

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 Conflict Minerals used in the manufacture of their products. If any Conflict Minerals are determined to have originated from the Democratic Republic of Congo or any of the adjoining countries (the “Conflict 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 Conflict Countries.

Novanta, Inc. (“Novanta”, the “Company”, “we”, or “our”) is committed to complying with all laws and regulations applicable to our business, including the Conflict Minerals laws and regulations. We are committed to sourcing components and materials from companies that share our values regarding human rights, ethics and environmental responsibility. We do not condone any activity that fuels conflict, leads to serious environmental degradation or violates human rights. Therefore, we will not knowingly procure Conflict Minerals from any of the Conflict 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.

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. Novanta also expects all of our direct suppliers to develop internal Conflict Minerals policies, 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. Additionally, we expect our suppliers to fully cooperate with us and to provide Novanta with the information required to support this Conflict Minerals Policy and our related compliance efforts. We will reconsider our willingness to partner with any supplier that fails to comply with this Conflict Minerals Policy.