Delta Dental of Virginia's Compliance Program

DELTA DENTAL®

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DELTA DENTAL OF VIRGINIA'S COMMITMENT

Delta Dental of Virginia is committed to full compliance with all applicable laws and regulations. Adherence to compliance and ethical standards is expected of all employees and agents that do business with Delta Dental of Virginia. This program document is not intended to fully describe all applicable laws and regulations, nor detail company policies and procedures.

If you find yourself in an ethical dilemma or suspect inappropriate or illegal conduct, you may want to discuss it with the appropriate person in your office or you may also contact our anonymous reporting hotline at 833.510.0033 or **reports@lighthouse-services.com**.

Description of Delta Dental's Corporate Compliance Program

Policy: Delta Dental of Virginia has adopted a Corporate Compliance Program ("Compliance Program" or "Compliance Plan") to reaffirm its commitment to promoting full compliance with applicable federal and state laws regulations, and federal and state health insurance program requirements, which includes public and private exchange requirements. The Compliance Program provides a framework for structuring a comprehensive range of compliance activities that are designed to help identify legal and ethical problems, to effectively address compliance allegations as they arise, and to remedy the effects of noncompliance.

Legal Basis: The Compliance Program has been developed in accordance with applicable law, and with guidance from federal and state authorities, including United States Federal Sentencing Guidelines, adapted to providers of health insurance services by the Office of Inspector General of the Department of Health and Human Services (OIG) in its various Compliance Program Guidance documents, and the requirements of the various insurance departments in the state in which Delta Dental of Virginia operates. The scope of the Compliance Program may be expanded in the future to cover additional areas of regulatory compliance to which Delta Dental of Virginia is subject.

Core Elements: The Compliance Program reflects Delta Dental of Virginia's good faith commitment to identify and reduce risk, improve internal controls, and establish standards. As such, Delta Dental of Virginia adopts the following principles of compliance:

1. Developing and distributing a written Code of Business Conduct and Ethics and written policies and procedures that address various components of the Compliance Program.

2. Designating a Compliance Officer (who may further designate a Privacy Officer) responsible for operating and monitoring the Compliance Program.

3. Developing and implementing ongoing routine effective education and training programs for the workforce and appropriate agents.

4. Maintaining an effective and publicized protocol for reporting or raising conduct or ethical concerns without fear of retaliation.

5. Developing disciplinary standards to clarify and respond to conduct that is prohibited by Delta Dental of Virginia's Code of Business Conduct and Ethics and policies and procedures, to respond appropriately to illegal or unethical conduct and to pursue equitable enforcement of these standards with regard to all employees who violate any criminal, civil or administrative law or regulation or the standards developed pursuant to the Compliance Program.

6. Developing criteria and protocol for ensuring no individual who has engaged in illegal or unethical behavior or who has been convicted of healthcare related crimes, will occupy key management positions within Delta Dental of Virginia or any other position that requires the exercise of discretionary authority over financial matters.

7. Maintaining effective auditing and monitoring systems to evaluate Delta Dental of Virginia's compliance with its Compliance obligations, to assist in the prevention of Compliance Program violations, and to maintain the effectiveness of the Compliance Program.

8. Investigating, responding to and preventing identified non-compliance, including establishing appropriate and coordinated corrective measures.

Scope: The Compliance Program standards apply to its workforce and appropriate agents (the latter determined by the Compliance Officer) of Delta Dental of Virginia, among others. It is the responsibility of all employees and engaged professionals (including members of the professional dental review staff), Board members, and appropriate agents , and to the extent possible, Delta Dental's network dentist, to be familiar and comply with all requirements of the Compliance Program that pertain to their respective areas of responsibility; recognize and avoid actions and relationships that might violate those requirements; and seek guidance when necessary.

Limitations: The Compliance Plan is not intended to summarize all laws and regulations applicable to the System. This Compliance Plan is a living document that must be reviewed and updated periodically to assure that employees, Board members, and appropriate agents are kept informed of the most current legal and compliance developments in the health insurance industry.

Glossary of Important Terminology

The terms below have the following meanings when used in this Compliance Plan:

Appropriate Agents: Except as otherwise provided, with respect to Delta Dental of Virginia, all persons and entities that have contracted with Delta Dental of Virginia to provide health insurance related services or other services that impact Delta Dental of Virginia's provision of dental benefits programs. Appropriate agents may include contractors, consultants, and vendors and to the extent possible, network dentists.

Audit: A formal review of compliance with internal policies and procedures and external laws and regulations.

Board Members: any board member of Delta Dental of Virginia.

CIRA: Compliance Inventory and Risk Assessment

Complainant: An individual who reports conduct that is not consistent with the goals of the Compliance Program or in violation of any criminal, civil or administrative law or regulation or federal or state health insurance requirement.

Compliance Obligations: Responsibility to comply with laws, regulations, federal and state health insurance program requirements, and standards developed by the Compliance Program.

Corrective Action Plan: Document that outlines the steps and proposed completion dates a department will take to correct a non-compliance item.

Excluded individuals and entities: An individual or entity who (a) is currently excluded, debarred, suspended or otherwise ineligible to participate in the federal health care programs or in federal procurement of non-procurement programs; or (b) has been convicted of a criminal offense that falls within the ambit of 42 U.S.C. §1320a-7(a), but has not yet been excluded, debarred, suspended or otherwise declared ineligible.

Exclusion lists: Refer to the electronic lists of excluded individuals or entities maintained by the Office of Inspector General [OIG] and the General Services Administration.

Executive Compliance Committee: Those employees responsible for providing direct support to the Compliance Officer in the creation, implementation and operation of the Compliance Program.

Executive management: Those individuals who are part of Delta Dental of Virginia's executive management team.

Federal health care programs: As defined in of 42 U.S.C. §1320a-7b(f), include any plan or program that provides healthcare benefits to any individual, whether directly, through insurance, or otherwise, which is funded directly, in whole or in part, by a United States

Government or state healthcare program, including, but not limited to: Medicare, Medicaid, Civil Health and Medical Program for the Uniformed Services (CHAMPUS), Department of Veterans Affairs (VA), Federal Bureau of Prisons, and Indian Health Services, but excluding the Federal Employees Health Benefit Program (FEHBP).

Management or managers: Other Delta Dental member company employees, including directors, managers and supervisors, who have the responsibility of evaluating, recommending and implementing major policies and strategies that assure continuance of quality dental benefits to the communities that Corvesta serves.

Monitoring: Compliance reviews that are repeated on a regular basis during the normal course of a company's operations.

Non-compliance: Conduct inconsistent with the goals of the Compliance Program or in violation of any criminal, civil or administrative law or regulation or federal or state health insurance statutes, regulations, or other requirements.

Workforce: Those individuals employed by other Delta Dental member companies including, but not limited to, executive staff, directors (i.e. non-board members) managers and supervisors.

Written Standards — Corporate Compliance

A core principle of the Compliance Program is the development, distribution and implementation of written standards that address Corvesta's principal compliance risk areas, reflect Delta Dental of Virginia's commitment to promote compliance with all applicable legal duties, and encourage and promote ethical conduct. These written standards consist of the Code of Business Conduct and Ethics and policies and procedures that reflect Delta Dental of Virginia's values and expectations regarding the behavior of the workforce and appropriate agents; explain the operation of the Compliance Program; clarify and establish internal standards for compliance with laws and regulations; and help the workforce and appropriate agents better understand the consequences of non-compliance.

CODE OF BUSINESS CONDUCT AND ETHICS

Delta Dental of Virginia adopted a Code of Business Conduct and Ethics that is intended to serve as a guide to provide standards by which the workforce and appropriate agents will conduct themselves to protect, promote and to enhance Delta Dental of Virginia's ability to carry out its mission. The Code of Business Conduct and Ethics is designed to assist the workforce and appropriate agents in carrying out their daily responsibilities within the appropriate legal and ethical framework. However, the Code of Business Conduct and Ethics

cannot encompass all legal and ethical standards and is not a substitute for each employee's, Board members or appropriate agent's own internal sense of honesty, integrity and fairness. Instead, each employee, Board member and appropriate agent must use their own good judgment, along with the principles in the Code of Business Conduct and Ethics, to maintain Delta Dental of Virginia's values.

The Code of Business Conduct and Ethics is intended to be easily understood. In some instances, the Code of Business Conduct and Ethics deals fully with the subject matter. In many cases, however, the subject discussed is sufficiently complex that additional guidance is necessary to provide adequate direction. Consequently, the Code of Business Conduct and Ethics is designed to be supplemented by this Compliance Plan, and policies and procedures.

The Code of Business Conduct and Ethics explains, in general terms, how Delta Dental of Virginia operates internally and conducts business with respect to our Nine Principles:

1. **Honesty, Integrity and Respect** — We will treat each other, our subscribers, providers, vendors, and group representatives with honesty, integrity, and respect.

2. **Complying with Law** — We will carry out our duties in strict accordance with the law.

3. **Fair Competition** — We will compete fairly and ethically in the marketplace.

4. **Financial Integrity** — We will record and report our transactions and results accurately.

5. **Stewardship of Assets** — Assets that the company and our business partners entrust to us are to be used for legitimate business purposes only. Carelessness, theft and waste have a direct adverse impact on all of us.

6. **Conflicts of Interes**t — We will not allow outside interests or personal relationships to interfere with our responsibilities to our organization.

7. **Fair Employment Practices and Non-discrimination** — We will not engage in unlawful discrimination or harassment in the workplace.

8. **Health and Safety** — We will maintain a safe, secure and healthy working environment.

9. **Privacy and Information Security** — We will respect the privacy of confidential information about our company and its employees, groups, subscribers, providers, vendors, and others.

POLICIES AND PROCEDURES — CORPORATE COMPLIANCE

The Compliance Program requires the creation, distribution and maintenance of policies and procedures that address the various components of the Compliance Program and Delta Dental of Virginia's principal legal risk areas.

Policies directly relating to the operation of the Compliance Program will address:

- The duties of the Compliance Officer, and the duties of any subcommittees or task forces created by the Audit Committee.
- Compliance education and training program requirements;
- Protocol for reporting or raising conduct or ethical concerns without fear of retaliation;
- Disciplinary standards and response to violations of those standards;
- Criteria and protocol for screening employees and agents, and potential employees and appropriate agents, including protocol for querying the exclusion lists to identify ineligible persons and entities;
- Effective auditing and monitoring procedures;
- Investigating and responding to complaints and potential compliance problems; and
- Implementing corrective action plans in instances of non-compliance.

There are certain areas of heightened risk that have been identified in the health insurance industry, including the investigative and audit functions of the OIG. Therefore, to ensure that the Compliance Program remains effective, it is important for Delta Dental of Virginia's policies and procedures to address adequately the following risk areas:

- The integrity and accuracy of claims submitted to the federal and state health insurance programs and commercial payors for reimbursement, including policies that address.
- Guidance regarding inappropriate gifts, gratuities and discounts to federal and state health insurance administrators or program beneficiaries.
- Appropriate methods for recruiting providers to our networks.
- The manner in which Delta Dental of Virginia contracts with dentists for professional and administrative services.
- Delta Dental of Virginia's obligations and rights when dealing with enrollees in emergency situations.
- The protection of confidential and other sensitive health information.
- Conflicts of interest and best strategies for avoiding and identifying potential conflicts.
- Compliance standards to govern Delta Dental of Virginia's relationship with independent contractors, vendors, and appropriate agents.

Policies and procedures will also be revised or supplemented as necessary to reflect changes in laws, regulations and Delta Dental of Virginia operations.

Compliance Officers & the Executive Compliance Committee

COMPLIANCE DIRECTOR

Delta Dental of Virginia's Compliance Director provides management and oversight for the ongoing implementation and development of the Compliance Program with the support of various roles including but not limited to the Privacy Officer (if designated), IT Security Officer, and Director of Internal Audit.

COMPLIANCE OFFICER

While compliance is everyone's responsibility, the Compliance Officer is the responsible owner of the Compliance Program and will be accountable for all compliance responsibilities within Delta Dental of Virginia. The Compliance Officer may delegate authority and responsibility for compliance activities, but will ultimately retain responsibility for the effectiveness of the Compliance Plan.

In addition to general accountability for Delta Dental of Virginia's Compliance Program, the Compliance Officer's (or Compliance Officer has designated to Director of Compliance) responsibilities include:

- Overseeing the inventorying and assessment of compliance related risks and the development of action plans to assure that the Compliance Program responds to identified risk areas.
- Formulating and ensuring the distribution of the Code of Business Conduct and Ethics.
- Overseeing the creation, distribution and maintenance of Delta Dental of Virginia's compliance policies and procedures.
- Coordinating with the identified Human Resource staff to ensure adequate employee background checks are performed.
- Establishing effective systems to prevent employment of individuals, relationships with contractors, or purchases from vendors who have been barred from participation in federal government programs (commonly referred to as ineligible individuals and entities) or who have demonstrated a propensity to engage in illegal activities.
- Ensuring mandatory compliance education and training programs, which are effective to familiarize the workforce and appropriate agents, and others with the components of the Compliance Program, the Code of Business Conduct and Ethics, compliance policies and procedures and relevant compliance issues.

- Updating and refreshing education and training information according to updates or revisions in relevant laws and regulations or changes in the Compliance Program.
- Maintaining a procedure for reporting potential Compliance Plan violations without fear of retaliation and promoting effective lines of communication for the workforce and appropriate agents among others, to pose informal compliance questions.
- Maintaining a record of compliance-related complaints and allegations and the disposition of each case, including any associated disciplinary actions and remedial action pursued by Delta Dental of Virginia.
- Coordinating audit activities with the Director of Internal Audit and Risk Management to assess the effectiveness of Delta Dental of Virginia's internal controls and to detect significant violations of legal and ethical standards.
- Conducting investigations, or authorizing external investigations, in consultation with the President and Chief Executive Officer (CEO) and legal counsel, of potential legal violations or instances of unethical behavior.
- Evaluating, determining, and implementing the most appropriate remedies to correct incidents of non-compliance and develop and implement strategies for preventing future occurrences.
- Reporting, after consulting with General Counsel, any compliance matter requiring external reporting or disclosure, including reporting to the external auditor.
- Establishing methods of improving Delta Dental of Virginia's efficiency and quality of compliance-related services, and reducing our vulnerability to fraud, abuse, and waste.
- Making annual reports on compliance developments to the President and CEO and the Board's Audit Committee. Additional reports may be made to the President and CEO, the Audit Committee, and the Board as determined by the Compliance Officer, with input from the President and CEO and the Board. For the purposes of reporting and receiving direct feedback, the Compliance Officer will have a dotted-line reporting relationship to the Audit Committee.
- Providing guidance and interpretation to the Board, Audit Committee, the President and CEO, and executive management on matters related to the Compliance Program.
- Preparing at least annually, a report describing the compliance activities and actions undertaken during the preceding year, the compliance priorities for the next year, and any recommendations for changes to the Compliance Program.
- Reviewing and updating the Compliance Program.

To ensure the Compliance Officer is able to carry out the responsibilities of their role, the Compliance Officer, after consultation with the Privacy Officer (if designated) and legal counsel, has been delegated authority to review all documents or other information related to compliance activities, examples include, but not limited to: Enrollment and eligibility records; Billing records; Records of marketing and sales activities; Records concerning Delta Dental of Virginia's arrangements with employees; and Board members and appropriate agents.

The duties of the Compliance Officer, Privacy Officer (if designated) and IT Security Officer do not diminish or alter the independent duty of every employee, Board member or agent to act in accordance with the Compliance Program. For example, as clarified by the Code of Business Conduct and Ethics, employees in a supervisory role will be responsible for monitoring and promoting compliant behavior among subordinate employees.

Education & Training — Compliance Officer/ Human Resources

To promote compliance with applicable legal requirements and to assure that the standards set forth in this Compliance Plan are maintained, Delta Dental of Virginia is committed to conducting education and training programs for all new employees, Board members, and appropriate agents and periodically thereafter. Some programs are required on annual basis including but not limited to Fraud, Waste and Abuse (FWA), Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Security training. Other training may be role specific emphasizing topics within the job function or timeliness such as a change in the law, regulations or a federal or state health insurance program requirement that affects the Compliance Program.

Reporting

All employees and agents are encouraged to raise ethical or conduct concerns when

applicable, to their immediate supervisor, another member of management, Human Resources or the Compliance Officer.

To ensure a viable system of internal reporting, the following are incorporated into Delta Dental of Virginia's Compliance Program:

- Creation of an environment in which employees, Board members and appropriate agents feel comfortable reporting concerns, questions, and instances of improper conduct without the fear of retaliation.
- A confidential reporting mechanism for all employees, Board members, and appropriate agents who are uncomfortable reporting concerns to, as applicable, an immediate supervisor or the Compliance Officer. The reporting may be done through our third-party confidential website, **www.lighthouse-services.com/deltadentalva**.
- Employees may also report by phone, by calling our toll-free hotline number 1-833-510-0033.
- Tracking, documentation and oversight mechanisms to ensure that reports or suspected non-compliance are fully and promptly investigated and addressed.
- Mechanisms to ensure that the President and CEO, the Audit Committee, the Board and appropriate executive management staff are properly and regularly apprised of and can take appropriate action on compliance issues identified in investigations or updating of related policies and procedures and training program content.

As soon as an employee, Board member, or appropriate agent has made a report, the complainant has a continuing obligation to update the report as new information becomes known to him/her. Reports that are judged to be credible by the Compliance Officer will be thoroughly and appropriately investigated and addressed.

Although Delta Dental of Virginia must always strive to maintain the confidentiality of a complainant's identity, regardless of the method used to report suspected non-compliance, the complainant will be made aware that their identity may have to be revealed in certain circumstances, such as scenarios involving government or law enforcement authorities or when it is necessary to further an internal investigation into the reported matter. Delta Dental of Virginia strictly prohibits a complainant from being retaliated against in any manner based on the complainant's report of suspected non-compliance. Any individual found to have retaliated against a complainant will face disciplinary action, up to and including termination. If a complainant is found to be responsible for the non-compliance, Human Resources is responsible for responding in accordance with established disciplinary standards. In addition, repeated incidents of questionable reporting will be dealt with by Human Resources through established disciplinary action procedures.

Disciplinary Standards — Director of Human Resources/General Counsel or Designee

Adherence to Delta Dental of Virginia's Compliance Program and all applicable laws and regulations is a condition of employment. Corvesta has developed, implemented, and maintains a mechanism of accountability and discipline for individuals who are found to be in violation of applicable laws and regulations or any Compliance Program standards in the course of their employment or other involvement with Family companies. Examples of actions or omissions that will subject an employee to disciplinary action include, but are not limited to:

- Conduct inconsistent with legal requirements or Compliance Program standards;
- Failure to report suspected non-compliance; or
- Direct or indirect retaliation against an individual who reports, through any means, suspected non-compliance.

Possible disciplinary action may include, but is not limited to, counseling, written warnings, suspension, or termination. Disciplinary action will be pursued on a fair and equitable basis, and employees at all levels of Delta Dental of Virginia are subject to the same disciplinary actions for the commission of similar offenses, including executive staff. Human Resources will ensure that the imposed discipline is proportionate to the level of misconduct and administered fairly and consistently in compliance with Family policies and procedures.

Disciplinary standards must be well-publicized, distributed and made available to all levels of management, employees, and where applicable, appropriate agents.

Hiring Criteria — Director of Human Resources/ General Counsel or Designee

Delta Dental of Virginia has the legal and ethical responsibility to protect the integrity of its business. Therefore, Delta Dental of Virginia will not knowingly employ or contract with an individual or entity that has engaged in substantive illegal activities or who has been convicted of healthcare insurance-related crimes.

Accordingly, any applicant for an employment position with Delta Dental of Virginia will be required to disclose whether he/she has ever been convicted of a substantive criminal offense, including:

- Fraud, theft, embezzlement, breach of fiduciary responsibility or other financial misconduct in connection with a healthcare program; or
- Exclusion from participation in federal government programs.

Also, Delta Dental of Virginia will reasonably inquire about the relevant status of each prospective employee and agent by, at a minimum, pursuing the following steps:

- Conducting mandatory background checks of employees and appropriate agents with discretionary authority in the billing and eligibility functions to ensure that no history of engaging in illegal or unethical behavior exists;
- Conducting periodic reviews of the General Services Administration's List of Parties Excluded from Federal Programs available at **www.epls.gov** and the OIG's List of Excluded Individuals and Entities available at **http://www.oig.hhs.gov/fraud/exclusions.html**;
- Conducting periodic reviews of the Virginia Department of Health Professionals public licensing website to determine status of participating dentists located at **https://secure01.virginiainteractive.org/dhp/cgi-bin/search_publicdb.cgi**

If an existing employee or agent is found to be excluded, they will be investigated and, if appropriate, will be immediately removed from their position of discretionary authority at Corvesta and Corvesta may terminate employment or its relationship with the agent accordingly. Participating providers whose licenses to practice dentistry have been suspended or revoked will be dealt with in the manner described in the "Termination" sections of their participating agreements.

Auditing & Monitoring — Director of Internal Audit & Risk Management/Compliance Officer

Delta Dental of Virginia conducts a variety of active auditing and monitoring functions designed to test and confirm the effectiveness of the Compliance Program and identify Delta Dental of Virginia's enterprise risk areas. Compliance audits will be conducted at the Compliance Officer's discretion and will, to the extent practical, be coordinated with audits or other examinations conducted by the Director of Internal Audit and Risk Management or external auditor. Also, audits will be outlined in an audit plan to be reviewed and approved by the Audit Committee and reevaluated annually to determine whether audits have been effective in identifying risk areas and, if action has been taken to correct discovered deficiencies, whether that corrective action is deemed sufficient to improve the audited area.

Routine audits by the Director of Internal Audit and Risk Management may include:

- Claims accuracy
- Billing systems
- High volume services
- Dental claim documentation
- Marketing endeavors

Compliance audits of these or other areas may take one or more of the following forms:

- **Baseline Audit** — An initial audit in a series of identical audits that provides a basis against which the progress of future audits is compared. Assessments of enterprise risk areas can be determined through baseline audits;
- **Prospective Audit** — An audit performed before a function is implemented or performed in an effort to correct discovered deficiencies. For example: in the case of enrollee PHI, a prospective audit would be performed before PHI is made available to non-affiliated parties.
- **Retrospective Audit** — An audit performed after a function is implemented or performed, that may require Corvesta to implement corrective action to remedy any discovered deficiencies in the audited area.
- **Special Audits** — An unscheduled audit performed at the discretion of the Director of Internal Audit and Risk Management in response to events necessitating an audit, such as internal or external investigations.

- **Post-Compliance Audits** — An audit performed following the correction of any detected deficiency to determine the effectiveness of the corrective action.
- **Annual Risk Assessment Audit** — An examination performed annually or more frequently to identify those audited areas that have improved and those that require further corrective actions.

External auditors who have attained the requisite certification and have expertise in applicable federal and state health insurance laws and federal health care program requirements may conduct these audits. Compliance audits may also be conducted by the Compliance Officer or Director of Internal Audit and Risk Management. The Director of Internal Audit and Risk Management, working with the Compliance Officer, may direct each department as to the level of monitoring activities necessary to detect and prevent deficiencies in the Compliance Program. The President and CEO, legal counsel or their designee will resolve disputes as to the necessary level of monitoring and issue resolution. Monitoring activities may also be initiated by the Audit and Compliance Committee of the Board.

The Director of Internal Audit and Risk Management (or any external auditors retained by Corvesta for that purpose) should prepare a written report to include the findings and results of each audit. These reports will help determine whether a particular area shows improvement or whether there are continued deficiencies that need additional attention or examination. Compliance reports created by an auditing or ongoing monitoring process, including reports of non-compliance, must be reported to, and maintained by the Compliance Officer and shared with the Executive Compliance Committee, the President and CEO, Audit Committee, and the Board, as dictated by Delta Dental of Virginia policy.

Investigation, Response & Prevention

Conduct in violation of law or inconsistent with the goals of the Compliance Program subverts Delta Dental of Virginia's mission and endangers its reputation. Accordingly, Delta Dental of Virginia has established a mechanism that enables prompt response to credible reports of non-compliance.

When the Compliance Officer receives a report of non-compliance that they determine to be credible, the Compliance Officer will coordinate with the representatives from the relevant Corvesta departments to:

- Promptly halt the underlying activity and halt or mitigate, where possible, any ongoing harm caused by the suspected non-compliance;
- Fairly and appropriately investigate to determine the existence, scope and seriousness of the non-compliance and to identify the conduct or process that caused the non-compliance;
- Respond with appropriate action to correct the confirmed non-compliance;
- Implement preventative measures to avoid similar instances of non-compliance in the future; and
- Perform periodic audits of the identified problem area(s) to ensure that the implemented preventative measures have effectively eliminated the cause of the non-compliance.

If an investigation uncovers credible evidence of non-compliance, and after a reasonable inquiry, the Compliance Officer has reason to believe that the non-compliance may violate a law or regulation, the Compliance Officer will immediately report the matter to the legal counsel for advice regarding Delta Dental of Virginia's reporting obligations. After consulting with legal counsel, the Compliance Officer will promptly report such matters to the President and CEO and/or the Audit and Compliance Committee of the Board. The Compliance Officer will maintain appropriate protocol to ensure that steps are pursued to secure or prevent the destruction of documents or other evidence relevant to the investigation.

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