

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/. 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 2023, 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	176,673
California Life Sciences Association	13,680
Texas Healthcare and Bioscience Institute	12,250
Massachusetts Biotechnology Council	12,883
New York Bio	450

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/
District of Columbia	https://bega.dc.gov/page/resources-lobbyists
Florida	https://floridalobbyist.gov/
Georgia	https://ethics.ga.gov/lobbyist-reporting/
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
Maryland	https://lobby-ethics.maryland.gov/
Massachusetts	https://www.sec.state.ma.us/LobbyistPublicSearch/
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/mse1/page/search/portal.aspx
Missouri	https://mec.mo.gov/MEC/Lobbying/Home.aspx
Montana	https://lobbyist-ext.mt.gov/LobbyistRegistration/
Nebraska	https://nadc.nebraska.gov/lobbying
Nevada	https://www.leg.state.nv.us/Lobbyist
New Hampshire	(https://sos.nh.gov/administration/ethics/lobbyists/)
New Jersey	https://www.elec.nj.gov/forcandidates/gaa_ed_train.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
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

2023 Corporate Contributions to State and Local Political Candidates

Recipient	State	Amount (\$)
Angela Cockerham Campaign Fund	MS	1,000
Assembly Democratic Camp Comm-SEG FUND	WI	750
Assembly Republican Victory	NJ	1,000
Barbara Ballard for Kansas	KS	500
Barbara West Carpenter Committee	LA	500
Beau Beaulieu Campaign	LA	500
Billy Mitchell Campaign Fund	GA	1,000
Blakespear for Senate 2026	CA	2,000
Bob Owen Campaign	LA	500
Brad Stephens for State Representative	IL	500
Brandon Beach Campaign Fund	GA	1,000
Brock Martin for State Representative	TN	1,000
Buckel for Delegate	MD	500
Butch Parrish Campaign Fund	GA	1,000
Cameron Henry Campaign Fund	LA	500
Cameron Sexton for State Representative	TN	1,000
Chris Croft for Kansas	KS	500
Chris Ward for Assembly 2024	CA	2,000
Christine Goodwin for Oregon	OR	250
Citizens for Adrienne Jones	MD	500
Citizens for Ann Gillespie	IL	500
Citizens for Bill Ferguson	MD	500
Citizens for Brian Chisholm	MD	250



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Citizens for Elizabeth Hernandez	IL	500
Citizens for Hammond	IL	500
Citizens for Heather Bagnall	MD	250
Citizens for Jackie Haas	IL	500
Citizens for Karina Villa	IL	250
Citizens for Laura Murphy	IL	1,000
Citizens for Marcus C. Evans	IL	500
Citizens for Matt Morgan	MD	500
Citizens for Melony Griffith	MD	1,000
Citizens for Patrick Windhorst	IL	500
Citizens for Sara Feigenholtz	IL	500
Citizens for Teresa Reilly	MD	500
Citizens for Thomas Hutchinson	MD	250
Clifford for Kansas	KS	500
Committee to Elect Jay C Hoffman	IL	500
Committee to Elect Royce Duplessis	LA	500
Committee to Elect a Republican Senate-SEG FUND	WI	1,250
Committee to Elect Edith Patterson	MD	250
Corey Simon Campaign Fund	FL	1,000
Dave Syverson Campaign Committee	IL	500
Democratic Assembly Campaign Committee	NJ	1,000
Dewey McClain for State House	GA	1,000
DeWitte for Illinois Senate	IL	500
Diane Dixon for Assembly 2024	CA	1,000
DougPAC	MO	500
Dr. Akilah Weber for State Senate	CA	1,500
Eastside Forward PAC	MO	500
Ed Diehl for Oregon	OR	250
Emanuel Welch for State Representative	IL	1,000
Faust-Goudeau for Kansas	KS	500
Ferrell Haile for State Senate	TN	1,000
Franklin J. Foil Campaign Committee	LA	500
Friends for Kathy Hochul	NY	5,000
Friends of Ann Rivers	WA	1,200
Friends of Annette Cleveland	WA	1,200
Friends of Bill Cunningham	IL	500
Friends of Bonnie Cullison	MD	500
Friends of Caleb Hemmer	TN	1,000



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Friends of Camille Y. Lilly	IL	500
Friends of Candi Mundon King	VA	500
Friends of Charlie Conrad	OR	250
Friends of Clarence Lam	MD	250
Friends of Dan Rayfield	OR	500
Friends of Dick Anderson	OR	250
Friends of Don Harmon	IL	1,000
Friends of Elgie Sims	IL	500
Friends of Ghazala Hashmi	VA	1,000
Friends of Harold Love	TN	1,000
Friends of James Manning	OR	250
Friends Of Jehan Gordon-Booth	IL	500
Friends of Jheanelle Wilkins	MD	250
Friends of John Curran	IL	1,000
Friends of Johnny Mautz	MD	250
Friends of Joseline Pena-Melnyk	MD	1,000
Friends of Justin Ready	MD	500
Friends of Karen R. Toles	MD	250
Friends of Kathy Klausmeier	MD	500
Friends of Kathy Szeliga	MD	500
Friends of Keith Hodges	VA	500
Friends of Ken Kerr	MD	250
Friends of Laurie Jinkins	WA	1,200
Friends of Marcia Price	VA	500
Friends of Mark Meek	OR	250
Friends of Michelle Maldonado	VA	500
Friends of Mike Cherry	VA	500
Friends of Nic Kipke	MD	500
Friends of Pam Beidle	MD	250
Friends of Rob Nosse	OR	250
Friends of Robyn Gabel	IL	500
Friends of Ryan Spain	IL	500
Friends of Steve Hershey	MD	500
Friends of Steve Johnson	MD	250
Friends of Sue Rezin	IL	1,000
Friends of Travis Nelson	OR	250
Friends of Vikki	OR	500
Friends to Elect Raumesh Akbari Senate	TN	1,000

Gerald Boudreaux Campaign	LA	500
Gilbert for Delegate	VA	1,000
Gilda Cobb-Hunter Campaign Fund	SC	1,000
Hawk for State Representative	TN	1,000
Hayes for Delegate	VA	500
Heath Flora for State Assembly 2024	CA	1,000
Honest Leadership	FL	4,000
Hoover for Assembly 2024	CA	1,000
How We All Win	FL	4,000
Jason Hughes Campaign Fund	LA	500
Jason White Campaign Fund	MS	1,000
Jerome Zeringue for State Representative	LA	500
Jim Boyd Campaign Fund	FL	1,000
Jim Wood For Assembly 2024	CA	2,000
Jimmy Harris Campaign Fund	LA	500
Joe Patterson for Assembly 2024	CA	1,000
Joe Schmick Campaign Committee	WA	1,200
Joe Stagni for State Representative	LA	500
Joey Hood Campaign	MS	500
Joseph Bouie, Jr. Campaign	LA	500
Juan Alanis for Assembly 2024	CA	1,000
Julie Morrison for State Senate	IL	500
Katrina Jackson Campaign	LA	500
Kay Kirkpatrick Campaign Fund	GA	1,000
Ken Brass Campaign Fund	LA	500
Kevin Blackwell Campaign Fund	MS	500
Kim Schofield for House	GA	1,000
Kirk Talbot Campaign	LA	500
Landwehr for Kansas	KS	500
Larry Bagely Campaign	LA	500
Lee Hawkins Campaign Fund	GA	1,000
London Lamar for State Senate	TN	1,000
Lori Wilson for Assembly 2024	CA	1,500
Mike Reese for State Senate	LA	500
Missouri Alliance PAC	MO	2,000
MO SIX Pac	MO	500
Murrell Smith Campaign	SC	1,000
NEMO Leadership Pac	MO	2,000

New York State DACC Housekeeping Committee	NY	3,000
NY DSCC Housekeeping Committee	NY	3,000
NY Republican Senate Campaign Cmte Housekeeping Account	NY	2,000
NYS Republican Assembly Campaign Cmte Housekeeping Account	NY	2,000
Omari Crawford For 84 Campaign Fund	GA	1,000
Papan for Assembly 2024	CA	1,000
Paula Davis Campaign	LA	500
People's Choice to Elect Charlane Oliver	TN	1,000
Regina Barrow Campaign Fund	LA	500
Republican Assembly Campaign Cmte-SEG FUND	WI	1,250
Republican Commonwealth Leadership PAC	VA	2,500
Robert D. "Bobby" Orrock for House Committee	VA	500
Roger Niello for Senate 2026	CA	1,000
Rosilicie Ochoa-Bogh for Senate 2024	CA	1,000
Sabi Kumar for TN House	TN	1,000
Sabi Kumar for TN House	TN	1,000
Sam L. Jenkins, Jr. Campaign Committee	LA	500
Senate Democratic Majority	NJ	1,000
Senate Republican Majority	NJ	1,000
Shane Reeves for State Senate	TN	1,000
Sheree Sample-Hughes Campaign Fund	MD	250
Sickles For Delegate	VA	500
State Senate Democratic Committee-SEG FUND	WI	750
Suetterlein for Senate	VA	1,000
Support the Candidacy of Tony McCombie	IL	1,000
Susan Ruiz for Kansas	KS	500
Tasha Boerner for Assembly 2024	CA	2,000
Terry Alexander for State House District 59	SC	1,000
Thomas C. Alexander Campaign Fund	SC	1,000
Tracie Davis for State Senate District 5	FL	1,000
Vince Fong for Assembly 2024	CA	1,000
W. Briggs Hopson Campaign Fund	MS	1,000

2023 Corporate Contributions to Political Organizations

Recipient	Amount (\$)
Democratic Governors Association (DGA)	500,000
Democratic Legislative Campaign Committee (DLCC)	100,000

Democratic Lieutenant Governors Association (DLGA)	25,000
GOPAC	50,000
Republican Governors Association (RGA)	500,000
Republican State Leadership Committee (RSLC)	140,000

2023 Corporate Contributions to 501(c)4 Organizations

Organization	Non-Deductible Portion of Payments (\$)
Alliance for Regenerative Medicine	14,400
Alliance for a Stronger FDA	9,000
Institute for Gene Therapies	60,000