

COMPLIANCE POLICY

The Smile Way Group

POLICY/PROCEDURE TITLE	Code of Conduct Annual Review Policy		
POLICY/PROCEDURE NUMBER	CC-105		
DEPARTMENT	Corporate Compliance Department		
Original Issue Date	7/19/2018		
Next Scheduled Review Date	10/26/2023		
Last Review Date	10/26/2022		
Revision Date History	1/2020 Revised organizational information to apply to all The Smile Way Group		
APPLIES TO			
<input checked="" type="checkbox"/>	SAP: ReachOut Healthcare America Ltd. dba Smile America Partners	<input checked="" type="checkbox"/>	MD: S.K. Pesis D.D.S., Big Smiles Maryland, PC dba Smile Maryland
<input checked="" type="checkbox"/>	AZ: Arizona Mobile Dental, PC dba Big Smiles	<input checked="" type="checkbox"/>	MI: Michigan Dental Outreach, P.C. dba Michigan Dental Outreach
<input checked="" type="checkbox"/>	CA: Elliot Paul Schlang, DDS, Professional Corporation dba Big Smiles	<input checked="" type="checkbox"/>	MO: Nevin K. Waters D.D.S., P.C. dba Big Smiles
<input checked="" type="checkbox"/>	GA: Shurett Dental Group, P.C. dba Shurett Dental Group	<input checked="" type="checkbox"/>	NC: Theodore F. Mayer, DDS P.A. dba Smile North Carolina
<input checked="" type="checkbox"/>	GA: Mark Shurett, DDS, PC dba Help A Child Smile	<input checked="" type="checkbox"/>	NY: Big Smiles Dental New York, PLLC
<input checked="" type="checkbox"/>	IL: Elliot P. Schlang, D.D.S. P.C. dba Smile Illinois	<input checked="" type="checkbox"/>	OH: Elliot P. Schlang DDS, Dental Outreach PLLC dba Ohio Dental Outreach
<input checked="" type="checkbox"/>	IN: Elliot P. Schlang DDS, Dental Outreach PLLC dba Indiana Dental Outreach	<input checked="" type="checkbox"/>	PA: Big Smiles Pennsylvania P.C. dba Smile Pennsylvania
<input checked="" type="checkbox"/>	KS: Nevin K. Waters D.D.S., PA dba Big Smiles	<input checked="" type="checkbox"/>	UT: Big Smiles Utah, P.C. dba Big Smiles
<input checked="" type="checkbox"/>	KY: Big Smiles Kentucky PSC dba Big Smiles	<input checked="" type="checkbox"/>	VA: Big Smiles Virginia PC dba Smile Virginia
<input checked="" type="checkbox"/>	MA: Elliot P. Schlang DDS Big Smiles Massachusetts P.C. dba Smile Massachusetts	<input checked="" type="checkbox"/>	WV: Elliot P. Schlang DDS, Inc. dba Smile West Virginia

I. POLICY:

The Code of Conduct is a guiding document for employees. It helps to inform common understanding among employees and contractors of the 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” or “the Organization”) culture, expectations and standards that influence their daily work. To ensure that The Smile Way Group’s Code of Conduct remains up to date and consistent with all policies and procedures, the SAP’s Corporate Compliance Committee (“CCC” or “the Committee”) and the Committee’s DPP Subcommittee will review the Code of Conduct annually, and the Corporate Compliance Officer will report to the Board of Directors any material revisions to the Code of Conduct. Any revisions proposed by the Committee will require the approval of legal counsel and the Board of Directors prior to enactment.

II. PROCEDURE:

- A. The Committee, under the direction of the Corporate Compliance Officer, will review the Code of Conduct on an annual basis to determine if amendments or revisions are necessary.
- B. After the review, if no changes are necessary, the Corporate Compliance Officer will report to the Board of Directors that no further action is needed.
- C. If revisions are necessary, the Committee will approve the material changes and submit a summary of the material changes to legal counsel for review.
- D. Legal counsel will review and provide other recommended changes or other applicable legal guidance for the Committee’s material changes to the Code of Conduct.
- E. The Committee will then revise changes to the Code of Conduct as needed before submitting the final draft version to the Board of Directors for review and approval.

- F. The Board of Directors will review and approve the material changes to the Code of Conduct by a majority vote.

Approvals:

DocuSigned by:

Steve Higginbotham

11/1/2022

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Steve Higginbotham, CEO

DocuSigned by:

Craig Thomas

11/1/2022

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Craig Thomas, CCO