



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 (collectively, “Lantheus,” the “Company” or “we”).

This Code applies to all of the Company’s:

- directors;
- officers; and
- all other employees (and, for the purposes of this Code, all Lantheus contractors, consultants and vendors working at, and having direct access to, any Company site or information technology network via a Company access badge, network credentials or the like 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, consultants and vendors) 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 other codes, 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 personnel 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 Lantheus Central. Personnel may also have other obligations to the Company pursuant to contractual obligations or applicable laws, rules and regulations. This Code is in addition to these obligations, but if the Code is stricter than contractual obligations or applicable laws, rules and regulations, then personnel must comply with the Code.

All personnel are required to be familiar with the Code and 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 or an appropriate member of management, Human Resources, any member of the Legal Department or any member of the Ethics and Compliance Department. Please be assured that there will be no retaliation or 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 Compliance Concerns*” 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.

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, rules 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. Directors, officers, and employees will be required to review this Code on an annual basis.

Lantheus is committed to the prompt and consistent enforcement of this Code. 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 or regulatory officials because some such violations may also violate applicable laws, rules or regulations.

Ethics and Compliance

The Ethics and Compliance Department is responsible for giving guidance on interpreting and applying this Code when questions arise. The Ethics and Compliance Department shares overall responsibility for Lantheus' compliance efforts globally. Representatives of the Ethics and Compliance Department is responsible for providing regular and comprehensive information on compliance activities and issues to the Chief Executive Officer, the Executive Team and the Nominating and Corporate Governance Committee of the Board of Directors. In addition, the Ethics and Compliance Department will provide and seek expert advice in the formulation of ethics strategies and programs. A list of members of the Ethics and Compliance Department, is available on Lantheus Central.

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 promptly 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 values the help of personnel who identify and speak up about potential concerns that need to be addressed. Speaking up is encouraged, and personnel who speak up are protected from retaliation for speaking up. You will not suffer any adverse actions 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 questions or concerns, including:

- Your supervisor or an appropriate member of management;

- A member of the Legal Department;
- A member of the Ethics and Compliance Department;
- A Human Resources business partner (for significant employment-related issues); and/or
- Our confidential whistleblower hotline/website (described below).

Our Confidential 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. We ask that, if you do make a report anonymously, please provide enough specific details to enable the Company to facilitate an investigation. Important details include a full description of the issue, an approximate date of the alleged event and the business unit and/or persons involved, if applicable. In addition, we ask that you please log back into the portal regularly for responses and any follow up questions (you would continue to remain anonymous by doing so).

While the Company encourages personnel to report wrongdoing within the Company as set forth above so that the Company can effectively address it, none of the above policies or reporting channels are intended to prevent personnel from reporting wrongdoing to a regulator or law enforcement agency, and there will be no retaliation by the Company in any manner for such reporting.

Accuracy of Books, Records, Accounts and Reports

All Lantheus books, records, accounts and reports must be maintained in accordance with all applicable laws, rules, regulations and standards and accurately reflect the true nature of the transactions they record. All personnel are responsible for the accuracy of their books, records, accounts 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 teams 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 public communications.

Personnel may use any of the procedures set forth under the heading “*Reporting Compliance Concerns*” to report any questionable accounting matters, including matters (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 affect the disclosures made by or on behalf of Lantheus in its regulatory filings and public communications.

Additionally, personnel 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
201 Burlington Road, South Building
Bedford, MA 01730

In order for this reporting process to operate effectively, it is important that reports provide enough specific details 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 personnel 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 Team member. A list of the current members of the Executive Team is available on Lantheus Central.

Any waiver of the Code for directors or executive officers may be made only by the Board of Directors, or an authorized committee thereof, and, if approved or implied, such waiver will be publicly disclosed as required by applicable law or otherwise, including applicable SEC regulations and the requirements of the Nasdaq Stock Market ("Nasdaq"). The Disclosure Committee will be advised of the waiver for the purposes of ensuring timely disclosure of the waiver in accordance with Securities and Exchange Commission ("SEC") and Nasdaq rules and modification (if required) of the Company's disclosure controls or procedures in light of the waiver.

This Code may be revised, changed or amended at any time by the Board of Directors.

International Business Laws

Our employees are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where we otherwise do business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries, and anti-boycott laws. The fact that in some countries certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. In addition, we expect employees to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the U.S.

These U.S. laws, rules and regulations, which extend to all our activities outside the U.S., include:

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, including the U.K. Bribery Act. 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, candidate for foreign political office or a foreign political party with the intention of somehow influencing that official, candidate or party 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* (as may be updated from time to time), which is available on the Legal Resource Center site.

U.S. Embargoes

U.S. economic sanctions and embargoes restrict or, in some cases, prohibit U.S. persons (including U.S. companies, their foreign branches, and U.S. employees) from engaging in certain dealings. Some programs are geographically broad, while many others are targeted at specific sectors, entities, or individuals (including parties on the Specially Designated Nationals List). These programs change frequently and must be checked before transacting.

Export controls

U.S. export controls regulate, and in many cases prohibit, the export of goods, technology and certain services to designated countries and to restricted parties. These rules also reach dealings with denied persons or denied entities and can restrict the re-export of U.S. origin goods from the country of original destination to such designated countries, restricted parties, denied persons or denied entities. [To facilitate compliance, you must adhere to the Company’s *Export Compliance Policy* \(as may be updated from time to time\).](#)

If you have a question as to whether an activity is restricted or prohibited, seek assistance before taking any action, including giving any verbal assurances that might be regulated by international laws.

Fair Dealing and Fair Competition

Fair Dealing

Personnel should endeavor to deal honestly, ethically and fairly with Lantheus suppliers, customers, partners, service providers, competitors, employees and anyone else with whom he or she has contact in the course of performing his or her job. 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, personnel 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 (or the interest of certain members of their family) interferes, or even appears to interfere, in any way with the interests of Lantheus. The existence of a conflict of interest 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. For example, a conflict of interest can arise if an employee or other personnel (or a family member of the employee or other personnel) 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 *Corporate Governance Guidelines and Principles*, its *Nominating and Corporate Governance Committee Charter*, its *Audit Committee Charter* and its *Supplemental Code of Ethics for Certain Covered Officers*, each of which is available on Lantheus Central.

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 and Compliance Department, the Legal Department and/or Nominating and Corporate Governance Committee, if and as appropriate. Executive officers and directors must disclose such matters to the member(s) of the Board of Directors charged with reviewing conflicts of interest.

Receiving gifts, gratuities and entertainment from people or entities 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 or other personnel 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 Health Care 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 or other personnel should consult with their supervisors, the Ethics and Compliance Department and/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.

Political Contributions and Activities

As a member of a highly regulated and publicly visible industry, Lantheus may be affected by various political initiatives. For that reason, we may from time to time express our views as a company or become engaged on national and local issues. Lantheus employees who are not specifically authorized to engage in political or lobbying activities may not make loans, donations, contributions, or payments to a political party, candidate, or political action committee on behalf of the Company or our affiliates, nor may Lantheus employees cause the Company to reimburse others who provide such support. Outside of the workplace, Lantheus employees are not prohibited from engaging in political or advocacy activities as private citizens, in a personal capacity, as long as the actions are exclusively on your own time and behalf and are not otherwise prohibited by Company policy.

Confidential 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 and other sensitive information ("Confidential Information") entrusted to you in spoken, printed, electronic, or any other form or medium (regardless of its source), 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 legitimate conduct of Lantheus' business or as otherwise required by applicable law, rule or regulation, or pursuant to a valid order of a court of competent jurisdiction or an authorized government agency, provided that the disclosure does not exceed the extent of disclosure required by such law, rule, regulation or order. 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. In special cases, the Company may be obligated to refer such unauthorized use or disclosure of Confidential Information to appropriate law enforcement or regulatory officials because such unauthorized use or disclosure may also violate applicable laws, rules or regulations.

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, rules or regulations or constitute breaches of agreements with third parties. The most common examples of Confidential Information include, but are not limited to:

- Nonpublic 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; and
- 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.

Notwithstanding the foregoing, nothing in this Code, any agreement you have entered into with Lantheus, or any other Lantheus policy limits, restricts or in any other way affects your ability to (i) communicate with any governmental agency or entity or communicate with any official or staff person of a governmental agency or entity, concerning matters relevant to the governmental agency or entity, (ii) file a charge or complaint with any federal, state or local governmental agency or entity, (iii) seek or receive any monetary award or bounty from any governmental agency or regulatory or law enforcement authority in connection with protected whistleblower activity, (iv) exercise any rights under Section 7 of the National Labor Relations Act, which are available to non-supervisory employees, including assisting co-workers with or discussing any employment issue as part of engaging in concerted activities for the purpose of mutual aid or protection; (v) discuss or disclose information about unlawful acts in the workplace, such as harassment or discrimination or any other conduct that you have reason to believe is unlawful; or (vi) testify truthfully in a legal proceeding. Specifically, nothing in this Code prohibits you from reporting an event that you reasonably and in good faith believe is a violation of law to the relevant local, state or federal government agency (such as the SEC, the U.S. Equal Employment Opportunity Commission or the U.S. Department of Labor), or from cooperating in an investigation conducted by a government agency; provided, however, to the extent permitted by applicable law, you will give the Company as much advance notice as is possible before such a disclosure to a duly authorized law government agency (generally five (5) business days or more) to allow the Company to take any legally permissible steps to protect its Confidential Information. Any communications and disclosures related to these matters must be consistent with applicable law and the information disclosed must not have been obtained through a communication that was subject to the attorney-client privilege

(unless disclosure of that information would otherwise be permitted consistent with such privilege or applicable law). Any provisions of any agreement between the Company and any personnel that is inconsistent with the above language or that may limit or interfere with the ability of any person to receive an award under the whistleblower provisions of applicable law will not be enforced by Lantheus.

Under the federal Defend Trade Secrets Act of 2016, you will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made: (a)(i) in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (b) in a complaint or other document filed in a lawsuit or other proceeding, if that filing is made under seal. Moreover, if you pursue a lawsuit for retaliation by the Company as your employer for reporting a suspected violation of law, then you may disclose the trade secret to your attorney and use the trade secret information in the court proceeding, but only if you file any document containing the trade secret under seal, and do not disclose the trade secret, except as permitted by court order.

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

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 that person 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 personnel share this responsibility and must comply with the highest standards of data privacy protection consistent with the laws, rules and regulations 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* 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 Information, all personnel should take great care not to disclose material nonpublic information within the Company, inadvertently or unnecessarily. In no event may personnel disclose such information to anyone outside of the Company. Personnel 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 discussing or 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;
- The potential or actual gain or loss of a significant customer, supplier, contract or purchase order; or
- Regulatory or competitive developments relating to business lines, products or product candidates.

Likewise, personnel 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.

Personnel uncertain about the rules on buying or selling Lantheus securities, or the securities of other companies 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, personnel 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, including any communications through online and social media posts, is key to the Company's business.

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

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, online posts and other such materials) must be cleared by the Corporate Communications and Legal departments prior to release to ensure accuracy and consistency.

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

Protection of Company Assets

All personnel should seek to protect the assets of Lantheus. Company property must not be sold, loaned, given away, or otherwise disposed of without proper authorization.

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 legitimate business purposes of the Company, pursuant to due authorization, and properly documented.

In general, personnel 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 may 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 personnel, customers, patients and the general public. All personnel are responsible for maintaining a safe workplace. Therefore, all personnel must comply with all Company safety rules as well as applicable laws, rules and regulations. Copies of health and safety rules are available at each of the Company's facilities and on Lantheus Central.

Personnel 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 Lantheus Central.

Regulatory Compliance

Lantheus recognizes the fact that, as participants in the radiopharmaceutical industry, we work in a heavily regulated industry. Adherence to regulatory compliance principles and procedures is among our highest priorities. We have a goal of developing and commercializing products of the highest quality possible. We also are sensitive to the special considerations involved in conducting scientific and clinical research, manufacturing our products, and in marketing and selling our products. Therefore, we have developed policies and procedures designed to ensure that these activities are conducted effectively and legally. This means that our (i) research procedures must abide by applicable regulatory requirements and be conducted with respect for the research participants involved; (ii) advertising and promotional efforts done either solely by Lantheus or in conjunction with our business partners must conform to applicable regulations, including, for example, those governing any discussion of off-label uses; and (iii) other activities, including, without limitation, financial, environmental health and safety, medical affairs, and product manufacturing, conform to applicable regulations.

Safety and Quality

The safety of the patients served by our products is a critical aspect of our work. To safeguard our customers' trust and our reputation, you are expected to demonstrate a firm dedication to quality and safety. In short, this means you must:

- Support all of our quality systems;

- Immediately raise quality issues to appropriate personnel;
- Fully understand, and follow all applicable quality guidelines and regulations created to ensure that our products are safe, meet their intended use, and adhere to quality processes during research and development, clinical development, manufacturing, control, storage and distribution; and
- Fully understand and follow all your department's policies and standard operating procedures.

As required by law, Lantheus closely monitors all reports of adverse events associated with the use of our products to ensure that we consistently adhere to the highest levels of safety and accountability. You are required to identify, record, and report any safety, quality, or performance issues, or any circumstance that suggests the occurrence of any of these issues, within 1 business day of becoming aware of the event, [in accordance with the Company's Compliance and Rules of Engagement \(C.A.R.E.\) Guide for U.S. Customer-Facing Company Personnel](#).

We will protect the patients served by our products by overseeing the manufacturing process and supply chain of our products for clinical and commercial use, requiring compliance with applicable laws and regulations concerned with quality control. We will also work only with reputable third-party manufacturers and distributors whose record reflects a commitment to current Good Manufacturing, Clinical, and Laboratory Practices.

Employee Relations

Lantheus will not tolerate discrimination, harassment, bullying or acts or threats of violence of any kind in the workplace, and doing so can subject you to discipline, up to and including termination. In special cases, the Company may be obligated to refer such acts or threats to appropriate law enforcement or regulatory officials because such acts or threats may also violate applicable laws, rules or regulations. The Company expects the work environment at Lantheus to be respectful and professional and 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 personnel.

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

Human Rights

Lantheus recognizes the importance of maintaining and promoting the fundamental human rights of personnel by operating under programs and policies that prohibit child labor, forced labor and human trafficking; provide fair and equitable wages and benefits in accordance with local laws; provide safe working conditions; and recognize employees' rights to freedom of association. Lantheus has zero-tolerance for human rights violations.

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 personnel 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, personnel 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.

Personnel 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 the Company's network, computer systems and devices 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 access and use of the Company's network, computer resources and devices (including through access via your own personal computers and devices) 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 information technology and device policies, which are available on Lantheus Central.

Professionalism and Personal Conduct

It is expected of all personnel 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 or other personnel's conduct when working for or representing Lantheus 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 times. 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 personnel with direct or indirect contact with health care professionals to read, understand and comply with the PhRMA Code. All activities in which Lantheus personnel 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 personnel 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 personnel 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 the MA Code and the PhRMA Code are available on Lantheus Central. 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)), 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 Lantheus Central.