

Governance

Restriction of Hazardous Substances (RoHS) and Waste Electrical and Electronic Equipment Directive (WEEE) Compliance Policy

Novanta is committed to complying with the Restriction of Hazardous Substances Directive (RoHS), Directive 2011/65/EU (Also known as RoHS re-cast or RoHS 2), as updated by Directive 2015/863/EU, which amends Annex II to Directive 2011/65/EU, by adding on four additional substances (phthalates). The RoHS directive therefore restricts the use of the following specific hazardous substances found in electrical and electronic products: Lead (Pb), mercury (Hg), cadmium (Cd), hexavalent chromium (CrV1), polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), and four different phthalates (BBP, DEHP, DPB, DIBP). The restricted materials are hazardous to the environment and pollute landfills, and are dangerous in terms of occupational exposure limit during manufacture and recycling. Directive 2017/2102/EU also amends Directive 2011/65/EU and includes amending the application scope and the exemption validity period.

Novanta is also committed to complying with the closely linked Waste Electrical and Electronic Equipment Directive (WEEE), also known as Directive 2002/96/EC, as updated by Directive 2012/19/EU, which mandates the treatment, recovery and recycling of electric and electronic equipment. All applicable products in the EU market after February 2003 must pass WEEE compliance.

Novanta will meet all RoHS/WEEE requirements and is committed to providing our customers with information about substances in our products according to RoHS/WEEE requirements. We support the basic objective of RoHS of reducing the amount of hazardous chemicals used in electronics manufacture. We also support the basic objective of WEEE to encourage the design of electronic products with environmentally-safe recycling and recovery in mind.

Novanta is committed to complying with all laws and regulations applicable to our business, including the RoHS/WEEE regulations. Novanta will actively monitor our supply chain to ensure that all materials have been verified to the RoHS/WEEE standards. Novanta expects all of its suppliers to use materials that comply with RoHS/WEEE regulations. Should Novanta discover that any of its suppliers are non-compliant with RoHS/WEEE regulations, we will work with the supplier to achieve compliance and if the supplier refuses, Novanta will work diligently to identify and partner with an alternative supplier.

/s/ Matthijs Glastra

Matthijs Glastra Chief Executive Officer Novanta Inc.