

WHISTLEBLOWER POLICY

THIS POLICY WAS APPROVED BY THE BOARD ON JULY 22, 2022

1. PURPOSE

OPAL Fuels Inc. (together with its subsidiaries, the “**Company**”) is committed to a culture of integrity, inclusiveness, and excellence. We aim for the highest standards of ethics, integrity, and accountability and to complying with applicable laws, rules, and regulations related to its business. You are required to perform your duties and responsibilities with honesty and integrity and to comply with all applicable laws, rules, and regulations, as well as Company policies. If you become aware of an actual or suspected violation of our policies or of any laws or regulations, it is your responsibility and obligation to report it and you should do so without fear of reprisal or retaliation of any kind.

We have established this Whistleblower Policy (“**Policy**”) to enable employees and other service providers to report any activity that is unlawful or otherwise violates our policies so that we can investigate and resolve potential violations as quickly and efficiently as possible. This Policy covers protections available to whistleblowers under the Sarbanes-Oxley Act of 2002 and the Dodd Frank Wall Street Reform and Consumer Protection Act of 2010 (“**Dodd Frank**”), each as amended, and Dodd Frank's whistleblower award program.

The Board has established this Policy for: (a) receipt, retention and treatment of any concerns, issues or complaints (collectively “**Concerns**”) regarding: (i) accounting, financial, internal controls, and auditing matters; and (ii) legal, compliance or regulatory matters (i and ii collectively, “**Reportable Matters**”), and (b) submission of Concerns by any employee, service provider or consultant of the Company regarding Reportable Matters.

You are encouraged to use the guidance provided by this Policy to report all known and suspected improper activities as described below. This Policy is designed to provide you with a confidential or anonymous method for reporting any improper activities.

2. PERSONS COVERED BY THIS POLICY

This Policy applies to our employees, contractors, consultants, agents, representatives, officers and members of our Board of Directors (“**Board**”).

3. PROTECTED ACTIVITIES

These procedures relate to Concerns relating to any Reportable Matters including, without limitation, the following (the “**Protected Activities**”):

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company's internal controls over accounting or financial reporting;
- misrepresentation or false statement to or by an officer, accountant or external auditor regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- deviation from full and fair reporting of the Company's financial condition or results of operations; and
- non-compliance with applicable legal, compliance and regulatory matters.

4. WHEN SHOULD VIOLATIONS BE REPORTED

We ask that you follow this Policy to report good faith concerns regarding known or suspected violations of any of the Protected Activities.

Keep in mind that your reporting obligation includes complaints or reports you might get from people outside of the Company and complaints regarding third parties who provide services to us.

5. HOW TO REPORT VIOLATIONS

If you believe that any violation has occurred or is occurring or you have a good faith concern regarding conduct that you reasonably believe may be a violation, you are required to promptly take one or more of the following steps:

- Report the known or suspected violation to your manager and/or supervisor.
- If you would prefer to speak to someone other than your manager or supervisor, you can report concerns to our General Counsel at JCoghlin@opal_fuels.com.

Alternatively, you may report the known or suspected violation confidentially and anonymously to our third-party vendor, Lighthouse Services, by any of the below channels 24 hours a day, 7 days a week:

- Website: <https://www.lighthouse-services.com/opalfuels>
- Anonymous Reporting App: Keyword: opalfuels (Detailed App instructions in this Word Document)
- Toll-Free Telephone: 833-658-3127

- E-mail: reports@lighthouse-services.com (must include company name with report)
- Fax: 215-689-3885 (must include company name with report)

Your anonymity will be protected to the extent possible by law by Lighthouse Services.

If you report using the above procedures, your report will automatically be directed to our General Counsel. Our General Counsel will provide reports to the Chair of the Audit Committee (“**Audit Committee**”) of our Board. Human resources complaints that do not involve accounting, internal accounting controls and auditing matters or violations of federal or state laws (including securities laws) or any other legal or compliance violation, will be reported to our human resources team.

You are encouraged to provide as much detail as possible regarding the subject matter of the complaint or concern. The communication should be candid and all of the information that the whistleblower party knows regarding the Concerns. To the extent possible, the communication should include sufficient corroborating information to support the commencement of an investigation. In order to better respond to any reported Concerns, it would be helpful if you provide your telephone number and other contact information when making the report. However, if you prefer to remain anonymous, you may report a concern without disclosing your name or position. The Company may, in its reasonable discretion determine to not commence an investigation if the communication contains only unspecified or broad allegations without appropriate support.

If you wish to report a matter directly to our Audit Committee, you may use the process above and indicate that the report should be delivered directly to the Audit Committee, you may use the process above and indicate that the report should be delivered directly to the Audit Committee. The Audit Committee will take whatever steps it deems necessary to respond to a report that they receive, including whether to refer the matter to our General Counsel for investigation.

6. INVESTIGATION

We treat all reports seriously. The Company will promptly review and address each concern as appropriate. This may involve an investigation conducted by qualified personnel. Investigations will be conducted confidentially to the extent practical and appropriate under the circumstances, recognizing that some disclosure may be necessary to effectively investigate the complaint.

You should not conduct your own independent investigation into any suspected violations; instead make your complaint or report by following the procedures in this Policy. The General Counsel will review and coordinate the investigation and resolution of all complaints and reports of a suspected violation, as well as ensure that corrective action is taken, as necessary and appropriate.

7. WE DO NOT RETALIATE AGAINST WHISTLEBLOWERS

This Policy and Procedures is intended to enable individuals to raise Concerns for investigation and appropriate action. With this goal in mind, consistent with the policies of the Company, the Audit Committee and General Counsel shall not retaliate or tolerate any retaliation by management of the Company directly or indirectly, including encouraging retaliation by others, against anyone

who makes a report of a Concern or provides assistance to the Audit Committee, management or any other duly authorized person or group, including any governmental, regulatory or law enforcement body, investigating a report of a Concern. Any employee who engages in retaliatory conduct will be disciplined, up to and including termination. In some cases, federal, state, and/or local law provides that retaliatory action for reporting unlawful activity is illegal. Employees who object to or refuse to participate in a policy, practice or activity that is unlawful, fraudulent, criminal or incompatible with a clear mandate of public policy concerning the public health, safety or welfare or protection of the environment are also protected from retaliatory action.

We do not permit any form of intimidation or retaliation by any employee, contractor, subcontractor or agent of the Company against you because of any lawful act done to:

- provide information or otherwise assist in an investigation of conduct you reasonably believe is a violation of any law, rule, or regulation, or of any Company policy; or
- testify, participate in or otherwise assist in a proceeding filed or to be filed relating to a violation of any law, rule or regulation.

Nothing in this Policy shall limit the authority of the Company to discipline, penalize, suspend or terminate any employee for good and sufficient reasons, which reasons shall not include having in good faith made a report of a Concern or provided assistance to the Audit Committee, management or any other duly authorized person or group, including any governmental, regulatory or law enforcement body, investigating such report. A person's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the Concerns or any ensuing investigation.

8. CONFIDENTIALITY

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The General Counsel or Chairman of the Audit Committee shall take reasonable steps necessary to protect the identity of any person making a report of a Concern so as to prevent any officer, employee, contractor, subcontractor or agent from being in a position to take any retaliatory action against such person making such report, including encouraging others to take retaliatory action. In no event will information be released to persons without a specific need to know about the Communication.

9. RETENTION OF COMPLAINTS AND DOCUMENTS

The General Counsel will maintain a log of all whistleblower communications, tracking their receipt, investigation and resolution. All whistleblower communications will remain confidential to the extent possible. All documents relating to the whistleblower communications and the investigations shall be maintained for a minimum of seven years.

10. CHANGES TO THIS POLICY

Our Board reserves the right in its sole discretion to modify or grant waivers to this Policy. Any amendments or waiver may be publicly disclosed if required by applicable laws, rules and regulations.