



Company Code of Conduct and Ethics

Introduction

This Company Code of Conduct and Ethics (this "Code") sets forth legal and ethical standards of conduct for personnel of Lantheus Holdings, Inc. and its subsidiaries, including Lantheus Medical Imaging, Inc. (collectively, "Lantheus," the "Company" or "we").

This Code applies to all of the Company's:

- directors;
- officers; and
- employees (and, for the purposes of this Code, all Lantheus contractors and consultants working at, and having access to, the Company site via a Company access badge must follow this Code as if he, she or it was a Lantheus "employee" under this Code).

For ease of reference, Lantheus directors, officers and employees (and such contractors and consultants) are referred to in this Code as "personnel" or "you."

The Company is committed to adhering to all applicable legal requirements and maintaining the highest standards of conduct and integrity. This Code is intended to promote those goals in conjunction with the Company's policies and *Employee Handbook*. While this Code is extensive, these statements are by no means exhaustive. They do not represent all the policies and procedures Lantheus employees must follow. For example, in addition to the Code, all personnel are required to comply with policies and procedures specifically related to their business unit, function and activities. More information on Company policies is available on MI.net.

All personnel are responsible for complying with this Code. Because a written code cannot answer all questions raised in the context of business relationships, you must take responsibility for recognizing and responding appropriately to specific situations as they arise. Therefore, it is critically important that you carefully read the Code and understand how the Code applies to you and your colleagues

If you have any questions about the requirements of this Code or the appropriateness of a relationship or action, you should consult with your supervisor, Human Resources or any member of the Ethics & Compliance Committee. Please be assured that there will be no retribution for your asking questions or raising concerns about reporting possible improper conduct. You are required to report suspected violations of this Code promptly as outlined under the heading "Reporting and Compliance Procedures" below.

The success of Lantheus depends on the commitment of everyone to abide by, embrace and live this Code. Thank you for your commitment to this vitally important initiative.

Mary Anne Heino
President and Chief Executive Officer
Lantheus Holdings, Inc.

Compliance, Ethics & Compliance Committee and Reporting Compliance Concerns

Compliance

We are committed to conducting our business on a daily basis consistent with the highest standards of ethical conduct, fairness, integrity and respect for the law and our corporate values. As such, all personnel must comply with, and must endeavor to ensure that Lantheus complies with, all laws and regulations applicable to the Company wherever it does business, and its policies and procedures in regard to legal and ethical responsibilities. You are expected to use good judgment and common sense in seeking to comply and to ask for advice when you are uncertain about what is required.

Anyone violating this Code may be subject to disciplinary action, up to and including, where appropriate and permissible, termination. In special cases, the Company may be obligated to refer violations of this Code to appropriate law enforcement officials because some such violations may also violate applicable law.

Ethics & Compliance Committee

The Ethics & Compliance Committee is responsible for giving guidance on interpreting and applying this Code when questions arise. The Ethics & Compliance Committee shares overall responsibility for Lantheus' compliance efforts globally and for informing senior management about compliance matters. The Ethics & Compliance Committee is responsible for providing regular and comprehensive information on compliance activities and issues to the Chief Executive Officer and Executive Leadership Team. In addition, the Ethics & Compliance Committee will provide and seek expert advice in the formulation of ethics strategies and programs. A copy of the *Ethics & Compliance Committee Charter*, as well as a list of members of the Ethics & Compliance Committee, is available on MI.net.

Reporting Compliance Concerns

If you observe or suspect any misconduct (including any conduct that seems to violate the law, this Code and/or our other codes and policies), you are required to speak up. By doing so, you give our Company the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and decrease trust. In particular, if you become aware of, or have reason to suspect, any activity that is criminal in nature or that may involve someone being in danger, you are required to report that activity immediately.

Our Company truly values the help of employees who identify and speak up about potential concerns that need to be addressed. Speaking up is encouraged, and employees who speak up are protected. You will not suffer for raising concerns in good faith about suspected misconduct, and we do not tolerate any form of retaliation against you for speaking up. After all, speaking up is essential for us to sustain our reputation, success and ability to operate – both now and in the future.

Reporting Up

You have many avenues to report your concerns, including:

- Your supervisor or an appropriate member of management;
- A member of the Legal Department;
- A member of the Ethics & Compliance Committee;
- A Human Resources business partner (for significant employment-related issues); and/or
- Our whistleblower hotline/website (described below).

Our Whistleblower Hotline and Website

We have a confidential, third-party reporting system that you may use by:

- calling toll-free 1-877-472-6272 (U.S. callers) or toll 1-503-747-1848 (international callers); or
- making a submission through our web-based submission system at www.lantheus.ethicspoint.com.

All calls and submissions to this reporting system are anonymous (unless you self-identify) and are directed via a web-based portal to the appropriate individual(s) within Lantheus.

Accuracy of Books, Records and Reports

All Lantheus books, records and accounts must be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. All employees are responsible for the accuracy of their records and reports. No undisclosed or unrecorded account or fund may be established for any purpose.

Internal Controls; Disclosure Controls and Procedures

It is the responsibility of the executive and financial team of Lantheus to ensure that the Company maintains (i) adequate controls over its assets and financial reporting and (ii) adequate controls and procedures to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, regulatory authorities and in other public communications.

Employees may use any of the procedures set forth in *Reporting Compliance Concerns* to report any questionable accounting matters, including (i) concerning deficiencies in the design or operation of internal controls that could adversely affect the ability of Lantheus to record, process, summarize and report financial data, (ii) concerning any fraud affecting the Company, or (iii) that otherwise affects the disclosures made by Lantheus in its regulatory filings and other public communications.

Additionally, employees who wish to make a report on a potential accounting matter directly to the Audit Committee of the Board may do so on an anonymous basis by sending a letter to:

Lantheus Holdings, Inc.
Attn: Audit Committee of Board of Directors of Lantheus Holdings
c/o General Counsel
331 Treble Cove Road
North Billerica, MA 01862

In order for this reporting process to operate effectively, it is important that reports provide enough detail to allow for a thorough review. Important details include a full description of the matter, an approximate date of the alleged event and the business unit and/or persons involved, if applicable.

Waivers of this Code

While some of the policies contained in this Code must be strictly adhered to and no exceptions can be allowed, other cases may permit exceptions. For example, minor conflicts of interest may be resolved by disclosing the conflict to all interested parties.

Any employee who believes that an exception to any of these policies is appropriate in his or her case should first contact his or her immediate supervisor. If the supervisor agrees that an exception is appropriate, the approval of the General Counsel must be obtained after consultation with the appropriate Executive Leadership Team member.

Any waiver of the Code for directors or executive officers may be made only by the Board of Directors or a Board Committee.

Foreign Corrupt Practices Act

All personnel, agents and stockholders acting on behalf of Lantheus must comply with the anti-bribery, accounting and recordkeeping provisions of the Foreign Corrupt Practices Act (the “FCPA”) and all other applicable anti-bribery laws of other countries. At a basic level, the FCPA prohibits Lantheus and anyone acting on its behalf from directly or indirectly making, offering to make, promising to make or approving a payment of money or anything else of value to a foreign official or a foreign political party with the intention of somehow influencing that official to assist Lantheus in obtaining or retaining business. The civil and criminal penalties that the FCPA imposes on individual and corporate violators are severe. When in doubt as to whether a contemplated payment or gift may violate the FCPA, consult with the General Counsel before taking any action. To facilitate compliance, you must adhere to the Company’s *Foreign Corrupt Practices Act and Anti-Bribery Compliance Policy*, which is available on MI.net.

Fair Dealing and Fair Competition

Fair Dealing

Personnel should endeavor to deal honestly, ethically and fairly with Lantheus suppliers, customers, competitors and employees. Your statements about the products and services of Lantheus should not be untrue or misleading. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice.

Fair Competition

Competition laws, also called antitrust, monopoly, fair trade or cartel laws, are designed to maintain a free, open and competitive marketplace. Under these laws, competitors cannot collaborate and agree on various matters, including:

- Prices to charge for their products or margins;
- Discounts for products;
- Terms and conditions of sale of their products;
- Territories in which to sell products;
- Customers to whom products are sold;
- Product types, product lines or amounts that companies can produce or sell; or
- Matters related to competitive bids.

There are a number of activities, some of which are listed below, that raise sensitive legal issues. Under certain fact-specific circumstances, these practices may not be permitted because they could result in an unreasonable restraint of trade, and therefore, an employee should discuss the implications of any of the following practices or arrangements with the General Counsel ahead of time:

- Predatory practices and attempting to monopolize a market;
- Tying and reciprocity arrangements;
- Restrictions on Company distributors, such as establishing a minimum price that a distributor must charge for the Company's products;
- Boycotting practices, for example persuading another company not to do business with a competitor;
- Restrictions on dealing in goods of a competitor, for example conditioning sales of Company products on a customer's refusal to deal with other suppliers;
- Ending a long-standing business relationship, for example, with long-term Company distributors;
- Granting or relinquishing patents or licenses;
- Joint or team bidding, or any joint venture or co-marketing arrangement;
- Acquiring any company, product or group of assets;
- Beginning or settling legal action, such as a patent infringement suit against other companies or individuals; and
- Comparing proprietary information with competitors, such as cost information or participating in other forms of benchmarking.

Laws governing competition are complex to apply. The General Counsel must be consulted in advance with regard to any practice or arrangement which could be viewed as a violation of competition laws.

Conflicts of Interest

A conflict of interest exists when a person's private interest interferes in any way with the interests of Lantheus. The existence of a conflict depends on the facts and circumstances, including the nature and relative importance of the interests that may be financial or may involve a personal relationship. A conflict situation can arise if an employee (or a family member of the employee) takes actions that make it difficult for him or her to perform Company duties objectively or receives improper personal benefits. Any actual or apparent conflict of interest between personal interests and those of the Company must be handled honestly and ethically in accordance with the following procedures and any other procedures applicable under the Company's *Related Person Transactions Policy*, its *Corporate Governance Guidelines* and its *Audit Committee Charter*, each of which is available on MI.net.

Full disclosure is the essential first step to remaining in full compliance with this Code. You must disclose any actual or reasonably apparent conflict of interest, including any existing or proposed transaction or relationship that reasonably could be expected to give rise to a conflict of interest. An employee must disclose such matters to his/her supervisor (or, if that supervisor is involved in the matter, to the General Counsel), who is responsible for consulting with the Ethics & Compliance Committee and/or Audit Committee, if and as appropriate. Executive officers and directors must disclose such matters to the Board of Directors member(s) charged with reviewing conflicts of interest.

Receiving gifts, gratuities and entertainment from people with whom the Company does business may not be acceptable, because it may potentially pose a conflict of interest by implying an obligation on behalf of the Company.

Occasionally, as a means of building relationships, an employee may accept or provide social entertainment or hospitality, such as modest meals, if such entertainment:

- Permits business or educational discussions;
- Is pursuant to a bona fide business relationship;
- Is consistent with industry practices, all applicable laws and Lantheus Policies on Interactions with Healthcare Professionals (see [Appendix A](#));
- Does not influence or is not perceived by others to influence business decisions;
- Is not excessive in price or quantity; and
- Would not embarrass Lantheus if it was brought to public attention.

In questionable cases, employees should consult with their supervisors or the Legal Department.

In all cases, it is unacceptable to receive a gift or invitation from a government employee or to provide a gift or invitation to a government employee. If you are doing business with a foreign government, be sure to inform the Legal Department.

Confidentiality Information

As a condition to your employment or retention with Lantheus, you must maintain the confidentiality of confidential, proprietary, competitive, strategic, trade secret, financial, pricing, cost, volume, personal or other sensitive information ("Confidential Information") entrusted to you, whether that Confidential Information relates to Lantheus, its customers or other third parties, including suppliers and service providers. Any use or disclosure to third parties of any Confidential Information is strictly prohibited, except as authorized in the conduct of Lantheus' business or as otherwise legally mandated. You should also take appropriate precautions to ensure that Confidential Information is communicated within Lantheus to only those personnel who have a "need to know" that Confidential Information in order to perform their responsibilities for the Company. Your unauthorized use or disclosure of Confidential Information can subject you to discipline, up to and including termination.

Confidential Information in any form is a business asset and must be protected. Inappropriate disclosures may destroy that Confidential Information's value, harm the Company's competitive position, violate laws or constitute breaches of agreements with third parties. The most common examples of Confidential Information include, but are not limited to:

- Financial results and data
- Budgeted or projected revenue, earnings and other financial metrics
- Sales figures for Lantheus products or product groups
- Customer pricing, volume or terms and conditions of customer contracts
- Customer lists
- Planned new advertising programs
- Supplier/service provider pricing, spend levels or terms and conditions of supplier contracts
- Supplier/service provider lists
- Acquisition or divestiture of businesses or products or other business development transactions
- Manufacturing processes and know-how
- Wage and salary data
- Company organizational charts
- Employee lists
- Capital investment plans
- Company policy or management changes
- Information on inventions, research and test data
- Company plans for life cycle management and improving products
- Other business strategies and plans

Confidential Information must be consistently protected throughout its lifecycle, from origination to destruction, and it must also be protected in a manner commensurate with its sensitivity.

For further information, you should refer to any confidentiality agreement you have signed with the Company and the appropriate sections of the *Employee Handbook* and the *Company's Policy on Insider Trading and Communications with the Public*.

Data Privacy

In the course of its business operations Lantheus receives, collects, maintains and uses significant amounts of data from individuals related to their financial, medical and benefit information. Some of this data may contain personally identifiable information ("PII"), including sensitive information that may pertain to a person's health. The data may relate to employees, customers, consumers, research subjects, shareholders, vendors and competitors.

For purposes of PII, a person is considered "identifiable" if they can be identified by reference to factors including, but not limited to, an individual's name, address, telephone numbers, e-mail addresses, social security number, billing records, service records, payment and deposit history, online identifier, location data, genetic information, health information and race or ethnicity. PII includes information that has been "coded" or "pseudonymized," even if Lantheus lacks the key to re-

identify the information. PII on its face or in combination with other information in our control or possession could identify an individual, regardless of the format in which it is maintained, such as paper or electronic formats.

Regardless of the subject of the data, Lantheus has at all times the responsibility to protect and respect personal information to which it has access. All Lantheus employees share this responsibility and must comply with the highest standards of data privacy protection consistent with the laws of the jurisdiction in which they operate.

Disclosure of Nonpublic Information, Insider Trading and Securities Laws Compliance

Lantheus policy forbids unauthorized disclosure of material nonpublic information about Lantheus or the companies it deals with, and both the Company's *Policy on Insider Trading and Communications with the Public*, which is available on MI.net, and federal securities laws strictly forbid trading in securities on the basis of material nonpublic information relating to Lantheus or the companies with which Lantheus does business.

Like confidential and proprietary information, all employees should take great care not to disclose material nonpublic information within the Company, inadvertently or unnecessarily. In no event may employees disclose such information to anyone outside of the Company. Employees should not discuss Company business where unauthorized persons may be present.

You should pay particular attention to the Company's *Policy on Insider Trading and Communications with the Public*, especially when disclosing the following types of material information:

- A proposed acquisition (whether of a material asset or a business or entity), or a proposed sale or disposition;
- Projected future earnings or losses, any changes to earnings guidance or earnings that are inconsistent with the consensus expectations of the investment community; or
- The potential or actual gain or loss of a significant customer, supplier, contract or purchase order.
- Regulatory or competitive developments relating to business lines, products or product candidates.

Likewise, Lantheus employees with knowledge of nonpublic information about other companies (suppliers, customers or other companies that Lantheus deals with), even those with whom the Company only contemplates transactions, may not buy or sell the securities of those companies or disclose such information to others.

Employees uncertain about the rules on buying or selling Company securities, having or potentially having a business relationship with Lantheus, should consult the General Counsel before making any purchases or sales.

Corporate Communications

In the course of doing business, employees communicate regularly with many important constituencies including customers, physicians, government officials, financial analysts, the press and others. Communicating with these various audiences in a thoughtful, careful, consistent and appropriate manner is key to the Company's business.

It is incumbent on all employees to be particularly alert to how information is communicated outside of Lantheus. Employees should abide by the guidelines established in the Company's *Policy on Insider Trading and Communications with the Public* and its *Social Media Policy*, each of which is available on MI.net.

You should expect that all written communications geared toward external audiences that discuss general information about the Company's business (in speeches, press releases, presentations and other such materials) must be cleared by Corporate Communications and the Legal Department prior to release to ensure accuracy and consistency.

All inquiries about Lantheus or its business should be directed to Corporate Communications, which will then refer the inquiry, if appropriate, to the appropriate business function or division of the Company.

Protection of Company Assets

All employees should seek to protect the assets of Lantheus. You may not take personal advantage of opportunities that are discovered through your position with the Company. All transactions on behalf of Lantheus and all uses of Company funds, facilities or other assets must be solely for business purposes of the Company, pursuant to due authorization, and properly documented.

In general, employees should not use Lantheus property or services for their own or another's personal benefit. Sometimes the line between personal and Company benefits may be difficult to determine, since activities sometimes create both personal and Company benefits. In these cases, seek approval from your immediate supervisor when using Company property or services that do not solely benefit the Company.

Environment, Health and Safety

In conducting its operations, Lantheus carefully considers the health and safety of its employees, customers and the general public. Each employee is responsible for maintaining a safe workplace. Therefore, each employee must comply with all Company safety rules as well as applicable laws and regulations. Copies of health and safety rules are available at each of the Company's facilities and on MI.net.

Employees should consider environmental protection and health and safety as inseparable parts of their everyday responsibilities. The Company's environment, health and safety policies are available on MI.net.

Employee Relations

Lantheus will not tolerate discrimination or harassment of any kind in the workplace. The Company expects the work environment at Lantheus to be free of bias, prejudice, discrimination, harassment and retaliation on the basis of gender, race, color, religion, national origin, age, disability, citizenship, marital status, sexual orientation, gender identity and expression or any other characteristic protected by law. Lantheus will provide a safe and healthy work environment for all employees. Lantheus will not tolerate any threat or act of violence from or against the Company's employees.

For additional information, please see the Company's *Employee Handbook*, *Unlawful Harassment Policy*, *Drug Free Workplace Policy*, *Threats and Acts of Violence in the Workplace Policy* and *Equal Employment Opportunity and Affirmative Action Policy*, each of which is available on MI.net.

Governmental Investigations and Other Legal Matters

Lantheus may receive subpoenas, complaints and notices from governmental agencies and other third parties advising of litigation, investigations or inquiries about the Company or third parties or their respective products or business practices. If Lantheus receives notification of litigation, subpoenas or investigations, or if Lantheus determines that such matters are reasonably foreseeable, Lantheus is obligated to ensure that all documents, communications, data and other materials that relate to the subject matter of the notification, both hard copy and electronic, are retained and preserved.

In order to cooperate fully with governmental investigations, inquiries or litigation requests, all employees must properly retain records of the Company. Please refer to the Company's *Records Management Policy*, for details on our records management program. Given the importance of such legal matters, an employee should not:

- Destroy Company documents (i) if there is a reasonable likelihood they will be subject to an investigation or litigation, (ii) after receiving notice to retain such documents or (iii) after receiving requests for the documents from a government agency, court or company counsel;
- Alter Company documents or records;
- Lie or make misleading statements to a government investigator or Company counsel; or
- Attempt to keep any person from giving information to government investigators or Company counsel, or attempt to induce anyone to offer false or misleading information.

Employees in the United States and certain other countries may have a right to be represented by counsel if government investigators contact them off Company premises, for example, after work hours or at home. If you are unsure of your right to be represented by counsel, contact the General Counsel.

Use of Company Computers and Networks

We carefully manage employees' use of electronic communications to ensure that corporate computer systems are accessible for business purposes, that the systems are operated in a cost-effective manner, that the Company's reputation is protected and that we are not subject to increased legal risk.

For all of these reasons, it is important that you restrict your use of the Company's computer resources to authorized business purposes, other than brief, incidental uses for personal reasons.

It is critical that employees understand all of the requirements detailed in the Company's *Computer System and Network Usage Policy*, which is available on MI.net.

Professionalism and Personal Conduct

It is expected of all employees that the quality of work and the atmosphere in which it is done be consistent with the reputation of Lantheus as a leading organization. An employee's conduct when working for or representing Lantheus, or when on Lantheus premises, should meet acceptable standards of the community and show respect for the law and the rights of others.

While Lantheus does not adhere to a formal dress policy, appropriate business dress is expected of employees at all time. This includes adherence to all safety requirements in terms of personal attire and hygiene.

Dependable attendance and punctuality are expected of all employees. If problems arise relating to an employee's attendance or punctuality, the supervisor or manager should not delay in taking corrective action.

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Appendix A

Lantheus Policies on Interaction with Health Care Professionals

Lantheus complies fully with the PhRMA Code. It is the responsibility of all Lantheus employees with direct or indirect contact with health care professionals to read, understand and comply with the PhRMA Code. All activities in which Lantheus employees engage and all programs that they conduct, or in which they participate, must conform to the PhRMA Code. Please see the full copy of the PhRMA Code for more information.

Lantheus also complies fully with the Massachusetts Pharmaceutical and Medical Device Manufacturer Code of Conduct ("MA Code"). Lantheus employees with direct or indirect contact with health care professionals must be aware of the contents of the MA Code. Employees in Sales and Marketing must complete and certify training on the MA Code. All activities in which Lantheus employees engage and all programs that they conduct, or in which they participate, must conform to the MA Code. Please see the full copy of the MA Code for more information.

Both Codes are available on MI.net. Any questions or issues should be referred to the General Counsel.

Lantheus complies with the mandatory disclosure under the Sunshine Act. Under Section 6002 of the Physician Payment Sunshine Provisions in the Protection and Affordable Care Act P.L. 111-148 (HR 3590, 11th Cong. (2009)) ("PPACA"), and commencing on August 1, 2013 Lantheus is required to report payments and other transfers of value provided to healthcare providers for any purpose, including, but not limited to, consulting, speaking engagements, advisory board services, travel, food, royalty payments, and clinical research. Please refer to the additional materials available on MI.net.