

# COMPLIANCE POLICY

The Smile Way Group

<b>POLICY/PROCEDURE TITLE</b>	Administrative Office Workplace Visitor Policy
<b>POLICY/PROCEDURE NUMBER</b>	CC-117
<b>DEPARTMENT</b>	Corporate Compliance Department
Original Issue Date	7/19/2018
Next Scheduled Review Date	5/22/2025
Last Review Date	5/23/2024
Revision Date History	10/2022 policy updated to include DPP and The Smile Way Group; 3/2023 added SNYO and WA DPP; 5/2024 updated applicability to office locations, added children language

<b>APPLIES TO</b>			
<input checked="" type="checkbox"/>	SAP: ReachOut Healthcare America Ltd. dba Smile America Partners	<input type="checkbox"/>	MI: Michigan Dental Outreach, P.C. dba Michigan Dental Outreach
<input type="checkbox"/>	AZ: Arizona Mobile Dental, PC dba Big Smiles	<input type="checkbox"/>	MO: Nevin K. Waters D.D.S., P.C. dba Big Smiles
<input type="checkbox"/>	CA: Elliot Paul Schlang, DDS, Professional Corporation dba Big Smiles	<input 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 type="checkbox"/>	NY: Big Smiles Dental New York, PLLC
<input checked="" type="checkbox"/>	GA: Mark Shurett, DDS, PC dba Help A Child Smile	<input type="checkbox"/>	NY: Smile New York Outreach, LLC
<input type="checkbox"/>	IL: Elliot P. Schlang, D.D.S. P.C. dba Smile Illinois	<input type="checkbox"/>	OH: Elliot P. Schlang DDS, Dental Outreach PLLC dba Ohio Dental Outreach
<input type="checkbox"/>	IN: Elliot P. Schlang DDS, Dental Outreach PLLC dba Indiana Dental Outreach	<input type="checkbox"/>	PA: Big Smiles Pennsylvania P.C. dba Smile Pennsylvania
<input type="checkbox"/>	KS: Nevin K. Waters D.D.S., PA dba Big Smiles	<input type="checkbox"/>	UT: Big Smiles Utah, P.C. dba Big Smiles
<input type="checkbox"/>	KY: Big Smiles Kentucky PSC dba Big Smiles	<input type="checkbox"/>	VA: Big Smiles Virginia PC dba Smile Virginia
<input type="checkbox"/>	MA: Elliot P. Schlang DDS Big Smiles Massachusetts P.C. dba Smile Massachusetts	<input type="checkbox"/>	WA: Michael LaCorte Dentistry, PC dba Big Smiles
<input type="checkbox"/>	MD: S.K. Pesis D.D.S., Big Smiles Maryland, PC dba Smile Maryland	<input type="checkbox"/>	WV: Elliot P. Schlang DDS, Inc. dba Smile West Virginia

## I. PURPOSE:

To provide a safe working environment and ensure appropriate safety and security controls, and to limit access to company confidential and proprietary information, including PHI, PI, and client data.

## II. SCOPE:

This policy applies to all employees, contractors, and visitors to any administrative office space of 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”).

## III. OFFICE POLICY:

1. **Authorization** No visitors are permitted in the workplace or property of The Smile Way Group unless authorized by a Department Head. All requests for permission for nonemployees to enter the property must be made with the Department Head.

**Children in the Workplace** While the workplace is a place of employment, it is generally not an appropriate place for children of employees. Whenever it is operationally practicable, managers should honor an employee’s request for flexibility to meet unexpected family needs that may require an employee’s attention during normal working hours. The Smile Way Group recognizes that certain circumstances may arise when an employee requests to bring a child to the workplace.

An employee must obtain prior approval from a Department Head prior to bringing their child to the workplace on a per occurrence basis. In considering an employee's request for a child's visit under this policy, management should consider the following:

- Determine if there are safety concerns and/or if the child may be exposed to high-risk areas;
- Address issues of possible disruption to co-workers in the workplace;
- The extent to which the child's presence in the workplace poses a risk of breaching the confidentiality of information in the workplace. The Department Head is responsible for assuring that Protective Health Information is not accessible to the child.
- Consider the extent to which the child's presence is appropriate to the specific work being accomplished.

A child who has an illness that prevents them from being accepted by a regular daycare provider or attending school, particularly a child with an infectious disease, may not be brought to the workplace under any circumstances.

Management has the authority to deny the presence of children in the workplace. Management may revoke previously granted permission for the employee to bring the child to the workplace and may direct an employee to remove a child from the workplace at any time if the manager determines that this policy has been violated or that the child's presence negatively impacts company interests.

2. **Logging of Visitors** All visitors of The Smile Way Group must enter through the reception area and sign the visitor logbook. The receptionist will call the Department Head to escort the visitor from the reception area.
3. **Identification of Visitors** All visitors must be issued a visitor's badge which shall be worn on the jacket, shirt pocket, or other visible area so as to identify that the individual is an authorized visitor. Visitors should return their ID to the front desk upon completion of their visit. Visitors should remain with an employee while on site and are limited to areas based upon the reason for being on site at The Smile Way Group unless an exception is made by the Department Head.
4. **Restrictions on Recording and Photography** Recording and/or photography is prohibited unless permission is given by the Department Head and as applicable, the individual to be photographed or recorded.
5. **Discovery of Unauthorized Individuals** Each employee is responsible for workplace safety and must report visitors without an ID badge to the nearest manager. Managers are responsible to address individuals in the workplace who do not display the visitor's pass to determine their authority for access to The Smile Way Group's facility. Unauthorized visitors should be escorted courteously but quickly from the workplace or to the front office.
6. **Disciplinary Action** Any employee who fails to comply with this policy is subject to disciplinary action, up to and including termination (see HR-101 Progressive Discipline Policy).

Approvals:

DocuSigned by:

*Steve Higginbotham* 7/23/2024  
9F2E17E4D88A41A  
Steve Higginbotham, CEO

DocuSigned by:

*Craig Thomas* 7/23/2024  
068E7D1B7A624EC  
Craig Thomas, CCO & SVP HR

**APPENDIX 1: SAMPLE VISITOR LOGBOOK**

Name (Print): _____ Date: _____ Reason for Visit: <input type="checkbox"/> Observation <input type="checkbox"/> Meeting <input type="checkbox"/> Other: _____ Representing Company: _____ Signature: _____ Phone: _____
Name (Print): _____ Date: _____ Reason for Visit: <input type="checkbox"/> Observation <input type="checkbox"/> Meeting <input type="checkbox"/> Other: _____ Representing Company: _____ Signature: _____ Phone: _____
Name (Print): _____ Date: _____ Reason for Visit: <input type="checkbox"/> Observation <input type="checkbox"/> Meeting <input type="checkbox"/> Other: _____ Representing Company: _____ Signature: _____ Phone: _____
Name (Print): _____ Date: _____ Reason for Visit: <input type="checkbox"/> Observation <input type="checkbox"/> Meeting <input type="checkbox"/> Other: _____ Representing Company: _____ Signature: _____ Phone: _____
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