

CORVEX, INC.

CODE OF BUSINESS CONDUCT AND ETHICS

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Corvex, Inc.

Amended and Restated Code of Business Conduct and Ethics

1. General Policy

It is the policy of Corvex, Inc. (“Corvex” or the “Company”) to conduct its business activities and transactions with the highest level of integrity and ethical standards and in accordance with all applicable laws. In carrying out this policy, the Company has adopted the following Code of Business Conduct and Ethics (this “Code”). In addition to being bound by any other codes, policies, and procedures of the Company, all Corvex employees, officers and directors, as well as agents and contractors working on behalf of the Company (each, a “Covered Person”) are subject to the following additional specific policies contained in this Code.

Because of the complex and changing nature of legal requirements, each Covered Person must be constantly vigilant to ensure that their conduct complies with the Code. If any Covered Person becomes aware of an issue of legal compliance which is not adequately addressed in the Code, you should notify your direct supervisor or analogous Company contact (each, a “Supervisor”) or the Company’s Director of Compliance (as defined below).

Corvex takes compliance with laws, regulations, rules and the Code seriously. Any such violation will result in disciplinary action. Disciplinary action may include an oral or written warning, disciplinary probation, suspension, reduction in salary, demotion or termination as a Covered Person, including, as applicable, dismissal from employment, removal as a director or termination as a contractor or agent. These disciplinary actions also may apply to a Covered Person’s Supervisor who directs or approves the Covered Person’s improper actions or is aware of those actions but does not act appropriately to correct them or fails to exercise appropriate supervision.

If a question arises as to whether any action complies with the Company’s policies or applicable law, a Covered Person should present that question directly to the Company’s designated compliance officer (the “Director of Compliance”). In raising an issue, you may remain anonymous, although you are encouraged to identify yourself. Simply ask your question or give any information you may have. Should you choose to identify yourself, your identity will be kept confidential to the extent feasible or permissible under the law. All Covered Persons of the Company have the commitment of the Company and Company’s Board of Directors that they will be protected from retaliation. However, Corvex reserves the right to discipline anyone who knowingly makes a false accusation, provides false information to the Company or has acted improperly. Failure to report known or suspected wrongdoing of which any Covered Person has knowledge may, by itself, subject that person to disciplinary action.

The Code generally highlights some of the more important legal principles with which Covered Persons are expected to be familiar. The fact that the Code does not specifically reference other applicable laws (some of which may be covered in other Corvex policies) does not diminish their importance or application. The standards and expectations set forth in this policy are in addition to the policies and obligations contained in the Corvex, Inc. Company Handbook, and you are expected to be familiar with both documents.

2. Compliance with Laws, Rules and Regulations

Company policy requires that our business activities comply with all applicable government laws, rules and regulations. We need the cooperation of all Covered Persons to do so and to bring lapses or violations to light. While some regulatory schemes may not carry criminal penalties, they control the

licenses and certifications that allow Corvex to conduct its business. Corvex's continued ability to operate depends upon your help for compliance.

Some of the regulations that Covered Persons will be required to comply with include, but are not limited to, the following:

- Anti-bribery, anti-corruption and anti-money-laundering laws;
- Insider trading laws;
- Import/Export regulations;
- Labor laws and wage and hour laws;
- Occupational Safety and Health regulations;
- Fair sales and marketing practices;
- Cybersecurity and data privacy laws; and
- Confidential information and third party communications policies.

Each and every Covered Person must comply with applicable laws. Questions or concerns about compliance issues should be raised by any of the means indicated under "Reporting and Enforcement Mechanisms" below.

The Company also maintains additional policies regarding such matters that include:

- Insider Trading Policy;
- Procedures for the Submission of Complaints or Concerns Regarding Accounting, Auditing and Securities Law Matters (Whistleblower Policy);
- Regulation FD Policy; and
- Related Person Transaction Policy.

3. Confidential Information and Third Party Communications

You will be entrusted with Corvex's confidential business information. You are required to safeguard and use such information only for the Company's purposes. Confidential information includes all non-public information that might be of use to competitors, or harmful to Corvex or its partners, if disclosed. You are expected to maintain the confidentiality of any and all such information entrusted to you by Corvex or its partners. Examples of confidential business information include, but are not limited to: the Company's trade secrets, business trends, information on product development programs, detailed sales and cost figures or other financial information, new product or marketing plans, significant new contracts, manufacturing processes, personnel data, and information about potential acquisitions, divestitures and investments. Failure to observe this duty of confidentiality may compromise our competitive advantage over competitors and may additionally result in a violation of securities, antitrust or employment laws. It may also violate agreements providing for the protection of such confidential information. You should not discuss confidential Company information outside the Company, even with your own family.

You may also possess sensitive, privileged information about our partners, customers or vendors. These parties properly expect that this information will be kept confidential. All Covered Persons are responsible for protecting both Company and third-party confidential and personal information, including digital data, and for complying with applicable data privacy laws and Company policies. Corvex takes very seriously any violation of a customer's or partner's confidentiality and will not tolerate such conduct.

4. Full, Fair and Accurate Disclosure in Public Filings and Communications

It is of paramount importance to the Company that all disclosure in reports and documents that the Company files with, or submits to, the SEC, and in other public communications made by the Company is full, fair, accurate, timely and understandable. You must take all steps available to assist the Company in fulfilling these responsibilities consistent with your role within the Company. In particular, you are required to provide prompt and accurate answers to all inquiries made to you in connection with the Company's preparation of its public reports and disclosure.

Each Covered Person who is involved in the Company's disclosure process must (a) be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting; and (b) take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

Each Covered Person must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent auditors and counsel. Knowingly entering inaccurate or fraudulent information into the Company's accounting system is unacceptable and may be illegal. Any individual that has knowledge that an entry or process is false and material are expected to consult the Director of Compliance. In addition, it is the responsibility of each Covered Person to give their cooperation to the Company's authorized internal and external auditors.

5. Record Keeping

The Company requires honest, accurate, and transparent recording and reporting of information to support responsible business decisions and compliance with legal requirements. All business expenses must be properly documented and recorded. If you are unsure whether an expense is appropriate, ask your Supervisor.

All Company books, records, accounts, and financial statements must be maintained in reasonable detail, accurately reflect the Company's transactions, and conform to applicable legal requirements and internal controls. Falsifying, omitting, or misrepresenting information in Company records is strictly prohibited. All Covered Persons must cooperate fully with audits and investigations and ensure that business records are maintained for the periods specified in the Company's record retention policies.

Covered Persons who contribute to or prepare the Company's financial statements, public filings, submissions, or communications should do so in accordance with the following guidelines:

- All accounting records, as well as reports produced from those records, must be prepared in accordance with the laws of each applicable jurisdiction.
- All records must fairly and accurately reflect the transactions or occurrences to which they relate.

- All records must fairly and accurately reflect, in reasonable detail, the Company's assets, liabilities, revenues, and expenses.
- The Company's accounting records must not contain any false or intentionally misleading entries.
- No transactions should be intentionally misclassified as to accounts, departments, or accounting periods.
- All transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period.
- No information should be concealed from independent auditors, and no action to improperly influence, coerce, manipulate or mislead internal or outside auditors should take place.
- Compliance with the Company's system of internal accounting controls is required.

Business records and communications often become public, and Covered Persons should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to e-mail, internal memos, and formal reports.

6. Protection and Proper Use of Company Assets

Corvex assets, both tangible and intangible, are to be used only for legitimate business purposes of the Company and only by authorized Covered Persons. Intangible assets include intellectual property such as trade secrets, patents, trademarks and copyrights, business, marketing and service plans, engineering and manufacturing ideas, designs, databases, Company records, salary information, and any unpublished financial data and reports. Unauthorized alteration, destruction, use, disclosure or distribution of Company assets violates Company policy and this Code. Theft or waste of, or carelessness in using, these assets have a direct adverse impact on the Company's operations and profitability and will not be tolerated.

The Company provides computers, electronic mail (e-mail) and Internet access to employees and may do so for Covered Persons for the purpose of achieving the Company's business objectives. As a result, the Company has the right to access, reprint, publish, or retain any information created, sent or contained in any of the Company's computers or e-mail systems of any Company machine. You may not use e-mail, the Internet or voice mail for any illegal purpose or in any manner that is contrary to the Company's policies or the standards embodied in this Code.

You should not make copies of, resell or transfer copyrighted publications, including software, manuals, articles, books and databases being used in the Company, that were created by another entity and licensed to the Company, unless you are authorized to do so under the applicable license agreement. In no event should you load or use, on any Company computer, any software, third party content or database without receiving the prior written permission to do so. You must refrain from transferring any data or information to any Company computer other than for Company use. You may use a handheld computing device or mobile phone in connection with your work for the Company, but must not use such device or phone to access, load or transfer content, software or data in violation of any applicable law or regulation or without the permission of the owner of such content, software or data.

7. Insider Trading

Covered Persons are not permitted to use, share, or disseminate material, non-public information for stock trading purposes or for any other purpose except the conduct of our business. Material, non-public information is any information not generally known to the public that a reasonable investor would find important in making a decision to buy, sell, or hold securities. Using material, non-public information for personal financial benefits or to “tip” others who might make an investment decision on the basis of this information is unethical and illegal. This prohibition applies to you, your family members, anyone living in your household, and any entities over which you have control. For more information, please refer to the Company’s Insider Trading Policy and all applicable laws.

8. Corporate Opportunities

Covered Persons are prohibited from (a) taking for yourself personally opportunities that you discover through the use of Company property, information or position, (b) using Company property, information or position for personal gain and (c) competing with the Company. A Covered Person owes a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

9. Fair Dealing

Each Covered Person must deal fairly with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom they have contact in the course of performing their job. In light of this aim, dishonest, unethical, or illegal business practices are prohibited, including, without limitation, corruption, bribery, kickbacks, extortion, embezzlement, or other similar practices. No Covered Person may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

10. Conflicts of Interest

Corvex employees, officers and directors should avoid all potential conflicts of interest or situations that give the appearance of such conflict of interest, including having any direct or indirect material financial interest in any entity (a “Related Party”) that does business with the Company. A conflict of interest occurs when the private interest of a Corvex employee, officer or director (or an immediate family or household member or someone with whom you have an intimate relationship) interferes, in any way -- or even appears to interfere -- with the duties performed by the Company employee, officer or director or with the interests of the Company as a whole. A conflict situation can arise when an employee, officer or director takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest also arise when an employee, officer or director, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company. Loans to, or guarantees of obligations of, such persons are of special concern.

To this end, unless approved in accordance with the following paragraph, Corvex employees, officers or directors may not be employed by, act as a consultant to, or have an independent business relationship with any of Corvex’s customers, competitors or suppliers. Similarly, unless approved in accordance with the following paragraph, no employees, officers or directors may invest in any customer, supplier, or competitor (other than through mutual funds or through holdings of less than one percent of the outstanding shares of publicly traded securities) unless they first obtain written permission from the Director of Compliance. Employees, officers or directors should not have other outside employment or business interests that place them in the position of (i) appearing to represent Corvex, (ii) providing goods or services substantially similar to those Corvex provides or is considering making available or (iii) lessening their efficiency, productivity, or dedication to Corvex in performing their everyday duties.

Employees, officers and directors and any of their Related Party entities may not engage in transactions with Corvex unless for the sole purpose of advancing Corvex's business interests and may only do so after approval from the Director of Compliance. Employees, officers and directors may not have an interest in or speculate in anything of value which may be affected by Corvex's business. Employees, officers or directors may not divulge or use Corvex's confidential information -- such as financial data, customer information, and computer programs -- for their own personal or business purposes.

Any personal or business activities by an employee, officer or director that may raise concerns along these lines must be disclosed to and approved in advance by the Director of Compliance. You should also obtain the approval of the Director of Compliance when accepting a board position with a not-for-profit entity, when there may be a Company business relationship with the entity or an expectation of financial or other support from the Company.

11. Discrimination and Harassment

The Company is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Examples of prohibited conduct include derogatory comments based on race, gender, ethnicity or sexual preference and unwelcome sexual advances.

More specific and detailed policies regarding discrimination, harassment and similar matters may be found in the Corvex, Inc. Company Handbook.

12. Bribery and Corruption

Corruption and bribery in all their forms, are against the values and business ethics of the Company. We will not directly or indirectly provide, offer, promise, request or accept bribes or kickbacks in violation of any applicable laws. A kickback or bribe includes any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is used to improperly influence the recipient, including to obtain or retain business or a business advantage, or to obtain or reward favorable treatment in a business transaction. Bribery can take many forms; payments need not be in cash to be illegal or inappropriate. Examples of items that, if used to improperly influence the recipient, could constitute a bribe include: employment opportunities, political or charitable contributions, travel expenses, golf outings, automobiles, and loans with favorable interest rates or repayment terms.

Because certain laws, such as the U.S. Foreign Corrupt Practices Act, prohibit improper payments to public officials, we must take extra care in our work with public officials. Public officials include any person who exercises a public function or who works for a government at any level; any political party or campaign, party official, or candidate for political office; and officers or employees of government-owned or state-owned companies. We also do not permit facilitation payments to expedite a routine, non-discretionary governmental task. The Company makes and keeps complete and accurate books and records, and maintains a system of internal controls designed to prevent and detect payments that would violate this Code or applicable anti-corruption laws. Any requests for bribes, kickbacks, or facilitation payments or any questions regarding application of anti-corruption laws should be reported and/or directed to the Director of Compliance.

13. Market Competition

Corvex is committed to complying with all state and federal antitrust laws. The purpose of the antitrust laws is to preserve the competitive free enterprise system. The antitrust laws in the United States are founded on the belief that the public interest is best served by vigorous competition, free from collusive

agreements among competitors on price or service terms. The antitrust laws help preserve the country's economic, political, and social institutions; Corvex is firmly committed to the philosophy underlying those laws.

While the antitrust laws clearly prohibit most agreements to fix prices, divide markets, and boycott, they also proscribe conduct that is found to restrain competition unreasonably. This can include, depending on the facts and circumstances involved, certain attempts to tie or bundle services together, certain exclusionary activities, and certain agreements that have the effect of harming a competitor or unlawfully raising prices. Any questions that arise in this area should be addressed to the Director of Compliance.

14. Political Contributions

We strictly adhere to state and federal election laws, and all applicable laws and regulations relating to lobbying or attempting to influence government officials. Corvex cannot reimburse Covered Persons for any money they contribute to political candidates or campaigns. Any question about the propriety of political activity or contribution should be directed to the Director of Compliance.

15. Exports and Imports

There are many U.S. laws governing international trade and commerce which serve to limit the export of certain products to certain countries. Corvex is committed to complying with those laws. Under no circumstances will Corvex make sales contrary to U.S. export laws. Because these regulations are complicated and change periodically, Covered Persons seeking to make a sale to a customer in a foreign country must first confirm the legal trade status of that country. If a Covered Person is uncertain about whether a foreign sale complies with U.S. export laws, he or she must contact the Director of Compliance for guidance. Corvex Covered Persons should be aware that there are also many U.S. laws that govern the import of items into the United States. Among other things, these laws control what can be imported into the United States, how the articles should be marked, and the amount of duty to be paid. Corvex complies with all U.S. import laws. If a Covered Person is uncertain about whether a transaction involving the importation of items into the United States complies with these laws, he or she must contact the Director of Compliance for guidance.

16. Media/Public Relations and Governmental Inquiries

When Corvex provides information to the news media, securities analysts or stockholders, it has an obligation to do so accurately and completely. In order to ensure that Corvex complies with its obligations, Covered Persons receiving inquiries regarding Corvex's activities, results, plans or position on public issues should refer the request to the Company's Co-Chief Executive Officers or their designee. Corvex Covered Persons may not speak publicly for the Company unless specifically authorized by senior management.

You may not publish or post any material in written or electronic format (including articles, social media postings, blogs, videos or other media), give interviews or make public appearances that disclose confidential Company business-related information, such as information concerning the Company's customers, technologies, products or services without prior approval from your Supervisor. Covered Persons communicating in any public venue or forum without approval must not give the appearance of speaking or acting on the Company's behalf.

Although unlikely, a government representative may seek to interview a Covered Person regarding Corvex's business activities or Covered Person's work on behalf of the Company. If a Covered Person is

contacted by a government agent or representative and asked to provide information, contact the Director of Compliance.

Occasionally, someone will arrive unexpectedly or a government representative may seek to inspect Company property. If this happens, a Covered Person should immediately notify his or her Supervisor and contact the Director of Compliance.

17. Reporting and Compliance

Covered Persons must report evidence of wrongdoing, complaints, or concerns relating to accounting and auditing matters to the Chair of the Audit Committee at any time. This report may be made in person or in writing, and may be anonymous, at the Covered Person's discretion, in accordance with the Company's Whistleblower Policy. Actions prohibited by this Code involving directors or executive officers must also be reported to the Audit Committee.

Actions prohibited by this Code involving anyone other than a director or executive officer must be reported to one of the persons listed below.

- a Supervisor or department head; and/or
- the Company's Director of Compliance.

After receiving a report of an alleged prohibited action, the Audit Committee will promptly take all appropriate actions necessary to investigate the action. All Covered Persons are expected to cooperate in any internal investigation of misconduct, and the Company will ensure prompt and consistent action against violations of this Code.

Upon receipt of a determination that there has been a violation of this Code, the Company will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

Covered Persons submitting a report on an anonymous basis are strongly encouraged to keep a copy of the report (if made in writing) and a record of the time and date of their submission, as well as a description of the matter as reported if the report was not in writing.

Covered Persons are encouraged to provide as much specific information as possible, including names, dates, places, and events that took place, relevant documents, and the Covered Person's perception of why the incident(s) may be misconduct.

If possible, the Covered Person should provide a means by which they can be contacted in the event that an investigator needs to follow-up or wants to report back to the Covered Person.

18. No Retaliation for Reports Made in Good Faith

The Company strictly prohibits retaliation against anyone who, in good faith, reports a possible violation of this Code, raises a concern, or participates in an investigation. Retaliation for reporting a federal offense is illegal and will result in disciplinary action, up to and including termination of employment, and may also result in criminal prosecution. Covered Persons are protected from retaliation even if the

investigation does not substantiate the reported concern. We encourage everyone to speak up and report concerns without fear. However, if the Covered Person making the report was involved in improper activity, the fact that they reported it will not necessarily prevent them from being disciplined for their participation in the violation. In these circumstances, the Company may consider the Covered Person's conduct in promptly reporting the information as a mitigating factor in any disciplinary decision.

19. What to Do if You Have Questions or Are Unsure About a Transaction

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations, it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Always ask first, act later. If you are unsure of what to do in any situation, seek guidance from your Supervisor or the Director of Compliance of the Company before you act.
- Make sure you have all the facts. In order to reach the right solutions, you must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Discuss the problem with your Supervisor. This is the basic guidance for all situations. In many cases, your Supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process.
- Seek help from Company resources. In the event it is inappropriate to discuss an issue with your Supervisor, or if you do not feel comfortable approaching your Supervisor with your question, you may also contact the Director of Compliance of the Company.
- You may report ethical violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected.
- **If you have any questions or uncertainties regarding this Code or are unsure as to whether a transaction is consistent with this Code, please contact the Director of Compliance of the Company.**

20. Waiver

The Code applies to all Corvex Covered Persons. Any waiver of this Code for executive officers or directors may be made only by the Board, or a committee of the Board responsible for corporate governance, and will be promptly disclosed as required by law.

Amended: March, 2026

COVERED PERSON CERTIFICATION AND AGREEMENT OF COMPLIANCE

I certify that I have read Corvex’s “Code of Business Conduct and Ethics” (the “Code”) and fully understand the obligations set forth in that document.

The Code includes a statement of Corvex’s policies, which are designed to ensure that the Company and its Covered Persons conduct Corvex’s business in compliance with all federal and state laws governing its operations and the conduct is consistent with the highest standards of business and professional ethics.

I understand that the Code obligates all Covered Persons to carry out their duties for Corvex in accordance with these policies and with applicable laws. I further understand that any violation of these policies or applicable laws, or any deviation from appropriate ethical standards, will subject a Covered Person to disciplinary action or termination. Indeed, I understand that even a failure to report such a violation or deviation may, by itself, subject a Covered Person to disciplinary action or termination.

I am also aware that in the event that I have any question about whether an action complies with Corvex’s policies or applicable law, I should present that question to my Supervisor or, if appropriate, directly to the Company’s Director of Compliance.

With these understandings of my obligations, I agree to act in accordance with the Corvex policies set forth in the Code. Having read the Code, I am not currently aware of any matter that should be brought to the attention of compliance personnel as a violation or suspected violation of the Code.

Name: _____

Signature: _____

Date: _____