

COMPLIANCE POLICY

The Smile Way Group

POLICY/PROCEDURE TITLE	Administrative Office Workplace Visitor Policy		
POLICY/PROCEDURE NUMBER	CC-117		
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	10/2022 policy updated to include DPP and The Smile Way Group; 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:

To provide a safe working environment and ensure appropriate safety and security controls, and to limit access to company confidential and proprietary information, including PHI, PI, and client data.

II. SCOPE:

This policy applies to all employees, contractors, and visitors to any administrative office space of 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.”

III. OFFICE POLICY:

- 1. Authorization** No visitors are permitted in the Smile Way Organization workplace or on Smile Way Organization property unless authorized by a Department Head. All requests for permission for nonemployees to enter Smile Way Organization property must be made with the Department Head.
- 2. Logging of Visitors** All visitors to Smile Way Organization must enter through the reception area and sign the visitor logbook. The receptionist will call the Department Head to escort the visitor from the reception area.
- 3. Identification of Visitors** All visitors must be issued a visitor’s badge which shall be worn on the jacket, shirt pocket, or other visible area so as to identify that the individual is an authorized visitor. Visitors should return their ID to the front desk upon completion of their visit. Visitors should

remain with an employee while on site and are limited to areas based upon the reason for being on site at Smile Way Organization unless an exception is made by the Department Head.

4. **Restrictions on Recording and Photography** Recording and/or photography is prohibited unless permission is given by the Department Head and as applicable, the individual to be photographed or recorded.
5. **Discovery of Unauthorized Individuals** Each employee is responsible for workplace safety and must report visitors without an ID badge to the nearest manager. Managers are responsible to address individuals in the workplace who do not display the visitor's pass to determine their authority for access to Smile Way Organization's facility. Unauthorized visitors should be escorted courteously but quickly from the workplace or to the front office.
6. **Disciplinary Action** Any employee who fails to comply with this policy is subject to disciplinary action, up to and including termination (see HR-101 Progressive Discipline 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

APPENDIX 1: SAMPLE VISITOR LOGBOOK

Name (Print): _____ Date: _____ Reason for Visit: <input type="checkbox"/> Observation <input type="checkbox"/> Meeting <input type="checkbox"/> Other: _____ Representing Company: _____ Signature: _____ Phone: _____
Name (Print): _____ Date: _____ Reason for Visit: <input type="checkbox"/> Observation <input type="checkbox"/> Meeting <input type="checkbox"/> Other: _____ Representing Company: _____ Signature: _____ Phone: _____
Name (Print): _____ Date: _____ Reason for Visit: <input type="checkbox"/> Observation <input type="checkbox"/> Meeting <input type="checkbox"/> Other: _____ Representing Company: _____ Signature: _____ Phone: _____
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