



Vertex Pharmaceuticals (Europe) Limited
Modern Slavery Act Transparency Statement
for the year ended 31 December 2018

Introduction

Vertex Pharmaceuticals (Europe) Limited ("Vertex") respects and believes in the inherent rights and dignity of every person as set forth by the United Nations General Assembly in the Universal Declaration of Human Rights. Vertex recognizes that companies have a responsibility to respect human rights and mitigate abuses in its operations.

The Modern Slavery Act 2015 came into effect on 29 October 2015 and requires those entities carrying on a business or part of a business in the UK, supplying goods or services, and having annual turnover of £36 million or more to disclose information regarding the steps they have taken to eradicate slavery and human trafficking from their supply chain as well as within their own organization during the previous financial year.

Our Organisation

Vertex Pharmaceuticals Incorporated is a global biotechnology company that invests in scientific innovation to create transformative medicines for people with serious and life-threatening diseases. In addition to clinical development programs in Cystic Fibrosis, Vertex Pharmaceuticals Incorporated has more than a dozen ongoing research programs focused on the underlying mechanisms of other serious diseases.

Founded in 1989, Vertex Pharmaceuticals Incorporated's headquarters is in Boston, United States. Vertex Pharmaceuticals (Europe) Limited is a subsidiary of Vertex Pharmaceuticals Incorporated and is headquartered in London, United Kingdom.

Commitment and Policies

Vertex's respect for human rights is supported by our company values, employment policies and compliance with laws and regulations in all countries where we do business. We are committed to ensuring that modern slavery or trafficking are not a part of our business or that of our supplier-partners.

Our Code of Conduct applies to all employees, contractors and agents and is our statement of ethical and compliance principles that guide our daily operations. It defines our commitment to operating with the highest ethical standards, including compliance with all applicable regulations and laws. Furthermore, it reinforces our commitment to embracing diversity and ensuring inclusion, and to create a work environment in which all individuals are respected and can work in a safe, productive, and professional environment.

We require each of our employees to certify that he or she has read and agrees to abide by all Vertex policies and procedures. Education and training are essential to effectively communicating our standards and requirements to our employees, contractors and agents and enabling them to perform in accordance

with them. Vertex maintains and monitors training records to help ensure all personnel have received their required training on policies and procedures. We monitor awareness of human rights issues in our workplaces and for the year ending 31 December 2018 there were no human rights issues or concerns reported. Vertex also verifies all employees and contractors based in the U.K. have the right to work in the U.K.

We have procedures that strongly encourage employees to report potential suspected compliance violations, company policies, and the laws of the countries in which Vertex operates. We do not tolerate retaliation against anyone who speaks up, in good faith, with concerns about a potential violation of the Code, company policy or the law. Vertex has reporting mechanisms in place to collect and relay information regarding potential violations, including an anonymous Compliance Alert Line.

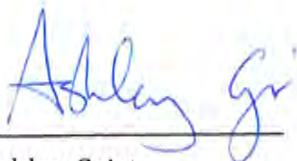
Supplier Expectations and Due Diligence

We treat our suppliers and other business partners responsibly, ethically and respectfully. We hold ourselves to a high standard and expect the same from our supplier partners who are integral to the success of Vertex. All suppliers agree to our Code of Conduct and compliance policies when they enter into an agreement with Vertex. As such, we expect suppliers to treat their employees with dignity and respect and to comply with all regulatory and legal requirements relating to the fair and equitable treatment of employees.

We have developed systems and processes to track, monitor and oversee our manufacturing suppliers' activities. Vertex may request suppliers provide certifications as to their ongoing adherence to our compliance policies and cause its personnel (including, to the extent reasonably practicable, employees of any permitted subcontractor) to attend and complete compliance trainings related to Vertex's Compliance Policies upon reasonable request by Vertex.

Accountability

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



Ashley Grist
Director

May 2019