

# COMPLIANCE POLICY

The Smile Way Group

<b>POLICY/PROCEDURE TITLE</b>	Responding Confidentially to Inquiries		
<b>POLICY/PROCEDURE NUMBER</b>	CC-108		
<b>DEPARTMENT</b>	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	3/2023 policy updated to include DPP and The Smile Way Group		
<b>APPLIES TO</b>			
<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. POLICY:

ReachOut Healthcare America, Ltd. d/b/a Smile America Partners (hereinafter “SAP”) and its affiliated Dental Professional Practices ( “DPPs” ) (hereinafter collectively referred to as “The Smile Way Group”) takes seriously its role in ensuring that all reports or inquiries regarding violations of law or the internal standards of conduct are handled confidentially. Allowing individuals the protection of confidentiality when making a compliance inquiry or reporting a potential concern helps to facilitate good faith reporting through appropriate and available corporate compliance channels.

## II. SCOPE:

All Corporate Compliance Department employees who are responsible for or receive reports or inquiries of this nature, including but not limited to the Chief Compliance Officer, are required to abide by this policy.

## III. PROCEDURE:

- Upon receiving a report or a compliance inquiry, the Corporate Compliance Department employee responsible for conducting the investigation shall inform the reporter that the identity of the reporter and information provided will be kept confidential, but that confidentiality cannot be guaranteed if revealing confidential information is necessary to progress the investigation toward its conclusion.
- When investigating a report under confidentiality, the investigating employee should not use the reporter’s name without first informing that reporter that use of their name is necessary to the forward progress of the investigation. To the extent possible, the investigating employee should limit the use of identifiable information related to the reporter.
- All written records memorializing conversations on confidential matters should be kept in a secure location or, for digital records, in files with restricted access or requiring permissions to open.

- Investigating employees shall not discuss any investigation with individuals not directly involved in the investigation.
- Investigatory actions may include but not be limited to:
  - Employee interviews.
  - Review of relevant electronic files, emails, and hard copy files.
  - Engagement of outside legal counsel in matters of a highly sensitive, regulatory or executive-level nature.
  - Coordinating investigatory efforts with other departments of The Smile Way Group including, but not limited to the Human Resources and Information Technology Departments, on a role-based and need-to-know basis.
  - Upon completion of the investigation, a written record should be created and logged of key findings, analysis, and corrective actions recommended for implementation.
  - To the extent reasonable, notice should be provided to the reporter of the completion of the investigation. The reporter is not entitled to specific findings.
  - Notice may include a statement as to whether the report or inquiry was substantiated or unable to be substantiated, and whether a corrective action occurred. The reporter is not entitled to specific findings, especially related to any employment actions involving other individual employees.

Approvals:

DocuSigned by:

*Steve Higginbotham*

1/4/2024

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Steve Higginbotham, CEO

DocuSigned by:

*Craig Thomas*

12/19/2023

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Craig Thomas, CCO & SVP HR