CLEAN ENERGY FUELS CORP.
CODE OF ETHICS

As of May 20, 2026

Introduction

This Code of Ethics (the "**Code**") sets forth policies of Clean Energy Fuels Corp., a Delaware corporation (the "**Company**"), with respect to the way the Company and its employees promote honest and ethical conduct, including the handling of actual or apparent conflicts of interest. All employees, officers and directors of the Company must comply with the provisions of the Code. References to employees contained herein should be understood as referring to officers and non-employee directors as well.

The Code is the Company's written code of ethics under Section 406 of the Sarbanes-Oxley Act of 2002, and the Company believes that the Code complies with the standards set forth in Securities and Exchange Commission Regulation S-K Item 406.

In the course of performing our various roles in the Company, each of us will encounter ethical questions in different forms and under a variety of circumstances. Ethical uncertainty may arise in our dealing with fellow employees, with customers, or with other parties such as government entities or members of our community. Employees should never be content with simply obeying the letter of the law, but must also strive to comport themselves in an honest and ethical manner. The Code provides rules and procedures to help employees recognize and respond to situations that present ethical issues.

The reputation of the Company depends upon the character of its employees. To protect its reputation, the Company will not tolerate unethical behavior. Those who violate the standards in the Code will be subject to disciplinary action. If you are concerned about taking an action that may violate the Code or are aware of a violation by another employee follow the guidelines set forth in this Code.

1. Compliance with Laws, Rules and Regulations

As a domestic company with international sales, the Company is subject to laws and regulations both in the United States and abroad. Company policy requires that all employees comply fully with both the letter and the spirit of all laws, rules and regulations. Whenever an applicable law, rule or regulation is unclear or seems to conflict with either another law or any provision of the Code, all employees are urged to seek clarification from their supervisor or the Company's General Counsel, who is the "**Ethics Officer**" for purposes of the Code, the Company employee designated to handle such matters, whose contact information is set forth in Section 6 below. The Code is in addition to, and should be read in conjunction with, the Company's existing policies, practices and procedures, including, but not limited to, the Company's policies on securities trades, proprietary inventions, trade secrets and employee conduct/harassment.

2. Conflicts of Interest

Every employee has a primary business responsibility to the Company and must avoid conflicts of interest. A conflict of interest arises when an employee takes actions or enters into relationships that may be inconsistent with the interests of the Company, may interfere with the employee's performance or independent judgment when carrying out his or her duties, or receives improper personal benefits as a result of his or her position in the Company. The Company strictly prohibits its employees from taking any action or entering into any relationship that creates, or even appears to create, a conflict of interest without the prior approval of the Ethics Officer. The Company's principal executive officer, principal financial officer, principal accounting officer and controller must receive approval of the Board of Directors (the "**Board**") or a Board committee prior to taking any action or entering into any relationship that creates, or even appears to create, a conflict of interest. The actions of an employee's immediate family members are also treated as those of the employee and are therefore subject to the same restrictions.

In order to avoid such conflicts, an employee may not receive any payments, compensation, or gifts, other than gifts of nominal value and in compliance with applicable laws, from any entity that does business or seeks to do business with the Company. Furthermore, employees may not use Company property, information or influence or their position in the Company for personal gain. Employees must be sensitive to other potential conflicts of interest that may arise and use their best efforts to avoid the conflict.

If an employee has any questions regarding the Company's policy on conflicts of interest or needs assistance in avoiding a potential conflict of interest, he or she should seek the advice of a supervisor or the Ethics Officer.

3. Fair Dealing

Although the success of our Company depends on our ability to outperform our competitors, the Company is committed to achieving success by fair and ethical means. We seek to maintain a reputation for honesty and fair dealing. In light of this aim, the Company prohibits employees from engaging in any dishonest, unethical or illegal business practices. It would be impractical to try to provide an exhaustive list of unethical practices. Instead, the Company relies on the judgment of each individual employee to avoid such practices. Furthermore, each employee should endeavor to deal fairly. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair business practice.

4. Books and Records, Accounting Controls and Disclosures

The Company requires that all its books and records be maintained accurately and with honesty. This requires that no asset, liability, revenue or expense be concealed or improperly or incompletely recorded for any purpose. All entries must be supported by documentation adequate to permit the books and records to be verified by audit. Proper accounting requires not only careful compliance by the Company's accountants, but also the cooperation of all employees who are involved in keeping financial records of any type.

The Company's accounting controls and procedures are essential to ensuring the accurate reporting of the Company's financial information. The Audit Committee of the Board has the responsibility of reviewing the Company's policies and practice with respect to financial reporting. By conducting this review, the Audit Committee of the Board helps the Company identify deficiencies in its practices so that they can be promptly corrected. Auditors will have unrestricted access to all of the Company's documents and records. All employees are required to cooperate fully with internal and external audits, especially as it relates to audits of our systems of internal controls, financial statements or accounting books and records. In no case may an employee make a false or misleading statement to any internal or external auditor, withhold records, or otherwise interfere with an audit. No employees should coerce, manipulate, mislead, or unduly influence any auditor. An employee who has knowledge of any unreported or improperly reported financial activity must report such information pursuant to our Whistleblower Policy reporting procedures.

The Company recognizes that the investment community derives information regarding the Company's financial condition primarily from the Company's filings with the Securities and Exchange Commission. To promote the transparency of its financial operations, the Company has a strict policy requiring that all filings with the Securities and Exchange Commission and press releases be fair, accurate, timely, complete and understandable.

5. Waivers

The Company expects all employees to comply with the provisions of the Code. Any waiver of the Code for executive officers or directors may be made only by the Board or a Board committee and will be promptly disclosed to the public as may be required by law and the rules of the Nasdaq Global Select Market. When necessary, a waiver will be accompanied by appropriate controls designed to protect the Company.

6. Compliance Resources

In some situations, an employee may be uncertain how to comply with the Code. This uncertainty may concern the ethical nature of the employee's own acts or the employee's duty to report the unethical acts of another. When determining the proper course of action, the employee must carefully analyze the situation and seek guidance from his or her supervisor, the Ethics Officer or other appropriate personnel in accordance with the following four steps:

A. *Gather all the facts*. Do not take any action regarding the Code until you have gathered all the facts that are required to make a well-informed decision and, if necessary, you have consulted with your supervisor or the Ethics Officer.

B. *Action illegal or contrary to the Code*. If you believe that the Code has been violated by an employee you must promptly report the violation in accordance with the procedures set forth in Section 7.

C. *Discuss the problem with your supervisor*. It is your supervisor's duty to assist employees in complying with the Code. Feel free to discuss the situation with your supervisor or the Ethics Officer if you have any questions. You will suffer no retaliation for seeking such guidance.

D. *If necessary, seek additional resources*. The Ethics Officer will be available to speak with you about problematic situations if you do not feel comfortable approaching your direct supervisor. The Company's Ethics Officer may be contacted via telephone (949) 437-1378.

7. Reporting and Investigation Procedures

All employees have a duty to report any violations of the Code, as well as violations of any laws, rules, or regulations. Employees also have a duty to report any transaction or relationship that could reasonably be expected to give rise to a conflict of interest.

If you are aware of a potential conflict of interest or believe that the Code has been violated by an employee, you must promptly report the violation. If a report is made to a supervisor, the supervisor must in turn report the violation to the Ethics Officer. All violations by an officer or director of the Company must be reported directly to the Ethics Officer. Employees may also choose to report any violations regarding record keeping, financial accounting or financial reporting pursuant to the Company's Whistleblower Policy reporting procedures.

Reports may be made in person, by e-mail, by telephone or in writing by sending a description of the violation and the names of the parties involved to the appropriate personnel mentioned in the preceding paragraph.

When reporting a violation, you may choose to remain anonymous. However, if you make an anonymous report, you should create and preserve your own record of this report in order to be able to demonstrate your compliance with the requirement of reporting violations. Where reasonably possible, every effort will be made to maintain the confidentiality of reports of potential violations. There may, however, be a point where the identity of the reporting employee may become known or may have to be revealed in the course of the investigation or to take corrective action.

After receiving a report of an alleged misconduct, the Ethics Officer, Board or a Board committee shall promptly take all fair and appropriate actions necessary to investigate. All employees are expected to cooperate in any internal investigation of misconduct. If an investigation is launched, it will include a review of all available relevant information and discussions with knowledgeable individuals. Investigations might involve representatives from Legal, HR, our operations teams and others. Once an investigation has concluded, we act in accordance with our values and policies.

The Company does not permit retaliation of any kind against employees for good faith reports of ethical violations. Any employee who attempts to or encourages others to retaliate against an individual who has reported a violation will be subject to disciplinary action as outlined in Section 8 below.

8. Disciplinary Action

The Company has implemented the following disciplinary policies to ensure that prompt and consistent actions are taken in response to violations of the Code:

A. *Range of Penalties*. All violations of the Code will be treated seriously and will result in the prompt imposition of penalties which may include (1) an oral or written warning, (2) a written reprimand, (3) suspension, and/or (4) termination. Violations will also be reported to the appropriate regulatory agencies or other authorities.

B. *Disciplinary Process*. The penalty for a particular violation will depend on the nature and severity of the violations as well as the employee's history of non-compliance and cooperation in the disciplinary process. Significant penalties will be imposed for violations resulting from intentional or reckless behavior. Penalties may also be imposed when an employee fails to report a violation due to the employee's willful misconduct, indifference, deliberate ignorance or reckless conduct. Where there is credible evidence of a violation, the Ethics Officer will determine the appropriate sanction.

C. *Consistent Enforcement*. It is our intent to give consistent, equal treatment to all employees with respect to the imposition of disciplinary measures. Pursuant to this policy, all employees will be subject to the same disciplinary action for the commission of a similar offense with similar underlying facts.

9. Dissemination and Amendment

The Code shall be distributed to each new employee upon commencement of his or her employment or other relationship with the Company and shall also be distributed annually to each employee, and each employee shall sign an acknowledgment that he or she has received, read and understood the Code and will comply with its terms.

The Company reserves the right to amend, alter or terminate the Code at any time for any reasons. The Code is available on the Company's website.