

2021 Code of Conduct

Effective November 19, 2021, the Board of Directors of Vertex Pharmaceuticals Incorporated (the “Company”) approved an amended and restated Code of Conduct (the “2021 Code”). The 2021 Code continues to reflect the Company’s core values and offers expanded guidance in certain areas.

As part of this revision, the following topics were modified or added to the 2021 Code:

- Conflicts of Interests
- Anti-Bribery
- Appropriate Conduct of Scientific Research

This summary is qualified in its entirety by reference to the full text of the 2021 Code, which is available on the Company’s website, www.vrtx.com, under “Investors-Corporate Governance-Governance Documents.”