

INVACARE HOLDINGS CORPORATION

<u>Financial Code of Ethics</u> <u>for the</u> <u>Chief Executive Officer and Specified Financial Officers</u>

(Adopted August 2023)

This Financial Code of Ethics of Invacare Holdings Corporation ("Invacare") applies to Invacare's principal executive officer, principal financial officer, principal accounting officer or controller or persons performing similar functions (the "financial officers"). Invacare expects all of its employees to act with personal and professional integrity in all aspects of their employment, to comply with all applicable laws, rules and regulations, to deter wrongdoing and to abide by Invacare's other policies and procedures that govern the conduct of Invacare employees. This Financial Code of Ethics is intended to supplement Invacare's other policies and procedures.

Each financial officer shall:

- (1) Engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- (2) Produce full, fair, accurate, timely, and understandable disclosure in reports and documents that Invacare files with, or submits to, the Securities and Exchange Commission and other regulators and in other public communications made by Invacare;
- (3) Comply with applicable governmental laws, rules and regulations, as well as the rules and regulations of self-regulatory organizations of which Invacare is a member;
- (4) Promptly report any possible violation of this Financial Code of Ethics to the Chairperson of the Audit Committee of the Board of Directors by writing to him or her c/o Invacare Executive Offices; and
- (5) Take all reasonable measures to protect the confidentiality of non-public, proprietary information about Invacare and its customers obtained or created in connection with such financial officer's activities and to prevent the unauthorized disclosure of such information unless required by applicable law or regulation or legal or regulatory process.

The financial officers understand that they are prohibited from directly or indirectly taking any action to fraudulently influence, coerce, manipulate or mislead Invacare's independent public accountants for the purpose of rendering misleading the financial statements of Invacare.

The financial officers further understand that they will be held accountable for their adherence to this Financial Code of Ethics. Failure to observe the terms of this Financial Code of Ethics may result in disciplinary action. Violations of this Financial Code of Ethics also may constitute violations of law and may result in civil and criminal penalties against the financial officer and/or Invacare.