

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 <u>Code of Conduct</u>.

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>U.S. Senate</u> <u>Office of Public Records website</u> and the <u>U.S. House of Representatives Office of the Clerk</u> <u>website</u>.

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: <u>www.fec.gov/data/committee/C00468660/.</u> 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 2024, 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	185,701
California Life Sciences Association	10,640
Texas Healthcare and Bioscience Institute	3,500
Massachusetts Biotechnology Council	4,000
New York Bio	432



Appendix

Lobbying Disclosures by Registered State Jurisdiction

Alabama	http://ethics.alabama.gov/lobbyists.aspx
Arizona	https://lobbying.az.gov/
	https://www.sos.arkansas.gov/elections/financial-disclosure/registered-
Arkansas	lobbyists-political-action-committees
California	http://cal-access.sos.ca.gov/Lobbying/
Colorado	https://www.sos.state.co.us/pubs/lobby/lobby_home.html
	https://portal.ct.gov/Ethics/Lobbyist-Filings/Lobbyist-Filings/Lobbyist-Main-
Connecticut	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
Maine	https://www.maine.gov/ethics/lobbyists
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/msel/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://www.sos.nh.gov/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/



	https://www.oregon.gov/ogec/public-records/Pages/Lobby-Registrations-
Oregon	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

2024 Corporate Contributions to State and Local Political Candidates

Name	State	Amount
Committee to Elect Butch Parrish	GA	1000
Friends of Jessica Bateman	WA	1000
Friends of Jesse Pippy	MD	500
Friends for Alonzo Washington	MD	500
Citizens for Antonio Hayes	MD	500
Friends of Don Harmon	IL	1000
Matt Gambill Campaign For State House	GA	500
Citizens for Castro	IL	500
Syverson for Senate	IL	500
Josh Harkins Senate Campaign Fund	MS	500
Bo Watson for Senate	TN	1000
Friends of Terri Bryant	IL	500
Lee Hawkins Campaign Fund	GA	500
Derrick Simmons for State Senate Campaign Fund	MS	500
Hoover for Assembly 2024	CA	2000
Republican Assembly Campaign Cmte-SEG FUND	WI	1250
Dr. Bill Wheat Campaign	LA	500
Friends of Candi Mundon King	VA	1000
Robert Rivas for Assembly 2024	CA	2000
Louis Ruiz for Kansas	KS	250
Friends for Kathy Hochul	NY	4000
NH House Democratic Victory Campaign Committee	NH	500

AshPAC	МО	1000
Ryan McDougle for Senate	VA	1000
Friends of Chris Gorsek	OR	500
Friends of Steve Hershey	MD	1000
Alabama House Republican Caucus	AL	2000
Cameron Henry Campaign Fund	LA	1500
Ty Masterson for Kansas	KS	500
Friends of Jeff Helfrich	OR	1000
Sam Creekmore Campaign	MS	1000
Cyrus for Oregon	OR	500
Kansas for Blex	KS	250
Tasha Boerner Horvath for Assembly 2024	CA	1000
Murrell Smith Campaign	SC	500
Billy Mitchell Campaign Fund	GA	500
Green for Louisiana	LA	500
The Committee to Elect Gary Carter, Jr.	LA	500
Brock Martin for State Representative	TN	1000
Friends of Win Stoller	IL	500
Campos for Oregon	OR	500
Thomas Pressly for State Senate	LA	500
Ed Diehl for Oregon	OR	500
Friends of Justin Ready	MD	600
Terry L. Austin for House of Delegates	VA	1000
Blakespear for Senate 2026	CA	1500
Bob Owen Campaign	LA	1000
Chase Blasi for State Senate	KS	500
Citizens for Elizabeth Hernandez	IL	500
Heath Flora for State Assembly 2024	CA	1000
Committee for Elect Clark Boyd	TN	1000
Woodard for Kansas	KS	250
Committee to Elect Royce Duplessis	LA	500
Friends Of Jehan Gordon-Booth	IL	500
Sickles For Delegate	VA	1000
NEMO Leadership Pac	МО	1000
Kevin Blackwell Campaign Fund	MS	500
Friends of Rob Nosse	OR	500
Alabama Senate Republican Conference	AL	2000
Friends of Robyn Gabel	IL	500
Shane Reeves for State Senate	TN	1000

Committee to Elect William Lamberth	TN	1000
Committee to Elect Alonzo Knox	LA	500
Jason White Campaign Fund	MS	1000
Faust-Goudeau for Kansas	KS	250
Friends of Caleb Hemmer	TN	1000
Cullison for Maryland	MD	500
Friends of Lillian Ortiz-Self	WA	500
Barbara West Carpenter Committee	LA	500
Friends of Clarence Lam	MD	500
Snaza for State	WA	1000
Wayne McMahen Campaign	LA	500
Friends of Mattie Hunter	IL	500
Laurie Davies for Assembly 2024	CA	1000
Citizens for Lightford	IL	500
Committee to Elect Tony McCombie	IL	1000
Buehler 4 Kansas	KS	250
State Senate Democratic Committee-Seg Fund	WI	750
Missouri Alliance PAC	МО	1500
Committee to Elect Edith Patterson	MD	300
Dr. Jasmeet Baines for Assembly 2024	CA	1000
Citizens for Bill Ferguson	MD	1500
Northland Forward	МО	1000
Committee to Elect House Republicans	NH	500
Willett for Delegate	VA	1000
Joseph Bouie, Jr. Campaign	LA	500
Megan Dahle for Senate 2024	CA	1000
NYS Republican Assembly Campaign Committee		
Housekeeping Account	NY	3750
H-PAC	MO	1000
Friends of Kathy Klausmeier	MD	250
Friends of Melissa Wells	MD	250
Friends of Robert "Bob" Rita	IL	500
Citizens for Jackie Haas	IL	500
Blake Carpenter for State Representative	KS	250
Steven Jackson Campaign	LA	500
Honest Leadership	FL	5000
Citizens for Laura Murphy	IL	500
Friends of Julie Fahey	OR	1000
Senator John Braun	WA	1000
Friends of Ghazala Hashmi	VA	1000

Maine Democratic State Committee	ME	20000
Friends of Rob Wagner	OR	500
Committee to Elect Vanessa Atterbeary	MD	500
Katie Dempsey Campaign Fund	GA	1000
Lori Wilson for Assembly 2024	CA	1500
Friends of Laurie Jinkins	WA	500
Assembly Democratic Camp Comm-SEG FUN	WI	750
Stephanie Berault Campaign	LA	500
Jimmy Harris Campaign Fund	LA	500
Jason Hughes Campaign Fund	LA	500
Friends of Joseline Pena-Melnyk	MD	1000
Elect Monical Stonier	WA	500
DougPAC	MO	1000
Plummer for Illinois	IL	500
Friends of Marcus Riccelli	WA	500
Oropeza for Kansas	KS	250
Brach Myers Campaign	LA	500
New Hampshire Senate Democratic Caucus	NH	500
Friends of Johnny Mautz	MD	550
Sam L. Jenkins, Jr. Campaign Committee	LA	500
Ed Price for Senate	LA	500
Tonya Anderson for State Senate District 43	GA	500
Buckel for Delegate	MD	1000
Brad Stephens for State Representative	IL	500
Friends of LaPointe	IL	500
Friends of Jheanelle Wilkins	MD	1000
Friends of Michelle Maldonado	VA	1000
Sabi Kumar for TN House	TN	1000
NY Republican Senate Campaign Committee		
Housekeeping Account	NY	3750
Missouri Leadership PAC	MO	1500
Hawk for State Representative	TN	1000
Cameron Sexton for State Representative	TN	1750
Lindsay Vaughn for Kansas House	KS	250
Carl Turner for Kansas	KS	250
Friends of Lisa Reynolds	OR	500
Gerald Boudreaux Campaign	LA	500
Hayes for Delegate	VA	1000
Friends of Jeff Keicher	IL	500
Friends of Dr. Todd Pillion	VA	1000

Friends of My-Linh	WA	500
Glen D. Womack Campaign	LA	500
Chris Croft for Kansas	KS	500
Friends of Sue Rezin	IL	500
Bob Hensgens Campaign Fund	LA	500
Amy Walen for State House	WA	500
Larry Selders	LA	500
Ashby for Senate 2026	CA	1000
Heart of SGF PAC	МО	1000
Friends of Hai Pham	OR	500
Friends of Pam Beidle	MD	1000
Friends of Cory McCray	MD	250
B PAC	МО	1000
Angela Cockerham Campaign Fund	MS	500
Rhonda Butler Campaign	LA	500
Joe Stagni for State Representative	LA	500
Citizens for Adrienne Jones	MD	500
W. Briggs Hopson Campaign Fund	MS	500
Citizens for Hauter	IL	500
Patrick Moore McMath Committee	LA	1000
Pat Pettey For Kansas Senate	KS	500
New Hampshire Senate Republicans PAC	NH	500
Committee to Elect Bo Mitchell	TN	1000
Friends of Janet Yang Rohr	IL	250
Friends of J.B. Jennings	MD	1000
Katrina Jackson Campaign	LA	500
Friends of Todd Nash	OR	500
Kirk Talbot Campaign	LA	500
Jason Brodeur Campaign Fund	FL	1000
Mary Margaret Oliver Campaign Fund	GA	500
John Ray Clemmons for TN House	TN	1000
Greg Wallis for Assembly 2024	CA	1500
Friends to Elect Elaine Davis	TN	1500
Menjivar for Senate 2026	CA	1000
Friends to Elect Raumesh Akbari Senate	TN	1000
Friends of Kathy Szeliga	MD	550
Hob Bryan Campaign Fund	MS	1000
Friends of Ron Muzzell	WA	1200
The Committee to Elect Esther Helton	TN	1000

Dietrich for Senate	KS	500
Pittman for Senate	KS	500
Friends of Marcia Price	VA	1000
Michelle Au Campaign Fund	GA	500
Citizens for Teresa Reilly	MD	550
Citizens for Karina Villa	IL	500
Committee to Elect Holscher	KS	500
The Adrian Fisher Campaign	LA	500
Citizens for Sara Feigenholtz	IL	500
Dr. Akilah Weber for State Senate 2024	CA	1500
Renee Erickson for Kansas Senate	KS	500
Kay Kirkpatrick Campaign Fund	GA	500
Friends of Guy Guzzone	MD	500
Dustin Miller Campaign Fund	LA	750
Vadenia Winn For Kansas House	KS	250
Eastside Forward PAC	МО	1000
Trey Lamar Campaign for State House	MS	500
Citizens for Thomas Hutchinson	MD	500
Friends of John Curran	IL	1000
Rosilicie Ochoa Bogh for Senate 2024	CA	500
Sykes for Senate	KS	500
Committee to Elect Phillip Devillier	LA	1500
Friends of Paul Corderman	MD	550
Friends of Mike Cherry	VA	1000
Citizens for Matt Morgan	MD	550
Julie Morrison for State Senate	IL	500
Mike McLane for Oregon	OR	500
Friends of Ken Kerr	MD	500
Alabama Democratic Senators	AL	1000
Citizens for Brian Chisholm	MD	550
Friends of Harold Love	TN	1000
Sheree Sample-Hughes Campaign Fund	MD	300
Friends to Elect Andre V. Johnson	MD	200
Friends of Ryan Spain	IL	500
Friends of Terri Hill	MD	300
Stacey Hobgood-Wilkes Campaign Fund	MS	1000
Gallagher for Assembly 2024	CA	3000
Friends of Fred Girod	OR	500
People for Emanuel Chris Welch	IL	1000

Susan Ruiz for Kansas	KS	250
Citizens for Hammond	IL	500
Citizens for Marcus C. Evans	IL	500
Friends of Nic Kipke	MD	1000
Gilbert for Delegate	VA	1000
London Lamar for State Senate	TN	1000
Friends of Bob Freeman	TN	1000
Mia Bonta	CA	1500
NY DSCC Housekeeping Committee	NY	3750
Friends of Laura Fine	IL	500
Franklin J. Foil Campaign Committee	LA	500
Ready to Lead	МО	1000
Clifford for Kansas	KS	250
Friends of Keith Hodges	VA	1000
Committee to Elect a Republican Senate-SEG FUND	WI	1250
Hawkins for Kansas	KS	500
Friends of Dewey McClain	GA	500
Friends for Kathy Hochul	NY	1000
Friends of Lashrecse Aird	VA	1000
Robert D. "Bobby" Orrock for House Committee	VA	1000
Friends of Dick Anderson	OR	500
Ken Brass Campaign Fund	LA	500
Friends of Camille Y. Lilly	IL	500
People for Joe Schmick	WA	200
New York State DACC Housekeeping Committee	NY	3750
Jeff Yarbro for State Senate	TN	1000
Friends of Annette Cleveland	WA	500
How We All Win	FL	5000
Elect Jamila Taylor	WA	500
Anderson for Illinois	IL	500
Croke for Illinois	IL	250
Alabama House Democratic Caucus	AL	1000
Elect Paul Harris	WA	1200



2024 Corporate Contributions to Political Organizations

Recipient	Amount (\$)
Democratic Governors Association (DGA)	530,000
Democratic Legislative Campaign Committee (DLCC)	100,000
Democratic Lieutenant Governors Association (DLGA)	100,000
GOPAC	50,000
Republican Governors Association (RGA)	525,000
Republican State Leadership Committee (RSLC)	175,000

2024 Corporate Contributions to 501(c)4 Organizations

	Non-Deductible Portion
Organization	of Payments (\$)
Alliance for Regenerative Medicine	14,400
Alliance for a Stronger FDA	9,000
Institute for Gene Therapies	52,000
GOPAC Education Fund	50,000
Center for Innovative Policy	25,000
Voices for Non-Opioid Choices	250,000