

## **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 Activities and Contributions**

#### ***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.

#### ***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.

## **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/](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 2019, the industry and trade organizations to which Vertex paid more than \$25,000, and the portion of our dues paid to these organizations used to engage in lobbying activities, were:

<b>Organization</b>	<b>Dues Attributable to Lobbying</b>
Biotechnology Innovation Organization	\$144,284
California Life Sciences Association	\$9,660
Texas Healthcare and Bioscience Institute	\$1,050
Massachusetts Biotechnology Council	\$2,853

**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>
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>
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://malobbyist-prod.pcctg.net/#/index">https://malobbyist-prod.pcctg.net/#/index</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>
Nevada	<a href="https://www.leg.state.nv.us/Lobbyist/Report/Home">https://www.leg.state.nv.us/Lobbyist/Report/Home</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>
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>
South Carolina	<a href="https://apps.sc.gov/lobbyingactivity/LAIndex.aspx">https://apps.sc.gov/lobbyingactivity/LAIndex.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>

**2019 Corporate Contributions to State and Local Political Candidates**

<b>Recipient</b>	<b>State</b>	<b>Amount (\$)</b>
Abraham, Mark T.	LA	500
Akbari, Raumesh	TN	1000
Armes, James K	LA	500
Atkins, Toni	CA	2900
Baertschiger, Herman	OR	700
Bagley, Larry A	LA	500
Barickman, Jason	IL	1000
Barker, George	VA	500
Barrow, Regina	LA	500
Bentley, Patty	GA	500
Book, Lauren	FL	1000
Boudreaux, Gerald	LA	500
Brady, Bill	IL	1000
Brass, Ken	LA	500
Burdick, Ginny	OR	700
Burke, Dean	GA	500
Butler, Gloria	GA	500
Carter, Troy	LA	500
Cobb-Hunter, Gilda	SC	500
Connick, Patrick	LA	500
Conroy, Deborah	IL	250
Cooper, Barbara	TN	500
Cooper, Sharon	GA	500
Cortez, Patrick Page	LA	500
Cox, Kirk	VA	500
Cullerton, John J.	IL	1000
Daley, Dan	FL	1000
Demmer, Tom	IL	1000
DeWitte, Donald	IL	250
Dixie, Vincent	TN	500
Drazan, Christine	OR	700
Duncan, Geoff	GA	1500
Durkin, James	IL	1000
England, Terry	GA	500
Falconer, Reid	LA	500
Feigenholtz, Sara	IL	1000
Foil, Franklin	LA	500
Freeman, Bob	TN	500
Gabel, Robyn	IL	250
Gianaris, Mike (Michael)	NY	1000
Gloria, Todd	CA	1500
Grove, Shannon	CA	3000
Hammond, Norine	IL	500



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Harmon, Don	IL	250
Harper, Sonya Marie	IL	250
Harris, Gregory	IL	500
Hastings, Michael	IL	250
Herbkersman, William G.	SC	500
Hill, Jack	GA	500
Hutto, C. Bradley	SC	500
Jackson, Katrina R	LA	500
Jernigan, Darren	TN	500
Johns, Ronnie	LA	500
Jones, Shevrin	FL	1000
Jordan, Jennifer Auer	GA	500
Kelley, Delores	MD	500
Kotek, Tina	OR	700
Lilly, Camille	IL	250
Madigan, Michael J.	IL	1000
Magnarelli, William (Bill)	NY	500
Maienschein, Brian	CA	2000
Marron, Mike	IL	250
Mayfield, Rita	IL	250
Mazzochi, Deanne	IL	250
McConchie, Dan	IL	250
McDonald, John T. III	NY	1000
McDougle, Ryan	VA	500
McPAC (McNally-STS-TN)	TN	5000
MD Rep House Caucus Cmte	MD	1000
Miller, Dustin	LA	500
Miller, Larry J.	TN	500
Mitchell, Bo	TN	500
Moeller, Anna	IL	250
Morrison, Julie	IL	500
Munoz, Tony	IL	250
Nazarian, Adrin	CA	2000
Nosse, Rob	OR	250
NY Dem Senate Camp Cmte	NY	2000
Pan, Richard	CA	2500
Pope, J. Rogers	LA	500
Portantino, Anthony	CA	3000
Price, Ed	LA	500
Prince, Brian	GA	500
Rendon, Anthony	CA	4000
Renner, Paul	FL	1000
Robinson, Lamont J.	IL	250
Sexton, Cameron	TN	5000
Sickles, Mark	VA	500



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Smith Warner, Barbara	OR	700
Smith, Gary	LA	500
Smith, Nicholas	IL	250
Smith, Patricia	LA	500
Smith, Richard	GA	500
Smyre, Calvin	GA	1000
Spain, Ryan	IL	500
Sprowls, Chris	FL	1000
Steans, Heather	IL	500
Syverson, Dave	IL	250
Talbot, Kirk	LA	500
Verdin, Daniel B.	SC	500
Waldron, Marie	CA	3000
Walsh, Larry (Jr.)	IL	250
Ward, Rick	LA	500
Wheeler, Keith	IL	250
WI Dem Assembly Camp Cmte-Seg Fund	WI	750
WI Dem Sen Camp Cmte-Seg Fund	WI	750
WI Rep Assembly Camp Cmte-Seg Fund	WI	1500
WI Rep Sen Camp Cmte-Seg Fund	WI	1500
Yarbro, Jeff	TN	1000

### *2019 Corporate Contributions to Political Organizations*

<b>Recipient</b>	<b>Amount (\$)</b>
Democratic Governors Association (DGA)	250,000
Democratic Legislative Campaign Committee (DLCC)	50,000
GOPAC	25,000
Republican Governors Association (RGA)	250,000
Republican State Leadership Committee (RSLC)	60,000