

2015 Code of Conduct

On May 28, 2015, Vertex Pharmaceuticals Incorporated (the “Company”) launched an amended and restated Code of Conduct (the “2015 Code”), approved by its Board of Directors. The 2015 Code reflects the Company’s core values, better accounts for the Company’s global expansion and business activities, and provides for improved readability and comprehension for employees.

As part of this revision, the following topics were modified or added to the 2015 Code:

- Investigations, Cooperation and Confidentiality
- Fair Dealing/Fair Competition
- Trade Controls
- Environmental Health and Safety
- Supplier Relationships
- Communications on Behalf of the Company
- Interactions with Patients
- Reporting Adverse Events and Product Complaints
- Good Operating Practices
- Clinical Research
- Promotion of Products
- Charitable Activities

This summary is qualified in its entirety by reference to the full text of the 2015 Code, which is available on the Company’s website www.vrtx.com under “Investors—Corporate Governance—Governance Documents.”