

COMPLIANCE POLICY

The Smile Way Group

POLICY/PROCEDURE TITLE	Reporting Compliance Concerns Policy		
POLICY/PROCEDURE NUMBER	CC-107		
DEPARTMENT	Corporate Compliance Department		
Original Issue Date	7/19/2018		
Next Scheduled Review Date	10/26/2023		
Last Review Date	3/09/2023		
Revision Date History	1/2020 Revised organizational information to apply to all The Smile Way Group; 10/2022 DPP boxes and anonymous web reporting option added; 3/2023 added SNYO and WA DPP		
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”) is committed to a culture of compliance. The Smile Way Group cares about and wants to hear about known or suspected wrongful non-compliance. The Smile Way Group wants people to feel comfortable and safe when making good faith reports regarding suspected non-compliance. The Smile Way Group wants to understand the effectiveness of its Compliance Program and how it can continue to improve and strengthen the Compliance Program and its policies. The Smile Way Group maintains an open door policy for reporting in support of these goals. This policy outlines the ways and mechanisms through which individuals can obtain guidance on an ethics or compliance issue, report a concern, or report a suspected violation of the law or company policy. The Smile Way Group has a zero tolerance retaliation policy (see CC-111 Non-Retaliation Policy).

II. SCOPE:

This policy applies to all personnel of The Smile Way Group, including any employee, agent, or other person performing services for or on behalf of The Smile Way Group.

III. POLICY:

Should any Smile Way Group personnel have questions or concerns regarding violations of law or policy, such persons can and should request clarification or direction from the appropriate Supervisor, Manager, Department Head, Corporate Compliance Officer, or through placing a call to the Compliance Hotline. Likewise, all suspected violations of The Smile Way Group’s Code of Conduct (the “Code”) or other policies and procedures must be reported to the appropriate Department Head, Corporate Compliance Officer, or Compliance Hotline. Any patient or patient’s representative may also report suspected violations of law or

company policy to a Supervisor, Manager, Department Head, Corporate Compliance Officer, or Compliance Hotline. The Smile Way Group maintains a zero tolerance policy for reports not made in good faith (see CC-111 Non-Retaliation Policy).

IV. PROCEDURE:

1. There are multiple ways for an individual to make a non-compliance inquiry or report. To ask a compliance question or to report a suspected violation, an individual may contact the appropriate Supervisor or Manager, or personnel at the next higher supervisory level. If the individual is uncomfortable with speaking with the Supervisor, Manager, or Department Head, he or she may contact their DPP's Compliance Liaison, the Corporate Compliance Officer, or any member of the Corporate Compliance Department. An individual may also report a concern or ask a question using the Compliance Hotline. Resolution of issues at the departmental level is encouraged. Individuals may also make a report or inquiry by emailing complianceofficer@mobiledentists.com.
2. Individuals wishing to make an anonymous report should utilize the Compliance Helpline that has been set up to provide information and to receive reports. The Compliance Helpline number is 800-447-9207 or individuals can make reports online at <https://www.mycompliancereport.com/report?cid=SAP>. All reports are anonymous (unless the individual identifies himself or herself) and confidential. The anonymous reporter will be assigned an issue number and will be asked to report in periodically in case additional information is needed and will be informed regarding investigation or follow-up results. The Smile Way Group will preserve the anonymity of individuals who wish to remain anonymous, subject to limitations imposed by the law. Anonymity may not be preserved if a reporter identifies himself or herself by name or provides other information that is identifying (see CC-108 Responding Confidentially to Inquiries Policy). The Smile Way Group is legally required to report certain types of serious infractions to external agencies. If there is no way to respond to an inquiry or alleged compliance issue without knowing a reporter's identity, the reporter will be notified and will have the option of revealing his or her identity or remaining anonymous, in which case the Organization may be limited in its ability to properly investigate the reported concern or allegation.
3. Contacts made via the internal phone system, email, US mail, interoffice mail, or personal conversation, by virtue of their design, are not necessarily anonymous. Confidentiality is maintained whenever possible and to the extent possible.
4. When a report is made to a Department Head, a response should be initiated within one (1) business day of the report being received by the Department Head. This response may be a direct answer or it may be an action plan for obtaining the answer. The Department Head should report the inquiry to the Corporate Compliance Department. Once the Department Head has contacted the Corporate Compliance Department, the Corporate Compliance Officer will initiate action within one (1) business day of the Corporate Compliance Officer's receipt of the report or question. If the Corporate Compliance Officer or Department Head is not able to provide prompt answers, the Organization may consult legal counsel or other experts as necessary and appropriate.
5. Reported inquiries are logged and tracked by the Corporate Compliance Department in order to manage individual reports and to provide data for use in understanding risk areas. Analysis of this data will also support remediation and effective control processes as identified and needed. The Corporate Compliance Department logs and tracks all reported inquiries and resolutions of reports. Individuals who make a report to the Compliance Helpline will receive an issue number from the Compliance Helpline Operator or web portal. The Compliance Helpline will forward the information received by the reporter to the Corporate Compliance Officer. The Corporate Compliance Officer or their designee will respond with an answer to the Compliance Helpline by the assigned report back date. If a final answer to the question is not available within two (2) weeks, either the Corporate Compliance Officer or the Compliance Helpline Operator will make an initial response, along with an estimate of when a final answer will be available. The Corporate Compliance Officer will make a report to the Compliance Helpline on a scheduled basis until the answer is finalized. Calls concerning the Corporate Compliance Officer will be forwarded to the Chief Executive Officer directly from the Compliance Helpline Operator.

6. The Smile Way Group management will investigate all suspected violations as appropriate.
7. Failure to report suspected violations in accordance with this policy is, in and of itself, a violation of the Code and will subject the individual failing to make such a report to discipline in accordance with the Discipline Policy (see HR-101 Progressive Discipline Policy).
8. No retaliation, or other disciplinary action inconsistent with law, will be taken or permitted against an individual for good faith reporting of, or cooperating in the investigation of, suspected illegal acts or violations of the Code. It is a violation of the Code for personnel to punish or retaliate against individuals who have made a good faith report of, or cooperated in good faith in the investigation of, suspected illegal acts or violations of the Code. Anyone who engages in retaliation, retribution, or harassment is subject to discipline in accordance with the Discipline Policy (see CC-111 Non-Retaliation Policy).

Approvals:

DocuSigned by:

Steve Higginbotham

3/10/2023

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Steve Higginbotham, CEO

DocuSigned by:

Craig Thomas

3/24/2023

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Craig Thomas, CCO & SVP HR