

HUMAN RIGHTS POLICY

OVERVIEW

American Public Education, Inc., together with its subsidiaries (APEI or the company), believes that human rights are fundamental to the freedom, security, and dignity of all people without regard to race, color, religion, language, pregnancy, ancestry, age, gender, national origin, sexual orientation, gender identity, gender expression, physical appearance or characteristics, mental or physical disability, genetic information, citizenship status, marital or veteran status.

SCOPE

This human rights policy applies to all employees, directors, trustees, and students. APEI values the ideals set forth herein and encourages its vendors, consultants, and strategic partners to adopt the same or similar human rights standards, as far as is reasonably achievable. The APEI Board of Directors, in partnership with APEI's executive leadership team, has responsibility for oversight of APEI's human rights policy and performance.

POLICY

APEI values legally and internationally recognized human rights and avoiding complicity in human rights abuses. APEI strives to respect human rights as defined by the [UN Guiding Principles on Business and Human Rights](#), and supports the principles set out in the [UN Universal Declaration of Human Rights](#). APEI supports international human rights principles and prohibits the use of all forms of forced labor, child labor, military labor, slave labor, and human trafficking. In addition, the company supports the protection of women's rights, LGBTQ+ rights, as well as the rights of minority and underrepresented groups in all its business activities.

APEI values an enjoyable workplace that is free from bullying, harassment, intimidation, violence or threats of violence, discrimination, and other unsafe or disruptive conditions resulting from internal or external threats.

In addition, APEI:

- respects the lives, rights, privacy, and property of all individuals;
- believes in honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest, as discussed in APEI's Code of Business Conduct and Ethics;
- endorses accessibility and providing reasonable accommodations to those with disabilities;
- believes that access to food and water is a human right and that everyone should be entitled to sufficient, safe, acceptable, physically accessible, and affordable food and water; and
- values a safe and healthy work environment within APEI and within its third-party suppliers and service providers regardless of geographic location, and believes in working with business partners who share its commitments to upholding human rights.

APEI offers regular training and engagement on human rights to employees. The company encourages employees to read the human rights policy and provide any comments or suggestions to any member of the ESG Oversight Committee. Questions or concerns regarding this policy and instances of non-compliance may be reported to the company's Human Resources or Legal department, 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