

# COMPLIANCE POLICY

The Smile Way Group

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|-------------------------------------|--|-------------------------------------|--|
| <b>POLICY/PROCEDURE TITLE</b>       | Effective Communication Policy   |                                     |  |
| <b>POLICY/PROCEDURE NUMBER</b>      | CC-110   |                                     |  |
| <b>DEPARTMENT</b>                   | Corporate Compliance Department  |                                     |  |
| Original Issue Date                 | 07/19/2018   |                                     |  |
| Next Scheduled Review Date          | 02/27/2025   |                                     |  |
| Last Review Date                    | 02/22/2024   |                                     |  |
| Revision Date History               | 4/2023 policy updated to include DPP and The Smile Way Group; 2/2024 minor edits |                                     |  |
| <b>APPLIES TO</b>                   |  |                                     |  |
| <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. POLICY:

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 works to make compliance an inclusive effort by fostering open lines of communication among employees, DPPs, field staff, and third party vendors, as needed. This policy establishes and implements effective, open lines of communication ensuring confidentiality between the Chief Compliance Officer, members of the Corporate Compliance Committee, employees, managers and governing body, and third party vendors in support of the Compliance Program.

## II. PROCEDURE:

- Lines of Communication:** The Corporate Compliance Department will develop and maintain effective, appropriate lines of communication with key stakeholders of the organization, including, but not necessarily limited to:
  - All levels of management, the Chief Executive Officer, and the Board of Directors
  - Business partners, including DPPs and field staff, as needed
  - Corporate Compliance Committee
  - Employees at all levels of The Smile Way Group
  - Third party vendors
  - Regulatory authorities
  - From time to time, law enforcement agencies, as needed
- Use of the Lines of Communication – Overview:** The Chief Compliance Officer and other Corporate Compliance Department staff will use these lines of communication to effectively communicate information about the Compliance Program, as well as information about laws, regulations, and guidance

for The Smile Way Group, such as statutory, regulatory, and sub-regulatory changes (e.g. Medicaid updates) and changes to Policies and Procedures and the Code of Conduct.

3. **Communicating Compliance Concerns:** These lines of communication will be openly accessible and allow anonymous and confidential good faith reporting of potential compliance issues as they are identified. See CC-107 Reporting Compliance Concerns Policy for an explanation of communication through the Corporate Compliance Helpline.
4. **Communication with the Chief Executive Officer and Board of Directors:** The Chief Compliance Officer will maintain open lines of communication with the Chief Executive Officer and Board of Directors regarding activities of the Corporate Compliance Committee and Corporate Compliance Department. This includes, but is not limited to the following:
  - The Chief Compliance Officer upon request will provide the Board of Directors a copy of the approved minutes from all Corporate Compliance Committee meetings.
  - Upon ratification by the Corporate Compliance Committee, the Chief Compliance Officer will forward a copy of the annual Compliance Work Plan, and any updates or revisions to the Compliance Program, to the Board of Directors for review and approval.
  - The Chief Compliance Officer will provide the Board of Directors with quarterly reports summarizing key issues and results in the operation of the Corporate Compliance Program. Topics may include but not be limited to:
    - Compliance or Ethics Issues
    - Compliance Inquiries/Incidents
    - Policy and Procedure Status
    - Current Projects
    - Summary of Audits
    - Key Regulation Updates
    - Training and Education Status
    - Other items, as determined
5. **Communication with the Compliance Committee:** As specified in CC-102 Corporate Committee Compliance Program Structure and Oversight, the Corporate Compliance Committee will meet in accordance to CC-102 Compliance Committee Program Structure Policy for the purpose of overseeing the Corporate Compliance Program. The Chief Compliance Officer, as Corporate Compliance Committee chair, sets the agenda and keeps/distributes the minutes, with input and approval of the Corporate Compliance Committee. The Chief Compliance Officer will also keep the Corporate Compliance Committee informed and seek its guidance on compliance or ethics issues that represent potential risk to the organization.
6. **Communication with Employees:** The Chief Compliance Officer and Corporate Compliance Committee will maintain open lines of communication with employees at all levels of the organization.
  - **Methods of Communication** – Examples of methods of communication with our employees include newsletters, bulletins, emails, meetings, and information posted to iSolved.
  - **Compliance Program** – The Corporate Compliance Department will distribute to employees compliance notice cards and contact cards to facilitate knowledge and understanding of the Corporate Compliance Program and ways to anonymously report concerns.
  - **Compliance Program and Code of Conduct** – The Code of Conduct is found within iSolved under Company Information/Messages. The Code of Conduct will be made available to third party vendors identified. Employees shall be required to certify their receipt and understanding and return a signed Acknowledgment upon assignment.
  - **Training and Education, Incident Reporting** – Employee training and incident reporting are key

aspects of organizational communication. These components are addressed in separate Policies and Procedures.

- **Identifying and Reporting Noncompliance and Fraud, Waste, and Abuse (FWA)** – The Smile Way Group will maintain open communication with employees, to educate these individuals on identifying and reporting noncompliance FWA, as appropriate.
7. **Issues Tracking Log:** The Corporate Compliance Department tracks compliance violations and issues and disseminate them to the appropriate manager to respond and resolve.
  8. **Communication with Contracted Entities and DPPs:** The Chief Compliance Officer and Corporate Compliance Committee will develop and utilize mechanisms for communicating with contracted entities, including healthcare providers and management service organizations. Such communication will typically occur in collaboration with departments or committees of The Smile Way Group that have established methods of contractor communication.
  9. **Communication with Regulatory Authorities:** The Smile Way Group will maintain open communication with regulatory authorities. The Chief Compliance Officer serves as one of the organization’s main points of contact with regulatory authorities. As such, the Chief Compliance Officer should be included on communications or notices of information or inquiries relating to regulatory inquiries, investigations, or complaints.

Approvals:

DocuSigned by:

*Steve Higginbotham*

2/26/2024

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Steve Higginbotham, CEO

DocuSigned by:

*Craig Thomas*

2/26/2024

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Craig Thomas, CCO & SVP HR