


HEPTAGON PHOTONICS PTE. LTD.

FLSGP-LOS-WI-0072

Process to Identify Applicable Labour laws, Ethics Regulations, and Customer Requirements

Rev.A0


Heptagon Photonics Pte. Ltd.

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1. Purpose

Heptagon Photonics Pte. Ltd. (“the Company” or “Heptagon”) is committed to conducting business with integrity, transparency, and accountability. This Process outlines the necessary process needed for identification and evaluation of the **applicable Labour laws, Ethics Regulations, and Customer Requirements in Singapore**, ensuring the Company complies with the following Singaporean labor laws, ethics regulations, and customer integrity requirements, and to track and evaluate updates or changes to applicable labor laws, ethics regulations, and customer requirements in a timely manner.

- Singapore’s Employment Act (EA).
- Applicable laws & Regulations from Ministry of Manpower.
- Singapore’s Ethics Regulations, including the **Tripartite Guidelines on Fair Employment Practices (TAFEP)**, **Prevention of Corruption Act (PCA)**, **Personal Data Protection Act (PDPA)**, and **Employment Claims Tribunals (ECT)**.

2. Scope

This Policy applies to Corporate Governance, Human Resources, Legal, Quality and other relevant departments etc., which will be publicly announced in the Company’s Website: <https://www.hptg.com/>.

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3. Responsibilities Allocation

- **Process Owner:** Compliance Team
- **Executing Departments:** Corporate Governance, Human Resources, Legal, Quality and other relevant departments
- **Review Team:** Periodically, the Compliance Team will review in collaboration with relevant departments.

4. Identify Applicable Labor Laws, Ethics Regulations, and Customer Requirements


4.1 Step 1: Identification

Identify the relevant labor laws and ethics regulations for the Company's business operational location, including national, industry-specific, local laws & regulations, as well as specific customer contract requirements.

4.2 Step 2: Reference Legal Sources

Use the following resources to identify applicable labor laws and ethics regulations:

- Official government websites (e.g., Ministry of Manpower of Singapore etc. [Ministry of Manpower](#))
- Legal databases (e.g., LexisNexis, Westlaw, etc.)
- Industry associations and professional organizations' guidelines
- Customer contracts and requirement specifications

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4.3 Step 3: Customer Requirements Assessment

Review customer contracts, industry standards, and specific customer requirements to identify any particular labor law and ethics compliance demands.

5. Evaluate the Impact of Labor Laws and Customer Requirements

5.1 Step 1: Analyze Changes in Labor Laws and Ethnic Regulations

Regularly evaluate how changes in labor laws and ethics regulations affect the Company's business operations and human resources management, such as changes in minimum wage, working hours, employee benefits, patent protection, etc.


5.2 Step 2: Assess Customer Requirement Changes

Track any changes in customer requirements regarding labor law and ethics compliance in contracts or project execution to ensure the Company can respond timely and remain compliant.

5.3 Step 3: Assess Compliance Gaps

Compare the current internal policies and processes with the latest laws & regulations and customer requirements to assess any compliance gaps.

6. Legal Register and Update Tracking

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6.1 Step 1: Establish Legal Register

Document the summary of key points of the applicable labor laws, ethnics regulations, and customer requirements in the **Governance Compliance Team**

Share-point **Folder**

(https://focuslight.sharepoint.com/:f:/s/GovernanceComplianceTeam/Eo_HgDD5wf1MsnezlVBQKfsB-ZB7FQJbIYj4Fsxqh3j-cg?e=WeeZhN), including relevant clauses, implementation dates, and requirement changes.


6.2 Step 2: Update Tracking

Set up a tracking mechanism to keep *the summary of key points of the applicable labor laws, ethnics regulations, and customer requirements* up to date by reviewing government and industry announcements, legal news, and customer requirement updates.

- Review updates to local labor laws monthly or quarterly.
- Regularly communicate with customers to understand any changes in their labor law or other compliance requirements.

6.3 Step 3: Reporting and Documentation

Any changes in labor laws or customer requirements should be promptly recorded in the **Governance Compliance Team Share-point Folder** and reported to management and relevant departments.

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7. Implement Changes and Compliance Adjustment

7.1 Step 1: Develop and Adjust Policies

If any compliance gaps are identified, the Compliance Team should propose adjustment recommendations and update company policies and procedures to ensure compliance with updated labor laws and customer requirements.

7.2 Step 2: Training and Communication


Regularly train relevant departments and employees to ensure they are aware of and comply with updated labor laws and customer requirements, ensuring overall Company compliance.

7.3 Step 3: Ongoing Monitoring & Review

Regularly review the Company's business operations and compliance status to ensure continued adherence to labor laws, ethnics regulations, and customer requirements.

8. Recording Keeping and Document Management

- Maintain a complete updating, including records of summary of the updating, the timing of regulatory changes, impact analysis, and subsequent adjustments.
- Ensure all legal documents and updates are archived and managed in accordance with company policies.

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(The End)