

2025 PUBLIC ACCOUNTABILITY QUESTIONNAIRE

This Questionnaire Covers Calendar Year 2024.
Please return your response to starshine.chun@afslaw.com no later than
June 30, 2025.

Vizient Supply, LLC (“Vizient Supply”) is a wholly-owned subsidiary and the supply chain contracting arm of Vizient, Inc. (“Vizient”). For the purposes of this questionnaire, all answers reflect Vizient and, where applicable, Vizient Supply, and its structure and national contracting practices as they existed in 2024.

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;**

Vizient is the largest member-owned healthcare performance improvement company in the U.S. with approximately 319 common stockholders (as of December 31, 2024).

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

Vizient’s stockholders are all current and former member institutions, made up of community-based healthcare providers and academic medical centers.

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

Vizient is a Delaware corporation.

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

Vizient is a private, for-profit company.

- **Location of corporate headquarters.**

Vizient is organized in Delaware and headquartered in Irving, TX.

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

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

Vizient is governed by a 13-member Board of Directors that includes executives and clinicians from academic medical centers, community hospitals and independent organizations across the nation.

- Percentage of Board representing GPO customers;

Approximately thirty-eight percent (38%) of the members of the Board represent entities that participate in Vizient.

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

Byron Jobe, the President and CEO of Vizient, was the only member of the Board that was an employee of Vizient during 2024.

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

None of Vizient's Board members serve as employees, officers or directors of any participating vendor.

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 physician (or immediate family member of a physician) owns an equity interest in Vizient.

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.

Vizient's Standards of Business Conduct and Conflicts of Interest Policy cover all employees and officers. In addition, Vizient has separate conflicts of interest policies for members of its Board of Directors and clinical advisory committees.

We have provided full copies of the conflicts of interest policies for your review. However, the primary constraints contained in the conflicts of interest policies include, but are not limited to, the following:

(a) Ownership of Individual Equity Interests in Participating Vendors.

Officers and employees (and their spouses and minor children) may not own an Individual Equity Interest (as defined below) in a vendor if they are in a position to influence a Vizient contracting decision with such vendor.

Employees who do not influence contracting decisions must disclose individual equity interests in participating vendors and recuse themselves from any negotiations or decisions regarding those participating vendors. The term “Individual Equity Interest” means securities, options, warrants, debt instrument (including bonds and loans) or rights to acquire any of the foregoing; provided, however, that the term shall not include (i) interests in publicly traded mutual funds, (ii) interests held in blind trust, or (iii) interests held in a professionally managed fund or account where the employee has (a) no control over decisions to buy or sell Individual Equity Interests, and (b) no communication with the manager regarding the security to be purchased or sold by the account/fund (a “Managed Account”) shall not be included. Members of Vizient’s Board of Directors and advisory committees must adhere to conflicts of interest policies that require the member to disclose ownership of an Individual Equity Interest in a participating vendor and be recused from any decisions relating to such vendors.

(b) Service on Boards of Participating Vendors.

Employees and officers are prohibited from serving as an officer, director, employee or consultant of any company whose business interests materially conflict with the interest of Vizient, including any participating vendor. Members of Vizient’s Board of Directors must adhere to the conflicts of interest policy that requires member to disclose service on any board of directors of any participating third party and be recused from any decisions relating to such third party. Advisory committee members have similar requirements.

(c) Vendor Gifts, Services, Entertainment and Favors.

Employees and officers may not accept or provide gifts of cash or cash equivalents to any vendors. Employees and officers may not accept gifts, services, entertainment, favors, honoraria from a participating vendor, unless the item or service is of nominal value. “Nominal Value” means any item, service or other thing of value (not including cash or cash equivalents) that does not exceed \$50 per instance or \$100 in any given calendar year. The total retail value of all nominal value gifts received by each employee during each calendar year from all sources shall not exceed \$300.

Members of Vizient’s advisory committees must adhere to the conflict of interest policy that requires the member to disclose the acceptance of any gifts, favors, personal services or payments, other than those of nominal value, from any participating vendor to the appropriate governing body. The member is then recused from any decisions relating to such vendors.

(d) GPO’s Process for Addressing Ethics Violations.

Reports of potential ethics violations can be made to any member of management; a member of the Human Resources, Legal or Compliance Departments; or through Vizient’s compliance hotline/website managed by Navex. All potential ethics violations are reviewed by the Compliance Department. In the Compliance Officer’s discretion, independent outside counsel may be utilized to investigate potentially serious issues. Action is taken on a case-by-case basis depending on the nature of the report and the results of the investigation. All reports of ethics violations and management’s responses thereto are reported to the Governance, Nominating, and Compliance Committee of the Vizient Board of Directors.

An electronic copy of Vizient's Conflicts of Interest, Advisory Body Conflict of Interest, and Board of Directors Conflicts of Interest policies are included with this response.

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).

Vizient has a conflict of interest policy for members of its Board of Directors. Generally, directors must avoid situations in which their personal interests or interests of other organizations they represent conflict, or appear to conflict, with the interests of Vizient. Members of Vizient's Board of Directors must complete annual disclosure statements of potential conflicts of interest and adhere to policies that require the member to disclose ownership of an Individual Equity Interest in a participating vendor and be recused from any decisions relating to such vendors. *See also* response to Question 4.

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]

Vizient does not offer services that might constitute conflicts of interest with its contracting activities. Vizient maintains and continues to enhance its Analytics and Advisory Services function, which offers consulting, clinical and supply chain data analytics and other related services that facilitate supply chain operations and drive the highest quality of care. Participation in these programs is voluntary and at the sole discretion of the member. In addition, Vizient offers non-GPO contracting services through a subsidiary, aptitude, LLC.

Information regarding activities and other lines of business of Vizient may be found at www.vizientinc.com. Information regarding Provista, Inc. ("Provista"), a subsidiary of Vizient that primarily services the non-acute marketplace, is available at www.provista.com. In addition to providing supply chain services to Vizient and Provista, Vizient Supply provides supply chain services to four additional GPOs. Effective April 1, 2021, Vizient acquired all the issued and outstanding stock of Intalere, Inc. ("Intalere") from IHC Health Services, Inc. As a result, Vizient Supply now provides contracting and supply chain services to Intalere's members, all of whom are now able to access the Vizient Supply portfolio. Through a February 2016 acquisition, Vizient Supply serves as the supply chain contracting agent of MedAssets Performance Management Solutions, Inc. ("MedAssets"). Vizient Supply is also the exclusive contracts management and supply chain partner for Children's Hospital Association ("CHA"), a network of children's hospitals and a member of HGPII. In addition, during 2013, Vizient entered into a joint venture with the Cleveland Clinic to develop a specialty GPO, Excelerate Strategic Health Sourcing LLC ("Excelerate"). Vizient Supply provides contracting and supply chain services to

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 48 CFR, Section 9.403 (2007); Securities Act, Sec. 16, 15 USC 77p(f)).

Excelerate. All contracting services provided by Vizient Supply to Vizient, Provista, Intalere, MedAssets, CHA, and Excelerate are conducted in accordance with Vizient's policies and procedures. *See also* response to Question 9. In addition, Vizient and its affiliates do business with various channel partners, as is typical in the industry, and some of those channel partners may also function as GPOs.

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.**

On August 1, 2024, to expand Vizient's advisory services, Vizient acquired Kaufman Hall, a strategic advisor for healthcare systems and providers which helps its clients improve financial performance, make effective strategic decisions, access capital, create strategic partnerships and achieve transformative outcomes. The combined organization offers advisory services in key areas such as revenue and cost, advanced clinical quality and operational analytics, corporate finance, partnerships, mergers and acquisitions, access to capital and balance sheet management.

- 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 responses to Questions 6 and 9.

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?**

Under limited circumstances, Vizient will accept sponsorship funds and/or educational grants from current or prospective vendors for member meetings (e.g., tradeshow), clinical programs or educational events (e.g., continuing medical education). Such funds are accepted pursuant to a written Supplier Sponsorship Policy that includes detailed controls to avoid even the appearance of impropriety, including but not limited to prohibitions on: selecting sponsors based on the volume or value of sales or administrative fee revenue; providing sponsors any preferential treatment or access during Vizient's open and competitive bid process; allowing sponsors to influence the outcome of research; allowing sponsors to influence the substance of educational materials; and requiring vendors to participate in sponsorship activities. In addition, the dollar value of all contributions for a given activity may not exceed 100% of the total project expenses for the activity and must be appropriately documented. In addition to the Standards of Business Conduct and Conflicts of Interest Policy, the Supplier Sponsorship Policy ensures that sponsoring vendors are not given preference in the vendor selection process. The Supplier Sponsorship Policy applies to any type of vendor sponsorship, including donations for educational programs. As for other "non-administrative fee revenue," Vizient does not accept

partnership incentives, vendor equity, or any “sign-on bonus” or other “up front” lump sum fees of any kind that are paid prior to inception of the contract. *See also* response to Question 11.

A copy of the Supplier Sponsorship Policy is attached.

- 10. Does the GPO and/or its parent or 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?**

See response to Question 9. In addition, these sponsorships and registration fees are used to cover costs of meetings that provide educational opportunities. Vendors are not required to participate, and a vendor’s participation or non-participation is not a factor taken into consideration during the contract award process.

- 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.).**

Vizient offers pharmacy spend data to vendors on a fee-for-service basis which helps facilitate supply chain operations. SG-2, LLC, a wholly-owned subsidiary of Vizient, also provides subscription-based market research and analytics to vendors.

- 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.**

Members receive two types of disclosures for GPO administrative fees: First, members may view the administrative fee provisions of vendor contracts with fee provisions that are not fixed at three percent or less of the dollar value of member purchases through a secure internet database that is available 24 hours a day, 365 days a year. In addition to this “up-front” notice of vendor contract administrative fee provisions, members receive annual fee disclosure reports that indicate, on a contract-by-contract basis, the amount each member purchased in the previous year and the amount of administrative fees Vizient received in connection with those purchases.

- 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. booth space, educational grants, marketing fees, honoraria, etc.) whether from the purchasing activity of those members or not? Describe your disclosure practices.**

In addition to the administrative fee disclosures described in response to Question 12, Vizient reports information regarding vendor sponsorship, grant, and exhibition fees to members upon request.

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

In the event that Vizient receives administrative fees from a vendor that does not have an active GPO agreement with Vizient, Vizient requires the return of those administrative fees to the applicable vendor. Vizient has optional tools that allow vendors to upload and validate their administrative fee reporting to prevent errors.

MEMBERFEES

- 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?**

Vizient does not 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.

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.**

Vizient utilizes a Request for Proposal (“RFP”) process that follows principles similar to those embodied in the ABA Model Procurement Code. Information regarding Vizient’s RFP process and its bid calendar are publicly available at www.vizientinc.com. In addition, any vendor who registers to participate in a particular RFP receives an “RFP Package,” which includes complete instructions for the particular procurement.

- 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.**

Vizient’s RFP Package contains (i) bid specifications for the product being procured, (ii) basic qualifying factors that vendors must meet, and (iii) the criteria that will be used to evaluate proposals. The RFP Package is sent to all interested vendors who register to participate in a particular RFP. RFP proposals are evaluated in accordance with the evaluation criteria and procedures set forth in the RFP Package.

Yes, if a bidder is not awarded a contract, that bidder is able to review the decision criteria. Not only are decision criteria included in the RFP Package, Vizient will also accommodate any vendor requests for a verbal debrief following an unsuccessful attempt to gain an award through a Vizient contracting process. This feedback is also available for any vendor who makes an unsuccessful submission to the Innovative Technology process. Vendor debriefs are designed to discuss the criteria Vizient used for evaluating the bid and assure vendors that they have been treated in a fair and open way according to the Vizient contracting process. The debrief also provides an opportunity for general guidance about how the vendor could expect to be most successful in future Vizient RFP submissions. Contracting process debriefs are regularly conducted by the Vizient Contract Services Leadership and representatives from the Vizient business unit. During a debrief, the following topics are usually covered: (1) identification of weaknesses or deficiencies in a vendor’s bid/proposal

with a focus on areas where vendor could be likely to be more successful in their next RFP attempt, (2) responses to questions about Vizient’s contracting process, and (3) responses to questions from vendor about its submission. At the debrief, the vendor is also made aware of the vendor grievance process to review lingering concerns regarding Vizient’s application of its contracting process. Vizient is also careful not to share information of other bidders that could be competitively sensitive or proprietary.

The criteria by which a winning vendor will be selected is identified to all bidders through the instructions included in the RFP Package. To assure that the criteria are followed in the actual awards, the appropriate member council or task force reviews information regarding the RFP and approves award decisions prior to the announcement of winning vendors.

The RFP process follows principles similar to those embodied in the Federal Competition in Contracting Act and is modeled upon, to the extent possible, the requirements of the ABA Model Procurement Code. Awards may be made without using this process in unique circumstances where they enhance member choice or flexibility and/or to promote Vizient’s responsible sourcing initiative. For example, non-competitive contract awards are provided: (i) to innovative medical products which offer incremental benefits to patient care, patient safety or health care worker safety; (ii) to small businesses; and (iii) to innovative proprietary products which have no alternatives. In addition, all non-competitively awarded contracts are clearly identified to members.

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.

With the active input of its member councils and task forces, a number of factors are carefully considered when evaluating whether to contract with one vendor (a single-source contract) or with more than one vendor (multi-source contracts) for a given product category. Single-source contracts are entered into when a member council or task force determines that such an agreement would provide substantial member value without compromising patient care, patient safety, or health care worker safety.

Single-source contracts are only awarded under the following circumstances: (1) when a product has no other generic equivalent competition or is viewed in the marketplace similarly to branded products (examples include branded pharmaceuticals or innovative technology products); (2) when no competing vendors respond to the RFP; (3) when a single-source supply contract is determined by a member council or task force to provide substantial member value without compromising patient care or safety or health care worker safety in conjunction with a competitive bid process; or (4) when concerns about supply chain resiliency are not anticipated in this product category.

Note, Vizient does not distinguish between “single-source” and “sole-source” terminology.

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?

Multi-product contract discounts are quite common in health care and other industries because they can promote competition and can help suppliers lower the costs of health care by offering lower prices to hospitals that prefer to standardize their purchases using a single

supplier's products. Vizient carefully assesses all proposed multi-product proposals in an effort to avoid those that would unreasonably limit member choice or flexibility, prevent innovative technology from reaching members, or unreasonably foreclose competition. Multi-product packages that combine clinical preference and non-clinical preference categories are not offered. However, multi-product packages for a group of functionally-related products may be offered (i) when members typically procure such functionally-related products together in the marketplace, and (ii) when consistent with the overriding objective to provide members with the most innovative, cost-effective products possible.

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.

Members are free to evaluate products from, or communicate and contract with, vendors of any products, regardless of the vendor's contracting status with Vizient or the product's classification as an innovative or clinical preference product.

In order to ensure that contract length does not encumber member access to innovative technology, with rare exception, that must be approved by executive management, Vizient Supply's contracts are generally limited to an initial term of three years or less. Additionally, contracts permit termination without cause, upon no more than 180 days' written notice, and include a provision permitting the addition of other vendors or the termination and re-bid of the contract if products that offer incremental patient care or safety benefits are introduced.

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.

The fee rates are offered by suppliers in their response to Vizient's invitation to bid and are based upon the value they attribute to the agreement. Vizient does have a written policy, but that policy contains proprietary and competitively sensitive information and is therefore internal-facing only.

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?

89.6% of Vizient contracts have administrative fees of 3% or less. All fees are disclosed and reported per Federal Regulatory Safe Harbor provisions. *See also* response to Question 21.

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.

See responses to Questions 21, 22, and 25.

PRIVATE LABEL PROGRAMS

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

Yes, Novaplus® is Vizient's private label brand. The Novaplus brand is founded on providing members substantial savings on high quality products and services that members use most. It encompasses a broad range of categories needed across the care continuum, such as: anesthesia, business products and services, diagnostic imaging, food, laboratory, medical, orthopedic, pediatric, pharmacy, respiratory and surgical.

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

In addition to traditional administrative fees, Vizient receives a trademark license fee for the use of the Novaplus brand name, packaging and sales and marketing support.

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.**

Information regarding Vizient's Vendor Grievance Process is available at: Vendor grievances (vizientinc.com). A copy of the Vendor Grievance Policy has also been provided as part of our response for your convenience.

- 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 June 26, 2025, no supplier has requested an independent evaluation pursuant to the HGPII independent evaluation process.

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

Yes. Vizient (through its legacy organizations) played a leading role in the development of the HGPII Independent Evaluation Process and continues to participate.

- 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. Vizient's public website (www.vizientinc.com) discusses the HGPII Independent Evaluation Process and includes a link to the HGPII website.

INNOVATION

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

Vizient has a detailed process for evaluating innovative technologies, which consists of products and services. Vizient's Innovative Technology Program offers vendors an ongoing,

year-round opportunity to connect and request an evaluation of their potential innovation(s) outside of the normal contracting cycle. Vizient's Innovative Technology Submission website (link below) offers 24/7 access to any vendor wishing to request a formal review of its products and services. Submissions are evaluated to determine whether the solution offers incremental benefits to patient care, patient safety or health care worker safety or has a positive impact on the business models of healthcare organizations. If the solution does offer such benefits, a contract will be awarded, even if the new technology determination is made outside normal contracting cycles. Since the inception of the Vizient Innovative Technology Program, Vizient has reviewed more than 1,700 product submissions and awarded more than 312 innovative technology agreements. Innovative technology contracting recommendations are made by the appropriate discipline-specific provider council. Vizient also actively monitors and evaluates the medical product development pipeline to identify potentially innovative products and devices for contract opportunities and operates a Web-based Technology Forum on which vendors can post information about new products. Vizient also seeks input from provider clients on potential innovations and proactively engages with vendors when appropriate. Further information regarding Vizient's innovative technology process is available at <https://www.vizientinc.com/what-we-do/supply-chain/supply-chain-programs/innovative-technology-program>.

Additionally, Vizient highlights innovative technology through its highly successful annual Innovative Technology Exchange event, where vendors have an opportunity to highlight their newest solutions and engage in a valuable face-to-face dialog with providers about improving healthcare. The Vizient Innovative Technology Exchange event in 2024 was hosted live in Las Vegas. At the Innovative Technology Exchange, 106 unique products and services were showcased by 92 companies and 23 of them were chosen by provider council members to be offered Vizient Innovative Technology contracts.

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

Yes. Vizient retains the right to execute new agreements for innovative technology products that offer incremental benefit to patient care, patient safety or health care worker safety at any time. Virtually all Vizient Supply agreements for medical or surgical products contain provisions authorizing Vizient to add new vendors of innovative technology products or to terminate the agreement and re-bid the affected product category. *See also* response to Question 30.

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. Vizient in no way restricts the members of Vizient, Provista, Intalere, MedAssets, CHA, or Excelerate from evaluating products from, communicating with, or contracting with vendors of any products. Members are free to communicate and contract with vendors regardless of the vendor's contracting status with Vizient or the product's classification as an innovative product.

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

Yes.

ENVIRONMENTALLY-PREFERRED PRODUCTS AND SERVICES

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

Yes. Members across the nation request details of the environmental attributes and carbon emission disclosures of products they are considering purchasing. Not only do members want to know the attributes of a product, members also want to be confident that such claims are validated by independent third parties. In addition, members want to know the percentage of their overall spend represented by products with environmentally-preferred attributes and contracted suppliers and products to help meet their climate action goals. Some members have included support of their environmentally-preferred purchasing and sustainability goals in their member agreements with Vizient.

Vizient's Sustainability Advisory Council is encouraging all Vizient members to bolster their focus on prioritizing products that are safer for human and environmental health. Members of the council are sustainability experts who are committed to leveraging purchases to prioritize products that are safer for patients, family members and the environment. Along with other Vizient members, members of Vizient's Sustainability Advisory Council seek to make smarter and safer purchasing decisions associated with positive health outcomes while reducing cost. The council has charged all Vizient members with prioritizing the environmentally preferred initiatives, including: the adoption of Vizient's standardized environmentally preferred attributes, educating suppliers on the importance of environmentally preferred attributes and carbon emission disclosures, incorporating such criteria into periodic business reviews and promoting the transparency of supplier-submitted data.

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.

Vizient has 23 standardized medical/surgical environmentally-preferred attributes, which range from safer chemical utilization to waste reduction initiatives and disclosure characteristics. In addition, Vizient has created additional attributes for specific product categories including, but not limited to: food, food service ware, cleaning chemicals, organic baby care, and furniture. Vizient offers a broad, cost-effective portfolio of environmentally-preferred products from energy star rated equipment to anesthesia masks without the use of PVC, bisphenols, and phthalates – chemicals that have been linked to adverse health impacts such as cancer and reproductive issues. Currently, over 400,000 products in Vizient's catalog clearly identify the environmentally-preferred attributes that each product contains. This number will continue to grow. Vizient's RFPs encourage vendors to provide details regarding the environmentally-preferred attributes of their products, and those attributes as well as science-based goals to reduce greenhouse emissions, including baseline date and target reduction date, are part of the non-financial criteria in all bids. In select RFPs, additional points will be considered when the supplier answers positively for the environmentally-preferred attributes. The percentage of suppliers reporting on environmental attributes in the national bid process has dramatically grown to 92% in 2024 from 8% in 2017.

In 2020, Vizient along with other industry organizations formalized a cooperative called the Medical Equipment Proactive Alliance for Sustainable Healthcare (“MEPA”). The purpose of MEPA is to develop a list of sustainability criteria specifically for medical imaging devices. This common set of criteria allows companies to focus on relevant sustainability aspects and helps purchasers to develop their sustainability policies pertaining to medical imaging devices. The “Sustainability criteria for purchasing of medical imaging devices” details three levels of the 49 criteria focused on five main areas: tools for life cycle assessment, climate change mitigation, sustainable use of resources, chemicals of concern, and corporate ESG performance. Each criterion is specifically designed for the complexity of medical imaging devices and aims at mitigating a relevant sustainability aspect. In 2023, a draft of the criteria was open to a six-month global consultation period for input on the development of the final draft. The global initiative was launched in 2024.

In addition, Vizient has served as a convener between healthcare providers, suppliers, and NGOs in efforts to establish a consensus and standard for decarbonizing healthcare through the development of CHARME, the Collaborative for Healthcare Action to Reduce MedTech Emissions. Building upon those efforts, Vizient has taken additional steps to develop resources and tools for 2024.

In 2024, Vizient continued to include carbon emissions language in contracts with suppliers. Vizient works with suppliers to identify their sustainability maturity and requests carbon emissions data, milestones and reduction plans to accelerate sustainability performance improvement across the health care sector.

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

Members have requested environmentally-preferred products with the greatest number of attributes and disclosed carbon emissions in all product categories. At times, a price increase has been witnessed for these products, which makes it difficult to implement at the majority of health care organizations. Vizient has worked both through its Sustainability Advisory Council and with additional members to identify cost-effective, environmentally-preferred products. Once identified, this information has been shared within Vizient’s membership to encourage growth of the sustainability program. Vizient continues to work with suppliers who offer costly products with environmentally-preferred attributes to lower prices and/or to identify environmentally-friendly updates that can be made. In addition, some suppliers do not offer a broad category of environmentally-preferred products. Members want to be able to choose from many environmentally-preferred products while viewing the cost and impact of those products. Vizient’s sustainability sourcing team will communicate in a transparent manner with suppliers to request a larger breadth and depth of product offerings to satisfy member requests. There is also a lack of cross references from “conventional” products to cleaner, healthier “green” products. Such cross references are currently in development as part of Vizient’s broader strategy in sustainability.

In addition, there is currently no industry standard for sustainability in healthcare. To address this, Vizient was the first GPO to adopt environmentally-preferred attributes from Kaiser Permanente’s best practice model. These attributes are quantitative, science-based, and align with regulations. Vizient advocated for the implementation of these attributes by

all GPOs in an effort to standardize them across the industry. Ultimately, several GPOs adopted these environmentally-preferred attributes, which will provide transparency and clarity to both members and suppliers. Further industry standardization in this regard would better enable members to know the top characteristics to request for environmentally-preferred products, and it would better enable suppliers to create safer products for both human and environmental health.

To further strengthen supplier engagement and ensure that sustainability efforts are informed by the supplier perspective, Vizient also created a Supplier Sustainability Task Force. This task force was formed to obtain supplier input on sustainability-related data, helping to inform the development of member-facing analytical tools. These tools are designed to provide data-driven insights into sustainability performance and product attributes, enhancing transparency and decision-making for our members. The collaboration with suppliers through this task force ensures that data used in analytics is both meaningful and actionable, while also encouraging supplier alignment with member sustainability goals.

See response to Question 35 regarding Vizient's 2024 actions towards carbon emissions.

37. Has your GPO designated someone to:

- **Identify your GPO's environmentally-preferred objectives;**

Yes.

- **Explore environmentally-preferred products and services; and/or**

Yes.

- **Develop initiatives to help educate your members about the value of using environmentally-preferred products and services?**

Yes.

All of these are elements of Vizient's annual goals. Four full-time employees are devoted to advancing environmental sustainability at Vizient. They are supported through all hierarchical levels at Vizient from the Chief Executive Officer down.

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?

Historically within healthcare, there has been a lack of standardization for sustainability. Therefore, Vizient participates in various industry groups and works with its members to promote more widespread adoption of common environmental sourcing standards – such as the 23 standardized attributes first modeled by Kaiser Permanente and adopted by Vizient as the backbone of the sustainability sourcing program. Vizient takes a strategic approach to sustainability by leveraging common frameworks such as the Green Science Policy Institute's six classes approach to eliminate chemicals of concern and avoiding regrettable substitutions. Vizient also collaborates with the Chemical Footprint Project to measure and disclose data on business progress to safer chemicals. Vizient invited a substantial number of suppliers to participate in the Chemical Footprint Project. As a result, participation in the Chemical Footprint Project rose 29%. Vizient collaborates closely with the Sustainability Advisory Council, comprised of sustainability experts, which guides Vizient's sustainability sourcing strategy. This is a continuation of expanding Vizient's leadership in all areas of healthcare sustainability while aligning with specific leaders in different areas of

sustainability. Vizient is also a member of the National Academy of Medicine's Climate Collaborative, a multiyear public-private collaboration composed of leaders from across the health care market dedicated to addressing the sector's environmental impact while improving its sustainability and resilience. Vizient participates in three of the four Working Groups including: Health Care Supply Chain, Health Care Delivery and Policy, Financing, and Metrics.

Vizient continues to expand its portfolio of environmentally preferred products that meet enhanced environmental criteria and support members in achieving their sustainable purchasing goals. A product must meet general and category specific environmental criteria, provide approved third-party certification verifying manufacturing and environmental standards are maintained, and report differentiated sales reporting that distinguishes between conventional and environmentally preferred spend. Vizient offers a total of 24 environmentally preferred designated agreements ranging from furniture and floor coverings to organic baby care.

Vizient offers various services to advance and amplify sustainability. Members may review high-level opportunities within sustainable procurement, find product/SKU level opportunities to the cleanest and safest products available in the industry while reducing cost, or access a sustainability roadmap to evaluate current performance, peer benchmarking and actionable solutions. In addition, Vizient offers members the ability to collaborate on a comprehensive approach to integrate sustainable business practices customized to meet members where they are. While one member may request a sustainability materiality assessment to evaluate priorities, another member may request a baseline on carbon emissions to expedite their journey to carbon neutrality. Vizient also provides climate performance solutions that leverage supplier and product-level data to deliver data-enabled insights, empowering members to track, manage, and accelerate their climate goals with precision and transparency.

Vizient routinely offers resources to its members in the form of webinars, articles, blog posts, tool kit guides and press releases to aid in implementing sustainability programs, replicating best practices or learning from industry leaders. Members can browse data and analytic technologies from sustainability dashboards to virtual item master details on Vizient's sustainability website. Guides on establishing quick wins within sustainability and what to include within a chemical policy are located within Vizient's sustainability toolkit. Numerous articles showcasing strategic alliances, the importance of sustainable sourcing and how members can access Vizient's resources are consistently published. Suppliers also have access to industry resources and policies, environmental attributes to keep contracts updated and information on Vizient's environmentally preferred member charge outlining priorities and how to get involved. In 2024, Vizient hosted three supplier education webinars on behalf of the member-led Sustainability Advisory Council, aimed at advancing supplier understanding of member goals in environmentally preferred purchasing, safer chemical management and mitigation, and healthcare decarbonization. Over 100 suppliers attended these educational webinars.

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.**

The Standards of Business Conduct (“SBC”) and other Compliance Program information are posted and available on Vizient’s employee intranet site and the external, publicly-available website for all vendors, contractors and others with whom Vizient does business at <https://www.vizientinc.com/About-us/Governance>. The direct link for the SBC can be found at <https://vizientinc-delivery.sitecorecontenthub.cloud/api/public/content/24c66beb07714a2cb8b35a6ae2842c5c?v=4cd875b1>. Although reviewed annually, there were no material changes to the content included within the Standards of Business Conduct compared to last year.

- 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.**

Vizient distributes the Standards of Business Conduct, Conflicts of Interest Policy and other Compliance Program information to all employees. As referenced in Question 39 above, Compliance Program information is provided in electronic form and is publicly available at <https://www.vizientinc.com/About-us/Governance>. In addition, all employees receive training on the Standards of Business Conduct, Conflicts of Interest Policy, and other key elements of the Compliance Program. This information and training is provided to all new employees upon employment. Supplemental compliance training is provided to all employees at least annually. Additionally, Vizient distributes a copy of the applicable conflict of interest policy to all members of its Board of Directors and advisory committees upon selection and on an annual basis thereafter.

In 2024, electronic training on the Standards of Business Conduct was provided by the Vizient compliance team through the company’s learning system. This training covered: Vizient’s culture and values; standards of business conduct; conflicts of interest; HIPAA; anti-fraud program; anti-harassment and anti-discrimination; intellectual property; non-retaliation; reporting violations and compliance hotline; and cultivating a culture of ethical behavior. All employees were required to certify completion of the training. Additionally, all employees are required to certify compliance with the Standards of Business Conduct and Conflicts of Interest Policy on an annual basis.

COVID-19 Response

- 41. 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?**

During the COVID-19 pandemic, Vizient mobilized to help healthcare providers navigate severe supply disruptions. Vizient launched a centralized Disaster Response team to triage thousands of member-reported issues and worked directly with manufacturers and distributors to secure access to constrained products. Approximately 40% of these cases

involved Vizient's supplier validation process, which included verification of FDA and NIOSH registration, checks on sourcing and manufacturing, and fraud screening—helping members avoid counterfeit or grey market products. In parallel, Vizient collaborated with manufacturers to investigate and report suspicious actors.

During this time, Vizient created the Novaplus® Enhanced Supply (NES) program to address product shortages. NES, launched in 2019, required participating suppliers to hold extended inventory of essential medications, offer increased transparency and strengthen accountability. Vizient also collaborated with providers and suppliers to expand domestic production of PPE and other critical supplies, often accelerating manufacturing timelines or fostering new sourcing relationships on members' behalf.

In 2024, Vizient evolved its emergency response infrastructure into a comprehensive and scalable assurance strategy. This strategy focuses on the following objectives: (i) leveraging data to forecast risk and equip members with sourcing alternatives before disruption occurs; (ii) including assurance-aligned contract terms, transparency requirements, and shared accountability; (iii) prioritizing redundancy and diversification in sourcing events and category strategies; (iv) offering supplier pedigree transparency and disruption monitoring; and (v) delivering playbooks, early warnings, and critical supply support.

Vizient continues to expand its supply assurance strategy with a focus on analytics, supplier collaboration, and transparency. Members are better positioned to avoid the risks of grey market purchasing with Vizient's assurance strategy of informed decision-making.

42. 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?

Vizient advised and supported policy makers ranging from the White House to Congress, providing counsel regarding how to ensure a resilient healthcare supply chain during the COVID-19 pandemic.

For example, Vizient's CEO, Byron Jobe, met with members of the White House's Coronavirus Task Force, including then Vice President Mike Pence and CMS Administrator Seema Verma, in March of 2020 to discuss the challenges that providers faced in preparing for and responding to the COVID-19 pandemic. Following that meeting, at the request of the administration, Vizient provided detailed recommendations of ways to avoid shortages of essential medications and supplies such as PPE. Many of those recommendations were implemented over the following months. Other ways Vizient has worked with federal government agencies during COVID-19 pandemic include: (i) supporting FEMA's various supply chain task forces; (ii) at the FDA's request, connecting with the agency at least weekly throughout the public health emergency to provide insights into supply chain disruptions, price spikes, gray-market suppliers, and ordering and demand trends; (iii) engaging regularly with HHS and FEMA specifically to discuss supply chain disruptions, price spikes, gray-market suppliers, and ordering and demand trends; and (iv) engaging heavily with legislative and regulatory policymakers to identify and advocate for changes that support the financial, operational, and care-delivery needs of hospitals across the country during the COVID-19 pandemic. Paralleling Vizient's work with government

agencies and in accordance with FEMA's direction, Vizient engaged with other supply-chain stakeholders to create a Private Sector Supply Chain Coalition, which met regularly with the various federal agencies to respond to their requests for information and provide them with valuable insights into the challenges members faced and opportunities for further collaboration.

At the local level, Vizient helped increase access to care through field hospitals by providing onsite leadership and staff support to help quickly stand up incremental field hospitals in Philadelphia, Chicago, and multiple sites in Maryland. Vizient teams managed five key areas to support 1,700 beds across the country, including (i) facility build-out, security, and management; (ii) operations, including governance, process, and practice management; (iii) clinical protocols as well as electronic medical record access and use; (iv) clinician and ancillary staffing; and (v) supply chain management, including procurement, systems, logistics, and fulfillment. Vizient also supported these efforts with clinical resources and expert professionals (medical doctors, registered nurses, and pharmacists) who are skilled in hospital operations and have the expertise to guide decision making related to supplies, equipment, and clinical and non-clinical operations.

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

Vizient created a wide variety of technology services and IT products to support its members and the public as they coped with the challenges posed by the COVID-19 pandemic. Some of the resources and tools Vizient created and made available, along with brief summaries of each, are as follows:

- **PPE Conservation Impact Calculator** – Helps quantify the impact of different PPE conservation strategies by incorporating patient volume and complexity and staffing ratios that affect PPE use.
- **Sg2 Surge Demand Calculator** – Allows hospitals to access important information to help them prepare for large increases in patient volume and plan for non-ICU bed, ICU bed, and ventilator demand. Vizient made the Sg2 Surge Demand Calculator available free of charge to all hospitals nationwide, not just Vizient members.
- **Ventilation Medication Demand Projection Calculator** – Helps hospitals accurately predict the amount of additional medication needed to treat COVID-19 patients on ventilators.
- **Pharmacy Field Hospital Toolkit** – Provides guidance for the provision of pharmacy services within a field hospital, covering physical, regulatory, communications, logistics, and operations components such as staffing and medication safety.
- **Pharmacotherapy for COVID-19 and Coronavirus Therapeutic Controversies** – Provides summaries of the clinical literature on new information about proposed treatments to manage COVID-19 and its sequelae (e.g., thrombotic events).

- **Clinical Workforce Well-Being Playbook** – Offers critical information, emerging practices, and recommendations to help members support their clinicians during and after the pandemic.
- **State-Specific National Stockpile Resource Guide** – Summarizes state-specific instructions for accessing the Strategic National Stockpile.
- **Webinars and Podcasts** – Provide information and insights on the management of COVID-19, with insights gleaned from Vizient data sources and emerging practices shared by members.

REPORTING POTENTIAL ETHICAL VIOLATIONS

- 44. 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.**

Vizient employees are required to report any conduct that they believe may violate the Standards of Business Conduct, other elements of the Compliance Program, and/or any laws or regulations. Suspected misconduct may be reported: (i) to management or a member of the Human Resources Department, Compliance Department or Legal Department; (ii) through Vizient’s Compliance Hotline administered by Navex (800-750-4972); (iii) through Vizient’s customized web-based reporting system at vizientinc.EthicsPoint.com; or (iv) to the employee’s direct supervisor. If a direct supervisor receives a report of suspected misconduct, he or she must report the suspected misconduct to the Compliance Department. *See also* response to Question 4.

- 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 identities of individuals who report suspected misconduct are maintained as confidential to the fullest extent possible. Employees who wish to remain anonymous can anonymously report suspected misconduct through Vizient’s Compliance Hotline or web-based reporting system administered by Navex. Vizient has a strict non-retaliation policy against any employee who makes a good faith report of suspected misconduct. This is clearly stated in the Company’s Standards of Business Conduct and other related policies.

- 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.**

Vizient’s Compliance Officer is required to promptly and thoroughly investigate reports of suspected misconduct to determine whether there has been a violation of any laws, regulations, or Vizient’s policies and procedures. The Compliance Officer may also, on his/her own initiative, investigate instances of suspected misconduct that have not been reported. The Compliance Officer is supported internally by Vizient’s Compliance Department and the Legal Department. Depending on the nature and severity of the suspected misconduct, the Compliance Officer may utilize outside legal counsel to assist in

conducting internal investigations. If the Compliance Officer determines that there has been a material violation of any laws, regulations or Vizient's policies and procedures, Vizient must take appropriate remedial actions, which may include programmatic corrective action and/or personnel disciplinary action, and must report any such actions to the Governance, Nominating, and Compliance Committee of the Vizient Board of Directors.

- 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.**

Employees are required to report any suspected misconduct and such reports are investigated. All employees are also required to execute annual certifications adhering to the Standards of Business Conduct and Conflicts of Interest Policy. In addition, the Vizient Legal Department conducts a vendor contract compliance review before each of its vendor contracts is executed to ensure compliance with Vizient's policies and procedures, as well as relevant laws and regulations. The Vizient Compliance Department conducts periodic compliance audits to ensure compliance with applicable laws and regulations and adherence to its Compliance Program policies and procedures.

- 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.**

The Compliance Officer reports to the Governance, Nominating, and Compliance Committee of the Board of Directors three to four times per year regarding compliance issues and the status of the Compliance Program. Also, the results of compliance investigations and audits are reported to the Governance, Nominating, and Compliance Committee of the Board of Directors. In addition, periodic reports on Vizient's participation in HGPII are made to the Governance, Nominating, and Compliance Committee during its meetings.

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

Eighteen Vizient personnel attended the Best Practices Forum in 2024. The most senior Vizient business executive attendee was David Berry, Chief Legal Officer.

- 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.**

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