

PHOTOMEDEX, INC.

CODE OF BUSINESS CONDUCT AND ETHICS

INTRODUCTION

Our Company's reputation for honesty, integrity, and adhering to the highest ethical standards and conduct is the sum of the personal reputations of our directors, officers and employees. To protect this reputation and to promote compliance with laws, rules and regulations, this Code of Business Conduct and Ethics (the "Code") has been adopted by our Board of Directors. We have a shared responsibility to make compliance and good business practices part of the fabric of PhotoMedex. This Code is only one aspect of our commitment. You must also be familiar with and comply with all other policies contained in our Employee Handbook and any other policy otherwise made available to you.

This Code sets out the basic standards of ethics and conduct to which all of our directors, officers and employees are held. These standards are designed to deter wrongdoing and to promote honest and ethical conduct, but will not cover all situations. If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom or policy conflicts with this Code, you must comply with the Code.

If you have any doubts whatsoever as to the propriety of a particular situation, you should submit it in writing to our Company's Corporate Counsel, who will review the situation and take appropriate action in keeping with this Code, our other corporate policies and the applicable law. If your concern relates to the Corporate Counsel, you should submit your concern, in writing, to the President of the Company. The mailing address of each of those individuals is included at the end of this Code.

Those who violate the standards set out in this Code will be subject to disciplinary action, up to and including termination.

1. SCOPE

This Code is applicable to any director, officer or employee (including temporary employee or independent contractor) of the Company or any of its subsidiaries. All individuals subject to this Code are expected to read and sign this Code acknowledging their receipt and understanding of the contents herein.

2. HONEST AND ETHICAL CONDUCT

We, as a Company, require honest and ethical conduct from everyone subject to this Code. Each employee has a responsibility to all other directors, officers and employees of our Company, and to the Company itself, to act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing your independent judgment to be subordinated and otherwise to conduct yourself in a manner that meets with our ethical and legal standards.

3. COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

You are required to comply with all applicable governmental laws, rules and regulations, both in letter and in spirit. Although you are not expected to know the details of all the applicable laws, rules and regulations, we expect you to seek advice from our Company's Corporate Counsel if you have any questions about whether the requirement applies to the situation or what conduct may be required to comply with any law, rule or regulation.

4. COMPLIANCE

We have structured a compliance system designed to support legal and ethical actions in our Company. This system principally consists of our Chief Compliance Officer, who is our Corporate Counsel, and the Audit Committee and the Nominations and Corporate Governance Committee of our Board of Directors.

A. Corporate Counsel / Chief Compliance Officer

Our Corporate Counsel is our Chief Compliance Officer. This individual is responsible for overseeing our compliance system and ensures that there is broad application and consistent interpretation of the standards in our Company. Corporate Counsel reports to either or both the Audit Committee or the Nominations and Corporate Governance Committee of the Board of Directors, as Corporate Counsel deems appropriate in each specific matter and in a manner compliant with the requirements of law, including the requirements of the Sarbanes-Oxley Act of 2002.

You may contact Corporate Counsel as follows:

Phone:	(215) 619-3286
E-mail:	mjp@photomedex.com
Mail:	PhotoMedex, Inc., Attn: Michele Jo Pupach 147 Keystone Drive Montgomeryville, PA 18936

B. Whistleblower Hotline

We have established a Whistleblower / Compliance Hotline to provide a way for you to report a concern or obtain information or advice anonymously. Employees and others may communicate suspected violations of law, policy, or other wrongdoing, as well as any concerns regarding questionable accounting or auditing matters (including deficiencies in internal controls) by contacting Lighthouse Services, Inc., a third-party contractor which we have engaged to receive communications about suspected violations, wrongdoing or questionable accounting matters. You can be assured that any

information will be treated with confidence, as detailed below. You may contact Lighthouse through any of the following methods:

Toll-Free Phone: 1-800-398-1496

Internationally: See country listing on PhotoMedex Intranet

Email: reports@lighthouse-services.com.

Mail: Lighthouse Services, Inc.,
1128 Wheatsheaf Road,
Abington, PA 19001.

The Compliance Hotline is available 24 hours a day, 7 days a week, and 365 days a year.

Lighthouse will receive anonymous reports, as well as reports in which the caller chooses to give his or her name. Calls to the Compliance Hotline will not be traced or recorded and callers may remain anonymous if they so choose. Representatives of the Compliance Hotline will listen to your concerns, ask questions and review the information provided. They will then forward your matter to the Company's Corporate Counsel, who will take action appropriate and compliant with applicable legal requirements, including the requirements of the Sarbanes-Oxley Act of 2002.

5. CONFLICTS OF INTEREST

A "conflict of interest" exists when a person's private interest interferes in any way with the interests of our Company. For example, a conflict situation arises if you take actions or have interests that interfere with your ability to perform your work for our Company objectively and effectively. Conflicts of interest also may arise if you, or a member of your family, receive an improper personal benefit as a result of your position with our Company. Any actual or apparent conflict of interest between your personal and business relationships must be handled in an ethical manner. Even the appearance of a conflict may damage your reputation or that of the Company.

If you become aware of any transaction or relationship that reasonably could be expected to give rise to a conflict of interest, you should report it promptly to our Company's Corporate Counsel, who will take action that is appropriate and compliant with applicable legal requirements, including the requirements of the Sarbanes-Oxley Act of 2002.

Conflicts of interest are prohibited as a matter of Company policy, except under guidelines approved by the Board of Directors. The following standards apply to certain common situations where potential conflicts of interest may arise. Although we do not intend to restrict the application of our policies by being too specific, we are describing below certain situations in which a conflict of interest may result:

A. Gifts and Entertainment

Personal gifts and entertainment offered by persons doing business with our Company may be accepted when offered in the ordinary and normal course of the business relationship. However, the frequency and cost of any such gifts or entertainment may not be so excessive that your ability to exercise independent judgment on behalf of our Company is or may appear to be compromised.

In any situation where a cash gift is offered or the value of a gift given exceeds \$100, you must disclose all such gifts to the Corporate Counsel. The Corporate Counsel will report such gifts to the Company's Nominations and Corporate Governance Committee, which will determine how such gifts should be handled.

B. Financial Interests In Other Organizations

The determination whether any outside investment, financial arrangement or other interest in another organization is improper depends on the facts and circumstances of each case. Your ownership of an interest in another organization may be inappropriate if the other organization has a material business relationship with, or is a direct competitor of, our Company and your financial interest is of such a size that your ability to exercise independent judgment on behalf of our Company is or may appear to be compromised. As a general rule, a passive investment would not likely be considered improper if it: (i) is in publicly traded shares; (ii) represents less than 1% of the outstanding equity of the organization in question; and (iii) represents less than 5% of your net worth. Other interests may also be allowable, depending on the circumstances.

C. Outside Business Activities

The determination of whether any outside position an employee may hold is improper will depend on the facts and circumstances of each case. Your involvement in trade associations, professional societies, and charitable and similar organizations will not normally be viewed as improper. However, if those activities are likely to conflict with your responsibilities to our Company, you should obtain prior approval from your supervisor. Other outside associations or activities in which you may be involved are likely to be viewed as improper if they would interfere with your ability to devote proper time and attention to your responsibilities to our Company, or if your involvement is with another Company with which our Company does business or competes. For a director, employment or affiliation with a Company with which our Company does business or competes must be fully disclosed to our Company's Board of Directors or the Nominations and Corporate Governance Committee of the Board of Directors and must satisfy any other standards established by applicable law, rule (including rule of any applicable stock exchange or market on which our Company's securities trade) or regulation and any other corporate governance guidelines that our Company may establish.

D. Corporate Opportunities

You are prohibited from taking for yourself, personally, opportunities that are discovered through the use of corporate property, information or position, unless the Board of Directors has specifically declined to pursue the opportunity. You may not use corporate property, information, or position for personal gain, or to compete with our Company. You owe a duty to our Company to advance its legitimate interests whenever the opportunity to do so arises.

E. Indirect Violations

You should not indirectly, through a spouse, family member, affiliate, friend, partner, or associate, have any interest or engage in any activity that would otherwise violate this Code if you had a direct interest or engaged in the activity. Any such relationship should be fully disclosed to our Company's Corporate Counsel (or the Board of Directors or the Nominations and Corporate Governance Committee of the Board of Directors if you are a director of our Company), who will make a determination whether the relationship is inappropriate, based upon the standards set forth in this Code.

6. FAIR DEALING

You should endeavor to deal fairly with our Company's customers, suppliers, competitors, employees and other persons with whom our Company does business. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

7. PUBLIC DISCLOSURES AND FINANCIAL REPORTING RESPONSIBILITIES

As a publicly traded U.S. company, PhotoMedex must comply with various securities laws, regulations, and reporting obligations. U.S. federal laws and this Company's associated policies and procedures require that PhotoMedex disclose accurate and complete information regarding its business, financial condition, and results from operations. It is our Company's policy to provide full, fair, accurate, timely, and understandable disclosure in all reports and documents that we file with, or submit to, the Securities and Exchange Commission and in all other public communications made by our Company. Inaccurate, incomplete, or untimely reporting will not be tolerated and may result in legal liability.

Depending on their position with the Company, employees may be called upon to provide information to assure that the Company's public reports are complete, fair and understandable. We expect all of our personnel to take this responsibility very seriously and to provide prompt and accurate answers to inquiries related to the Company's public disclosure requirements.

8. CONFIDENTIALITY

Confidential information includes all non-public information that might be of use to competitors of, or harmful to, our Company or persons with whom our Company does business, if disclosed. Every employee or affiliate of the Company maintains a duty to retain the confidentiality of all such information entrusted to them by our Company. This includes, but is not limited to, material, non-public information concerning the Company, information regarding the Company's intellectual property, customer information, and confidential employee information. The sharing of corporate records or information with unauthorized individuals outside of the Company or unauthorized third-parties is prohibited. Disclosure of such information may be required in some circumstances, including instances when disclosure is authorized or legally mandated by a state or government agency. In such instances, Corporate Counsel will advise as to what information is required. Employees who violate this confidentiality are subject to disciplinary action, up to and including dismissal, and civil or criminal penalties. Should you have questions regarding what is considered confidential information, or would like to report a possible breach of confidentiality, please call our Compliance Hotline or contact Corporate Counsel.

9. INSIDER TRADING

If you have access to material, non-public information concerning our Company, you are not permitted to use or share that information for stock trading purposes, or for any other purpose except the conduct of our Company's business. All non-public information about our Company should be considered confidential information. Insider trading, which is the use of material, non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information, is not only unethical but also illegal. The prohibition on insider trading applies not only to our Company's securities, but also to securities of other companies if you learn of material non-public information about these companies in the course of your duties to the Company. Violations of this prohibition against "insider trading" may subject you to criminal or civil liability, in addition to disciplinary action by our Company.

10. PROTECTION AND PROPER USE OF COMPANY ASSETS

You should protect our Company's assets and promote their efficient use. Theft, carelessness, and waste have a direct impact on our Company's profitability. All corporate assets should be used for legitimate business purposes. The obligation of employees to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate Company policy. It could also be illegal and result in civil or even criminal penalties.

11. INTERPRETATIONS AND WAIVERS OF THE CODE OF BUSINESS CONDUCT AND ETHICS

If you are uncertain whether a particular activity or relationship is improper under this Code or requires a waiver of this Code, you should disclose it to our Company's Corporate Counsel (or the Board of Directors or Nominations and Corporate Governance Committee if you are a director or senior executive officer), who will make a determination first, whether a waiver of this Code is required and second, if required, whether a waiver will be granted. You may be required to agree to conditions before a waiver or a continuing waiver is granted. However, any waiver of this Code for an executive officer or director may be made only by the Company's Board of Directors and will be promptly disclosed to the extent required by applicable law, rule (including any rule of any applicable stock exchange) or regulation.

12. REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOR

Our Company desires to promote ethical behavior. Employees are expected to cooperate in internal investigations of misconduct. When encountered with a compliance or ethical dilemma, employees are encouraged to talk to Supervisors, Human Resources or other appropriate personnel when in doubt about the best course of action. Please see our Whistleblower Policy for details on reporting illegal or unethical conduct and the protections our Company provides. We believe that confidentiality is a priority and every effort will be made to protect your identity whenever you interact with any element of the compliance system. In some instances, it may be impossible to keep your identity confidential because of the demands of conducting a thorough investigation or because of certain legal requirements. If you are concerned about confidentiality, you may consider placing an anonymous call to our Compliance Hotline.

Additionally, employees should promptly report violations of laws, rules, regulations or this Code to our Company's Corporate Counsel. Any report or allegation of a violation of applicable laws, rules, regulations or this Code need not be signed and may be sent anonymously. All reports of violations of this Code, including reports sent anonymously, will be promptly investigated and, if found to be accurate, acted upon in a timely manner. If any report of wrongdoing relates to accounting or financial reporting matters, or relates to persons involved in the development or implementation of our Company's system of internal controls, a copy of the report will be promptly provided to the Chairman of the Audit Committee of the Board of Directors, which may participate in the investigation and resolution of the matter.

13. ANTI-RETALIANTION

PhotoMedex encourages employees to bring issues and concerns forward to management without fear of retaliation. It is the policy of our Company not to allow actual or threatened retaliation, harassment or discrimination due to reports of misconduct by others made in good faith by employees. Retaliation against any employee who raises a question or concern about PhotoMedex's business practices or for using utilizing the Whistleblower Hotline will **not** be tolerated.

14. COMPLIANCE STANDARDS AND PROCEDURES

This Code is intended as a statement of basic principles and standards and does not include specific rules that apply to every situation. This Code is in addition to other policies, practices or instructions of our Company and its contents must be viewed within the framework of these other policies, practices, instructions and the requirements of the law. Moreover, the absence of a specific corporate policy, practice or instruction covering a particular situation does not relieve you of the responsibility for exercising the highest ethical standards applicable to the circumstances.

In some situations, it is difficult to know right from wrong. Because this Code does not anticipate every situation that will arise, it is important that each of you approach a new question or problem in a deliberate fashion:

- (a) Determine if you know all the facts.
- (b) Identify exactly what it is that concerns you.
- (c) Discuss the problem with the Company's Corporate Counsel.
- (d) Seek help from other resources such as other management personnel or our Company's Corporate Counsel.
- (e) Contact our Compliance Hotline.
- (f) Seek guidance before taking any action that you believe may be unethical or dishonest.

You will be governed by the following compliance standards:

- Compliance with the law is mandatory;
- You are personally responsible for your own conduct and for complying with all provisions of this Code and for properly reporting known or suspected violations;
- If you are a supervisor, Manager, director or officer, you must use your best efforts to ensure that employees understand and comply with this Code;
- No one has the authority or right to order, request or even influence you to violate this Code or the law; a request or order from another person will not be an excuse for your violation of this Code;
- Any attempt by you to induce another director, officer or employee of our Company to violate this Code, whether successful or not, is itself a violation of this Code and may be a violation of law;

- Any retaliation or threat of retaliation against any director, officer or employee of our Company for refusing to violate this Code, or for reporting in good faith the violation or suspected violation of this Code, is itself a violation of this Code and our Whistleblower Policy and may be a violation of law; and
- Every reported violation of this Code will be investigated.

Violation of any of the standards contained in this Code, or in any other policy, practice or instruction of our Company, can result in disciplinary actions, including dismissal and civil or criminal action against the violator. This Code should not be construed as a contract of employment and does not change any person's status as an at-will employee.

This Code is for the benefit of our Company, and no other person is entitled to enforce this Code. This Code does not, and should not be construed to, create any private cause of action or remedy in any other person for a violation of the Code.

All PhotoMedex employees are expected to read and understand this Code. Employees who have questions about the Code should feel free to raise such questions with his or her manager, Human Resources, and/or Corporate Counsel.

Adopted by Resolution of the Board of Directors, May 3, 2004

Amended by Resolution of the Board of Directors, August 1, 2013

ACKNOWLEDGEMENT

I acknowledge that I have received and read the Code of Business Conduct and Ethics and agree to adhere to it and ensure that this Code is emphasized to all of the staff that reports to me and that the requirements are rigorously followed.

Employee Name (Print): _____

Employee Signature: _____

Date: _____