

## **POLITICAL ENGAGEMENT PRINCIPLES**

### **Our Mission**

Every day, Vertexians work hard to improve the lives of patients. In so doing, we recognize the importance of public policy in supporting our mission of creating transformative medicines for people with serious diseases. Public sector decisions significantly affect our business and industry, as well as the communities in which we operate and the patients that we serve. It is therefore critical for us to interact with policymakers across the political spectrum to advocate for policies that benefit patients and foster biopharmaceutical innovation and advancement.

We have regular and constructive engagement with government officials and policymakers at the federal, state, and local levels to promote an innovative, patient-focused policy environment. We also contribute to state and local candidates and political organizations where permitted by applicable law. Our participation in the political process is guided by our [Code of Conduct](#).

### **Management and Board Oversight**

The Vertex Board of Directors has oversight over the Company's public policy activities, including political contributions and lobbying, and reviews our public policy and lobbying priorities at least annually. Our Head of U.S. Public Affairs is responsible for approving all corporate political contributions and ensuring that they align with our mission and business priorities. Political contributions are made without regard for the private political preferences of Vertex executives.

### **Lobbying and Political Activities**

#### ***Lobbying***

We comply with the Lobbying Disclosure Act and file quarterly reports listing the issues for which we are conducting lobbying activities and the amounts we spend in support of those activities, including (i) total federal lobbying expenditures, (ii) the name of the specific piece of legislation or subject that was the topic of communication, (iii) disclosure of Vertex individuals lobbying on behalf of Vertex, and (iv) identification of the legislative body or executive branch that was contacted. Our latest federal lobbying disclosure filings are available on the [U.S. Senate Office of Public Records website](#) and the [U.S. House of Representatives Office of the Clerk website](#).

Lobbying disclosure rules also often apply at the state and local levels. We have included, and will update annually, an Appendix listing the states in which we file lobbying reports and, to the extent available, links to state websites where such information can be found.

We do not engage in grassroots lobbying communications.

### ***Political Contributions***

Vertex contributes to state and local candidates where permitted by applicable law. Our contributions are bipartisan and support candidates and policies that will enable us to create transformative medicines for people with serious diseases, including those that further biopharmaceutical innovation and access to medicines; help patients with serious diseases; and impact our employees or geographic areas where our facilities are located. We also may provide financial support to other political organizations, including 527 organizations. A list of these contributions will be updated annually in the Appendix.

Vertex does not make independent political expenditures and does not make payments to influence ballot measures.

At times, Vertex may contribute to 501(c)4 organizations that engage in lobbying or political activity. We will disclose such organizations annually in the Appendix and, to the extent available to us, the portion of those payments used for activities that are not deductible under Chapter 162(e) of the Internal Revenue Code. Vertex does not contribute funds intended for elections to 501(c)4 organizations.

### ***VPAC***

The Vertex Political Action Committee (the “VPAC”) is a nonpartisan organization that contributes to federal and state candidates across the political spectrum. VPAC-supported candidates share our commitment to ensuring access to transformative medicines and recognize the vital contributions that Vertex and its employees make in discovering medicines that can prevent, cure or fundamentally change the outcomes of serious diseases for patients and their families. VPAC takes into consideration many issues that are important to meeting the needs of the patients we serve, our employees, and our company. A contribution from VPAC does not mean that Vertex agrees with the candidate on every issue.

The VPAC is funded entirely by voluntary contributions from employees and members of our Board of Directors. Federal law prohibits corporations from making direct contributions to federal candidates, political parties, and political committees. Companies are permitted to administer a political action committee funded solely by voluntary employee contributions.

VPAC’s contributions are publicly disclosed in reports with the U.S. Federal Elections Commission available here: [www.fec.gov/data/committee/C00468660/](http://www.fec.gov/data/committee/C00468660/). All VPAC spending decisions are reviewed by the VPAC Board of Directors and are approved by Vertex’s Head of U.S. Public Affairs.

**Trade Organization and Industry Group Memberships**

Vertex is a member of industry and trade groups that are aligned with our business objectives and our political contributions philosophy. Our government affairs executives evaluate our participation in these organizations regularly to ensure alignment with our contribution criteria and principles.

While we may not always agree with the positions taken by these organizations or their members, we are committed to participating in the discussions. In some instances, these organizations may use membership dues to engage in lobbying activities. We do not direct, nor have discretion over, how these funds are used.

In 2022, the industry and trade organizations to which Vertex paid more than \$25,000 in membership dues or other payments, and to the extent available to us, the portion of those payments that were used for activities that are not deductible under Chapter 162(e) of the Internal Revenue Code were:

<b>Organization</b>	<b>Non-Deductible Portion of Payments (\$)</b>
Biotechnology Innovation Organization	163,496
California Life Sciences Association	15,000
Texas Healthcare and Bioscience Institute	12,250
Massachusetts Biotechnology Council	12,375
New York Bio	400

**Appendix**

***Lobbying Disclosures by Registered State Jurisdiction***

Alabama	<a href="http://ethics.alabama.gov/lobbyists.aspx">http://ethics.alabama.gov/lobbyists.aspx</a>
Arizona	<a href="https://lobbying.az.gov/">https://lobbying.az.gov/</a>
Arkansas	<a href="https://www.sos.arkansas.gov/elections/financial-disclosure/registered-lobbyists-political-action-committees">https://www.sos.arkansas.gov/elections/financial-disclosure/registered-lobbyists-political-action-committees</a>
California	<a href="http://cal-access.sos.ca.gov/Lobbying/">http://cal-access.sos.ca.gov/Lobbying/</a>
Colorado	<a href="https://www.sos.state.co.us/pubs/lobby/lobby_home.html">https://www.sos.state.co.us/pubs/lobby/lobby_home.html</a>
Connecticut	<a href="https://portal.ct.gov/Ethics/Lobbyist-Filings/Lobbyist-Filings/Lobbyist-Main-Page">https://portal.ct.gov/Ethics/Lobbyist-Filings/Lobbyist-Filings/Lobbyist-Main-Page</a>
Delaware	<a href="https://depic.delaware.gov/">https://depic.delaware.gov/</a>
District of Columbia	<a href="https://bega.dc.gov/page/resources-lobbyists">https://bega.dc.gov/page/resources-lobbyists</a>
Florida	<a href="https://floridalobbyist.gov/">https://floridalobbyist.gov/</a>
Georgia	<a href="http://ethics.ga.gov/search-recordsreports-late-fees/">http://ethics.ga.gov/search-recordsreports-late-fees/</a>
Idaho	<a href="https://sos.idaho.gov/elections-division/lobbyist-information/">https://sos.idaho.gov/elections-division/lobbyist-information/</a>
Illinois	<a href="https://www.ilsos.gov/lobbyistsearch/">https://www.ilsos.gov/lobbyistsearch/</a>
Indiana	<a href="https://www.in.gov/ilrc/">https://www.in.gov/ilrc/</a>
Iowa	<a href="https://www.legis.iowa.gov/lobbyist">https://www.legis.iowa.gov/lobbyist</a>
Kansas	<a href="https://www.kssos.org/elections/elections_lobbyists.html">https://www.kssos.org/elections/elections_lobbyists.html</a>
Kentucky	<a href="https://klec.ky.gov/Pages/default.aspx">https://klec.ky.gov/Pages/default.aspx</a>
Louisiana	<a href="http://ethics.la.gov/lobbyinghome.aspx">http://ethics.la.gov/lobbyinghome.aspx</a>
Maryland	<a href="https://lobby-ethics.maryland.gov/">https://lobby-ethics.maryland.gov/</a>
Massachusetts	<a href="https://www.sec.state.ma.us/LobbyistPublicSearch/">https://www.sec.state.ma.us/LobbyistPublicSearch/</a>
Michigan	<a href="https://www.michigan.gov/sos/0,4670,7-127-1633_11945---,00.html">https://www.michigan.gov/sos/0,4670,7-127-1633_11945---,00.html</a>
Minnesota	<a href="https://cfb.mn.gov/citizen-resources/board-programs/overview/lobbying/">https://cfb.mn.gov/citizen-resources/board-programs/overview/lobbying/</a>
Mississippi	<a href="https://lobbying.sos.ms.gov/elec/portal/mse1/page/search/portal.aspx">https://lobbying.sos.ms.gov/elec/portal/mse1/page/search/portal.aspx</a>
Missouri	<a href="https://mec.mo.gov/MEC/Lobbying/Home.aspx">https://mec.mo.gov/MEC/Lobbying/Home.aspx</a>
Montana	<a href="https://lobbyist-ext.mt.gov/LobbyistRegistration/">https://lobbyist-ext.mt.gov/LobbyistRegistration/</a>
Nebraska	<a href="https://nadc.nebraska.gov/index.html">https://nadc.nebraska.gov/index.html</a>
Nevada	<a href="https://www.leg.state.nv.us/Lobbyist">https://www.leg.state.nv.us/Lobbyist</a>
New Jersey	<a href="https://www.elec.state.nj.us/forcandidates/gaa_forms.htm">https://www.elec.state.nj.us/forcandidates/gaa_forms.htm</a>
New Mexico	<a href="https://www.cfis.state.nm.us/media/ReportLobbyistFilingPeriods.aspx">https://www.cfis.state.nm.us/media/ReportLobbyistFilingPeriods.aspx</a>
New York	<a href="https://jcope.ny.gov/public-data">https://jcope.ny.gov/public-data</a>
North Carolina	<a href="https://www.sosnc.gov/divisions/lobbying">https://www.sosnc.gov/divisions/lobbying</a>
North Dakota	<a href="https://sos.nd.gov/lobbyists">https://sos.nd.gov/lobbyists</a>
Ohio	<a href="http://www.jlec-olig.state.oh.us/?page_id=4">http://www.jlec-olig.state.oh.us/?page_id=4</a>
Oklahoma	<a href="https://www.ok.gov/ethics/State_Officers_&amp;_Employees/Lobbying/">https://www.ok.gov/ethics/State Officers &amp; Employees/Lobbying/</a>
Oregon	<a href="https://www.oregon.gov/ogec/public-records/Pages/Lobby-Registrations-andExpenditure-Reports.aspx">https://www.oregon.gov/ogec/public-records/Pages/Lobby-Registrations-andExpenditure-Reports.aspx</a>
Pennsylvania	<a href="https://www.dos.pa.gov/OtherServices/LobbyingDisclosure/Pages/default.aspx">https://www.dos.pa.gov/OtherServices/LobbyingDisclosure/Pages/default.aspx</a>

Rhode Island	<a href="https://www.sos.ri.gov/divisions/open-government/transparency/lobbying">https://www.sos.ri.gov/divisions/open-government/transparency/lobbying</a>
South Carolina	<a href="https://apps.sc.gov/lobbyingactivity/LAIndex.aspx">https://apps.sc.gov/lobbyingactivity/LAIndex.aspx</a>
South Dakota	<a href="https://sosenterprise.sd.gov/businessservices/lobbyist/default.aspx">https://sosenterprise.sd.gov/businessservices/lobbyist/default.aspx</a>
Tennessee	<a href="https://apps.tn.gov/ilobby/">https://apps.tn.gov/ilobby/</a>
Texas	<a href="https://www.ethics.state.tx.us/search/lobby/loblistsREG2016-2020.php">https://www.ethics.state.tx.us/search/lobby/loblistsREG2016-2020.php</a>
Utah	<a href="https://lobbyist.utah.gov/Search/PublicSearch">https://lobbyist.utah.gov/Search/PublicSearch</a>
Vermont	<a href="https://lobbying.vermont.gov/">https://lobbying.vermont.gov/</a>
Virginia	<a href="http://ethics.dls.virginia.gov/lobbyists.asp#prepare">http://ethics.dls.virginia.gov/lobbyists.asp#prepare</a>
Washington	<a href="https://www.pdc.wa.gov/browse">https://www.pdc.wa.gov/browse</a>
West Virginia	<a href="https://ethics.wv.gov/lobbyist/Pages/Reporting.aspx">https://ethics.wv.gov/lobbyist/Pages/Reporting.aspx</a>
Wisconsin	<a href="https://lobbying.wi.gov/Home/Welcome?session=2019REG">https://lobbying.wi.gov/Home/Welcome?session=2019REG</a>
Wyoming	<a href="https://lobbyist.wyo.gov/Lobbyist/Default.aspx">https://lobbyist.wyo.gov/Lobbyist/Default.aspx</a>

### ***2022 Corporate Contributions to State and Local Political Candidates***

<b>Recipient</b>	<b>State</b>	<b>Amount (\$)</b>
April Weaver Campaign	AL	1,000
Assembly Democratic Camp Comm-SEG FUND	WI	750
Barbara Ballard for Kansas	KS	250
Barbara West Carpenter Committee	LA	500
Beth Mizell for Louisiana	LA	500
Beverly Gossage for Kansas	KS	500
Bob Hensgens Campaign Fund	LA	500
Bruce Bannister for House District 24	SC	1,000
Bruce Williamson for House District 115	GA	1,000
Buckel for Delegate	MD	500
Cameron Henry Campaign Fund	LA	500
Cameron Sexton for State Representative	TN	2,000
Chris Ward for Assembly 2022	CA	2,500
Christine Goodwin for Oregon	OR	500
Citizens for Brian Feldman	MD	500
Citizens for C.D. Davidsmeyer	IL	500
Citizens for Castro	IL	250
Citizens for Durkin	IL	1,250
Citizens for Elizabeth Hernandez	IL	250
Citizens for Hammond	IL	500
Citizens for Marcus C. Evans	IL	500
Citizens for Matt Morgan	MD	500
Citizens for Melony Griffith	MD	500
Citizens for Saab	MD	500





# THE SCIENCE *of* POSSIBILITY

Committee to Elect William Lamberth	TN	1,000
Committee for John Lovick	WA	1,000
Committee to Elect a Republican Senate-SEG FUND	WI	1,000
Committee to Elect C. Travis Johnson	LA	500
Committee to Elect Edith Patterson	MD	1,000
Crystal PAC	MO	1,000
Democratic Assembly Campaign Committee	NY	3,750
Dunnavant for Senate	VA	1,000
Dustin Miller Campaign Fund	LA	500
Eastside Forward PAC	MO	1,000
Ed Diehl for Oregon	OR	500
Elect Dan McConchie	IL	1,250
Elect Paul Harris	WA	1,000
Feigenholtz for State Senate	IL	500
Florida Strong	FL	4,000
Friends for Kathy Hochul	NY	5,000
Friends of Ariana Kelly	MD	500
Friends of Bonnie Cullison	MD	500
Friends of Camille Y. Lilly	IL	500
Friends of Chapin Rose	IL	500
Friends of Dan Rayfield	OR	500
Friends of Darryl Barnes	MD	500
Friends of Don Harmon	IL	1,500
Friends of Don Scott	VA	500
Friends of Guy Guzzone	MD	500
Friends of Harold Love	TN	1,000
Friends of J.B. Jennings	MD	500
Friends of James Manning	OR	1,000
Friends of Jason Barickman	IL	500
Friends Of Jehan Gordon	IL	500
Friends of Joseline Pena-Melnyk	MD	500
Friends of Justin Ready	MD	500
Friends of Karen Camper	TN	1,000
Friends of Kathy Szeliga	MD	500
Friends of Lamont Bagby	VA	500
Friends of Laura Fine	IL	500
Friends of Luke Torian	VA	500
Friends of Marcus Ricelli	WA	1,000



# VERTEX THE SCIENCE *of* POSSIBILITY

Friends of Mark D. Sickles	VA	500
Friends of Mattie Hunter	IL	500
Friends of Napoleon Harris	IL	250
Friends of Nic Kipke	MD	500
Friends of Rob Nosse	OR	1,000
Friends of Robbyn Lewis	MD	250
Friends of Robert Orrock	VA	1,000
Friends of Robyn Gabel	IL	500
Friends of Ron Watson	MD	500
Friends of Ryan Spain	IL	500
Friends of Sonya Marie Harper	IL	250
Friends of Steve Hershey	MD	500
Friends of Sue Rezin	IL	500
Friends of Terri Bryant	IL	500
Friends of Tim Butler	IL	500
Friends of Travis Nelson	OR	500
Friends of Vikki	OR	500
Friends to Elect Raumesh Akbari Senate	TN	1,000
Gallagher for Assembly 2022	CA	3,000
George Barker for Senate	VA	1,000
Gerald Boudreaux Campaign	LA	500
Gilbert for Delegate	VA	1,000
Gipson for Assembly 2022	CA	2,000
Hanger Campaign Fund	VA	500
Hayden for Oregon	OR	500
Hayes for Delegate	VA	500
Honest Leadership	FL	4,000
J. Todd Rutherford For State House District 74	SC	1,000
Jack Johnson for Senate	TN	1,000
Jason Hughes Campaign Fund	LA	500
Jay Luneau Campaign	LA	500
Jeremy Gray for Alabama House 83	AL	1,000
Jerome Zeringue for State Representative	LA	500
Jimmy Harris Campaign Fund	LA	500
Joe Stagni for State Representative	LA	500
Jones for Senate	CA	2,500
Julie Morrison for State Senate	IL	500
Katrina Jackson Campaign	LA	500



# VERTEX THE SCIENCE *of* POSSIBILITY

Kim Schofield for House	GA	1,000
Larry Bagely Campaign	LA	500
Larry Selders	LA	500
Lincoln PAC	MO	1,000
London Lamar for State Senate	TN	1,000
Lori Wilson for Assembly 2022	CA	1,500
Lucas for State Senate	VA	1,000
Maienschein for Assembly 2022	CA	2,000
Mark Mullet for Senate	WA	1,000
Matt Hatchett for State House District 155	GA	1,000
Maxine for Oregon	OR	500
Mike Reese for State Senate	LA	500
Missouri Alliance PAC	MO	1,000
Missouri Forward PAC	MO	1,000
Patrick Moore McMath Committee	LA	500
People for Joe Schmick	WA	1,000
Peters for Illinois	IL	250
Randy McNally for Lt. Governor	TN	2,000
Regina Barrow Campaign Fund	LA	500
Republican Assembly Campaign Cmte-SEG FUND	WI	1,000
Republican Assembly Campaign Committee	NY	3,750
Senate Democratic Campaign Committee	NY	3,750
Senate Republican Campaign Committee	NY	3,750
Shelly for Senate	WA	1,000
Sheree Sample-Hughes Campaign Fund	MD	250
State Senate Democratic Committee-SEG FUND	WI	750
Steve Clouse Campaign	AL	1,000
Susan Ruiz for Kansas	KS	250
Syverson for Senate	IL	500
Tanner Magee Campaign	LA	500
Terry Alexander for State House District 59	SC	1,000
The Jack McFarland Campaign Fund	LA	500
The People for Emanuel "Chris" Welch	IL	1,500
Thomas C. Alexander Campaign Fund	SC	1,000
Tim Knopp for State Senate	OR	500
Tina McKinnor for Assembly	CA	1,500
Tonya Anderson for State Senate District 43	GA	1,000
Tracie Davis for State Senate District 5	FL	1,000



Truth in Campaigns	MO	1,000
Ty Masterson for Kansas	KS	1,000
Waldron for Assembly 2022	CA	2,500
Weber for CA Assembly	CA	2,000
William Davis for St. Rep.	IL	500

***2022 Corporate Contributions to Political Organizations***

<b>Recipient</b>	<b>Amount (\$)</b>
Democratic Governors Association (DGA)	500,000
Democratic Legislative Campaign Committee (DLCC)	155,000
Democratic Lieutenant Governors Association (DLGA)	25,000
GOPAC	80,000
Republican Governors Association (RGA)	500,000
Republican State Leadership Committee (RSLC)	235,000

***2022 Corporate Contributions to 501(c)4 Organizations***

<b>Organization</b>	<b>Non-Deductible Portion of Payments (\$)</b>
Alliance for Regenerative Medicine	36,000
Alliance for a Stronger FDA	9,000
Institute for Gene Therapies	20,000