VERTEX THE SCIENCE *of* POSSIBILITY

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.

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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.

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.

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/. 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.

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In 2020, 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:

Organization	**Non-Deductible Portion of Payments**
Biotechnology Innovation Organization	$161,687
California Life Sciences Association	$6,900
Texas Healthcare and Bioscience Institute	$3,499
Massachusetts Biotechnology Council	$3,350

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Appendix

Lobbying Disclosures by Registered State Jurisdiction

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

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

2020 Corporate Contributions to State and Local Political Candidates

Recipient	**State**	**Amount ($)**
Adams4Delegate	VA	500
ADCC-Segregated Fund	WI	750
Alex Andrade Campaign	FL	1,000
Anthony Rodriguez Campaign	FL	1,000
Barbara Smith Warner	OR	500
Barry Milligan Campaign Fund	LA	500
Brady for Senate Inc.	IL	1,000
Brenda Gilmore for State Senate	TN	500
Cameron Sexton for State Representative	TN	500
Campaign to Elect Larry Miller to State House	TN	250
CERS-Segregated Fund	WI	1,250
Chad Mayes for Assembly	CA	1,500
Chris Ward for Assembly 2020	CA	2,000
Citizens for Durkin	IL	1,000
Citizens for Gregory Harris	IL	500
Citizens for Hammond	IL	500
Citizens for Mazzochi	IL	500
Citizens for Michael E. Hastings	IL	250
Citizens for Saab	MD	200
Citizens to Elect Mike Marron	IL	500
Clay Schexnayder Campaign Fund	LA	500
Cmte to Elect Cleo Fields	LA	500
Cmte to Elect James Beverly	GA	500
Cmte to Elect Parrish	GA	1,000
Committe to Elect William Lamberth	TN	500
Committee to Elect Bob Trammell Jr.	GA	1,000

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Committee to Elect Bryan Terry	TN	500
Committee to Elect Vincent Dixie	TN	250
Committee to Elect Yusuf Hakeem	TN	250
Dean Burke for GA State Senate Campaign	GA	1,000
DeWitte for Illinois Senate	IL	500
Dr. Richard Pan Senate 2018 Officeholder Account	CA	2,000
Dunnavant for Senate	VA	1,000
Dustin Miller Campaign Fund	LA	500
Ed Price for Senate	LA	500
Edmunds for Delegate	VA	500
Elect Dan McConchie	IL	500
Feigenholtz for State Senate	IL	1,000
Ferrell Haile for State Senate	TN	500
Filler-Corn for Delegate	VA	1,000
Fowler for Delegate	VA	500
Franklin J. Foil Campaign Committee	LA	500
Friends of Andrea Salinas	OR	500
Friends of Bill Beck	TN	250
Friends of Blake Tillery	GA	1,250
Friends of Christen Drazan	OR	500
Friends of Darren Jernigan	TN	250
Friends of Deborah Conroy	IL	250
Friends of Don Harmon	IL	1,000
Friends of Elgie Sims	IL	500
Friends of Fran Hurley	IL	250
Friends of Fred Girod	OR	500
Friends of Harold Love	TN	250
Friends of Heather Steans	IL	500
Friends of Hugh Leatherman Sr.	SC	500
Friends of Jason Barickman	IL	1,000
Friends of Jen Jordan Inc	GA	1,000
Friends of John Curran	IL	500
Friends of Karen Camper	TN	250
Friends of Ken Kerr	MD	100
Friends of LaPointe	IL	250
Friends of Lee Beyer	OR	500
Friends of Mark D. Sickles	VA	750
Friends of Michael J. Madigan	IL	1,000
Friends of Natalie Manley	IL	250
Friends of Nic Kipke	MD	500
Friends of Nikki G. Setzler	SC	500

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Friends of Omar Aquino	IL	500
Friends of Rita Mayfield	IL	250
Friends of Rob Nosse	OR	500
Friends of Rob Wagner	OR	500
Friends of Robert Orrock	VA	500
Friends of Robyn Gabel	IL	250
Friends of Ryan Spain	IL	500
Friends of Sonya Marie Harper	IL	250
Friends to Elect Lamont Robinson	IL	250
Friends to Elect Raumesh Akbari Senate	TN	500
Friends To Elect William K. Boddie Jr. Esq	GA	500
Gary Smith Campaign Fund	LA	500
Gary Smith Campaign Fund	LA	500
George Barker for Senate	VA	1,000
Gerald Boudreaux Campaign	LA	500
Gilda Cobb-Hunter Campaign Fund	SC	500
Gloria S. Butler Campaign committee	GA	500
Grove for Senate 2022	CA	1,700
Grove for Senate 2022	CA	300
Gustavo Rivera for State Senate	NY	1,000
HAILEPAC	TN	500
Hanger Campaign Fund	VA	750
Hawk for State Representative	TN	500
Hayden for Oregon	OR	500
Heath Flora for Assembly 2020	CA	1,500
House Democratic Campaign committee	MO	1,000
J. Rogers Pope Campaign Fund	LA	500
Jason Hughes Campaign Fund	LA	500
Jeff Yarbro for State Senate	TN	500
Jennifer Bradley Campaign	FL	1,000
Jones for Senate	CA	1,500
Juan Fernandez-Barquin Campaign	FL	1,000
Julie Morrison for State Senate	IL	500
Katrina Jackson Campaign	LA	500
Katrina Jackson Campaign	LA	500
Ken Brass Campaign Fund	LA	500
Kirk Talbot Campaign	LA	500
Larry Bagely Campaign	LA	500
Larry Bagely Campaign	LA	500
Lauren Book for State Senate	FL	1,000
Lorena Gonzalez for Assembly 2020	CA	2,000

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Lucas for State Senate	VA	1,000
Maienschein for Assembly 2020	CA	2,000
Mark Abraham Campaign	LA	500
MIGHTY MISSOURI PAC	MO	500
Mike Stewart for State Representative	TN	500
Missouri Senate Campaign Committee	MO	1,500
New York State DACC Housekeeping Committee	NY	1,500
Nicholas X. Duran Campaign	FL	1,000
NY DSCC Housekeeping Committee	NY	2,500
Page Cortez Campaign Fund	LA	500
Page Walley for State Senate	TN	750
Patrick Connick Campaign Fund	LA	500
Paul Bailey Committee	TN	500
People for Pendergrass	MD	500
Powell for Tennessee	TN	250
RACC - Segregated Fund	WI	1,250
Regina Barrow Campaign Fund	LA	500
Republican Assembly Campaign Committee Housekeeping Account	NY	2,500
Rick Ward Campaign	LA	500
Ronnie Johns Campaign Fund	LA	500
Rusty Crowe for Senate	TN	1,000
Ryan Williams for State House	TN	250
San Diego County Democratic Party	CA	1,500
Senate Republican Campaign Committee Housekeeping Account	NY	2,500
Shane Reeves for State Senate	TN	500
Shevrin Jones Campaign	FL	1,000
Skidmore for State House	FL	500
SSDC-Segregated Fund	WI	750
Syverson for Senate	IL	500
Tasha Boerner Horvath for Assembly 2020	CA	1,500
Team Demmer	IL	1,000
The Committee to Elect Esther Helton	TN	250
The Committee to Re-Elect Terry England	GA	1,250
Thomas C. Alexander Campaign Fund	SC	500
Tim Knopp for State Senate	OR	500
Tina Polsky for State Senate	FL	1,000
Troy Carter Campaign Fund	LA	500
Troy Carter Campaign Fund	LA	500
Vance Aloupis Campaign	FL	1,000

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Vote Mark Hall	TN	250
Waldron for Assembly 2020	CA	2,000
William Davis for St. Rep.	IL	250

2020 Corporate Contributions to Political Organizations

Recipient	**Amount ($)**
Democratic Governors Association (DGA)	260,000
Democratic Legislative Campaign Committee (DLCC)	100,000
Democratic Lieutenant Governors Association (DLGA)	30,000
GOPAC	50,000
Republican Governors Association (RGA)	275,000
Republican State Leadership Committee (RSLC)	75,000

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