

<b>POLICY/PROCEDURE TITLE</b>	Compliance Program Structure and Oversight (Compliance Department)
<b>POLICY/PROCEDURE NUMBER</b>	CC-103
<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:**

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 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 Smile America Partners’ 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 in Coordination with Human Resources**

- Develop, implement, and manage new hire and annual employee corporate compliance training in coordination with Human Resources.
- Oversee the development and implementation of employee communication 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 Smile America Partners’ Code of Conduct and policies.

## **Reporting and Complaints Processes**

- Manage 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.
- 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 Smile America Partners' 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 company Code of Conduct and standards of conduct.

## **Response and Prevention**

- Oversee the action taken by Smile America Partners 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, Company-wide, and/or systemic levels, as applicable.