

# COMPLIANCE POLICY

The Smile Way Group

<b>POLICY/PROCEDURE TITLE</b>	Non-Retaliation Policy		
<b>POLICY/PROCEDURE NUMBER</b>	CC-111		
<b>DEPARTMENT</b>	Corporate Compliance		
Original Issue Date	8/16/2018		
Next Scheduled Review Date	10/26/2023		
Last Review Date	10/26/2022		
Revision Date History	10/2022 policy updated to include DPP and The Smile Way Group and added compensation language in definition section.		
<b>APPLIES TO</b>			
<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. PURPOSE:

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”) believes it is important that employees are not afraid to speak up about any suspected compliance concerns. Employee reports made in good faith help The Smile Way Group address harmful, discriminatory or unethical behaviors and maintain the culture of the company. The Smile Way Group has a zero tolerance policy for any victimization or other retaliatory behavior towards an employee who inquires about or reports a compliance concern in good faith. This non-retaliation company policy protects employees who, in good faith, file reports for or seek guidance regarding harmful, discriminatory or unethical behaviors.

## II. DEFINITIONS:

Retaliation is any action, statement, or behavior that is designed to punish an individual for filing a compliance report, cooperating with a compliance investigation, seeking guidance regarding a compliance concern or to deter one from taking such action. Retaliation includes, but is not limited to, intimidation, adverse action against an employee regarding the terms and conditions of employment, such as termination, lowering of compensation, demotion, or suspension, as well as related threats of such actions.

Good faith does not mean that an individual has to be right, but it does mean that they have an honest belief that the information provided in support of a compliance concern is truthful based on existing information known to them.

## III. POLICY:

The Smile Way Group expects employees and other affiliated individuals to report compliance concerns. Those who have concerns of any kind stemming from possible noncompliance with federal, state, or local laws

or regulations, or The Smile Way Group's policies or standards of conduct are expected to promptly report those concerns. Reporting may be done by following the procedures outlined in The Smile Way Group's Reporting Policy (See CC-107 Reporting Compliance Concerns Policy).

Employees of The Smile Way Group are prohibited from retaliating against any other employee or person affiliated with The Smile Way Group who files a compliance report, cooperates with a compliance investigation, or seeks guidance on compliance concerns in good faith.

Individuals who believe they have been subject to retaliation prohibited by this policy should contact their supervisor or manager, Department Head, Human Resources, the Corporate Compliance Officer or the Compliance Helpline.

#### **IV. VIOLATIONS OF THIS POLICY:**

Individuals found to have violated this policy are subject to disciplinary action up to and including termination of employment.

Individuals who fail to act in good faith in connection with reporting a compliance concern or in cooperating with an investigation, grievance, or appeals process regarding a compliance concern are subject to disciplinary action up to and including termination of employment.

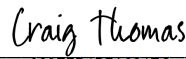
An adverse personnel or other disciplinary action against an employee or affiliated individual of The Smile Way Group whose conduct or performance warrants such action for reasons unrelated to the reporting of a compliance concern does not constitute a violation of this policy.

#### Approvals:

DocuSigned by:

  
11/1/2022  
9F2E17E4D88A41A  
Steve Higginbotham, CEO

DocuSigned by:

  
11/1/2022  
088E2D1B7A624EC  
Craig Thomas, CCO