

## **Veradigm Inc. Political Expenditures Policy**

As a participant in the healthcare industry, the operations and relationships of Veradigm Inc. (“Veradigm”), as well as those of its clients, are regulated by a number of federal, state, and local governmental entities. The impact of this regulation on Veradigm is direct, to the extent Veradigm is subject to these law and regulations; and is also indirect, both in terms of the level of government reimbursement available to Veradigm’s clients and in that, in a number of situations, even if Veradigm is not directly regulated by specific healthcare laws and regulations, Veradigm’s products must be capable of being used by Veradigm’s clients in a manner that complies with those laws and regulations. Furthermore, Veradigm expects that the healthcare industry generally, and the healthcare information technology segment specifically, will continue to undergo significant legal and regulatory changes for the foreseeable future.

Veradigm’s policy is to participate in the policymaking process by informing public officials about our positions on issues significant to our clients and our business. Expenditures for these purposes are reviewed by Veradigm’s Vice President, Chief Compliance Counsel and approved by Veradigm’s Senior Vice President, General Counsel. These expenditures will be reported annually to the Audit Committee of Veradigm’s Board of Directors (the “Audit Committee”).

In recent years, Veradigm has not made political contributions to individual candidates, political parties, or campaigns regarding state or local referenda. Veradigm has no current intention to do so in the future. To the extent Veradigm decides to make any political contribution to an individual candidate, it will promptly report such contribution publicly on Veradigm’s website.

Veradigm complies with all applicable laws and regulations governing political contributions and expenditures and discloses all political contributions and expenditures as required by law. Veradigm does not have a political action committee.

Veradigm engages with government officials at all levels on issues that impact Veradigm and its operations. Veradigm also belongs to various trade organizations that focus on matters concerning Veradigm’s interests. These organizations, which operate on a multi-national, national, and/or state and local level, are principally comprised of healthcare information technology companies and/or healthcare provider organizations, such as health systems. Some of the major trade associations and non-governmental organizations that Veradigm currently belongs to include the Healthcare Information and Management Systems Society (HIMSS), including its Electronic Health Record Association (EHRA); the Bipartisan Policy Center; and the eHealth Initiative (eHI). These organizations may engage in efforts to inform policymakers on issues important to their members. Where possible, Veradigm does not allow trade association dues to be used to make political contributions. These expenditures will also be reported annually to the Audit Committee.