

POLICY/PROCEDURE TITLE	Responding Confidentially to Inquiries
POLICY/PROCEDURE NUMBER	CC-108
DEPARTMENT	Corporate Compliance Department
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I. POLICY:

ReachOut Healthcare America, LTD d/b/a Smile America Partners (hereinafter “Smile America Partners”) takes seriously its role in ensuring that all reports or inquiries regarding violations of law or the internal standards of conduct are handled confidentially by Smile America Partners employees. 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 Smile America Partners 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 can not 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 his or her 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 Smile America Partners departments 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.