

COMPLIANCE POLICY

The Smile Way Group

POLICY/PROCEDURE TITLE	Compliance Committee Program Structure and Oversight		
POLICY/PROCEDURE NUMBER	CC-102		
DEPARTMENT	Corporate Compliance Department		
Original Issue Date	7/19/2018		
Next Scheduled Review Date	2/22/2024		
Last Review Date	2/23/2023		
Revision Date History	11/2019 Revised organizational information to apply to The Smile Way Group; 2/2023 minor edits		
APPLIES TO			
<input checked="" type="checkbox"/>	SAP: ReachOut Healthcare America Ltd. dba Smile America Partners	<input checked="" type="checkbox"/>	MI: Michigan Dental Outreach, P.C. dba Michigan Dental Outreach
<input checked="" type="checkbox"/>	AZ: Arizona Mobile Dental, PC dba Big Smiles	<input checked="" type="checkbox"/>	MO: Nevin K. Waters D.D.S., P.C. dba Big Smiles
<input checked="" type="checkbox"/>	CA: Elliot Paul Schlang, DDS, Professional Corporation dba Big Smiles	<input checked="" type="checkbox"/>	NC: Theodore F. Mayer, DDS P.A. dba Smile North Carolina
<input checked="" type="checkbox"/>	GA: Shurett Dental Group, P.C. dba Shurett Dental Group	<input checked="" type="checkbox"/>	NY: Big Smiles Dental New York, PLLC
<input checked="" type="checkbox"/>	GA: Mark Shurett, DDS, PC dba Help A Child Smile	<input checked="" type="checkbox"/>	NY: Smile New York Outreach, LLC
<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"/>	WA: Michael LaCorte Dentistry, PC dba Big Smiles
<input checked="" type="checkbox"/>	MD: S.K. Pesis D.D.S., Big Smiles Maryland, PC dba Smile Maryland	<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”) operate in a complex, dynamic, highly competitive, and regulated environment. The environment is highly regulated at both the federal and state levels.

To assist SAP’s senior management in its responsibilities relating to operational compliance with applicable legal requirements and sound ethical standards, The Smile Way Group has established a Corporate Compliance Committee (“CCC”) with Subcommittee formations that work in collaboration to manage an effective compliance program. The CCC and Subcommittees support the Chief Compliance Officer (“CCO”) and the Corporate Compliance Department in adopting and implementing an organization-wide Compliance Program and distributing policies and other key documents and information on a regular and as-needed basis.

The CCO reports CCC and Subcommittee activities to the SAP Board of Director’s (“the Board”) Compliance Steering Committee no less frequently than every quarter. This report assists the Board with its oversight duties of the Compliance Program and promotes adherence to the policies and practices for corporate accountability, transparency and integrity.

II. COMPOSITION:

The CCC Committee is composed of the following positions:

- Chief Executive Officer
- Chief Operating Officer
- Chief Compliance Officer
- Chief Financial Officer

- Senior Vice President
- Vice President of Clinical Operations
- Vice President of IT
- Vice President of Billing and Insurance Coordination
- Controller
- Director of Compliance
- Credentialing Supervisor
- Human Resources Generalist
- Dynamic HR

and such other positions appointed by the Chief Executive Officer.

III. MEETINGS:

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

IV. RESPONSIBILITIES AND DUTIES:

The CCC will undertake the following responsibilities and duties and any other activities related to The Smile Way Group's 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, The Smile Way Group's culture of compliance and commitment to ethical organizational practices and behaviors.

Employee and Contractor Training

- 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 The Smile Way Group's processes, including a toll-free telephone number and online self-reporting portal through which employees may seek advice on application of The Smile Way Group's 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 The Smile Way Group, through the monitoring of various sources including, but not limited to state Medicaid newsletters and emails, state laws, and registries.

Reporting to the Board Compliance Steering Committee

- Assist the Board with its oversight duties of the Compliance Program and promote adherence to the policies and practices for corporate accountability, transparency and integrity, both the CCC and DPP's activities will be reported at least quarterly to the Board Compliance Steering Committee via the CCO.

Approvals:

DocuSigned by:

Steve Higginbotham

3/9/2023

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Steve Higginbotham, CEO

DocuSigned by:

Craig Thomas

3/9/2023

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Craig Thomas, CCO & SVP HR