

ENTERPRISE ENVIRONMENTAL POLICY

OVERVIEW

American Public Education, Inc., together with its subsidiaries (APEI), is dedicated to providing the evolving workforce with effective and engaging learning experiences that maximize the potential for a better life. APEI seeks to fulfill this objective with the help of its employees, students, directors, trustees, and business partners, in an environmentally responsible way through the use of sustainable business practices. APEI believes that a safe and healthy environment plays an important role in the lives of its students, employees, stakeholders, and the communities it serves. APEI values the use and development of renewable energy, conservation programs, and practices that will enhance APEI's environmental performance.

ENVIRONMENTAL RISKS

Economic and social disruption from climate change may impact the ability of students to access higher education and the willingness of corporations to fund workforce training programs. APEI conducts and supports the ongoing assessment of risks associated with climate change and other environmental factors that may materially impact APEI's ability to create or preserve value for itself and its stakeholders.

OPPORTUNITIES

Online education requires no physical classroom space and enables students to attend class without the environmental impact of commuting to campus. APEI may market its online offerings as an environmentally-friendly alternative to on-campus education. APEI also operates campus locations that are conveniently located to reduce the time, distance, expense, and environmental impact of commuting to classes on campus.

APEI regularly evaluates strategies to implement environmentally sustainable practices, including with respect to water, energy, and paper resources conservation, and waste management.

Greenhouse Gas Emissions Reduction. APEI's long-term environmental goals aim to emit less than 0.23 metric tons of carbon dioxide equivalent per full-time enrollment (FTE) annually by 2030.

Waste Minimization. APEI has set targets to achieve a 20% reduction in non-hazardous waste per FTE by 2030, following up with a 50% reduction by 2050.

Water Conservation. APEI will explore strategies to save and reuse water.

APEI established 2022 as the base year for emissions, non-hazardous waste, and other sustainability comparisons following its transformative acquisition of Rasmussen University in 2021.

SCOPE

This policy applies to APEI, including all departments and business units within APEI's institutions. The provisions of this policy shall supplement, but not supersede, the institutional mission and the regulatory requirements applicable to each subsidiary. APEI values the ideals set forth herein and encourages its vendors, consultants, and strategic partners to adopt the same or similar environmental policies, as far as is reasonably achievable.

POLICY

To encourage conservation and further minimize its impact on the environment, APEI is committed to sustainable business practices and participating in efforts that improve protect the environment. APEI encourages ongoing sustainability efforts and supports the evaluation and potential adoption of new initiatives. Such efforts include but are not limited to the following:

- Regularly identifying and measuring APEI's environmental impact, in particular greenhouse gas emissions, energy
 consumption, water consumption and waste, as well as measuring offsets (including recycling and renewable energy
 generation).
- Identifying new opportunities to reduce energy consumption and waste, including the proper disposal of IT equipment, expanded single stream recycling, composting, water conservation, improving energy efficiency, and giving preference to renewable resources when appropriate.
- Encouraging environmental and sustainable practices in APEI's relationships with vendors, consultants, and strategic partners.
- Keeping stakeholders informed by measuring results and periodically reporting on the progress of environmental, health, and safety initiatives, including updating and publishing APEI's climate action plan at least every five years and making this Enterprise Environmental Policy publicly available.
- Providing a safe and healthy workplace for employees that encourages them to participate, engage in, and benefit from APEI's environmental initiatives.
- Educating employees, students and other key stakeholders about APEI's environmental initiatives and how they may contribute to the efforts.
- Complying with applicable environmental laws and regulations.
- Establishing a mechanism for reporting non-compliance with APEI's Enterprise Environmental Policy and violations of environmental laws and regulations, and requesting that employees report any such non-compliance.

The APEI Board of Directors, in partnership with the executive leadership team, has responsibility for oversight of APEI's Enterprise Environmental Policy and performance. Questions or concerns regarding this policy and instances of non-compliance may be reported to APEI's Real Estate or Legal department, as applicable, or anonymously through APEI's confidential Alertline, which can be accessed by dialing 866-648-0636 or at www.apei.ethicspoint.com.

This policy will be periodically reviewed and updated.

Date: November 19, 2025