



Yes, you can.®

October 15, 2013

Subject: Invacare Corporation Policy Statement on Conflict Minerals

In 2010, Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank”) requiring the Securities and Exchange Commission (“SEC”) to issue rules specifically relating to the use of “Conflict Minerals” within manufactured products. Conflict Minerals are defined by the US State Department as tin, tantalum, tungsten and gold (also known as the “3TGs”) originating from the Democratic Republic of the Congo (“DRC”) and adjoining countries (collectively, “DRC Region”). The SEC rules require all SEC registrants whose commercial products contain any 3TGs necessary to the functionality or production of those products to determine whether the minerals originated from the DRC Region, and, if so, whether they are conflict free. By enacting this provision, Congress intends to further the humanitarian goal of ending the extremely violent conflict in the DRC Region, which has been partially financed by the exploitation and trade of Conflict Minerals originating in the DRC Region.

Invacare’s Commitment

Invacare Corporation is guided by its core values and believes that its commitment to integrity and accountability extends to its worldwide supply base. Invacare is committed to sourcing its products responsibly, and it expects its suppliers to source materials from responsible suppliers. To aid in complying with the SEC disclosure requirements, Invacare is working with its suppliers to perform appropriate due diligence in determining the potential for Conflict Minerals in our supply chain and products. We are designing our due diligence in accordance with the Organization for Economic Cooperation and Development Due Diligence Framework.

Expectations of Suppliers

Invacare expects its suppliers to partner with it to comply with Dodd-Frank’s Conflict Minerals reporting rules. Invacare expects its suppliers to:

- (i) Complete Invacare Corporation’s Conflict Minerals survey, identifying 3TG containing products they sell to Invacare or any of its subsidiaries and the smelter that provided the original 3TG material (Invacare’s direct suppliers may have to require successive upstream suppliers to complete Invacare Corporation’s Conflict Minerals survey until the smelter is identified);
- (ii) Agree to cooperate with Invacare in connection with any due diligence that Invacare determines to perform with respect to its country of origin inquiries; and
- (iii) Provide reasonable proof of the due diligence performed by the supplier, when Invacare deems it necessary, to support the country of origin certification provided by the supplier to Invacare.