

COMPLIANCE POLICY

The Smile Way Group

POLICY/PROCEDURE TITLE	Compliance Department Program Structure and Oversight		
POLICY/PROCEDURE NUMBER	CC-103		
DEPARTMENT	Corporate Compliance Department		
Original Issue Date	7/19/2018		
Next Scheduled Review Date	12/5/2024		
Last Review Date	12/14/2023		
Revision Date History	11/2020 Revised organizational information to apply to The Smile Way Group; 2/2023 minor revisions		
APPLIES TO			
<input checked="" type="checkbox"/>	SAP: ReachOut Healthcare America Ltd. dba Smile America Partners	<input checked="" type="checkbox"/>	MI: Michigan Dental Outreach, P.C. dba Michigan Dental Outreach
<input checked="" type="checkbox"/>	AZ: Arizona Mobile Dental, PC dba Big Smiles	<input checked="" type="checkbox"/>	MO: Nevin K. Waters D.D.S., P.C. dba Big Smiles
<input checked="" type="checkbox"/>	CA: Elliot Paul Schlang, DDS, Professional Corporation dba Big Smiles	<input checked="" type="checkbox"/>	NC: Theodore F. Mayer, DDS P.A. dba Smile North Carolina
<input checked="" type="checkbox"/>	GA: Shurett Dental Group, P.C. dba Shurett Dental Group	<input checked="" type="checkbox"/>	NY: Big Smiles Dental New York, PLLC
<input checked="" type="checkbox"/>	GA: Mark Shurett, DDS, PC dba Help A Child Smile	<input checked="" type="checkbox"/>	NY: Smile New York Outreach, LLC
<input checked="" type="checkbox"/>	IL: Elliot P. Schlang, D.D.S. P.C. dba Smile Illinois	<input checked="" type="checkbox"/>	OH: Elliot P. Schlang DDS, Dental Outreach PLLC dba Ohio Dental Outreach
<input checked="" type="checkbox"/>	IN: Elliot P. Schlang DDS, Dental Outreach PLLC dba Indiana Dental Outreach	<input checked="" type="checkbox"/>	PA: Big Smiles Pennsylvania P.C. dba Smile Pennsylvania
<input checked="" type="checkbox"/>	KS: Nevin K. Waters D.D.S., PA dba Big Smiles	<input checked="" type="checkbox"/>	UT: Big Smiles Utah, P.C. dba Big Smiles
<input checked="" type="checkbox"/>	KY: Big Smiles Kentucky PSC dba Big Smiles	<input checked="" type="checkbox"/>	VA: Big Smiles Virginia PC dba Smile Virginia
<input checked="" type="checkbox"/>	MA: Elliot P. Schlang DDS Big Smiles Massachusetts P.C. dba Smile Massachusetts	<input checked="" type="checkbox"/>	WA: Michael LaCorte Dentistry, PC dba Big Smiles
<input checked="" type="checkbox"/>	MD: S.K. Pesis D.D.S., Big Smiles Maryland, PC dba Smile Maryland	<input checked="" type="checkbox"/>	WV: Elliot P. Schlang DDS, Inc. dba Smile West Virginia

I. PURPOSE:

ReachOut Healthcare America, LTD d/b/a Smile America Partners (“SAP”) and its affiliated Dental Professional Practices (“DPPs”) (hereinafter collectively referred to as “The Smile Way Group”) operates in a complex, dynamic, highly competitive, and regulated environment. The Smile Way Group’s business involves an environment that is highly regulated at both the federal and state levels. To assist The Smile Way Group’s senior management in its responsibilities relating to the company’s operational compliance with applicable legal requirements and sound ethical standards, The Smile Way Group’s senior management has established a Corporate Compliance Department. The Corporate Compliance Department will support the Chief Compliance Officer and Corporate Compliance Committee in adopting and implementing a company-wide compliance program and distributing policies and other key documents and information on a regular and as needed basis.

II. RESPONSIBILITIES AND DUTIES:

The Corporate Compliance Department will undertake the following responsibilities and duties and any other activities related to The Smile Way Group’s Compliance Program.

Compliance Standards and Policies

- Oversee the development or modification, issuance, distribution, and review of the Code of Conduct and appropriate compliance policies.

Employee and Contractor Training

- Develop, implement, and manage new hire and annual employee corporate compliance training in coordination with Human Resources.

- Oversee the development and implementation of employee communications regarding the Compliance Program and compliance issues.
- Oversee administration of a certification program for all employees and appropriate contractors to ensure that they receive, read, acknowledge understanding of, and agree to comply with The Smile Way Group's Code of Conduct and policies.

Reporting and Complaints Processes

- Manage The Smile Way Group's processes, including a toll-free telephone number and online self-reporting portal, through which employees may seek advice on application of The Smile Way Group's Code of Conduct and policies and report potential Code of Conduct, policy, and legal violations.
- Manage investigations of compliance reports or inquiries reported to the Chief Compliance Officer.

Monitoring and Auditing Compliance with Code of Conduct, Policies, and Legal Requirements

- Monitor compliance with laws, regulations, and company standards of conduct based on annual risk assessments.
- Ensure appropriate internal and/or external audits and surveys are conducted to verify adherence to the Code of Conduct, policies, and applicable legal requirements.
- Oversee periodic employee surveys to test awareness of The Smile Way Group's compliance guidelines and procedures.
- Manage and implement annual risk assessment process and work plan.

Enforcement and Discipline

- Conduct periodic review of disciplinary activities to ensure appropriate and consistent discipline for violations of the Code of Conduct and standards of conduct.

Response and Prevention

- Oversee the action taken by The Smile Way Group to ensure violations of the Code of Conduct, policies, and/or legal requirements are remedied.
- Oversee steps taken to prevent similar violations from occurring in the future.
- Manage incident response and corrective action plans to ensure proper remediation of corrective action plans at the Department, Entity, and/or organization-wide levels, as applicable.

Approvals:

DocuSigned by:

Steve Higginbotham

1/4/2024

9F2E17E4D88A41A
Steve Higginbotham, CEO

DocuSigned by:

Craig Thomas

12/19/2023

068E4D1B7A624EC
Craig Thomas, CCO & SVP HR