



California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act provides that retailers and manufacturers doing business in the State of California disclose their efforts to eradicate slavery and human trafficking from their direct supply chain. Invacare, through this disclosure, is communicating its efforts to address the risk of human trafficking and slavery in its direct material supply chain. Invacare's efforts include:

1. **Verification.** Invacare internally conducts an annual enterprise-wide risk assessment which evaluates and addresses the significance and likelihood of risks the company faces, including verification of supply chain sourcing risk, such as the risks of human trafficking and slavery. This is handled internally, and we do not use a third party for verification.
2. **Audits.** Invacare performs periodic audits of suppliers to assess their compliance with our standards for suppliers. The Invacare Code of Conduct for Suppliers (Code) prohibits human trafficking and slavery. The supplier verification audits are not independent, unannounced audits.
3. **Certification.** The Code contains specific language regarding human trafficking and slavery. As part of the terms and conditions of doing business with Invacare, direct material suppliers are expected to comply with the Code as well as laws regarding slavery and human trafficking of the country or countries in which they do business.
4. **Accountability.** Invacare's employees and suppliers are expected to adhere to the Code. Invacare requires immediate cessation of serious breaches of the Code, and where these persist, termination of the business relationship. Employees who violate Company policy are subject to disciplinary action up to and including termination of employment.
5. **Training.** Sourcing, purchasing, and supplier quality employees of Invacare who are directly responsible for supply chain management particularly with respect to mitigating risks within the supply chains of products are provided awareness training on human trafficking and slavery, and are expected to report any known or suspected violations.

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