

# COMPLIANCE POLICY

The Smile Way Group

<b>POLICY/PROCEDURE TITLE</b>	Government Affairs and Lobbying Activities Policy		
<b>POLICY/PROCEDURE NUMBER</b>	CC-127		
<b>DEPARTMENT</b>	Corporate Compliance Department		
Original Issue Date	05/25/2023		
Next Scheduled Review Date	06/26/2025		
Last Review Date	07/10/2024		
Revision Date History			
<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 observe and maintain compliance with federal and state regulations surrounding our governmental affairs, lobbying activities, political activities, election fundraising and monetary donations.

The Smile Way Group conducts its advocacy activities in a transparent and professional manner; in light of ethics rules, it is essential that advocacy activities by The Smile Way Group and its employees receive prior approval are carefully and fully reported.

## II. APPROVAL PROCEDURES:

### Political Activities and Election Fund Raising Approval

- The Smile Way Group may utilize funds or property for a political contribution or purpose, including election fund raising only upon review and approval by the Chief Executive Officer (CEO). Personnel may not directly or indirectly authorize, pay, promise, deliver, or solicit any payment, gratuity, or favor for the purpose of influencing any political official or government employee in the discharge of that person’s responsibilities without obtaining written notification from the Chief Compliance Officer (CCO) that the CEO has approved the request. To obtain approval by the CEO:
  1. Each request for political and election fund raising will be submitted to the CCO for review by the requester. The CCO will examine state, federal and local ethics and regulatory requirements pertaining to the specific request. The CCO will make a determination if the requested political and election fund raising request is compliant with the Smile Way Group policies, Code of Conduct, Corporate Compliance Plan and state, federal and local ethics and regulatory requirements. The CCO may request a legal review by legal counsel if needed. If the CCO determines there may be company policy violations or concerns with state and federal ethics and

- regulatory requirements with the requested activity, the CCO will inform the requester of the denial to proceed.
- 2. If the CCO determines there are not any company policy violations or concerns with state, federal and local ethics and regulatory requirements with the requested activity, the CCO will seek approval from the CEO.
- 3. After CEO approval, the CCO will submit the request to the Corporate Controller.
- Personnel may make direct contributions of their own money to political candidates and activities, but these contributions will not be reimbursed and should not represent The Smile Way Group in any manner.

### **Lobbying Activity Approval**

- The Smile Way Group may utilize funds or property for lobbying activity only upon review and approval by the CEO. To obtain approval by the CEO:
  1. Each request for lobbying activity will be submitted to the CCO for review by the requester. The CCO will examine state, federal and local ethics and regulatory requirements pertaining to the specific request. The CCO will make a determination if the requested lobbying activity request is compliant with the Smile Way Group policies, Code of Conduct, Corporate Compliance Plan and state, federal and local ethics and regulatory requirements. The CCO may request a legal review by legal counsel if needed. If the CCO determines there may be company policy violations or concerns with state and federal ethics and regulatory requirements with the requested activity, the CCO will inform the requester of the denial to proceed.
  2. If the CCO determines there are not any company policy violations or concerns with state, federal and local ethics and regulatory requirements with the requested activity, the CCO will seek approval from the CEO.
  3. After CEO approval, the CCO will submit the request to the Corporate Controller.
- Personnel must follow the approval procedures before using resources of The Smile Way Group for lobbying activities.

### **III. LOBBYING REPORTING PROCEDURES:**

The Smile Way Group and its representatives must disclose relevant advocacy activity to the public and abide by applicable gift and ethics rules governing engagement with public officials and employees in accordance to state, federal and local statutes and regulations (e.g. the Lobbying Disclosure Act, and Honest Leadership and Open Government Act). The Chief Compliance Officer will:

1. Review, approve, and file all lobbying reports for external federal lobbyists that were prepared by outside legal counsel or the lobbying consultant
2. Collect Lobbying Disclosure Forms (form attached with policy) within 10 days after the end of each quarter from all staff who directly lobby Members of a state or federal congress or their staff on behalf of The Smile Way Group and Smile Way Group priorities, and/or use Smile Way Group resources for lobbying activities. Employees should use this form to a) report exchanges with senior Executive Branch officials to advance specific public policy positions, b) report in-person meetings, c) report any other communications for the purpose of federal lobbying such as meetings in a state capital, telephone calls, letters, and emails. Employees must include details such as who the meeting or communication was with; the subject discussed (e.g., "increasing the budget of the National Institutes of Health" or "supporting bill \_\_\_\_\_" or "opposing Medicaid cuts to a dental billing code); the approximate length of time of each meeting, as well as time spent preparing; and the costs associated with each meeting, including travel costs to location (or a pro rata share of those costs when the travel involves other, non-lobbying activities), and a portion of salary and benefits associated with time spent.
  - An example of an activity requiring report: Dr. Jones, a Smile Way Group employee, exchanges email with congressional staff using her Smile Way Group email and expresses her support for a piece of legislation on behalf of her role as dentist of a clinic at Smile Way Group affiliated practice.

Lobbying contacts made by employees in their capacity as private citizens and not using The Smile Way Group resources do not need to be reported. An example of an activity not requiring report: Dr. Jones, a Smile Way Group employee, participates in advocacy meetings with a specialty society in Kansas. She identifies herself as

a dentist in practice at a Smile Way Group affiliated dental practice but makes clear she is representing herself and/or her society. No Smile Way Group resources were used for the visit.

Approvals:

DocuSigned by:

*Steve Higginbotham*

7/23/2024

9F2E17E4D88A41A  
Steve Higginbotham, CEO

DocuSigned by:

*Craig Thomas*

7/23/2024

D68E7D1B7A624E6  
Craig Thomas, CCO & SVP HR

# LOBBYING DISCLOSURE FORM

The Smile Way Group

Due to federal lobbying disclosure rules, all employees of The Smile Way Group who engage in lobbying activity using Smile Way Group resources (including time, computers, email addresses, etc.) or on behalf of Smile Way Group must report and disclose this form quarterly. There are substantial civil and criminal penalties for The Smile Way Group if it fails to file lobbying disclosure reports in a timely and accurate manner.

“Lobbying activity” refers to any direct contact with Members of Congress or their staff in which an individual is asking for federal funding, requesting specific legislative action, or attempting to influence the position of an elected official on an issue pending before Congress. This would include meetings, telephone calls, letters, faxes, or emails. Lobbying contacts made by employees in their capacity as private citizens and not using Smile Way Group resources do not need to be reported.

**This form should be completed and returned to [cthomas@mobiledentists.com](mailto:cthomas@mobiledentists.com) within 10 days after the end of each quarter (i.e.: April 10, July 10, October 10 and January 10).**

Name/Title: \_\_\_\_\_

Reporting period (indicate one): Year \_\_\_\_\_  1st Quarter  2nd Quarter  3rd Quarter  4th Quarter

Date(s) of lobbying activity(ies): \_\_\_\_\_

\_\_\_\_\_

Name(s) of who was contacted (Member and/or staff): \_\_\_\_\_

\_\_\_\_\_

Subject(s) discussed: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

The length of time spent lobbying: \_\_\_\_\_

Costs associated with each lobbying contact:

- Direct costs (Pro-rata share of direct costs when travel involves other, non-lobbying activities):

\_\_\_\_\_

- Portion of salary/benefits for actual time spent in direct communication with Member and/or staff (office visits, telephone calls, email); this does not include travel time to or from a meeting:

\_\_\_\_\_

**If you have any questions about these federal reporting requirements, please contact:**

Craig Thomas, Chief Compliance Officer & Senior VP, Human Resources and People Development  
Smile America Partners, 15458 N. 28th Ave, Suite A, Phoenix, AZ 85053  
Office: (623)434-9343 ext 21115 • Cell: (480)785-6098 • Email: [cthomas@mobiledentists.com](mailto:cthomas@mobiledentists.com)