

Corporate Governance

Political Activity Policy

General Policy Statement: Novanta Inc., including its subsidiaries, will not use any Novanta (or subsidiary) funds, assets or resources in connection with political activities.

Statement of Policy

Novanta will not make any political contributions or use Novanta's funds, assets, or other company resources to benefit any political candidates, parties, political committees or political special interest groups. This includes not using any resources towards any political action committees ("PACs") or any group or organization engaged in political fundraising, including special interest groups organized under Section 527 of the US Internal Revenue Code ("527 organizations"). Equivalent groups in other countries are also covered by this policy. PACs, 527 organizations and equivalent bodies in other countries are called "[Political Groups](#)" in this policy.

Employee Political Contributions and Other Activity

All employees acting on Novanta's behalf must comply with laws that apply to the use of company resources for political purposes. As part of that compliance program, Novanta prohibits the use of Corporate resources to support or oppose political candidates or political committees. Novanta does not allow political campaigns or partisan political activities at any Novanta facility or workplace. In addition, Novanta does not allow any Novanta resource (including, but not limited to, computers, telephones, IT system) to be used for political campaigning, fund-raising, or other partisan political activities. While Novanta encourages employees' involvement in the political process on their own personal time, an employee's involvement in these processes must not in any way suggest Novanta's support or use Novanta's resources.

This policy is not intended to preclude or dissuade employees from engaging in legally protected activities; and is not intended to restrict communications or actions protected or required by national or local law.

This policy does not prohibit or restrict the following lawful activities or uses of Novanta's resources:

- The activities of the Corporate Communications or Public Affairs organization.
- Novanta's communications on issues of concern to Novanta or Novanta's employees.
- Other lawful activities or uses of Novanta's resources that are consistent with Novanta Code of Ethics and Business Conduct Policy, and approved in advance by Novanta's Chief Financial Officer or Legal Counsel.
- Political officeholders and candidates for public office may visit a Novanta facility and address Novanta employees. In such cases, no Novanta employee is required to attend such events. Novanta may refuse or limit any political candidate's appearance on Novanta properties as permitted by law. In addition, no candidate may distribute literature or solicit contributions on Novanta premises. All such visits must be approved in advance by Novanta's Chief Financial Officer or Legal Counsel.

An employee's personal, lawful political contributions and decisions to make or not to make political contributions will not influence an employee's compensation, job security, or opportunities for advancement at Novanta.

Anti-Corruption and Bribery Policy

Employees are reminded that Novanta maintains an Anti-Corruption and Bribery Policy which is applicable to all business units and all employees in all countries. Any personal employee political contributions or activities must additionally comply with Novanta's Anti-Corruption and Bribery Policy.

Roles and Responsibilities

The following table outlines the roles and responsibilities of various functional and business areas for compliance with this policy:

Responsibility	Responsible Department or Function
Oversight of Political Activity Policy	Chief Financial Officer, Legal Counsel
Investigation of policy violations	Human Resources, Internal Legal Counsel, Outside Counsel if needed
Training on this policy	Human Resources
Development of local procedures and local organizational support	Local Leadership