



CODE OF CONDUCT FOR SUPPLIERS

Invacare Corporation is committed to high standards of integrity and sustainability.

Invacare Corporation expects its suppliers and subcontractors to share and comply with the principles expressed in this Code of Conduct for Suppliers (the “Code of Conduct”). This Code of Conduct comprises an important component of supplier selection and evaluation. We expect our suppliers to replicate these standards further down the supply chain.

I. LABOR STANDARDS

Suppliers are expected to protect the human rights of their employees and respect their personal dignity and privacy. The labor standards in this Code of Conduct are based on the conventions of the International Labor Organization (ILO).

No Child Labor. Invacare does not tolerate child labor in our supply chain. Suppliers shall avoid any child labor in their business operations in accordance with the ILO’s core labor standards, applicable laws and regulations.

Human Trafficking or Slavery. Suppliers, including sub-suppliers, shall not engage in activities or support of human trafficking or use of slave labor, directly or indirectly.

Freely Chosen Employment. Invacare does not tolerate any forced, bonded or involuntary prison labor. Workers shall not be required to lodge “deposits” or their identity papers with the employer and should be free to leave their employer after reasonable notice.

Free Association. Suppliers shall respect the rights of employees to freely associate and bargain collectively.

Regular Employment. To every extent possible, work performed must be on the basis of a recognized employment relationship established through national law and practice.

Wages and Benefits. Employee wages and benefits paid for a standard working week shall, at a minimum, meet the applicable national legal standards or industry benchmarks. In any event, wages should always be sufficient to meet basic needs and to provide some discretionary income. All employees shall be paid in a timely manner. Suppliers should provide to employees written and understandable information about their employment conditions with respect to wages before they enter employment, and about particulars of their wages for each pay period. Unless otherwise

provided by local laws, deductions from wages as a disciplinary measure shall not be permitted. All disciplinary measures should be recorded.

Working Hours. Working hours shall comply with the national laws and benchmark industry standards, whichever affords protection. Overtime should be voluntary, shall not be demanded on a regular basis and shall always be compensated at an agreed-upon higher rate.

No Discrimination. There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, or political affiliation. Suppliers shall promote equal treatment of all employees.

Safe and Hygienic Working Conditions. Suppliers shall provide a safe and hygienic working environment for their employees, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Suppliers shall take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers. Access to clean toilet facilities and potable water, and if appropriate sanitary facilities for food storage shall be provided. Accommodations, where provided, shall be clean, safe and meet the basic needs of the workers. Suppliers observing the standards shall assign responsibility for health and safety to a senior management representative.

No Harsh or Inhumane Treatment. Suppliers shall provide their employees with a workplace free of harsh or inhumane treatment. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

II. ENVIRONMENTAL STANDARDS

Suppliers are expected to operate in an environmental responsible and efficient manner. Suppliers should, at a minimum, comply with all statutory and other legal requirements relating to the environmental impacts of their business.

Waste Management. Suppliers shall have systems in place to ensure safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. In the case of hazardous materials, suppliers shall have emergency response plans in place.

Packaging and Paper. Undue and unnecessary use of materials should be avoided and recycled materials used, whenever appropriate.

Conservation. Processes and activities should be monitored and modified as necessary to ensure conservation of scarce resources, including water, flora and fauna and productive land in certain situations.

Energy Use. All production and delivery processes, including the use of heating, ventilation, lighting, Information Technology (IT) systems and transportation, should be based on the need to maximize efficient energy use and to minimize harmful emissions.

III. CHEMICAL CONTENT DIRECTIVES

Suppliers are expected to provide goods and services that do not negatively impact human health and the environment. Suppliers should, at a minimum, comply with all statutory and other legal requirements relating to the chemical content of their product.

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Prop 65). Suppliers shall report to Invacare any chemical substances subject to Prop 65 that are found in the products supplied to Invacare. If any product does not contain any Prop 65 chemical substances, then suppliers shall provide a Prop 65 compliant certification. If any Prop 65 chemical substances are found in the products supplied to Invacare, then such products must include a Prop 65 warning label that meets the requirements of the Prop 65 warning safe harbor.

Restriction of Hazardous Substances (RoHS) EU Directive. Suppliers shall report to Invacare any RoHS restricted chemical substance that is found in the products supplied to Invacare. If the product does not contain any RoHS restricted chemical substances, then suppliers shall provide a RoHS-compliant certification.

Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) EU Regulation. Suppliers shall report to Invacare any listed chemical substance that is found in the products supplied to Invacare. Subject lists include those restricted-use chemical substances regulated by REACH, as well as those chemical substances proposed for REACH listing, known as Substances of Very High Concern (SVHC).

IV. BUSINESS INTEGRITY AND ETHICS

Suppliers are expected to conduct their business in an ethical manner and to act with integrity. Suppliers shall commit to the highest standards of ethical conduct when dealing with their employees, suppliers and customers.

Business Behavior. Suppliers shall not be engaged in the sale of arms to governments which systematically violate the human rights of their citizens; or where there is internal armed conflict or major tensions; or where the sale of arms may jeopardize regional peace and security.

Integrity. Suppliers shall prohibit any and all forms of corruption, extortion and embezzlement by their employees, officers, directors or agents. Suppliers should accurately record and disclose information regarding their business activities, structure, financial situation and performance in accordance with applicable laws and regulations as well as prevailing industry business practices.

Fair Competition. Suppliers shall adhere to standards of fair business, advertising and competition.

Intellectual Property. Suppliers shall respect intellectual property rights and safeguard customer information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

Supply Chain Security. Suppliers should incorporate international Supply Chain Security (SCS) measures into their business processes as described by the World Trade Organization’s SAFE framework or similar SCS guidelines (e.g., Business Anti-Smuggling Coalition (BASC) Security Program; Customs-Trade Partnership Against Terrorism (C-TPAT); Authorized Economic Operator (AEO), Partners in Protection (PIP)).

Privacy. Suppliers shall ensure that all employees’ and business partners’ privacy are protected.

Business Continuity Plan. Suppliers shall implement a comprehensive business continuity plan throughout their operations and supply chain to preserve the safety of workers, protect physical property from loss and damage, safeguard intellectual property, prevent interruptions in the manufacturing process and ensure the integrity of shipments at the point of origin.

Identification of Concerns. Suppliers shall implement processes to address the confidentiality and protection of an employee who in good faith raises a concern, makes a report, or assists with an investigation related to potential ethical or criminal violations.

Conflict Minerals. Invacare is committed to ensuring that the products it sells do not incorporate “conflict minerals” (minerals which are smelted into tin, tantalum, tungsten or gold) sourced from entities which directly or indirectly finance conflict in the Democratic Republic of Congo or adjoining countries. Invacare requires its suppliers to:

1. Perform sufficient due diligence into their respective supply chains to determine whether products sold to Invacare contain tin, tantalum, tungsten or gold, and, if so, whether and to what extent those metals are sourced from conflict-free smelters;
2. Report to Invacare the results of such due diligence to enable Invacare to comply with its legal obligations and policy goals; and
3. Commit to being or becoming “conflict-free”, so that any such metals are sourced only from conflict-free smelters.

Banned Technology. Invacare is committed to ensuring that the products it sells do not incorporate technology banned under Part A of Section 889 of the U.S. 2019 National Defense Authorization Act (“Part 889”). Invacare requires its suppliers to:

1. Perform sufficient due diligence into their respective supply chains to determine whether products sold to Invacare contain any technology banned under Part 889;
2. Report to Invacare the results of such due diligence to enable Invacare to comply with its legal obligations and policy goals; and
3. Commit to not using any technology banned under Part 889 in any products supplied to Invacare.

V. ANTI-CORRUPTION

Invacare is committed to complying with anti-corruption laws that prohibit bribes, kickbacks, or other corrupt actions to obtain or retain business or obtain any improper advantage. All suppliers are expected to comply with applicable anti-corruption laws while conducting business on behalf

of Invacare. Suppliers are prohibited from directly or indirectly receiving or offering any form of bribe, kickback, or other corrupt payment, to or from any person or organization, including government agencies or officials, private companies or employees of those private companies.

VI. GIFTS AND ENTERTAINMENT

Invacare recognizes that it is customary for some of its suppliers and other business associates to occasionally give small gifts or offer modest business entertainment to those with whom they do business. It is important, however, that these gifts and entertainment events do not affect an employee's business judgment or give the appearance that judgment may be affected. When doing business with or conducting business on behalf of Invacare, suppliers may, for legitimate business purposes (i) offer gifts or entertainment to its suppliers, customers or other business associates; or (ii) accept gifts or entertainment offered by its suppliers, customers or other business associates; provided, however, that in each instance the gift or entertainment: a) is unsolicited; b) is not a bribe, kickback or other illegal or illicit payment; c) is not given in exchange for any consideration; d) would not embarrass Invacare if disclosed publicly; e) is not lavish or excessive; and f) does not create the appearance (or an actual or implied obligation) that the gift giver is entitled to preferential treatment, an award of business, better prices or improved terms of sale.

Any supplier that violates the provisions of Section V or VI of this Code of Conduct when conducting business on behalf of Invacare risks *immediate* loss of all existing and future Invacare business.

VII. CONTINUOUS IMPROVEMENT

Suppliers adopting this Code of Conduct commit to continuous improvement towards compliance with the labor, environmental, business conduct and ethical standards specified, both in their own companies and those of their suppliers.

VIII. OPERATING PRINCIPLES FOR INVACARE AND ITS SUPPLIERS

The implementation of the Code of Conduct will be a shared responsibility between Invacare and its suppliers, informed by a number of operating principles, which will be reviewed from time to time.

Invacare will:

1. Without exception, hold each and every supplier accountable to the principles contained herein.
2. Assign responsibility for compliance with the Code of Conduct to a senior manager.
3. Communicate its commitment to the Code of Conduct to employees, as well as to its direct suppliers of goods and services.

4. Make appropriate human and financial resources available to meet its stated commitments, including training and guidelines for relevant personnel.
5. Provide guidance and reasonable non-financial support to suppliers who genuinely seek to promote and implement the Code of Conduct standards in their own business, and in the relevant supply chains within available resources.
6. Adopt appropriate methods and systems for monitoring and verifying the achievement of the standards.
7. Report progress in implementing the Code of Conduct to the corporate management of Invacare.

Invacare expects Suppliers to:

1. Accept responsibility for labor and environmental conditions under which products are made and services provided. This includes all work contracted or sub-contracted and that conducted by home or other out-workers.
2. Assign responsibility for implementing the Code of Conduct to a senior manager.
3. Report progress in implementing the Code of Conduct, as requested by Invacare.

Both Parties will:

1. Require the immediate cessation of serious breaches of the Code of Conduct and, where these persist, terminate the business relationship.
2. Seek to ensure all employees are aware of their rights and involved in the decisions which affect them.
3. Avoid discriminating against enterprises in developing countries.
4. Recognize official regulations and inspection of workplace standards.

Qualifications to the Policy Statement

The humanitarian imperative is paramount. Where speed of deployment is essential in saving lives, Invacare will purchase necessary goods and services from the most appropriate available source.

Invacare cannot accept uncontrolled cost increases nor decreases in quality. It accepts appropriate internal costs, but will work with suppliers to achieve required ethical standards as far as possible at no increase in cost or decrease in quality.

SUPPLIER ACKNOWLEDGES THAT IT HAS RECEIVED, READ, UNDERSTOOD AND AGREES TO COMPLY WITH THE CODE OF CONDUCT.

Signature

Name

Title

Date