

Governance

Conflict Minerals Responsible Sourcing Policy

Background:

In August 2012, the U.S. Securities and Exchange Commission (the “SEC”) adopted a rule mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd Frank Act”) to require U.S. publicly traded companies to report their use of Conflict Minerals, defined as tin, tantalum, tungsten and gold (commonly referred to as the “3TG” or “Conflict Minerals”). The rule requires all U.S. publicly traded companies to conduct reasonable country of origin inquiries and supply chain due diligence with respect to the sourcing of Conflict Minerals used in the manufacture of their products. If any Conflict Minerals are determined to have originated from the Democratic Republic of Congo (DRC) or any of the adjoining countries, further due diligence and disclosures must be made as to whether the related trades in these minerals, directly or indirectly, financed or benefited the armed groups or contribute to human rights abuse. Novanta Inc. (“Novanta”, the “Company”, “we”, or “our”) files a Form SD and Conflict Minerals Report with the SEC on an annual basis.

Policy Statement:

Novanta is committed to complying with all laws and regulations applicable to our business, including laws and regulations concerning responsible sourcing of minerals. Our Responsible Sourcing Policy is a key element of our commitment to an ethical and sustainable supply chain.

We are committed to sourcing components and materials from companies that share our values regarding human rights, labor rights, ethics, and environmental responsibility. We do not condone any activity that fuels conflict, leads to serious environmental degradation, or violates human rights. We will not knowingly procure Conflict Minerals from any of the conflict-affected or high-risk countries that are not certified as conflict free or otherwise take any action that would contribute to the financing of armed groups responsible for human rights violations. We require our suppliers to be committed to compliance with applicable laws, rules, and regulations, as well as the standards relevant for their business and Novanta’s Supplier Code of Conduct. Novanta’s suppliers are evaluated with respect to their ability to meet these requirements in addition to our specified business and technical requirements.

Although Novanta does not source any Conflict Minerals directly from smelters or refineries, we are committed to conducting necessary due diligence through our direct supply chain to identify the smelters and refineries where the Conflict Minerals in our products originate. We follow the Organization for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-risk Areas. We also expect all of our direct suppliers to fully cooperate with us and to provide Novanta with the information required to support this Responsible



Sourcing Policy and our related compliance efforts. Novanta also expects all of our direct suppliers who source Conflict Minerals to develop internal Responsible Sourcing Policies that adhere to Conflict Minerals mandates, due diligence frameworks and systems designed to ensure that components and materials supplied to Novanta use materials that have been sourced in a socially responsible manner and to confirm that they have not, and will not, knowingly procure Conflict Minerals that originate from smelters and refineries that are not certified as conflict free. We will reconsider our partnership with any supplier that fails to comply with this Policy or fails to implement reasonable steps to transition to Conflict Free sources. We reserve the right to request from any supplier at any time such information, certifications and documentation as it shall deem necessary to monitor or assess compliance with this Responsible Sourcing Policy.