering services that increase efficient use of energy/water such as renewable energy and/or fuel

- Minimizing the use of desflurane and changing the delivery method of nitrous oxide gases from central distribution to point-of-use.

36. What challenges, if any, have you experienced in identifying or contracting for working avariety of environmentally-preferred products and services to your members? How have you responded to such challenges?

Throughout the industry, there is still difficulty in ascertaining the sustainability attributes that should apply to each product and service category. Many organizations have adopted the sustainability standardized questionnaire that was originally introduced in 2010 by leaders in the healthcare sustainability space. HealthTrust is taking a similar approach as industry standards continue to evolve in this area.

Providing sustainability information at the product level has historically been a challenge. We have been successful in gathering this information on some key categories and are surfacing this information to our members through our member portal. We will continue to expand this effort into additional categories. However, members have varying degrees of capabilities for how this information is considered at the point of purchase.

37. Has your GPO designated someone to:

- **Identify your GPO's environmentally-preferred objectives;**
- **Explore environmentally-preferred products and services; and/or**
- **Develop initiatives to help educate your members about the value of using environmentally-preferred products and services?**

HealthTrust has a Sustainability leader responsible for supporting the sustainability initiatives of the organization's members, including effectively incorporating the principles of environmentally preferable purchasing into the contracting process. HealthTrust has also created a Sustainability Council (SC) made up of members to review related EPP questions as part of the supplier RFP process. Potential supplier responses are reviewed for feedback and sustainability-related attributes that can be used as differentiators in making recommendations to related advisory boards during the contract awards process. Information on key categories is posted on the related contract packages and the Sustainability page within the HealthTrust Member Portal. HealthTrust also provides sustainability-related education and member case studies to its members throughout the year through webinars, articles in *The Source* magazine, HealthTrust Huddle (virtual platform), and live sessions held during the annual HealthTrust University and HealthTrust Connect Conferences.

38. Please describe your organization's role in educating, advising, and supporting the adoption of Environmentally Preferred Purchasing among your members, including the availability of websites, catalogues, toolkits, or webinars?

HealthTrust's sustainability leader regularly communicates and collaborates with members to understand their environmental sustainability goals and objectives and to align our contract portfolio to support their objectives. We provide opportunities for the membership to collaborate, learn, and share with one another via the Sustainability Council, the Energy Sustainability Council, the HealthTrust University Conference, HealthTrust Huddle platform, HealthTrust Connect (Construction and Facility conference), and HealthTrust Collaboration Summits.

We have collaborated with the HealthTrust Sustainability Council, and other environmental industry organizations to identify and define environmental product attributes that are important for consideration – including but not limited to chemicals of concern, and recyclability of the product and of the packaging. The product attributes are available to members to enable more informed purchasing decisions.

CODE OF CONDUCT

39. Provide a copy of and an electronic link to your GPO's written code of business ethics and conduct. Describe any changes made to it from the previous HGPII reporting year.

HealthTrust's Code of Conduct is available at this link: Code of Conduct. In 2025, the HealthTrust Code of Conduct was modernized to reflect the current healthcare and business environment. Key updates included an expanded focus on sustainability and responsible business operations, enhanced guidance related to digital communications and emerging technologies, and broader supplier evaluation criteria that emphasize operational excellence, supply chain resiliency, and long-term value.

40. Describe whether and in what manner the GPO distributes its written code of business ethics and conduct to all applicable employees, agents, contractors, clinical advisory committees, and others involved in group purchasing activity. How often is the code of conduct provided to employees? Do employees receive annual refresher training on the GPO's ethics and the code of conduct? Describe the content of the training and the method of delivery.

The HealthTrust Code of Conduct is available on its public website to all persons at any time at this link: Code of Conduct.

New employees (as well as non-employee contractors) are directed to the Code of Conduct upon joining the company and are required to take an on-line training course covering all aspects of the Code within thirty days of commencing work. The training includes the message that the Code of Conduct represents mandatory policies of HealthTrust and that all staff must abide by it. New staff members also attend a live orientation session that includes a segment on HealthTrust's Ethics and Compliance program and key policies. HealthTrust

employees receive annual Code of Conduct refresher training covering particular aspects of the code and/or policies. Failure to take the refresher training results in disciplinary action.

The Code of Conduct is distributed to HealthTrust's Advisory Board members and Partner Advisory Committee members via the Member Portal area of HealthTrust's website and is also available on its public website. They are generally required to take annual training on aspects of HealthTrust's Code and policies that have relevance for the work they do for HealthTrust (with an emphasis primarily on conflict of interest issues and business courtesies). They too receive the message that their compliance with those HealthTrust standards is mandatory. The training may be delivered live or electronically. Participation in the training is documented and maintained in our learning management system.

The HealthTrust Code of Conduct is also easily available to suppliers at the Ethics link on HealthTrust's "Welcome Supplier" webpage. In addition, the HealthTrust Supplier Business Relationship Statement outlines HealthTrust's expectations for supplier conduct. This statement is provided to new suppliers during orientation and is also available on our public website.

41. Describe the mechanism (e.g., a corporate review board, ombudsman, corporate compliance or ethics officer) for employees to report possible violations of the written code of business ethics and conduct to someone other than one's direct supervisor, if necessary.

HealthTrust has a dedicated Ethics and Compliance Officer who implements its Ethics and Compliance Program, and an Ethics and Compliance Committee to oversee and advise the Program. The roles and responsibilities of HealthTrust's Ethics and Compliance Officer and the Ethics and Compliance Committee are detailed in HealthTrust's policy titled Ethics and Compliance Officer and Committee.

Employees may report concerns directly to the HealthTrust Ethics and Compliance Officer. Employees may also contact HealthTrust's toll-free Ethics Line, which is operated by an independent company and where a report may be made anonymously. The number is 1-800-345-7419. When a matter relating to HealthTrust is received through the HealthTrust Ethics Line, it is referred to HealthTrust's Ethics and Compliance Officer.

COVID-19 RESPONSE

42. With the onset of the COVID-19 pandemic many healthcare providers experienced shortages of critical supplies and equipment due to disruptions in the supply chain. In response, how did your organization assist its members in assessing the quality and reliability of supplies? Specifically, what role did your organization play in vetting new and previously unknown supply chain sources, especially within the so-called Grey Market?

HealthTrust established a COVID-19 triage process whereby supplier/product leads could be sent either directly from a member or directly from a supplier/broker. HealthTrust then vetted these leads to determine if they were viable. Over 4,000 leads were evaluated by HealthTrust. Viable leads were communicated back to the member (if submitted directly)

or through our account team to members that expressed a need for a product. Unfortunately, the vast majority of these leads were not able to be validated as acceptable (e.g. quality, regulatory, authenticity, reliability). However, HealthTrust felt it was important to help our members perform this due diligence.

43. Please describe your organization's role in advising and supporting federal and state policy makers in managing the healthcare supply chain during the pandemic, including cooperation with federal and state stockpiles?

HealthTrust, both directly and indirectly in support of our member systems, participated in a variety of ad hoc and regular public-private collaborative initiatives to gather supply chain data; identify and discuss strategies to anticipate needs and mitigate shortages; and share best practices on use and conservation of critical supplies.

44. As a response to pandemic related challenges and supply chain disruptions, what technology services and IT products did your organization provide to members and theirpatients? What information and best practices services did you provide to the public?

HealthTrust leveraged its existing suite of spend analytics tools and web-based communication platforms to provide our members with real-time data and critical information on supplies and other factors impacting COVID-19 readiness and response. We provided daily and weekly updates to our members throughout the pandemic, and generated hundreds of original documents, summaries, and reviews outlining leading practices to help them stay up-to-date on every aspect of the pandemic. Recognizing the importance for all healthcare beyond just our members, we published much of this original content on our public facing website available for everyone to use.

Post-pandemic, we continue to support our members with assessing and navigating supply chain risks. Beyond supporting members when disruptions do occur (e.g. communicating backorders/shortages, providing guidance on alternatives, etc.) we leverage our supply chain intelligence suite to map supply chains, assess supply chain risks, develop risk mitigation strategies, and to be as proactive as possible to navigate potential disruptions.

REPORTING POTENTIAL ETHICAL VIOLATIONS

45. What process is used to protect the confidentiality of the reporting employee's identity and what safeguards are in place to mitigate the opportunities for retaliation?

The HealthTrust Code of Conduct emphasizes that HealthTrust will make every effort to maintain, within the limits of the law, the confidentiality of the identity of an individual who reports concerns or possible misconduct if they request to remain anonymous.

HealthTrust has a provision in the HealthTrust Code of Conduct that states, "There is no retribution or discipline for anyone who reports a concern in good faith. However, any colleague who deliberately makes a false accusation for the purpose of harming or retaliating against another colleague is subject to discipline." The Code of Conduct orientation and annual refresher training ensure that these policies are regularly communicated. In addition,

employees who wish to remain anonymous may do so by calling the HealthTrust Ethics line. Ethics line managers and others who receive an ethics concern from an employee are trained to reiterate for the employee that retaliation is not tolerated, and they encourage employees to report any instances of retaliation. Reports of retaliation are investigated and appropriate disciplinary actions are taken, up to and including termination.

46. Describe how the GPO follows up on reports of suspected violations of the code of business ethics and conduct to determine if a violation has occurred and if so, who was responsible. Describe corrective and other actions taken in such circumstances.

HealthTrust is committed to investigating all reported concerns promptly and confidentially to the extent possible as stated in the HealthTrust Code of Conduct. The HealthTrust Ethics and Compliance Officer conducts investigations by interviewing employees and others who may have knowledge of the reported incident, reviewing any documentation and seeking out other sources of information on the matter. He or she then reviews findings with the CEO and/or other management personnel, recommends corrective action where appropriate, and reviews the resolution of the matter with the person who raised the concern. HealthTrust expects all colleagues to cooperate with investigation efforts. If the concern is substantiated, the person responsible is subject to discipline, which can range from a verbal or written warning to termination.

47. Describe the processes the GPO follows up on, to monitor on a continuing basis, adherence to the written code of business ethics and conduct, and compliance with applicable federal laws.

HealthTrust incorporates several practices to help ensure adherence to its Code of Conduct, and the Code of Conduct itself mandates compliance with applicable law:

- All new HealthTrust employees receive the Code of Conduct and are required to take training on the Code within 30 days of commencing work. The training includes the message that the Code of Conduct represents mandatory policies of HealthTrust and that all must abide by it. Please see HealthTrust's Code of Conduct Distribution and Training Policy .

- All HealthTrust employees, Partner Advisory Committee members and Advisory Board members are generally required to participate in annual ethics and compliance refresher training, and records of such training are maintained at HealthTrust.

- Adherence to and support of the HealthTrust Code of Conduct and participation in related activities and training is considered in decisions regarding hiring and promotion for all candidates and employees. All HealthTrust employees are measured annually as part of their performance review on several core competencies, including one on ethics and compliance. HealthTrust expects all employees to maintain the highest ethical standards.

- Questionnaires as to conflict of interest are completed on an annual basis by HealthTrust decision-makers (including all employee decision-makers and Advisory Board members) and submitted to the Ethics and Compliance Officer. These

questionnaires include attestations that the decision-maker is aware of and agrees to comply with the Conflict of Interest and Business Courtesies policy requirements.

- The Ethics and Compliance Officer keeps a log of issues and concerns raised throughout the year. This data is evaluated to track and address any observable trends.

48. Are periodic reports on the GPO's ethics and compliance program made to the GPO's Board of Directors or to a committee of the Board? If so, please state how often and in general, what information is reported? Are periodic reports on the company's participation in HGPII made to the GPOs Board of Directors or to a committee of the Board? If so, please state how often and in general, what information is reported.

Regular reports on HealthTrust's Ethics and Compliance Program are made to HealthTrust's Ethics and Compliance Committee, which is comprised of the ethics officers of several HealthTrust members. The report includes high-level information regarding HealthTrust's commitment to ethical business practices, governance principles, compliance oversight, and participation in industry initiatives that promote integrity and accountability within the healthcare supply chain. The report also highlights member-driven governance structures, advisory board engagement, and other activities that support transparency and responsible business operations. This information is communicated annually as part of HealthTrust's ongoing commitment to keeping members informed about key governance and compliance-related initiatives. In addition, the ECO meets regularly with the HealthTrust CEO, who is on HealthTrust's Partner Advisory Committee.

Also, as noted in the response to Item 44, HealthTrust incorporates several practices to help ensure employees' adherence to the HealthTrust Code of Conduct and applicable laws. These practices are monitored by the Ethics and Compliance Officer, who summarizes them for the CEO and the HealthTrust Ethics and Compliance Committee.

The CEO and other HealthTrust leaders report significant developments and issues, if any, related to its Ethics and Compliance Program, to the Partner Advisory Committee at its regular meetings or earlier if warranted. Information presented may include Program violations (if any), discussion of new policies and procedures, trends in questions or issues presented, and updates to the Program.

HealthTrust partners are aware that HealthTrust is a member of HGPII, and from time-to-time reports as to HGPII matters are provided to them.

49. How many of your GPO employees attended the most recent Best Practices Forum? Include the name of the most senior executive who attended.

At least 32 HealthTrust representatives attended the 2025 Best Practices Forum either in person or virtually. The most senior executive who attended was Jocelyn Bradshaw, President, GPO Operations, HealthTrust.

50. List the name, title and contact information of the senior manager assigned responsibility to oversee the business ethics and conduct program. Provide the name, title and contact information for the individual(s) responsible for responding to this

report.

Tonya Goad is HealthTrust's Ethics and Compliance Officer. She may be contacted at Tonya.Goad@healthtrustpg.com or (615) 807-9505.