



Modern Slavery and Child Labor Transparency Statement for the year ended December 31, 2024

This statement (the “Statement” or the “Global Statement”) is published pursuant to the *Australian Commonwealth Modern Slavery Act*, *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act* and *UK Modern Slavery Act* (collectively, the “Acts”). This Statement is for Vertex Pharmaceuticals Incorporated and its subsidiaries (hereinafter “Vertex” or the “Company”) for the financial year ended December 31, 2024.

Vertex respects and believes in the inherent rights and dignity of every person. Vertex supports the principles established under the United Nations Universal Declaration of Human Rights. We expect every employee and the suppliers with whom we work to respect human rights in all countries where we do business. This Statement sets out the steps taken by Vertex to address forced labor, slavery and human trafficking (collectively, “modern slavery”) and child labor in its operations and supply chain.

We have prepared this Statement on a consolidated basis for Vertex because our Code of Conduct and underlying policies and controls address modern slavery and child labor in addition to other topics. Not all of the entities in our consolidated group have reporting obligations under the aforementioned Acts.

Our operations and structure

Vertex is a global biotechnology company that invests in scientific innovation to create transformative medicines for people with serious diseases and conditions. The company has approved therapies for cystic fibrosis, sickle cell disease, transfusion-dependent beta thalassemia and acute pain, and it continues to advance clinical and research programs in these areas. Vertex also has a robust clinical pipeline of investigational therapies across a range of modalities in other serious diseases where it has deep insight into causal human biology, including neuropathic pain, APOL1-mediated kidney disease, IgA nephropathy, autosomal dominant polycystic kidney disease, type 1 diabetes and myotonic dystrophy type 1.

Vertex was founded in 1989 and has its global headquarters in Boston, Massachusetts, with international headquarters in London, England. The Company has research and development sites and commercial offices in North America, Europe, Australia, Latin America and the Middle East. Globally, Vertex employs approximately 6,100 employees. Vertex is consistently recognized as one of the industry's top places to work, including 15 consecutive years on Science Magazine’s Top Employers list and three years on Fortune’s 100 Best Companies to Work For.

Our manufacturing and supply chain

Vertex uses a worldwide network of third-party manufacturers and internal capabilities, including Vertex’s own manufacturing facility in Boston, to manufacture product candidates for clinical trials and commercial-use medicines. A variety of inputs are used to make our commercial products including but not limited to raw materials, active pharmaceutical ingredients, excipients, tablets and finished kits.

Risk of modern slavery and child labor in our operations and supply chains

We believe there is a low risk of modern slavery and child labor in Vertex's own operations because:

- Vertex's workforce is largely comprised of R&D staff, office-based and field-based employees.
- Most employees work in countries with very low prevalence of modern slavery and child labor.
- Except for early career programs, such as internships and industrial placements, all employees are 18 years or older.
- Our employees work in controlled settings where there are established standard operating procedures, in line with the highly regulated nature of the pharmaceutical industry.
- Vertex has rigorous hiring practices and contractual, policy and statutory protections we provide to all employees.

We also believe that there is a low risk of modern slavery and child labor in our supply chains due to the nature of Vertex's products and operations and Vertex's policies and procedure to mitigate related risks. However, we recognize that modern slavery or child labor could occur without Vertex's knowledge in violation of Vertex's policies and principles. The goods and services Vertex procures with potential higher risk for modern slavery include:

- Electronics and telecommunications: The electronics industry is generally considered a higher risk industry for modern slavery. Manufacturing of equipment may occur in locations with minimal regulation and oversight of labor practices.
- Facilities: Services such as cleaning, security and maintenance may give rise to a higher risk of modern slavery to the extent they involve temporary or unskilled labor, after-hours work, foreign workers and/or use of short-term contracts and outsourcing.

While we believe that Vertex's existing policies and procedures (described herein) are effective in mitigating against the risk of modern slavery and child labor at Vertex's direct suppliers and that our upstream suppliers are lower risk compared to many other industries due to the nature of their inputs, modern slavery or child labor could take place in upper tiers of the supply chain from which we may in some cases be several levels removed and where we have less visibility.

Policies and due diligence processes

Our commitment and policies

We are committed to operating our business in a responsible manner and expect all managers, employees, contractors and agents to be accountable for our culture of transparency and integrity. Our [Code of Conduct](#) provides guidance on how to live these values, including in areas such as human rights, protection of personal data, financial integrity, commitment to communities and environmental sustainability. The Code of Conduct is a key component of Vertex's global approach to compliance. Specifically, our Code of Conduct requires employees to:

- Comply with laws and practices that prohibit illegal child labor; forced, bonded or indentured labor; involuntary prison labor; human trafficking and unfair wages and benefits.
- Promote the health, safety and equitable and respectful treatment of employees, without discrimination or harassment.
- Respect fundamental human rights and the dignity of every person.

We expect employees to comply with our Code of Conduct and all associated policies, procedures and guidelines. If we become aware of violations of law or Vertex policy, we investigate the matter and, where appropriate, take disciplinary action and implement corrective measures to prevent future violations.

Vertex's Board of Directors, including the Audit and Finance Committee, provide general oversight of our compliance program and Code of Conduct. The Chief Compliance Officer is responsible for designing and driving our compliance program with support and advice from other control functions, including Internal Audit, Supply Chain & Sourcing, Trade Compliance, and the global Compliance Committees, which are made up of cross-functional, senior leaders from across Vertex. The Chief Compliance Officer provides regular updates to Vertex's Executive Committee and the Board of Directors about health care compliance and risk at Vertex, including violations of the Code of Conduct.

Supplier expectations and policies

Our [Supplier Code of Conduct](#) outlines Vertex's expectation that suppliers share our commitment to high ethical standards and behavior and defines the expectations they should have of us. All suppliers are expected to comply with our Supplier Code of Conduct. The Supplier Code of Conduct is incorporated into our contract templates and purchase order terms and conditions and is communicated during the supplier onboarding process.

The Supplier Code of Conduct states our expectations that suppliers treat their employees with dignity and respect and comply with all regulatory and legal requirements relating to the fair and equitable treatment of employees. Specifically, it states the following expectations for suppliers related to Human Rights:

- Do not engage in any forms of forced slavery including bonded, indentured or prison labor. Employees should be free to leave their employer at their own discretion.
- Under no circumstances shall child labor be employed.
- Any discrimination in hiring, training, promotion, compensation or other areas based on any protected class/characteristic must be prohibited.
- Treat your people fairly, equally and with respect. Do not tolerate abuse or harsh treatment of any kind including sexual harassment, sexual abuse, mental or physical coercion or verbal abuse, including the threat of such treatment.
- Work hours must be in compliance with country regulations. Furthermore, payment to employees shall be in compliance with applicable wage laws including minimum hourly and overtime wages as well as mandated benefits. Communicate with your employees the basis on which they are compensated in a timely manner, including whether overtime is required and the corresponding overtime wages.
- Employees shall be able to freely communicate with their supervisors regarding their working conditions and compensation or to voice other concerns without the fear of retribution, intimidation, termination or harassment. You shall respect the rights of workers, as set forth in local laws, to associate freely.
- You shall respect the rights of the local communities around your sites, including the right to a clean and healthy environment.

As outlined in the Supplier Code of Conduct, we expect our supplier-partners to have management systems in place that demonstrate their commitment and accountability to these concepts, with mechanisms in place to identify and manage risks for each area addressed, and to maintain documentation to demonstrate conformance.

The Supplier Code of Conduct, and our contracts, grant Vertex the right to audit suppliers', or to authorize a third party to audit suppliers', practices and facilities to confirm compliance with Vertex expectations and policies. At Vertex's request, suppliers also must provide Vertex with certifications, in a form reasonably acceptable to Vertex, as to the supplier's ongoing compliance with Vertex policies.

Actions taken to assess and address the risks of modern slavery and child labor

Risk management

Vertex has implemented a number of due diligence measures related to supplier selection and engagement to minimize the risk of modern slavery and child labor. As outlined in our Supplier Code of Conduct, this includes due diligence related to anti-bribery, anti-corruption, information security, privacy, financial solvency, insurance and quality. Due diligence may occur prior to and throughout our business relationship, on a regular cadence or ad hoc. The due diligence process may include assessments related to specific risk-related controls, on-site audits or general inquiries to assess and verify that our specific product or service requirements are being met.

Reporting mechanism

Vertex maintains an [Alert Line](#) hosted by an independent third party, which allows individuals—internal and external—to confidentially and anonymously raise concerns of misconduct or violations of Vertex policies, including potential issues or allegations associated with modern slavery. Vertex has strict anti-retaliation protections. We do not tolerate retaliation against anyone who speaks up, in good faith, with concerns about a potential violation of the Code of Conduct, Company policy or the law. We strongly encourage employees and suppliers to report potential or suspected compliance violations of Company policies and the laws of the countries in which Vertex operates.

Vertex investigates reports of potential violations of our Code of Conduct, company policies or the law. Violations may result in disciplinary action up to and including termination of employment or termination of contractual arrangements with Vertex. Some violations may also result in legal action, as appropriate.

External engagement

We are a member of the Pharmaceutical Supply Chain Initiative (PSCI), a group of pharmaceutical and health care companies that share a vision of better social, health, safety and environmental outcomes in the communities where we buy. We support the [PSCI Principles for Responsible Supply Chain Management](#), which include principles for human rights and labor. We expect our supplier partners to have management systems in place that demonstrate their commitment and accountability to follow the PSCI principles.

Training

All Vertex employees complete annual Code of Conduct training as part of our commitment to the core values that guide us as a company – providing guidance as we go about our work each day, shaping our interactions with external groups and outlining expectations in important areas. This yearly refresher helps reinforce our commitment to living our core values and helps us make choices that reflect the kind of company we want to be. It is our pledge to one another, to our company, and most importantly, to patients that we will adhere to the highest standards of ethics and accountability.

As stated in the Supplier Code of Conduct, we expect suppliers to implement and maintain a training program to ensure awareness about our Supplier Code of Conduct among the individuals working on Vertex projects.

Assessing the effectiveness of our actions

In 2024, 100 percent of employees completed the annual Code of Conduct training. We recognize effective Codes, policies, and risk management must evolve and respond to the changing

circumstances of the company and its environment. To this end, we are committed to continuous improvement based on regular reviews and assessments of the regulatory and business landscape.

Through Vertex's Alert Line, potential instances of modern slavery and child labor can be reported to Vertex for investigation. The Alert Line did not receive reports of modern slavery in 2024.

Vertex periodically reviews its practices and policies to ensure we appropriately assess and address risk related to modern slavery and child labor in our operations and supply chain.

UK Modern Slavery Act

Vertex Pharmaceuticals (Europe) Limited ("Vertex UK"), a subsidiary of Vertex, is required to submit a report under section 54(1) of the *UK Modern Slavery Act 2015* (the "UK Act"). This report constitutes Vertex UK's slavery and human trafficking statement for its financial year ended December 31, 2024 (the "Report"). Vertex UK is covered by Vertex's global approach to compliance and Code of Conduct, which is set out in the Global Statement and discussed throughout this Report. This Report relates to all of Vertex's activities in the UK.

About Vertex UK

Vertex Pharmaceuticals (Europe) Limited is located in London, United Kingdom and, as of December 31, 2024, had 732 employees, 688 of which are fulltime employees. Vertex UK's employees are primarily office-based and field-based.

Vertex Pharmaceuticals (Europe) Limited manages the regulatory approval process, pricing and reimbursement, as well as commercialization of the Vertex products in international territory. Additionally, Vertex Pharmaceuticals (Europe) Limited is responsible for manufacturing and supply chain oversight activities, including outsourcing to contract manufacturing organizations.

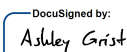
Vertex UK's supply chains generally are the same as those of Vertex. Over 50% of Vertex UK's suppliers are in the UK, with the remaining suppliers based outside the country. The main goods and services Vertex UK procures are contract manufacturing services, supply chain services, and marketing & commercialization services. The majority of Vertex UK's supplier agreements are long term Master Service Agreements/contracts. In general, these agreements expressly set out our expectations of compliance with our Code of Conduct and Supplier Code of Conduct.

Risk of slavery and human trafficking; Addressing the risk of slavery and human trafficking

The risk of slavery and human trafficking at Vertex UK mirrors that of Vertex, as set out in the main body of this Statement. The policies and processes described earlier in this Statement that Vertex has taken to assess, manage and mitigate risks related to slavery and human trafficking are also applicable to Vertex UK.

Approval

Solely for purposes of compliance with the UK Act, this Report and Statement have been approved by the Board of Directors of Vertex UK on May 20th, 2025, and signed by a director thereof directly below.

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Ashley Grist

Director, Vertex Pharmaceuticals (Europe) Limited