



**CLEAN ENERGY FUELS CORP.**

**HUMAN RIGHTS POLICY**

**May 16, 2024**

**Policy Statement**

Employees of Clean Energy Fuels Corp., its business units and subsidiaries, are expected to be ethical, respectful, and strong community partners – forming positive relationships wherever we do business. We are mindful that individuals from certain groups or populations may be at heightened risk of marginalization. This policy underscores our commitment to value and respect human rights across our operations and to conduct business in a way that minimizes the adverse effects our infrastructure or operations may have on people and communities, wherever possible, independent of what governments or other regulatory authorities may or may not require. We also expect our Suppliers and partners to uphold the principles outlined in this Human Rights Policy.

- Conduct periodic human rights assessments in connection with our business and operations.
- Make efforts to avoid causing or contributing to human rights violations wherever possible.
- Mitigate and/or remediate adverse human rights impacts of our business and operations wherever possible.
- Respect freedom of association and right to collective bargaining.
- Prohibit the use of child labor or forced labor in company operations.
- Promote elimination of discrimination in all employment situations.
- Promote a formal grievance mechanism.
- Be transparent in our efforts, successes, and challenges.

The Board approves and oversees the Human Rights Policy as part of its responsibilities in reviewing strategic goals, objectives, policies, issues, and practices relating to various risks. Human rights are the responsibility of every employee.

*Reporting*

If an employee, business partner, supplier, customer, or other stakeholder witnesses or learns of any incident that may involve a violation of this policy, it should be reported promptly (anonymously if desired), via the company's Whistleblower Hotline, available 24 hours a day, seven days a week at the following:

<http://www.whistleblowerservices.com/clne> or +1-866-713-4457

Every report made to the Hotline is investigated and we prohibit retaliation against individuals who report concerns in good faith.

In addition to the Whistleblower Hotline, company employees may report a concern to their immediate supervisor, the next level of management above their supervisor, the corporate compliance department, the human resources department, or to the company's General Counsel.

*Due Diligence, Verification and Transparency*

The company is committed to conducting and monitoring human rights impacts, review alleged violations, review the processes and systems used to identify and investigate alleged violations, and remedy any negative impacts we identify. The company will update our policies and practices based on any improvement opportunities identified by this monitoring, including the Whistleblower Hotline.



### *Commitment to Remedy*

The company will endeavor to remediate, through legitimate processes (including judicial and non-judicial mechanisms, as appropriate), any situation where it identifies that its actions have caused or contributed to an adverse human rights impact. We further commit to work with our suppliers to remedy adverse impacts that are directly linked to the company's operations, products, or services.

### **Background**

Respect for human rights is essential to the sustainability of a business. Business plays a fundamental role in tackling human rights challenges, in collaboration with government where possible. Transparency on key topics such as human rights enable informed decision making and builds trust with shareholders, customers, community leaders, employees, business partners, suppliers and other stakeholders. These stakeholders may represent many different races, nationalities, religions, cultures and customs.

We believe in the dignity, human rights, and personal aspirations of all people. The company upholds the United Nations' (UN) *Guiding Principles on Business and Human Rights*.

### **Definitions**

Human Rights: Human rights are rights inherent to all human beings, regardless of race, color, national origin, ancestry, citizenship, religious creed, physical or mental disability including HIV and AIDS, cancer, genetic characteristics, marital status, sex, sexual orientation, gender identity or expression, age, pregnancy, childbirth, or related medical conditions, family and medical care leave, military status, or political affiliation. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.