

<b>POLICY/PROCEDURE TITLE</b>	Corporate Level Policy Review Process
<b>POLICY/PROCEDURE NUMBER</b>	CC-101
<b>DEPARTMENT</b>	Corporate Compliance Department
Original Issue Date	July 19, 2018
Next Scheduled Review Date	July 1, 2019
Last Review Date	July 19, 2018
Revision Date History	N/A
Author:	N/A
Approved by:	Corporate Compliance Committee

### **I. PURPOSE:**

The purpose of this policy is to establish the framework for the management of those Company policies identified as having impact across Company, department, and PC areas (“Corporate Level Policies”) and supporting documents at ReachOut Healthcare America, LTD d/b/a Smile America Partners (hereinafter “Smile America Partners” or “SAP”) and alignment to relevant legal, regulatory, and/or patient or client requirements, as applicable or deemed appropriate.

This framework exists to ensure that Smile America Partners’ Corporate Level Policies are identified by need, developed, and drafted using objective criteria and implemented and communicated in an efficient, uniform, and timely manner on a company wide basis. This Charter is reviewed on a triannual basis.

### **II. SCOPE:**

This framework applies only to Policies and Procedures that reside at the Corporate Level or have been designated for Corporate Level review as indicated in the Annual Policy Review Calendar. All Corporate Compliance Committee members should comply with this Framework when drafting, revising, or retiring a Corporate Level Policy.

This Framework is not intended to apply to and does not control Department or Practice Level policies, procedures, workflows, or other administrative guidelines put in place to support individual dentists or staff members. In the event of a conflict between or among policies, Corporate Level Policies will be the controlling document only in matters requiring compliance with a specific law and regulation and addressed by a specific Corporate Level Policy.

### **III. POLICY:**

Smile America Partners, through its Corporate Compliance Committee, policy framework, and Corporate Level Policies, has established a compliance management framework to enable it to effectively and efficiently manage its legal, regulatory, and patient compliance risks including risks related to external rules and regulations, internal standards of conduct, cybersecurity, and privacy.

A Corporate Level Policy is a high level strategic directive that establishes a principle or requirements-based approach to a particular external or internal regulatory or standard-based conduct or activity. A Corporate Level Policy should be developed for any area of the Company's operations where direction or purpose regarding relevant laws, regulations, or internal standards needs to be set in order to conduct Company business, meet regulatory requirements, or in some instances, patient requirements. All Corporate Level Policies and Procedures must be developed, drafted, implemented, and communicated in accordance with this Framework.

#### **IV. DEFINITIONS:**

**Annual Review.** The schedule according to which the majority of Corporate Level Policies will be reviewed. An Annual Policy Review Calendar will be distributed by the Corporate Compliance Department.

**Approval Authorities.** The Smile America Partners Corporate Compliance Committee Chair and Executive Committee members vested with Company Level Policy approval sign-off and signatory authority (see Form A-1).

**Corporate Level Policy.** Concise formal statements of principles and/or requirements that indicate how the Company will act in a particular aspect of its operations. In general, Corporate Compliance Level Policies regulate and direct actions and conduct in order to comply with a desired principle, obligation, or standard relevant to the Company's services.

**Procedures.** Describe in detail the process to implement a Policy. Procedures are written in sequential order at a relatively high level and include assignment of responsibilities. Procedures generally refer to a process rather than a desired outcome.

#### **V. CORPORATE LEVEL POLICIES AND PROCEDURES IMPLEMENTATION APPROACH AND PROCESS GUIDELINES:**

##### **Approach**

Smile America Partners believes the process of the development or review of Corporate Level Policies should allow all relevant stakeholders the opportunity to be consulted at a sufficiently early stage.

The process of development, drafting, implementation, and communication of Corporate Level Policies is intended to be consultative, not unduly burdensome, and informed by standard best practices and committee or individual dentists with subject matter expertise and knowledge. Consultation processes may vary.

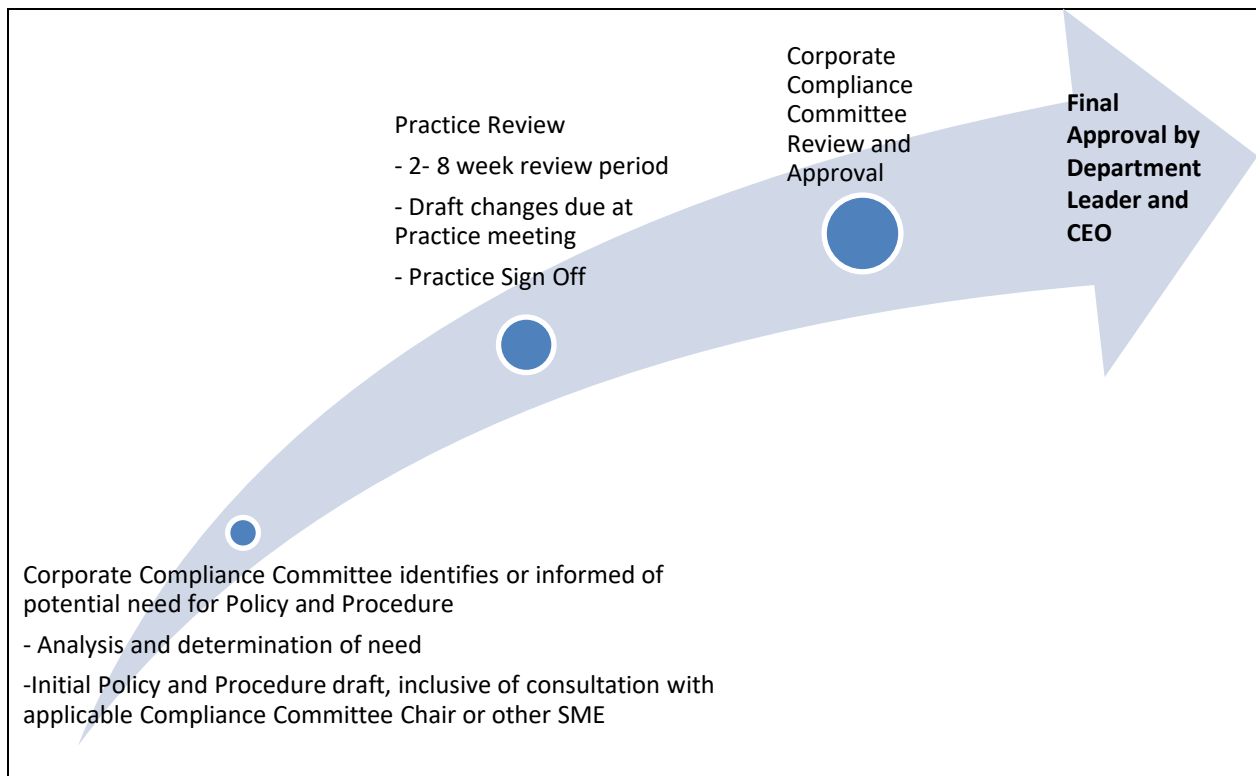
Approval sign-off is required at the end of the Corporate Level Policy review process (use Form A-1 for signature process).

Smile America Partners has adopted the Corporate Level Policy Review and Hierarchical Approval Process at Figure 1.

### Annual Review

Corporate Compliance Level Policies are reviewed at least once a year according to the Annual Policy Review Calendar. Corporate Level Policies and Procedures will remain in place unless formally retired by the relevant Approval Authorities.

**Figure 1. Corporate Level Policy Review and Hierarchical Approval Process**



# COMPLIANCE POLICY



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Original Issue Date	[Insert Original Issue Date]
Next Scheduled Review Date	[Insert Next Scheduled Review Date]
Last Review Date	[Insert year and day of last review]
Revision Date History	[Insert each year's date]
Author:	[Insert name of author, if applicable]
Approved by:	Corporate Compliance Committee

Revisions to Policy:

Approved by:

CEO

\_\_\_\_\_  
Name: Steve Higginbotham

Date: \_\_\_\_\_

Department Head

\_\_\_\_\_  
Name: \_\_\_\_\_

Date: \_\_\_\_\_