



Conflict Minerals Policy

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”). 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 any of the 3TG minerals used in the manufacture of their products. If any 3TG minerals are determined to have originated from the Democratic Republic of Congo (the “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 in the DRC or any of the adjoining countries.

Novanta, Inc. (“Novanta” or the “Company”) is committed to complying with all laws and regulations applicable to our business, including the Conflict Minerals laws and regulations. Novanta is conducting necessary due diligence to ensure that none of the 3TG minerals in its products directly or indirectly finances or benefits armed groups in the DRC or any of the adjoining countries. Novanta expects all of its suppliers to use materials that have been sourced in a legally responsible manner and to confirm that they have not, and will not, procure Conflict Minerals from smelters and refineries that are not certified as conflict free. Should Novanta discover that any of its suppliers is sourcing any 3TG minerals that directly or indirectly finances or benefits armed groups in the DRC or any of the adjoining countries, Novanta will work with the supplier to end this practice and if the supplier refuses, Novanta will work diligently to identify and partner with an alternative supplier.

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