

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.

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

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.