



## ENTERPRISE ENVIRONMENTAL POLICY

### OVERVIEW

American Public Education, Inc. and 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 a way that minimizes environmental impacts 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 supports the ongoing assessment of risks associated with climate change and other environmental factors that may impact APEI's ability to create or preserve value for itself and its stakeholders.

### OPPORTUNITIES

Online education, by its nature, is environmentally friendly because it 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.

**Greenhouse Gas Emissions Reduction.** APEI seeks to invest in and use technologies to achieve its environmental goals, including the goal of emitting less than 0.1 metric tons of carbon dioxide equivalent per full time enrollment (FTE) per year by 2030. In addition, APUS is a signatory of the American College & University Presidents' Climate Accord and has pledged to be carbon neutral by 2050.

**Waste Minimization.** APEI will explore strategies to reduce non-hazardous waste per FTE by 20% by 2030 and 50% by 2050, compared to 2010 levels.

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

### SCOPE

This policy applies to APEI and its subsidiaries. All departments within APEI's institutions and business units must adhere to this policy. The provisions of this policy shall supplement, but not supersede, the institutional mission and the regulatory requirements applicable to each subsidiary, and shall also apply to APEI's relationships with its business partners.

## 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 the environment. APEI encourages ongoing environmental and sustainability efforts of the enterprise, including new initiatives and the review and ongoing improvement of existing efforts. Including by:

- Regularly identifying and measuring APEI's environmental impact, in particular greenhouse gas emissions, energy consumption, water consumption and waste, as well as measuring offsets (recycling and renewable energy generation).
- Identifying new opportunities to reduce energy consumption and waste, including the proper disposal of IT equipment, [single stream recycling, composting, water conservation] improving energy efficiency, and giving preference to renewable resources when appropriate.
- Incorporating environmental and sustainable practices into APEI's relationships with its business partners and encouraging them to be environmentally responsible.
- Continuing to invest in and maintain green infrastructure, such as APEI's solar panel arrays at its headquarters in Charles Town and APEI's EV fueling stations for commuter vehicles at its campus locations.
- Keeping stakeholders informed about environment, health and safety initiatives and performance by measuring results and periodically reporting on the progress, including updating and publishing APEI's climate action plan at least every five years and making this policy publicly available.
- Regularly reporting greenhouse gas emissions data to the Carbon Disclosure Project (CDP), endorsing and fulfilling the obligations of the UN Global Compact's CEO Water Mandate and maintaining active memberships in the American College and University President's Climate Accord (ACUPCC), as well as in Second Nature and the Association for the Advancement of Sustainability in Higher Education (AASHE).
- Providing a safe and healthy workplace for employees that encourages them to participate, engage in, and benefit from APEI's environmental initiatives. This includes transit options such as offering telework and remote teleconferencing for APEI's employees and shareholders.
- Educating employees, students and other key stakeholders about APEI's environmental initiatives and how they may contribute to the efforts.
- Complying with applicable environmental law.
- Establishing a mechanism for reporting non-compliance with environmental laws and regulations, and requesting the employees report any such non-compliance. Any violations of this Environmental Policy can be reported anonymously through APEI's confidential Alertline, which can be accessed by dialing 866-648-0636 or at [www.apei.ethicspoint.com](http://www.apei.ethicspoint.com).
- Including sustainable practices and relevant environmental lessons in the curriculum of certain courses and encouraging collaboration among faculty, staff, and students on [matters][projects][initiatives] related to sustainability.
- Requiring that all new construction and upgrades meet at least LEED silver standards, and that plans for any significant capital improvement project consider environmental impacts.
- Assessing environmental impact when making substantial business decisions and/or planning capital improvement projects.
- Providing that APEI headquarters and its campus buildings are to be maintained, and all new buildings are to be constructed, with a view toward minimizing environmental impact and enhancing the wellness of employees.

**Review.** This policy will be periodically reviewed and updated.