HEALTHTRUST
Performance Group®

Business Relationship Statement

WELCOME

Dear HealthTrust Suppliers and Potential Suppliers,

Thank you for all you do to support our members and other healthcare providers. Without your cooperation, HealthTrust could not make available to our members innovative products and services essential to managing cost, quality and patient outcomes.

This Business Relationship Statement outlines HealthTrust's expectations for supplier conduct. If you are already a HealthTrust supplier, please ensure others in your organization are aware of these expectations. If you are not a HealthTrust supplier, and are considering applying, please review this document to understand our expectations; then go to the Supplier Portal to submit your company information.

Sincerely,

Jocelyn Bradshaw
President, GPO

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Purpose

HealthTrust acts with honesty, integrity and fairness in conducting its business. This expectation carries over to each supplier HealthTrust contracts with for products and services. Suppliers, their employees and representatives must be familiar with and act in a manner consistent with all provisions set forth in this statement.

Our Mission

HealthTrust is committed to strengthening provider performance and clinical excellence through an aligned membership model and the delivery of total spend management advisory solutions that leverage our operator experience, scale and innovation.

Members

HealthTrust's current membership consists of acute care facilities, surgery centers, alternate site facilities and physician practices located throughout the United States.

Self-Guidance Standards

HealthTrust has implemented policies, practices and programs to ensure that HealthTrust operates with unquestioned integrity.

- HealthTrust has an Ethics and Compliance Program with a senior executive designated as our ethics and compliance officer.
- If a HealthTrust colleague has a personal, financial or other private interest in any HealthTrust supplier, it must be disclosed to HealthTrust and the colleague will be excluded from matters relating to the conflict in a way that effectively mitigates it.
- HealthTrust does not as of this writing have an ownership interest in any HealthTrust supplier. HealthTrust would consider obtaining such an interest only for reasons that benefit members and clients generally, such as a need to create or maintain a source of supply for products or services where there is no other source, or limited sources.
- HealthTrust does not invest in venture capital funds or product research initiatives.
- HealthTrust does not have an ownership interest in Global Health Exchange (GHX), our contracted e-commerce company (although an affiliate of HealthTrust's general partner owns a small minority interest.

- HealthTrust does not generally accept or contract for administrative fees from any supplier in excess of 3 percent, as allowed under the U.S. federal GPO Safe Harbor (42 U.S.C. Section 1320a-7b(b)).
- HealthTrust may receive a global sourcing fee from its members for products obtained through its Global Sourcing program. These fees range from 0 percent to a maximum of 5 percent of the sourcing costs.

Community Supplier Development

HealthTrust has a long-standing commitment to building, maintaining and developing business relationships with a broad base of suppliers to help ensure our supplier base reflects the communities they serve.

The Community Supplier Development Program provides an opportunity for businesses that are registered with or recognized or supported by the U.S. Small Business Administration, SAM.gov, or other applicable government contracting authority as a small business, disadvantaged business, or as eligible for one or more SBA-recognized small business certifications, designations, or program statuses (SWVEs) to compete for contracts for products and services for HealthTrust members. HealthTrust also advocates for suppliers to have their own internal programs that support SWVEs.

Innovative Products and New Technology

We encourage those with new technology or product innovations to be certain that HealthTrust fully understands their capabilities, and, in addition, we urge our advisory boards to bring new technologies to our attention. We have a policy that sets out a process for this important flow of information.

Contract Implementation and Maintenance

HealthTrust contracted Suppliers must work with HealthTrust to actively support the launch and implementation of their HealthTrust supplier agreement, and provide other information and support required for ongoing contract maintenance. This includes, but is not limited to the following:

- An experienced national account representative, or at a minimum a central point of contact, will be required for all HealthTrust contracts. This individual must be authorized to make decisions on behalf of the supplier. This enables better communication between HealthTrust and the supplier and better addresses the needs of members. Supplier national account teams respond to inquiries from HealthTrust and its members within one business day following receipt of such inquiries.
- Provision of accurate and current company information helps HealthTrust partner with suppliers

more effectively, and also provides better service to HealthTrust members on suppliers' behalf.

It is essential that supplier company and key contact information is updated and verified on a regular basis within the HealthTrust Supplier Portal.

- A competent, well-trained, responsive field sales force must be available to support all HealthTrust agreements.
- Complete and accurate product cross-reference information must be provided encompassing all products included on a contract.
- Suppliers must support the educational needs of HealthTrust members with respect to their product lines. This includes providing adequate in-service training for supplier products and services as well as other appropriate educational opportunities.
- Accurate and timely sales reporting in an electronic format specified by HealthTrust is required of all suppliers. This information enables HealthTrust and the supplier to better support our members and facilitates contract compliance.
- Suppliers must have appropriate systems and processes in place to ensure accurate pricing in the electronic format specified by HealthTrust. This process insures that HealthTrust members are invoiced with the correct contracted pricing. Where supplier products are sold through distribution, it is the supplier's responsibility to ensure that distributors have accurate pricing.
- Suppliers must also have systems in place to ensure correct prices are charged, to verify correct prices were charged, and to automatically refund any overcharges to HealthTrust members.
- HealthTrust requires suppliers to publish a full product catalog, and corresponding attributes to HealthTrust's GLN (1100005351615) through a certified GS1 data pool. HealthTrust has selected FSEnet as our GDSN data pool service provider. Suppliers may partner with any GDSN provider of choice.
- HealthTrust utilizes an eSourcing system for Contract Lifecycle Management (CLM). Accessible through the supplier portal, CLM standardizes how suppliers—contracted, non-contract or prospective—respond to RFIs/RFPs and the process by which HealthTrust analyzes those responses.
- E-commerce, EDI and other HealthTrust technology initiatives intended to reduce supply chain costs and improve efficiencies for its members must be supported by all suppliers.
- Suppliers shall access membership data regularly provided by HealthTrust to update and maintain accurate membership rosters. This will help to facilitate access by HealthTrust members to all agreements and accurate pricing, and will facilitate the accurate allocation of administrative fees and rebates.
- Suppliers must provide billing, coding or reimbursement information on supplier products and/or services to HealthTrust members only after consultation with the appropriate billing, coding or reimbursement official for the HealthTrust member.

- Suppliers shall make accurate and timely payments to HealthTrust for all administrative fees, rebates and other payments according to agreement terms. Failure to provide such payments along with appropriate back-up information may result in inaccuracies on financial and cost reports for HealthTrust members.

Conduct

The following guidelines outline conduct expected of contracted and non-contracted suppliers, as applicable, in their relationships with HealthTrust and its members.

- Suppliers are expected to not only honor the terms and conditions in supplier agreements but also the spirit and intent of these agreements.
- Members of HealthTrust have agreed to purchase products and services consistent with the terms of our supplier agreements. We expect any supplier who is aware of the existence of such agreements not to encourage a HealthTrust member to fail to fully meet its freely assumed membership obligations.
- Suppliers must not create individual agreements with HealthTrust members that would be in direct conflict with an existing agreement between supplier and HealthTrust.
- HealthTrust members have a commitment to purchase from contracted suppliers. If HealthTrust is made aware that a non-contract supplier attempts to market its products or services to HealthTrust members, where a supplier agreement already exists for those products or services, HealthTrust will work in conjunction with the contracted supplier to assist and facilitate contract compliance. Such assistance may include a disclosure of any information that becomes known to HealthTrust that might assist in ensuring compliance by HealthTrust members to the applicable supplier agreement.
- Should a supplier lose a contractual position with HealthTrust, the supplier should cooperate with HealthTrust to develop a reasonable and appropriate transition plan to facilitate the movement of members to the new supplier and to avoid any disruption in patient care.
- Marketing by suppliers should be conducted in a manner to promote competition in the marketplace. Suppliers should not attempt to block, delay or undermine legitimate evaluations or validations of competing products by HealthTrust and its advisory boards. HealthTrust suppliers will provide detailed product information including nonproprietary information concerning product composition when requested to do so.

Medical Device Security

Cybersecurity concerns have heightened the importance of evaluating medical device vendors and service providers on their current and future cybersecurity management practices across the

expected life of the device. The avoidance of unexpected downtime, loss of functionality, or worse, harm to patients because of a cybersecurity event, makes the evaluation and negotiation of cyber-security terms in purchasing agreements a top-of-mind focus. This results in the introduction of additional contract language that outlines responsibilities for security hygiene requirements, liability, and support for the entire solution, including the operating system and third party components.

HealthTrust and suppliers must foster a collaborative and trusting relationship of working together to address current and future issues for the life of the device.

Ethics and Compliance Overview

HealthTrust's members demand that we select suppliers based on their commitment to excellence in serving the needs of HealthTrust member hospitals and their patients. Because of the trust HealthTrust places in its suppliers, utmost integrity in these business relationships is a must.

Standards of conduct that relate to HealthTrust's relationships with suppliers and our membership are described in HealthTrust's Code of Conduct and related policies and procedures, which can be accessed at this link: HealthTrust Ethics and Compliance. HealthTrust employees and others who assist HealthTrust are held to these standards. HealthTrust expects its suppliers to conduct themselves in a manner consistent with both the letter and the spirit of these documents.

HealthTrust expects that its contracted suppliers will have their own ethics and compliance programs and codes of conduct applicable to their respective industries, to ensure their employees comply with applicable laws and behave in an ethical and responsible manner.

Below are some highlights from HealthTrust's Code of Conduct, and some of the compliance-related contractual terms that are required of HealthTrust suppliers:

Conflicts of Interest

Suppliers that become aware of a conflict—actual, potential or the appearance of one—must disclose it to HealthTrust senior management or HealthTrust's ethics and compliance officer. This would include any financial, personal or business relationship that suppliers or their personnel may have or are perceived to have with those who are or may be negotiating or making decisions about a HealthTrust agreement, or making purchasing decisions under a HealthTrust contract. This could include HealthTrust employees, advisory board members or HealthTrust members. Consulting and other relationships between suppliers and physicians on staff at HealthTrust member facilities must be fully disclosed to those facilities before their purchasing decisions are made.

Gifts, Entertainment and Meals

Two of the most important words in the healthcare industry today are "cutting costs" and, for this reason, HealthTrust prefers that business courtesies such as gifts, entertainment and meals either not be exchanged or that they be of minimal value. The value of any business entertainment

(including meals) given by a supplier or supplier division to a HealthTrust employee must be modest, reasonable and customary for the location and not exceed, in the U.S., $150 per person per event, or $500 in any calendar year. Gifts are discouraged and cannot exceed a value of $75 per person per calendar year in the U.S. Maximum amounts for other countries are specified in our policies.

Absent special circumstances, HealthTrust employees may not accept a supplier's offer to pay their travel expenses. No gifts, entertainment or meals may be accepted by HealthTrust employees who are negotiating with a potential supplier, from that supplier, during our quiet period (the time between issuance of an RFP and signing of a contract).

HealthTrust Colleague Participation in Educational, Training and Promotional Events of Others

HealthTrust employees are permitted to attend supplier-sponsored and industry/professional events only if HealthTrust pays all expenses relating to their attendance. Exceptions are made for HealthTrust employees who are speaking or presenting at such an event or who serve as advisors for the event or the organizers of the event. Also, expenses of HealthTrust employees for registration, food and entertainment may be paid by event organizers only if such expenses are paid for all attendees.

No Improper Payments

Suppliers are prohibited from directly or indirectly making any payment or providing anything of value to HealthTrust, any HealthTrust member or affiliated third party or their respective directors, officers, employees or representatives, in return for HealthTrust entering into an agreement with the supplier, or for any business transacted under the agreement (excluding GPO fees and rebates and business courtesies of minimal value). No HealthTrust employee should ask or induce, or attempt to induce, a supplier to provide a personal benefit to the employee.

Practices and Issues that HealthTrust Supports

A HealthTrust contract may be awarded single-source, dual-source, multi-source, optional or SWVE status. HealthTrust members are uniquely committed to the HealthTrust contracting portfolio, which eliminates the inefficient and costly requirement of suppliers soliciting market share facility by facility. However, HealthTrust typically includes a "carve out" provision in its agreements with its suppliers, notwithstanding the status of the award (sole, dual or multi-source, optional or SWVE). These carve outs allow HealthTrust to contract with other suppliers to further certain goals that are desired by and beneficial to our membership. For example, HealthTrust and its members believe that new technology, environmental goals, and a breadth of supplier opportunities should be fostered. HealthTrust strives to include in its portfolio suppliers who offer benefits or advancements in these areas.

Social Responsibility

Suppliers, as well as their subcontractors and manufacturers, are required to comply at all times

with (a) applicable labor and employment laws, including those relating to child labor, forced labor, unsafe or unsanitary working conditions or trafficking in persons; and (b) laws relating to "conflict minerals" as defined in the Dodd-Frank Act. Suppliers are also required to undertake periodic inspections of any subcontractor or manufacturer involved in the provision of products under the suppliers' agreement with HealthTrust, to ensure compliance with the foregoing.

Reporting Suspected Wrongdoing

HealthTrust asks suppliers to report any activity by HealthTrust personnel or another supplier that appears to violate applicable laws, rules, regulations or HealthTrust's Code of Conduct or policies. This would include requests for or acceptance of gifts, meals or entertainment by a HealthTrust employee inconsistent with the rules outlined in the "Gifts, Entertainment and Meals" section above. Suspected wrongdoing can be reported to HealthTrust's Ethics and Compliance Officer at (Ethics@HealthTrustpg.com) or by calling the HealthTrust Ethics Line (1.800.345.7419). Reports may be made anonymously. There is no retribution or discipline for anyone who reports a concern in good faith.

Warranty of Non-Exclusion

Suppliers must represent to HealthTrust that neither they nor any of their officers, directors or key employees (a) are currently excluded, debarred or otherwise ineligible to participate in U.S. federal or state healthcare programs; (b) have been convicted of a crime relating to the provision of health-care items or services; or (c) are under investigation or aware of circumstances that may result in their being excluded from participation in healthcare programs. Any change in such status must be reported to HealthTrust immediately.

Background Checks

Suppliers are required to perform background checks on any of their personnel who (a) have or may have access to a member facility to deliver, maintain, service or remove equipment and/or products, or (b) may participate in surgical procedures in which the products are used.

Physician-Owned Entities

Many HealthTrust members have policies restricting the purchase of certain products from suppliers that have physician ownership. Suppliers are therefore required to complete a certification as to any ownership by a physician, and HealthTrust makes that information available to members.

Discounts and Rebates

HealthTrust expects all contract pricing that includes rebates and other forms of discounts to be in compliance with the Discount Safe Harbor Regulations [42 C.F.R. §1001.952(h)] to the Anti-Kick- back Law 42 U.S.C. §1320a-7b(b)(3) (A) and (C).

GPO Administrative Fees

HealthTrust structures all supplier contracts in compliance with the GPO Safe Harbor Regulations

(42 C.F.R. §1001.952(j)) to the Anti-Kickback Law 42 U.S.C. §1320a-7b(b)(3) (A) and (C).

SUPPLIER INFORMATION REQUIREMENTS

Prospective Suppliers

Prospective suppliers are encouraged to visit the HealthTrust Supplier Portal at https://health-trustpg.com/suppliers/ to familiarize themselves with our process and submit their company profile. Creating a profile provides HealthTrust with information about your company that helps us identify and evaluate potential suppliers. Submitting a profile does not guarantee you a HealthTrust contract, however it does give you access to the HealthTrust bid schedule. HealthTrust will notify you if you will be considered in a bid process.

Contracted Suppliers

Contracted suppliers are encouraged to visit the HealthTrust Supplier Portal on a regular basis to review and update company profile information.

HealthTrust is committed to partnering with our contracted suppliers to deliver a comprehensive portfolio of products and services to our members. Without your vigilance to the letter and the spirit of these standards of conduct as described in this business relationship statement, HealthTrust would not be able to fulfill this commitment or its mission of strengthening member performance. Thank you.

"Supplier(s)" as used in this statement includes any manufacturer, supplier, distributor, wholesaler, service company, and any other business that contracts with, or seeks to contract with HealthTrust to provide products and services to HealthTrust and/or its members.

This HealthTrust Supplier Business Relationship Statement and the HealthTrust Code of Conduct and policies referenced herein can be found on the HealthTrust website. Version date: July 2025

HEALTHTRUST
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Questions? Contact us.

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