

<b>POLICY/PROCEDURE TITLE</b>	Compliance Program Structure and Oversight (Corporate Compliance Committee)
<b>POLICY/PROCEDURE NUMBER</b>	CC-102
<b>DEPARTMENT</b>	Corporate Compliance Department
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### **I. PURPOSE:**

ReachOut Healthcare America, LTD d/b/a Smile America Partners (hereinafter “Smile America Partners”) operates in a complex, dynamic, highly competitive, and regulated environment. Smile America Partners’ business involves an environment that is highly regulated at both the federal and state levels. To assist Smile America Partners’ senior management in its responsibilities relating to the company’s operational compliance with applicable legal requirements and sound ethical standards, Smile America Partners’ senior management has established a Corporate Compliance Committee. The Corporate Compliance Committee will support the Chief Compliance Officer and Compliance Department 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. The Corporate Compliance Committee will receive a report from the Chief Compliance Officer no less frequently than every quarter.

### **II. COMPOSITION:**

The Corporate Compliance Committee is composed of the following positions:

- Chief Executive Officer
- Chief Financial Officer
- Senior Vice President
- Corporate Compliance Officer and Vice President of Clinical Operations
- Controller
- Chief Marketing Officer
- Vice President of IT
- Human Resources Liaison
- Vice President of Provider Relations and Credentialing
- Dynamic HR Liaison

and such other positions appointed by the Chief Executive Officer.

### **III. MEETINGS:**

The Corporate Compliance Committee will meet monthly. A majority of the Corporate Compliance Committee constitutes a quorum for the transaction of business. The Corporate Compliance Committee shall take action by the affirmative vote of a majority of the Corporate Compliance Committee members present at a duly held meeting.

### **IV. RESPONSIBILITIES AND DUTIES:**

The Corporate Compliance Committee will undertake the following responsibilities and duties and any other activities related to Smile America Partners' Compliance Program.

#### **Compliance Standards and Policies**

- Participate in annual Code of Conduct review and approval process.
- Participate in annual corporate review process.
- Serve as a compliance ambassador and support, in word and deed, Smile America Partners' culture of compliance and commitment to ethical organizational practices and behaviors.

#### **Employee and Contractor Training in Coordination with Human Resources**

- Review and approve the development and implementation of appropriate and adequate training regarding the Code of Conduct, policies, and the Compliance Program.
- Review and approve the development and implementation of employee communication regarding the Compliance Program and issues.
- Identify and bring to Chief Compliance Officer's attention issues of potential or known non-compliance risks or concerns.

#### **Reporting and Complaints Processes**

- Review and approve Smile America Partners' processes, including a toll-free telephone number, through which employees may seek advice on application of Smile America Partners' Code of Conduct and policies and report potential Code of Conduct, policy, and legal violations.

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

- Participate in an annual risk assessment process and work plan development.
- Direct the Chief Compliance Officer to commission special audits as necessary to verify adherence to the Code of Conduct, policies, and/or legal requirements.
- Participate in and approve an annual risk assessment process and work plan.

### **Enforcement and Discipline**

- Inform the Chief Compliance Officer and the Compliance Department of any known or suspected violations of law, regulations, contracts, or internal standards of conduct.
- Receive quarterly reports from the Chief Compliance Officer regarding reported disciplinary action taken during the prior quarter.

### **Response and Prevention**

- Be aware of and stay informed on applicable regulations, laws, and industry best practices applicable to Smile America Partners, through the monitoring of various sources including, but not limited to state Medicaid newsletters and emails, state laws, and registries.