

## Governance

# Human Rights Policy

## Including Novanta's Statements regarding U.K. Modern Slavery Act 2015 and California Transparency in Supply Chains Act of 2010

Novanta's Board of Directors provides oversight over policies and operational controls related to Novanta's Environmental Social and Governance ("ESG") programs and compliance. As part of this, the Board of Directors reviews and oversees Novanta's Human Rights Policy. We provide our Board of Directors comprehensive updates on ESG issues, including human rights, climate change and other ESG related risks, at least annually and as warranted at their regular meetings.

**Novanta Inc.**, its subsidiaries and affiliates ("Novanta") are committed in our business practices to reflect our company's values, including treating people with respect and dignity. Novanta's Code of Ethics and Business Conduct, which is available in eight (8) languages (English, Chinese, Czech, German, Japanese, Spanish, French, and Italian), describes our ethical standards and our expectations for all directors, officers, employees, contractors, and suppliers. As further outlined below, employees receive periodic ethics and compliance trainings, and our suppliers are expected to adhere to our Supplier Code of Conduct.

**Novanta condemns all forms of child, forced, unpaid or compulsory labor and human trafficking. We expect the same from our business partners and suppliers.**

## Modern Slavery Act

The Modern Slavery Act (United Kingdom) requires certain commercial organizations doing business in the United Kingdom to prepare a slavery and human trafficking statement for each financial year. The statement is to disclose the steps taken to ensure that slavery and human trafficking is not taking place in our business operations or supply chains. Novanta requires its business partners and suppliers to comply with relevant labor laws and, where applicable, to the relevant provisions of the U.K. Modern Slavery Act.

## California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act requires certain manufacturers doing business in the State of California to disclose their efforts to eliminate the use of slave labor and human trafficking from their supply chains. The law was designed to increase consumers' knowledge about products they buy and the companies they choose to support.

## Human Rights for All People

Novanta is committed to the spirit and letter of all human rights laws in all countries in which we do business. Our belief is that these laws should protect our employees, contractors, employees anywhere in our supply chain and any other persons impacted by or doing business with us. We aim not only for full compliance but also to avoid adverse impacts on human rights by focusing on the perspective of the rights holder, i.e. each and every person. Novanta supports and respects internationally proclaimed human rights; for example, the principles reflected in the Universal Declaration of Human Rights issued by the



General Assembly of the United Nations as well as the provisions in the U.K. Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010.

We comply with all applicable laws pertaining to fair labor and employment practices, freedom of association, collective bargaining, privacy, immigration, working time, wages and hours. We do not tolerate the abuse of human rights in our operations.

Novanta does not condone or tolerate any form of harassment, including psychological, physical or sexual harassment; or any other violation of the dignity and respect of persons in the workplace. Similarly, Novanta will not allow or overlook any form of workplace discrimination based on gender, age, ethnicity, national origin, religion, disability, sexual orientation, HIV/AIDS status, citizenship, genetic information or any other relevant characteristics protected under the applicable law.

Novanta has zero tolerance for any form of retaliation. Any act or omission motivated by prejudice or bigotry will result in a termination of the wrongdoer's relationship with Novanta.

### Safe Workplace

We will also work continuously to maintain workplaces free from physical dangers. Novanta observes all regulations in the area of safety and health at work, not only in respect of all its employees but also in respect of anyone else at our sites or potentially affected by our activities. Employees must comply with the applicable safety, security, health and environmental legislation in force at Novanta.

### Supplier Code of Conduct

Our responsibilities go beyond our factories and corporate offices: they extend to our supply chain. In order to better communicate Novanta's standards for ethical and lawful business conduct to our vendors throughout the world, we have written and posted a [Supplier Code of Conduct](#). This document summarizes the values and principles that Novanta expects of its vendors. Novanta expects its suppliers to comply with all applicable legal requirements. Novanta considers these issues when we choose potential suppliers. Novanta also performs periodic audits of our suppliers to evaluate and address issues relating to their compliance with applicable laws and regulations, including human rights, and with Novanta's policies and procedures.

### No Child Labor

Novanta allows the employment of juveniles only where such employment is lawful, and only under conditions which adequately safeguard their well-being.

### Privacy

We are committed to protecting the privacy of those who entrust us with their personal information, including our customers, vendors, website visitors, employees, and all those who do business with us. Whenever possible, we explain how personal information can be corrected, updated or deleted. We keep personal information secure. (Click [Here](#)) for our Position on Data Privacy.



## Training of Employees and Reporting of Concerns

In addition to receiving our **Code of Business Conduct**, Novanta employees complete **periodic ethics and compliance trainings**. Employees are required to certify their adherence to the standards described during training, and to disclose any exceptions. Employees know they are expected to always respect human rights and to conduct business ethically, honestly, and in compliance with applicable laws and regulations.

Novanta maintains a **Compliance Hotline** through which employees and the public can submit, anonymously, any concerns of possible ethics or compliance violations by anyone at Novanta, including slavery and human trafficking. Concerns may also be raised with Novanta's Legal Counsel, Human Resources Department, or the Board of Directors. Every submission is taken seriously and is investigated objectively and thoroughly by Novanta or outside counsel and handled accordingly. Anyone with a business relationship with Novanta who is found to have violated any provision of the Code of Ethics and Business Conduct is subject to disciplinary action, up to and including termination of the relationship with Novanta, and possible referral to appropriate legal authorities.