CLEAN ENERGY FUELS CORP.
CONFLICT MINERALS POLICY

As of May 20, 2026

Background

In 2010, Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank"), requiring the Securities and Exchange Commission ("SEC") to issue a rule specifically relating to the use of "Conflict Minerals" within manufactured products. Conflict Minerals are defined as columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tin, tantalum, tungsten, respectively), and gold (also known collectively as "3TG"), and any such other minerals and their derivatives designated by the U.S. State Department. The SEC rule requires all SEC registrants who manufacture or contract to manufacture products for which 3TG is necessary to the functionality or production to determine whether such minerals originated from the Democratic Republic of the Congo ("DRC") and adjoining countries, and, if so, whether they are "conflict free." By enacting this provision, Congress intends to create further transparency for consumers about the origin of the products they are buying.

Commitment

Clean Energy Fuels Corp., together with its consolidated subsidiaries (hereinafter collectively referred to as the "Company") is guided by its core beliefs and values as stated in the Company's Code of Ethics. The Company is committed to ethical practices and compliance with applicable laws and regulations wherever it does business. The Company believes that its commitment to integrity and citizenship extends to its worldwide supply base. The Company is committed to sourcing its products responsibly, and it expects its suppliers to also source materials from responsible suppliers.

Expectations of Suppliers

The Company expects its suppliers to partner with it to comply with Dodd-Frank's conflict minerals reporting rules. The Company expects its suppliers to:

i. When the Company deems it necessary, complete the Company's Conflict Minerals survey, identifying whether any 3TG is present in the material that they sell to the Company and the smelter, refiner or mine that originally provided it (for this purpose, the Company's direct suppliers may have to require successive upstream suppliers to complete a Conflict Minerals survey until the applicable smelter, refiner or mine is identified);

ii. Agree to cooperate fully with the Company in connection with any due diligence that the Company chooses to perform with respect to its inquiries; and

iii. When the Company deems it necessary, to provide reasonable proof of the due diligence performed by the supplier to support the information provided by the supplier to the Company.

The Company evaluates its relationships with its suppliers on an ongoing basis, and reserves the right to consider the extent to which a supplier has failed to reasonably comply with this Policy in the course of such evaluation.