

UK Modern Slavery Act Statement

2024

Introduction

At Novanta, we are committed to ensuring that all forms of modern slavery, including forced, compulsory labour and human trafficking, are excluded from our business and supply chain. We assess our supply chain for slavery and forced labour across Novanta business units and adopt these approaches enterprise-wide. Our business partners are also expected to act in accordance with the highest standards of integrity and in compliance with all applicable laws and regulations. The U.K. Modern Slavery Act of 2015 ("UK Modern Slavery Act") requires certain businesses with operations in the UK to disclose their efforts to prevent and address slavery and human trafficking in their supply chains in an effort to eliminate the risk of modern slavery in business operations and supply chains.

About This Statement

This Modern Slavery Statement ("Statement") is made by Novanta Technologies UK Limited (or "we," "us" and "our"), an indirect wholly owned subsidiary of Novanta Inc. located in the United Kingdom in compliance with the Modern Slavery Act of 2015. This Statement addresses these laws, policies, and regulations and our commitment to the prohibition of slavery and human trafficking in our supply chain.

The terms "slavery and human trafficking" as used in this Statement include all forms of forced labour including slavery, child labour, domestic and indentured servitude, human trafficking, sex trafficking, and workplace abuse.

This Statement covers the policies and activities of Novanta Technologies UK Limited between January 1, 2024, to December 31, 2024.

This Statement was reviewed and approved by the Board of Directors of Novanta Technologies UK Limited.

1 Organizational Structure and Supply Chains

Novanta is a leading global supplier of core technology solutions that give medical, life science, and advanced industrial original equipment manufacturers a competitive advantage. We combine deep proprietary expertise and competencies in precision medicine, precision manufacturing, robotics and automation, and advanced surgery with a proven ability to solve complex technical challenges. This enables Novanta to engineer proprietary technology solutions that deliver extreme precision and performance, tailored to our customers' demanding applications. The driving force behind our growth is the team of innovative professionals who share a commitment to innovation, the Novanta Growth System, and our customers' success. Novanta's common shares are quoted on Nasdaq under the ticker symbol "NOVT".

About Novanta Technologies UK Limited

Novanta's active centres of manufacturing excellence in the UK are located in Stockport, Taunton, Newton, Foxton. The Stockport and Taunton facilities manufacture, and market visible and NIR laser, light engine, and optical beam steering technologies used in advanced manufacturing and precision medical applications. The Newton and Foxton facilities are dedicated to the manufacture of high-performance encoder technologies for advanced position sensing applications.

Oversight of Human Rights and Other Sustainability Topics

Responsibility for strategy and planning has been placed with our Novanta Technologies UK Limited Leadership Team, our senior-most leaders, under the oversight of the General Management of our Precision Manufacturing Business. The Novanta Technologies UK Limited Leadership Team manages day-to-day assessment and decision-making around Novanta Technologies UK Limited's risks and opportunities which include human rights and supply chain risks, with a focus on our most significant risks. Novanta's executive leadership oversees and guides these efforts and, the Novanta Board of Directors, as well as the ESG Committee of the Board, oversee the corporate governance and sustainability strategy and policies and are committed to the operation of Novanta in a responsible manner. Novanta's compliance manager is responsible for working with Novanta Technologies UK Limited in managing sustainability compliance by Novanta Technologies UK Limited's key suppliers, which represent the top 80% of its spending. Novanta's quality managers are responsible for working with Novanta Technologies UK Limited in managing quality assurance and compliance for the business unit and directly engaging suppliers on sustainability topics, among others

Novanta Technologies UK Limited Supply Chain

Our Code of Business Conduct, our Supplier Code of Conduct and our other policies described in this Statement convey our values and create the importance of ethical business behavior within our supply chain and other communities. Novanta Technologies UK Limited purchases a wide range of products and services from its supply chain, including equipment, supplies and raw materials. We encourage third parties who provide goods and services to us to operate in accordance with these policies and values, to comply with all applicable laws and regulations, and to implement practices and guidelines that address the issues.

2 Policies in Relation to Slavery and Human Trafficking

Our commitment to taking steps to identify and eradicate modern slavery risks within our business operations and supply chain are embodied in our requirement that all employees and suppliers comply with all the relevant laws and regulations in the countries in which they work or operate. In addition, this commitment to safeguarding human rights in our operations and supply chain additionally includes a robust set of policies defining the actions and behaviors we expect from our employees and business partners. [These policies](#) include the following Novanta policies that govern Novanta Technologies UK Limited as well:

Code of Business Conduct — Available in eight languages, the Novanta Code of Business Conduct identifies the ethics, values, and principles that guide our business relationships. We are committed to doing business with a strong sense of ethics, honesty, and integrity. The Code of Business Conduct was written by management and approved by Novanta's Board of Directors. The Code of Business Conduct provides guidelines on relationships between employees and internal and external stakeholders, conflicts of interest, anti-bribery and anti-corruption, protection of assets, and more. All employees and directors are responsible for upholding the Code of Business Conduct.

Supplier Code of Conduct — Novanta's Supplier Code of Conduct outlines the policies and procedures with which we expect our suppliers to comply. This Supplier Code provides guidelines on labour rights, ethics, conflict minerals due diligence, regulatory compliance, and more. Novanta Technologies UK Limited key suppliers — defined as the top 80% of direct material suppliers by spend — are required to sign and adhere to the most recent Supplier Code of Conduct.

Human Rights Policy — Novanta Technologies UK Limited condemns all forms of child, forced, unpaid or compulsory labour and human trafficking. We expect the same from our business partners and suppliers. Novanta's Human Rights Policy details the various laws and regulations related to human rights that we adhere to and the ethical standards we expect all our leaders, employees, and business partners to adhere to.

Anti-Harassment Policy — Novanta Technologies UK Limited prohibits and does not tolerate any unlawful harassment against employees or any other covered persons because of race, color, religion, creed, national and or ethnic origin, ancestry, sex, pregnancy and maternity, parenthood, marital or familial status, gender, gender identity, age, sexual orientation, disability, chronic disease, citizenship, political opinion, genetic information, domestic violence victim status, or service in the uniformed services, or any other characteristic protected under applicable federal (including national/UK), state, or local law.

3 Due Diligence

We at Novanta conducted our annual internal assessment of our own operations to ensure we are adhering to human rights standards set forth in our Code of Business Conduct and Human Rights Policy in 2024. The assessment covered compliance at all Novanta Technologies UK Limited sites with regard to the following topics:

- Human Rights Reporting
- Employee Health & Safety
- Working Conditions
- Social Dialogue
- Career Management & Training
- Child Labour, Forced Labour & Human Trafficking
- Discrimination & Harassment

No violations were identified in the 2024 assessment.

Our Supply Chain

Novanta and Novanta Technologies UK Limited screen all new key suppliers for financial, legal, and business ethical risks. All new suppliers are required to agree to adhere to our Supplier Code of Conduct. They are also audited for the purpose of assurance and compliance and required to complete a self-assessment annually or biennially depending on their level of risk. Audits and self-assessments include ESG criteria, including labour rights and working conditions.

Novanta Technologies UK Limited also completes the Slavery & Trafficking Risk Survey Template (STRT), disclosing our locations of operations, human rights policies, supplier screening, and potential risks, on an annual basis.

4 Risk Assessment and Management

Novanta's Internal Audit function performs an annual update to Novanta's enterprise risk assessment by conducting interviews of various senior leaders within Novanta. All risks are ranked based on both the likelihood of occurrence and the severity of the potential impact. We have also included human rights-related risks in our enterprise risk assessment. Our risk assessments will be updated for changes in the business environment annually.

5 Assessment

We are committed to ensuring high standards of human rights within our supply chain. All of our key suppliers are provided the Novanta Supplier Code of Conduct and are asked to review and confirm they comply with all expectations contained within it. We expect each supplier to adopt and carry out processes and procedures within its own organization that align with the Novanta Supplier Code of Conduct. As stated in our Supplier Code of Conduct, we reserve the right to audit suppliers' conformity to the Supplier Code of Conduct at any time, including compliance with fair labour practices and human trafficking, as well as request certification from suppliers that they adhere to these policies. If a supplier fails to comply with our Supplier Code of Conduct, we reserve the right to suspend, reduce or terminate our relationship with the supplier. In 2024, our assessment of our progress towards reaching our human rights objectives included achievement of the sign off by all of our key suppliers on the Supplier Code of Conduct and completion of all of our Novanta Technologies UK Limited employees of their ethical training, including execution of our latest Code of Ethics and Business Conduct. We also assess our key suppliers through conducting on-site audits or self-assessments which include sustainability aspects (i.e. human and labour rights) and in 2024 were able to conduct such assessments without material concerns raised. We strive to complete this for every key supplier within a three-year period.

6 Training on Modern Slavery and Trafficking

New and existing employees are required to regularly pass training courses on ethics, anti-bribery and anti-corruption, anti-harassment, and data privacy policies. Additionally, all employees are required to annually certify that they understand and uphold the Novanta Code of Business Conduct, Anti-Bribery and Anti-Corruption Policy, and Anti-Harassment Policy.

We conduct sustainability related training courses for our supply chain and quality management employees, including those of Novanta Technologies UK Limited. The trainings cover our Sustainability Scorecard, workflow, Sustainable Purchasing Policy, roles and responsibilities, assessments, audits, and include information about slavery and human rights. These trainings are a standard part of our onboarding process for these roles.

7 Conclusion

At Novanta Technologies UK Limited, we are committed to reflecting our values in the way we do business both internally in our own operations and externally with the business partners we choose to work with. We strive to uphold both the spirit and letter of all human rights laws in all countries in which we do business.

These laws, along with our own internal policies, protect our employees, contractors, workers 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 each employee.

This Statement was approved by the General Manager and the Board of Directors of Novanta Technologies UK Limited as of June 26, 2025.

Steve Lane

Director
Novanta Technologies UK Limited