

## **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 2021, 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	210,676
California Life Sciences Association	12,920
Texas Healthcare and Bioscience Institute	12,250
Massachusetts Biotechnology Council	11,715

**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/msel/page/search/portal.aspx">https://lobbying.sos.ms.gov/elec/portal/msel/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>

### ***2021 Corporate Contributions to State and Local Political Candidates***

<b>Recipient</b>	<b>State</b>	<b>Amount (\$)</b>
Amy Walen for State House	WA	500
Ana Maria Rodriguez for State Senate	FL	1,000
Anthony Daniels for Alabama	AL	1,000
Assembly Democratic Camp Comm-SEG FUND	WI	250
Assembly Democratic Camp Comm-SEG FUND	WI	500
Assembly Republican Victory	NJ	2,000
Blanca Rubio for Assembly 2022	CA	600
Bo Watson for Senate	TN	1,000
Bradford for Senate 2024	CA	900
Buckel for Delegate	MD	500
Cameron Sexton for State Representative	TN	1,500
Campaign to Elect John Stefanski	LA	1,000
Chad Brown Campaign Fund	LA	1,000
Chris Ward for Assembly 2022	CA	1,200
Citizens for Adrienne Jones	MD	500
Citizens for Antonio Munoz	IL	500
Citizens for Bill Ferguson	MD	500
Citizens for Brian Feldman	MD	500
Citizens for C.D. Davidsmeyer	IL	250
Citizens for Delores Kelley	MD	500
Citizens for Durkin	IL	1,500
Citizens for Marcus C. Evans	IL	500
Citizens for Matt Morgan	MD	500
Citizens for Melony Griffith	MD	500
Citizens for Saab	MD	500
Clay Schexnayder Campaign Fund	LA	1,500



# VERTEX THE SCIENCE *of* POSSIBILITY

Cmte to Elect Eileen Cody	WA	500
Cmte to Re-elect Ed Harbison	GA	1,000
Cmte. to Elect Gloria Frazier	GA	1,000
Committee to Elect a Republican Senate-SEG FUND	WI	250
Committee to Elect a Republican Senate-SEG FUND	WI	750
Committee to Elect Gary Hicks	TN	500
Committee to Elect Linda Coleman-Madison	AL	1,000
Committee to Elect Rachel Prusak	OR	500
Committee to Elect Yusuf Hakeem	TN	500
Community for Dee	IL	250
Conservatives for a Better Florida	FL	5,000
Cullison for Maryland	MD	500
Dan Roberts for Senate	AL	1,000
Daniel Perez Campaign	FL	1,000
Danny Burgess for Senate	FL	1,000
Dave Syverson Campaign Committee	IL	500
Democratic Assembly Campaign Committee	NJ	2,000
Democrats for the Illinois House	IL	1,000
Dotie Joseph for House District 108	FL	1,000
Dr. Joaquin Arambula for Assembly 2022	CA	700
Dunnavant for Senate	VA	1,000
Dustin Miller Campaign Fund	LA	1,000
Edmunds for Delegate	VA	500
Elect Dan McConchie	IL	1,500
Feigenholtz for State Senate	IL	1,000
Fentice D. Driskell Campaign	FL	1,000
Filler-Corn for Delegate	VA	1,000
Florida Strong Finish	FL	5,000
Fowler for Delegate	VA	500
Friends for Avery Bourne	IL	500
Friends for Eva Dina Delgado	IL	250
Friends for Nicholas Charles	MD	250
Friends of Alex Ybarra	WA	500
Friends of Alicia Hyndman	NY	500
Friends of Ariana Kelly	MD	250
Friends of Bill Cunningham	IL	500
Friends of Bob Freeman	TN	500
Friends of Camille Y. Lilly	IL	250
Friends of Chapin Rose	IL	500
Friends of Christine Drazan	OR	500
Friends of Dan Brady	IL	500



# VERTEX THE SCIENCE *of* POSSIBILITY

Friends of Darryl Barnes	MD	500
Friends of Don Harmon	IL	2,000
Friends of Elizabeth Steiner Hayward	OR	500
Friends of Frank Bigelow for Assembly 2020	CA	900
Friends of Fred Girod	OR	500
Friends of Harold Love	TN	500
Friends of J.B. Jennings	MD	500
Friends of James Manning	OR	500
Friends of Jason Barickman	IL	500
Friends Of Jehan Gordon	IL	500
Friends of John Curran	IL	500
Friends of Joseline Pena-Melnyk	MD	500
Friends of Justin Ready	MD	500
Friends of Karen Camper	TN	500
Friends of Kathy Szeliga	MD	500
Friends of Ken Kerr	MD	250
Friends of Kevin Byrne	NY	500
Friends of Kim Jackson	GA	1,000
Friends of Larry Springer	WA	500
Friends of Laura Fine	IL	500
Friends of Laurie Jinkins	WA	500
Friends of Mark D. Sickles	VA	1,000
Friends of Mattie Hunter	IL	500
Friends of Mattie Hunter	IL	500
Friends of Mike Martucci	NY	500
Friends of Nic Kipke	MD	500
Friends of Pam Beidle	MD	250
Friends of Patsy Hazlewood	TN	500
Friends of Paul Evans	OR	500
Friends of Randy McNally	TN	1,500
Friends of Raquel Moore-Green	OR	500
Friends of Rita Mayfield	IL	250
Friends of Robert Orrock	VA	500
Friends of Robyn Gabel	IL	500
Friends of Ryan Spain	IL	500
Friends of Sonya Marie Harper	IL	500
Friends of Steve Hershey	MD	500
Friends of Sue Rezin	IL	500
Friends of Susan Krebs	MD	500
Friends of Terri Bryant	IL	500
Friends of Tim Butler	IL	500



# VERTEX THE SCIENCE *of* POSSIBILITY

Friends of Tom O'Mara	NY	500
Friends of Vandana Slatter	WA	500
Friends of Will Barclay	NY	500
Friends to Elect Raumesh Akbari Senate	TN	1,000
Gallivan for Senate	NY	500
George Barker for Senate	VA	1,000
Gilda Cobb-Hunter Campaign Fund	SC	1,000
Gipson for Assembly 2022	CA	900
Grove for Senate 2022	CA	900
Gustavo Rivera for State Senate	NY	750
Hanger Campaign Fund	VA	500
Hawk for State Representative	TN	500
Hayden for Oregon	OR	500
Heath Flora for Assembly 2022	CA	900
IL House Republican Organization	IL	1,000
IL Senate Democratic Victory Fund	IL	1,000
J. Rogers Pope Campaign Fund	LA	1,000
James Bush Campaign	FL	1,000
Jason Brodeur Campaign Fund	FL	1,000
Jason Hodges for State House	TN	500
Jay Luneau Campaign	LA	1,000
Jil Tracy for State Senate	IL	250
Jim Wood for Assembly 2022	CA	1,100
Joe Schmick Campaign Committee	WA	500
John F. Kennedy for Senate	GA	1,000
Jones for Senate	CA	1,200
Judy Warnick for Senate	WA	500
Julie Morrison for State Senate	IL	500
Kamia Brown Campaign	FL	1,000
Kathleen Murphy for Delegate	VA	500
Kevin Mullin for Assembly 2022	CA	800
Larry Bagely Campaign	LA	1,000
Laura Hall Re-election Cmte	AL	1,000
Lincoln PAC	MO	2,800
London Lamar for State Representative	TN	500
Lorena Gonzalez for Assembly 2022	CA	1,100
Lucas for State Senate	VA	1,000
Maienschein for Assembly 2022	CA	900
Majority Forward	MO	2,000
McDonald for Assembly	NY	750
Melinda for Senate	IL	500



Missouri United	MO	2,000
MO House Dem. Camp Cmte (Team Missouri)	MO	2,000
Murrell Smith Campaign	SC	1,000
New York State DACC Housekeeping Committee	NY	1,500
NY DSCC	NY	1,500
NY Republican Senate Campaign Cmte Housekeeping Account	NY	1,000
NYS Republican Assembly Campaign Cmte Housekeeping Account	NY	1,000
Page Cortez Campaign Fund	LA	1,500
Pat Bates for Senate	CA	1,200
Paul Lee for House Campaign	AL	1,000
Re-Elect Senator Atkins 2024	CA	1,500
Regina Barrow Campaign Fund	LA	1,000
Rendon for Assembly 2022	CA	1,200
Republican Assembly Campaign Cmte-SEG FUND	WI	250
Republican Assembly Campaign Cmte-SEG FUND	WI	750
Sabi Kumar for TN House	TN	500
Senate Democratic Majority	NJ	2,000
Senate Presidents Campaign Committee	NJ	2,000
Senate Republican Majority	NJ	2,000
Senate Republican Victory Fund	IL	1,000
Senator John Braun	WA	500
Sharon Cooper for State House	GA	1,000
Shelly for State Senate	WA	500
Shevrin Jones Campaign	FL	1,000
State Senate Democratic Committee-SEG FUND	WI	250
State Senate Democratic Committee-SEG FUND	WI	500
Stec for Senate	NY	500
Team BSW	OR	500
Team Demmer	IL	500
The People for Emanuel "Chris" Welch	IL	2,000
Tim Knopp for State Senate	OR	500
Waldron for Assembly 2022	CA	1,200
Weber for CA Assembly	CA	900
Wilk for Senate	CA	1,200

**2021 Corporate Contributions to Political Organizations**

<b>Recipient</b>	<b>Amount (\$)</b>
Democratic Governors Association (DGA)	335,000
Democratic Legislative Campaign Committee (DLCC)	25,000
Democratic Lieutenant Governors Association (DLGA)	25,000
GOPAC	155,000

Republican Governors Association (RGA)	335,000
Republican State Leadership Committee (RSLC)	45,000

***2021 Corporate Contributions to 501(c)4 Organizations***

<b>Organization</b>	<b>Non-Deductible Portion of Payments (\$)</b>
Alliance for Regenerative Medicine	6,000
Alliance for a Stronger FDA	9,000
Institute for Gene Therapies	20,000