

STATE OF CALIFORNIA Compliance Program Declaration



As part of our continued commitment to compliance, Vertex Pharmaceuticals Incorporated (“Vertex”) has developed and implemented a Compliance Program consistent with the HHS OIG Compliance Program Guidance for Pharmaceutical Manufacturers (“OIG Guidance”) and the PhRMA Code on Interactions with Healthcare Professionals (“PhRMA Code”). The Vertex Compliance Program meets the requirements of the California Marketing Practices Act (California Health and Safety Code §§ 119400-119402). Vertex’s Compliance Program is intended to help prevent and detect compliance-related infractions and problems. Vertex recognizes that even an effective compliance program may not prevent all compliance violations, so we have, as part of the Compliance Program, developed disciplinary and corrective procedures to address violations that are detected.

To the best of our knowledge, we are in compliance with our Compliance Program and the requirements of the California Health and Safety Code §§ 119400-119402 as of June 12, 2020. Vertex will evaluate and update our Compliance Program, as necessary and appropriate.

Vertex is committed to the highest standards of business conduct and ethics in its relationships with customers, healthcare professionals, employees, contractors, shareholders and the business community, as well as with state, federal and foreign governments. Consistent with our understanding of the California Health and Safety Code, this declaration is limited to those activities undertaken by Vertex that are directed to California. Vertex makes this declaration, in good faith, in the absence of clarifying regulations or guidance from the State of California. This declaration reflects our consideration of the OIG Guidance, which gives broad discretion to manufacturers in the development, design and definition of the scope of compliance programs.

Vertex is committed to conducting all of our activities in compliance with applicable laws and ethical standards. We believe we have developed and implemented an effective Compliance Program, and we will continue to work to improve our Compliance Program and all of our compliance-related activities. healthcare professional is anticipated to be substantially less than this maximum amount. Waiver of the limit would require the approval of the CCO.