Welcome to American Public University System!

On behalf of your colleagues, I welcome you to APUS and wish you every success here.

We believe that each employee contributes directly to APUS’s growth and success, and we hope you will take pride in being a member of our team.

This handbook was developed to describe some of the expectations of our employees and to outline the policies, programs, and benefits available to eligible employees. You should familiarize yourselves with the contents of this handbook, as it will answer many questions about your employment with APUS.

We hope your experience at APUS will be challenging, enjoyable, and rewarding.

Again, welcome!

Sincerely,

[Signature]
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I. MISSION, VISION & CORE VALUES

MISSION
American Public University System’s mission is to provide quality higher education with emphasis on educating the nation’s military and public service communities by offering respected, relevant, accessible and affordable, student-focused online programs, which prepare them for service and leadership in a diverse, global society.

VISION
The University System is a respected higher learning organization known for its distinctive strengths in providing superior and relevant distance learning programs to its learners. In pursuing this vision, the University System:

• Creates interactive, effective learning environments for all constituents.
• Serves its constituents’ diverse personal and professional development needs.
• Expands access to affordable programs for underserved learners.

CORE VALUES
The University System is guided in fulfilling its mission by these shared principles and core values:

Learning: The University System fosters an environment that promotes a life of learning for its constituents and uses feedback from its participants and supporters to improve the quality of its teaching, learning, and support.

Quality: The University System holds a strong commitment to high standards in all aspects of its educational activities, learning outcomes, and support services. It seeks to continuously strengthen the overall effectiveness of its operations.

Integrity: The University System conducts its operations and makes its public representations in an ethical manner. It assesses its operations in an open and collaborative manner and practices fairness, honesty, and objectivity in dealing with its constituencies.

Accountability: The University System is accountable to its constituencies and the public for fulfilling its mission in an appropriate manner by openly assessing its operations and by inviting external evaluations by public agencies.

Access to Underserved: The University System seeks to broaden access to its higher education programs by underserved communities who wish to engage the organization in their learning goals.

Adaptive and Responsive: The University System anticipates and adapts to its changing environment and responds to the needs of the organization and its constituencies in manners both appropriate and timely.

Innovation: The University System seeks imaginative and effective solutions to its challenges and innovative ways to fulfill its mission.

Collaboration: The University System seeks and nurtures partnerships with its constituents and the communities it serves in creating effective learning environments for its learners.
Freedom of Inquiry and Expression: The University System supports the rights of its constituents to freely inquire and express their opinions. It engages and encourages an open exchange of ideas and seeks input from all who wish to participate in its learning programs.

Diversity: The University System embraces and promotes diversity in its policies and practices to prepare its learners to live and work successfully in an increasingly diverse society. It strives to create diverse learning environments by welcoming teachers, learners, and staff who bring diverse ideas, values, backgrounds, and beliefs to the learning and work environment.
II. THE HISTORY AND DEVELOPMENT OF APUS

THE BEGINNING
American Public University System (APUS) is an independent University System that was established in June 2002 in the state of West Virginia. Its predecessor organization, the American Military University (AMU), was incorporated in the Commonwealth of Virginia on June 11, 1991. The Founder, James P. Etter, USMC (Ret), developed the original concepts used by AMU during his military service. These were later expanded to include all of the University System. His early concept for the institution focused on the need to develop an educational program for military officers, particularly those whose aspirations were not being fulfilled through the educational programs offered by the military services. Armed with the knowledge that a market existed, Mr. Etter gathered a small team of educators and other professionals to begin working on the difficult task of putting together a university system structure that would fulfill the requirements of reaching an anticipated audience. Over the intervening years the power of his concept became evident as more and more students enrolled in courses and degree programs. American Public University System’s corporate office is located in Charles Town, West Virginia with administrative support located in Manassas, VA.

METHOD OF INSTRUCTION
All instruction at APUS is delivered through on-line education with the exception of a few on-site seminars conducted through special arrangements with subcontractors. Direct communication between the student and professor is accomplished by using the Internet via the www.apus.edu web site. APUS's students are located throughout the US and overseas, and are generally not able to attend traditional classroom instruction. The University system provides each of its students with sufficient material for directed self-study and research, to be augmented by local research facilities.

FACULTY
APUS employs professors who are located all over the world and offer expertise in fields of study ranging from military history to national security issues. New instructors are added to match our growth in students, courses, and degree programs.

ACCREDITATION
The Importance of Accreditation
Accreditation is a voluntary, non-governmental process that gives public recognition to institutions that meet published standards of academic and administrative quality. The purpose of accreditation is to assure the public of the quality of an institution and its dedication to high standards, as well as its commitment to continuous improvement.

The U.S. Department of Education formally recognizes accrediting commissions that meet all federal standards. Further, the Council on Higher Education Accreditation (CHEA) extends recognition to accrediting bodies and their institutions that meet established quality standards. Generally, accrediting bodies fall into three major categories: national, regional, and specialized/professional.

As an accredited institution, APUS is eligible to participate in federal educational entitlement programs such as military tuition assistance, government tuition reimbursement programs, the Department of Veterans Affairs GI Bill, and many corporate education assistance programs. Credits and degrees earned through APUS
are therefore recognized for promotion, assignment, and position qualification standards within the military and federal government.

**Regional Accreditation**
American Public University System is accredited by the Higher Learning Commission of the North Central Association of Colleges and Schools, [www.ncahlc.org](http://www.ncahlc.org), 230 South LaSalle Street, Suite 7-500, Chicago, IL 60604, 800-621-7440.

**National Accreditation**
American Public University System is accredited by the Accrediting Commission of the Distance Education and Training Council, [www.detc.org](http://www.detc.org), 1601 18th St., NW, Washington, DC 20009, 202-234-5100.

**Specialized/Professional**
In addition to institutional accreditation, APUS has obtained programmatic accreditation through appropriate governing organizations for specific academic programs. These specialized accreditations require a significant amount of self-study and presentation of evidence to satisfy the demanding requirements of each accrediting organization, and collectively demonstrate that the APUS is focused on academic excellence and providing the best possible educational experience for its students. As a result, APUS has enhanced the curriculum for certain programs by implementing standards from an external accrediting organization for specific disciplines or fields of study.

For further information on accreditation, please contact the Office of Institutional Advancement at [Accreditation@apus.edu](mailto:Accreditation@apus.edu)

**ADDITIONAL INFORMATION**
Since the University System's founding, the staff has grown tremendously. As operations and enrollment expand, so will the number and type of positions required for staff. While each member of the APUS staff has a title and responsibilities associated with their position, the University System requires teamwork and cooperation among the various departments. APUS encourages employee feedback on how tasks and processes can be improved. The University welcomes any ideas or suggestions on initiatives that can be taken to help the University System grow and succeed. Suggested improvements to policies or changes to this employee handbook should be forwarded to the HR Department.
III. EMPLOYMENT POLICIES AND PRACTICES

EQUAL EMPLOYMENT OPPORTUNITY
It is the policy of APUS to afford equal opportunity to all qualified persons. We treat all qualified individuals equally as to their recruitment, hiring, assignments, advancements, compensation, and all other terms and conditions of employment. APUS does not discriminate on the basis of race, color, religion, creed, sex, age, national origin, sexual orientation, or physical, mental, or sensory disability, or any other characteristic protected by law.

INTRODUCTORY PERIOD OF EMPLOYMENT
New employees are subject to an evaluation and orientation to our business during an Introductory Period, which typically is the first 90 days of your employment. This period gives you an opportunity to demonstrate satisfactory work performance, attitude, and attendance. You also have the opportunity to see if APUS is the right employer for you.

The Introductory Period may be extended at the discretion of APUS to further evaluate your suitability to the job. You will be notified in writing if your Introductory Period is being extended, and the length of the extension will be stated.

APUS is an “At-Will” employer. As is the case at all times, you and APUS each have the right to terminate employment during or after the Introductory Period without advance notice and without cause.

REHIRING & BRIDGE OF SERVICE
Employees may leave APUS for a period of time, but choose to reapply at a later date. If employees separate from APUS in good standing; they may be eligible for reemployment. Employees must meet the qualifications of the position, attend new hire orientation, and successfully pass a background check.

If employees choose to leave the organization, but are rehired within 12 months of their separation date; they will be permitted to come back and be treated with the initial start date (as if they never left) minus the time spent away. (Ex. - employee works for one year; quits APUS for six months and is rehired; then they will be eligible for awards and vacation accrual as if they are starting their second year.) This does not change eligibility requirements for benefits enrollment.

BACKGROUND & CREDENTIAL CHECKS
Background and credential checks ensure the credibility and integrity of APUS to our students, investors, and the general public. APUS will conduct background checks on all candidates who receive an employment offer and complete the signed authorization. Successful completion of a background check by candidates or existing employees is a condition of employment with APUS.

It is understood that individuals may have extenuating circumstances regarding the outcome of these reports and encourages candidates to discuss these with the hiring manager or with the Human Resources Department. A credit check will also be conducted depending on your position within the organization.

Background and credit checks may be conducted annually on Executive and Finance employees. In addition, background and credit checks for Executives and Finance staff may be conducted on other employees as deemed necessary by the President/CEO.
Employees who fail to pass the background check or refuse to authorize APUS to conduct the background check may be subject to discipline, up to and including separation of employment.

**SECURITY**

We are committed to a safe and secure campus facility for all students, employees, faculty, staff and visitors both within our online education system and the physical buildings. All of our campuses are located on the world-wide web. We have multiple corporate offices located throughout downtown Charles Town, WV. We also have an administrative building at 10110 Battleview Parkway, Manassas, VA and our Marketing Department is located at 7717 Coppermine Drive, Manassas, VA 20109.

**THE AMERICANS WITH DISABILITIES AMENDMENTS ACT OF 2008 (ADAAA)**

It is company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training, or other terms, conditions, and privileges of employment.

Additionally, the ADAAA requires employers to reasonably accommodate qualified individuals with disabilities. It is the policy of APUS to comply with all federal, state, and local laws concerning the employment of persons with disabilities.

APUS will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of the job in question. An individual, who can be reasonably accommodated for the job in question without undue hardship, will be given the same consideration for that position as any other employee or applicant.

All employees are required to comply with safety standards. Applicants who pose a direct threat to the health or safety of other individuals in the workplace, which threat cannot be eliminated by reasonable accommodation, will not be hired. Current employees who pose a direct threat to the health of safety of the other individuals in the workplace will be placed on appropriate leave until an organizational decision has been made in regard to the employee’s immediate employment situation.

**Definitions**

- “Disability” refers to a physical or mental impairment that substantially limits one or more of the major life activities of an individual. An individual who has such an impairment, has a record of such an impairment is also deemed a “disabled individual”. An individual may also be deemed “disabled” if that person is regarded as having such impairment. However, in the “regarded as” instance, the situation is more complicated. Under amendments to the ADA in 2008, if the condition is transitory and minor, defined as having an actual or expected duration of 6 months or less, then the condition does not qualify as a disability.

- Generally, ameliorative measures such as medications and medical devices will not be considered in making a disability determination, although ordinary eyeglasses may be taken into consideration. So, for example, the mere fact that a person wears ordinary eyeglasses will not qualify that person as “disabled.” On the other hand, the fact that a person has a hearing aid or takes medications to address the impairment will not disqualify that person as being “disabled” if the person otherwise meets the definition of “disabled.”
• “Major life activity” may include things such as caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating or working. A “major life activity” may also include bodily functions such as functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive systems.

• “Direct threat to safety” refers to a significant risk to the health or safety of others that cannot be eliminated by reasonable accommodation.

• A “qualified individual with a disability” refers to an individual with a disability who, with or without reasonable accommodation, can perform the essential functions of the employment position that the individual holds or has applied for.

• “Reasonable accommodation” refers to making existing facilities readily accessible to and usable by individuals with disabilities, including but not limited to; job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, adjustment or modification of examinations, adjustment or modification of training materials, adjustment or modification of policies, and similar activities.

• “Undue hardship” refers to an action requiring significant difficulty or expense by the employer. The factors to be considered in determining an undue hardship include: (1) the nature and cost of the accommodation; (2) the overall financial resources of the facility at which the reasonable accommodation is to be made; (3) the number of persons employed at that facility; (4) the effect on expenses and resources or other impact upon that facility; (5) the overall financial resources of the Company; (6) the overall number of employees and facilities; (7) the operations of the particular facility as well as the entire Company; and (8) the relationship of the particular facility to the Company. These are not all of the factors but merely examples.

• “Essential job functions” refers to those activities of a job that are the core to performing the job in question.

*In the event that you believe you have a qualifying event, schedule an appointment with the Benefits Administrator in the Human Resources Department. You will be required to provide documentation from your physician indicating the suggested accommodation. The company will determine whether it can grant the accommodation based on the facts presented by the physician.*

**FAMILY EDUCATION RIGHTS AND PRIVACY ACT (FERPA)**

APUS Student Records/FERPA Policy governs the conduct of University employees who act in the student's educational interest within the limits of the employee's need to know. This policy clarifies the responsibilities of persons with access to student educational records. Persons who have access to student records are responsible for being aware of the APUS Student Records/FERPA Policy. The Student Records/FERPA Policy is published on the APUS website, and staff training is held annually to keep employees current on student records and privacy law. Staff must sign a FERPA Confidentiality statement annually as a condition of employment and/or as a condition of gaining access to student educational records.
Violation of the policy and practices related to student records is grounds for rescinding your access to records or imposing disciplinary action, up to and including dismissal.

Violations include the following offenses and other comparable actions:

- accessing a student record outside of your assigned duties;
- releasing suppressed or private information without authorization;
- publicly discussing a student record in a way that might personally identify that student;
- releasing non-directory information about students without obtaining proper authorization (release, power of attorney, subpoena); or
- altering a student record without appropriate supporting documentation/authorization, regardless of whether you benefit from this alteration.

**WHISTLE BLOWER HOTLINE**

APUS is proud of its reputation for employing ethical business practices throughout our rapidly expanding organization. The company established a Corporate Governance Hotline to assure the highest ethical standards and provide a system for reporting violations of the Code of Ethics and Business Conduct.

This hotline is for all employees to anonymously report their concerns about the possibility of questionable accounting, operational reporting, auditing procedures, or other types of fraud by employees at every level.

To report possible ethics and governance policy violations, please register your confidential complaint by leaving a message at the following phone number: US: 1-866-838-7982.

Messages left on the hotline are completely confidential – once recorded, the message will be transcribed into text to protect the privacy of the user. The confidential text message will be sent to the Internal Auditor and the Audit Committee Chairperson for investigation.

Please note that the hotline should not be used to report personal and professional difficulties with managers and other employees. It should also not be used to report compensation and benefits related disputes. Such issues should always be addressed by reporting concerns to your supervisor or the Human Resources Department.

All employees are required to read the Code of Ethics and Business Conduct in this Employee Handbook. A copy is also available on the APUS Intranet.

**NON-DISCLOSURE**

You will be asked to sign a non-disclosure agreement as a condition of employment. Any employee who improperly uses or discloses trade secrets, confidential business information and inside information may be subject to disciplinary action, up to and including separation and may be subject to legal action.
The protection of confidential business information and trade secrets is vital to the interests and the success of APUS. Such confidential information includes, but is not limited to:

- Student, staff and faculty lists, and information
- Financial information
- Marketing strategies
- New material research
- Pending projects and proposals
- Research and development strategies
- PAD business design

As a publicly traded company that is subject to the rules and regulations of the U. S. Securities and Exchange Commission (SEC) and other regulators, all employees must follow company policy regarding communications to non-employees. Employees are not authorized to disseminate information that is considered to be outside the realm of normal business ("prohibited information") and/or material non-public information ("inside information") to non-employees. Such information includes, but is not limited to:

- Information not previously provided in press releases or in SEC filings
- Current/future enrollment and registrations (including retention and conversion rates)
- Current/future financial information (including growth rates and expected earnings)
- New product introductions
- Management changes
- Pending mergers and acquisitions

It is APUS policy that all employees are to immediately refer all questions from the financial community, shareholders and financial media to the Director of Corporate Communications.

**INSIDER TRADING**

Employees may not trade in the company’s stock when in possession of material, nonpublic information ("inside information").

If externally communicated information has not been disclosed through a press release or conference call/web-cast and if it could likely affect the stock price or affect the investment decision making process of an investor, it is considered material, non-public information or “inside information”. Disclosure of inside information is prohibited.

*Prohibited information* includes, but is not limited to the following:

- Unpublished enrollment/registrations (including expected growth rates, applications, and inquiries)
- Unpublished financial figures (including revenues, expenses and earnings, as well as their growth rates)
- New programs or lines of business in development or to be launched
- Changes in conversion rates, bad debt/receivables, Title IV and student financing information
- Positive or negative regulatory or other governmental or accrediting agency developments
- A significant merger or acquisition involving the Company
- A change in control or a significant change in management of the Company
- The public or private sale of a significant amount of additional securities of the Company
- Significant intellectual property developments
- Establishment of a program to repurchase securities of the Company

Unless authorized by a designated spokesperson, employees are prohibited from communicating company information in chat rooms, blogs, message boards and other electronic media, other than what is already publicly available on the APUS and APEI websites.

If you have questions regarding APEI’s trading policy or the nature of specific company information, please contact the Director of Corporate Communications.

**HARASSMENT AND INVESTIGATION OF COMPLAINTS**

All employees shall adhere to a strict non-discrimination policy. Every person is to be recognized as a unique individual and is to be treated with respect in all interactions. No person will be discriminated against on the basis of race, ethnicity, gender, age, physical disability or other conditions, in accordance with federal and state law.

APUS is committed to providing a work environment that is free of all forms of unlawful harassment and discrimination. In keeping with this commitment, we maintain a strict policy prohibiting all forms of unlawful harassment and discrimination in the workplace, including sexual harassment. Harassment or discrimination will be not be tolerated and may be grounds for disciplinary action up to and including separation of employment.

Unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct of a sexual or harassing nature constitute unlawful harassment if:
- Submission to such conduct is made an explicit or implicit term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual; or
- Such conduct has the purpose or effect of either unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Examples of such conduct which violate this policy include, but are not limited to:
- Offensive or unwelcome sexual flirtations, advances or propositions.
- Verbal abuse of a sexual nature.
- Graphic or verbal commentaries about an individual's body.
- Sexually degrading words used to describe an individual.
- Sexually oriented jokes or offensive literature.
- Unwelcome physical touching of others.
- Unwelcome conduct such as standing too close, leering or sexually suggestive gestures or physical movements.
Harassment or discrimination in the workplace by any employee to another employee or in the course of instruction to a student will result in disciplinary action up to and including separation.

Procedure: If you experience, observe or become aware of behavior which you believe to be harassing or discriminatory in nature, which is inappropriate or offensive, or which makes you or others uncomfortable, you have an obligation to report the behavior immediately to either a supervisor or the Human Resources Department. Providing information of this type will enable APUS to take appropriate action to ensure that employees enjoy a work environment free from harassment and discrimination. All information gathered under this policy will be kept as confidential as possible to protect you while allowing APUS to fully investigate the matter.

It is our policy and practice to investigate any report of harassment or discrimination. We will take whatever corrective action is deemed appropriate, including disciplinary action or separation of any individual who violates this policy. In addition, any individual who engages in conduct contrary to this policy may be personally liable in legal action brought against him or her.

You will be protected from retaliation for making a report or participating in an investigation under this policy. Any person that retaliates against any individual who seeks a review under this policy will be considered a violation of this policy and will result in serious corrective action up to and including separation of employment.

OPEN DOOR POLICY & HOTLINE/WEBSITE
APUS promotes an "Open Door" policy that encourages employees to discuss issues or problems related to their job, their supervisors, their coworkers or other managers within the company. APUS desires to provide an effective way for you to bring problems or concerns to the attention of management. We are always open to listening to your concerns.

In any organization, problems or differences of opinion over work-related matters may occasionally arise between an employee and supervisor, fellow employees, or APUS in general. If this should occur, please follow the procedure outlined below.

- You are encouraged to bring any concerns you might have to your immediate supervisor;
- If you are not satisfied with your supervisor's resolution of the problem; you should discuss it with the next level of supervision or Human Resources;
- If the concern is unresolved, please communicate to your department head or Human Resources;
- If the concern is unresolved, contact Human Resources so the situation can be elevated to the appropriate levels for further action.

We encourage you to bring your problems and questions to our attention. We will thoroughly discuss and evaluate each issue and take the necessary actions to reach a solution.
**HOTLINE & WEBSITE**

In addition to our Open Door Policy, APUS has an additional web and telephonic resource for employees who may feel they have exhausted all other means of communicating their concerns to either a manager or Human Resources. This system is operated by a third party organization, Global Compliance, and provides employees an avenue to share their concerns relative to management practices, policy issues, interpersonal concerns, threats or violence, etc. This system mirrors the Whistle Blower hotline in terms of the anonymous reporting opportunities and 24/7 access.

Employees can utilize this resource by calling the Open Door Hotline at 866.648.0636 or logging onto the alert line at [https://apusopendoor.alertline.com](https://apusopendoor.alertline.com).

*Please remember that if your concern is related to a violation of the Code of Business Ethics, you should call the Whistle Blower hotline at 866.838.7982 to report your concerns anonymously.*

**EMPLOYEE STATUS**

For a variety of legal and operating reasons, it is necessary to define the working status of each employee. Your employment status refers to the nature of your job responsibilities and weekly work schedule; affects your eligibility for benefit programs and whether you will be paid for overtime work. The categories of employment used at APUS are described below. Your supervisor will inform you of your status.

**Full-Time Employee:** An employee who is regularly scheduled to work a minimum of 30 hours per week.

**Full-Time Faculty:** FT Faculty are eligible for the same benefits as a regular FT Employee with the exception of sick leave. FT Faculty are eligible for vacation leave, but the vacation must be taken in 4 week intervals. *Please refer to the Faculty Handbook for more information.*

**Part-Time Employee:** An employee who is regularly scheduled to work less than 30 hours per week. PT employees are not eligible to participate in APUS health insurance plans or variable incentive pay program. Additionally, the education benefits are reduced for PT employees. PT employees are eligible to participate in the APUS retirement plans and service awards.

**Adjunct Faculty:** Adjunct employees not eligible for participation in the health benefits and variable incentive pay program offered by APUS. Adjunct Faculty are eligible for participation in the APUS retirement plans. *Please refer to the Faculty Handbook for more information.*

**Exempt Employee (Salary):** An employee who regularly works in an executive, administrative, professional position, or position as defined by the Fair Labor Standards Act and is not eligible for overtime.

**Non-Exempt Employee (Hourly):** An employee whose position does not meet the criteria for exemption from overtime.
Non-Employees: Consultants, contractors, and workers from temporary service agencies and are not employees of APUS. Non-employees are not eligible for APUS’s employee benefits.

APUS Temporary Employees: Employees hired by APUS management to fulfill a particular role on a defined temporary basis. Temporary employees are not eligible to participate in APUS health benefits and the variable incentive pay program, and may not accrue sick and vacation leave. However, temporary employees are eligible to participate in the APUS retirement plans. Temporary employees may be hired into regular positions within APUS, but their seniority date will be reflected by the date of hire into the regular full or part-time position.

PERFORMANCE REVIEW
Your supervisor will periodically review your performance. APUS normally conducts performance reviews:

- At the conclusion of your Introductory Period;
- At least annually thereafter; and
- As necessary when performance is below the expected level, or to track rapidly changing job content.

PERSONNEL RECORDS
Personnel records are confidential and are company property.

Promptly update changes in your address, telephone, emergency contact information, and benefits' qualifying events in the Employee Self Services (ESS) module at https://home.eease.com.

You may make an appointment with Human Resources to review your personnel file. However, your file may not be removed from APUS. If you have a question regarding your personnel file, or need copies of any information in your personnel file, please contact Human Resources.

INTERNAL JOB OPPORTUNITIES
APUS provides employees an opportunity to indicate their interest in open positions and advance within the organization according to their skills and experience. In general, notices of all regular, full-time and part-time job openings are posted by the Human Resources Department.

Job postings are a way to inform employees of openings and to identify qualified and interested applicants who might not otherwise be known to the hiring manager. Other recruiting sources may also be used in conjunction with the internal job posting to fill open positions in the best interest of the organization.

Available job openings can be located on the on the Internal Career Portal at http://myapuscareers.silkroad.com for all employees to review for a period of at least 5 business days. Each job posting will include the job location, type of position, posting date, job title, and job description.
Employee Eligibility Requirements
Employees must have performed competently for at least 90 days in their current position. The 90-day requirement may be waived if the candidate has performed successfully in the department where the vacancy exists.

A satisfactory performance history must have been achieved during the employee’s tenure with APUS.

Employees who have a written warning on file within 6 months of the job posting, or are on probation or suspension as a result of disciplinary action may not eligible to apply for posted jobs.

Employees may only apply for those posted jobs for which they possess the minimum required skills, competencies, and qualifications.

Employees must complete a “Self-Nomination” form as well as apply online for the open position via the Internal Career Portal (http://myapuscareers.silkroad.com).

- The employee should apply online and indicate that they are an internal candidate. All postings can be accessed by visiting the Internal Career Portal (http://myapuscareers.silkroad.com).
- A Recruiter will contact the employee of the status of the application and notify the employee if an interview is requested.
- If an interview is requested, an HR Representative will send a self-nomination form to the employee for completion.
- The employee must forward the self-nomination form to his/her manager for review and signature.
- The employee’s manager will give this document back to the employee.
- The employee is responsible for forwarding the completed form to the HR department via e-mail to recruiting@apus.edu. This form must be received prior to an interview being conducted.

All qualified and eligible self-nominees will be interviewed by the Hiring Manager.

APUS recognizes the benefit of developmental experiences and encourages employees to talk with their supervisors about their career plans.

CONFLICTS OF INTERESTS
APUS employees have an obligation to conduct business within the guidelines that prohibit actual or potential conflicts of interests or the appearance of a conflict of interest. Transactions with outside firms should be conducted within the framework established by Management. Business dealings with outside firms are expected to conform to the norms of routine business-to-business operations. Unusual gains are to be avoided. These refer to bribes, product bonuses, special fringe benefits, extraordinary price break, and/or other windfalls designed to ultimately benefit the employer, the employee, or both.

WORKING WITH FAMILY & FRIENDS (NEPOTISM)
The employment of relatives in the same area of an organization may cause serious conflicts and problems with favoritism and employee morale. In addition to claims of partiality in treatment of work, personal conflicts outside the work environment can be carried into daily working relationships.
Relatives of persons currently employed by APUS may be hired if they will not be working directly for the employee or supervising an employee, and will not occupy a position in the same line of authority within the organization. This policy applies to any relative of a person, higher or lower in the organization, which has the authority to review employment decisions. APUS employees who are related cannot be transferred into such a reporting structure.

For the purpose of this policy, "relative" or "relationship" is defined as individuals related by blood, marriage, or adoption or involvement through domestic partnership, dating or other personal relationships in which objectivity might be impaired as determined by the company.

**DRESS CODE**
APUS considers it very important that employees are well groomed, neat, and dress appropriately for the job function. A dress code must be followed to ensure that employees are displaying a professional image for the work environment. When you are representing APUS, you are required to follow these guidelines.

*Requests for modifications to this policy as a reasonable accommodation for a person with a disability, a medical reason, a religious belief or as required by law shall be directed to the AVP of HR for additional consideration and discussion.*

**Office Environment**
Appropriate dress and hygiene are important in promoting a positive company image to our customers, both internally and externally. A business casual dress code policy is a benefit and must be adhered to. Employees reporting to work dressed inappropriately will be sent home to change. This time will be unpaid or paid utilizing the employee’s vacation time. Special circumstances such as participation in a planned move of furniture or equipment in the building may warrant casual attire, with prior supervisor approval. Situations that warrant more casual attire must be discussed with the employee’s supervisor and approved ahead of time.

**Meetings with External Contacts**
If you are conducting or attending meetings, seminars, roundtables, etc. where you come into contact with business professionals, you are expected to represent the company in a professional manner and dress appropriately for conducting such business.

**Attire Guidelines**
Business casual is intended to be comfortable, attractive and neat, and while there are infinite variations, the following are guidelines with some specific examples of attire considered to be acceptable and not acceptable at APUS. This is **not** an all inclusive list.

<table>
<thead>
<tr>
<th>MALES</th>
<th>Acceptable</th>
<th>Not Acceptable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dress Pants, Dockers, Corduroy</td>
<td>Jeans, Shorts, Cotton or Nylon Sweatpants, Athletic Attire(including AMU/APUS T-shirt)</td>
<td></td>
</tr>
<tr>
<td>Pullovers, Dress Shirts, Sweater with Collared Shirt or Turtleneck, Polo Type Shirt, Blazer/Sport Coat</td>
<td>Sweatshirts, T-Shirts(both long and short-sleeved), Sleeveless Shirts</td>
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<tr>
<td>Loafers, boat/deck shoes</td>
<td>Flip Flops, Athletic Shoes, Work Boots</td>
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<tr>
<td>FEMALES</td>
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<tr>
<td><strong>Acceptable</strong></td>
<td>Dress Pants, Dockers, Corduroy,</td>
<td>Jeans, Shorts, Sweatpants, Athletic Attire (including AMU/APUS T-shirt), Casual Shorts, Stretch Pants or Leggings, Stirrups, Cotton or Nylon Sweatpants</td>
</tr>
<tr>
<td>Dress Sandals</td>
<td>Blouses, Sweaters, Polo Shirts,</td>
<td>Tank Tops, Sweatshirts, T-Shirts (long or short sleeved), Halter Tops, Spaghetti Straps,</td>
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<td></td>
<td>Dress Jackets,</td>
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<td></td>
<td>Dress Shoes With or Without Heel,</td>
<td>Flip Flops, Hiking Boots or Hiking Sandals, Athletic Shoes</td>
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<td>Loafers, Slides, Open Toed Shoes,</td>
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<tr>
<td></td>
<td>Boots, Dress Sandals</td>
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</tbody>
</table>

- Mustaches and beards must be kept clean, well trimmed and neat.
- Hairstyles are expected to be in good taste. Unnaturally colored hair and extreme hairstyles, such as spiked hair, do not present an appropriate professional appearance.
- Excessive make-up is not permitted.
- Offensive body odor and poor personal hygiene is not professionally acceptable.
- Perfume, cologne, and aftershave lotion should be used moderately or avoided altogether, as some individuals may be sensitive to strong fragrances.
- Jewelry should not be functionally restrictive, dangerous to job performance or excessive.
- Facial jewelry, such as eyebrow rings, nose rings, lip rings, and tongue studs and plastic spacers is not professionally appropriate for physically facing positions and must not be worn during business hours. The allowance of this is based on management discretion.
- Torso body piercings with visible jewelry or jewelry that can be seen through or under clothing for physically facing positions must not be worn during business hours.
- Visible excessive tattoos and similar body art must be covered during business hours for physically facing positions.

**Fridays**

Employees are permitted to wear jeans and athletic footwear on Fridays. Jeans must be free from holes and not be frayed; athletic footwear must be in good condition. All other aspects of the APUS dress code will remain in effect.

**Compliance**

Managers are responsible for ensuring their employees are in compliance. Managers reserve the right to send employees who violate any part of the dress code policy home to change clothes. They will not be paid for the time lost; however, the time can be made-up with manager approval. If you have questions about another employee’s attire, you should bring those to the attention of your manager.

**PARKING**

**Charles Town:** Full-time employees (with the exception of those working in the Administrative, Human Resources, Institutional Advancement and IT Buildings – these employees have parking available at their work sites) will be eligible to receive a city parking permit subject to availability. Employees must display their permit at all times.
The permit allows unlimited parking at permitted parking meters. *This does not guarantee a parking space.*

Available parking permits will be allocated by the Facilities Department to full-time, regular employees in seniority order based upon date of hire to full-time employment.

When the number of employees wishing to have a permit exceeds the number of available permits, their names will be placed on a waiting list in order of seniority and will be notified by Facilities or Human Resources once a pass becomes available.

Employees who waive their right to request a parking permit; or are not able to receive a permit can park at any of the designated parking lots and be transported by the APUS shuttle. These employees are required to display an APUS parking pass (available from Facilities) hanging from their rear-view mirror. There are a limited number of parking passes available for the designated parking spaces. Therefore, place your business card in a visible location of your vehicle so your vehicle can be identified as an APUS employee’s vehicle.

Any person owning a motor vehicle may apply to the City Treasurer for an annual permit to park at any meter within the City and/or the Liberty Street Lot, without the necessity of or being required to deposit a coin in said meter, except for non-metered spaces on Washington Street from Samuel Street on the east to West Street on the west (refer to subsection (d)), and for meters located in the 100 block of South George Street, the 100 and 200 blocks of North George Street and the 100 block of West Liberty Street. Only one permit shall be issued to the person owning the motor vehicle(s). APUS will reimburse the employee for the cost of the permit.

See your manager about the location of the designated parking lots and shuttle service schedule.

**Manassas:** Employees in Manassas have a parking lot available for use. APUS designated spaces are not assigned so they are available for anyone to park. Employees should take care not to park in the spaces designated for other businesses in the business park. Parking is free in Manassas.

**SMOKING & TOBACCO PRODUCTS**

Out of respect for the health and safety of our people, we maintain a smoke-free work environment. Those employees who choose to smoke are required to do so at a minimum of 20 ft. from exits/entrances. Smoking is not permitted at the front entrances of our buildings. Tobacco products must be disposed in the appropriate waste receptacles provided at the designated areas.

The use of tobacco products on premises is strictly prohibited.

**STAFF MEETINGS**

APUS holds periodic staff meetings to keep employees informed of what is happening within the University System at large. These meetings provide an opportunity for employees to ask questions and understand better what the organization’s goals and accomplishments are. All employees in Charles Town and Manassas are encouraged to attend if possible.
OUTSIDE EMPLOYMENT
Meeting APUS’s goals requires focused attention to our jobs. Therefore, full-time employees should not hold other jobs that interfere or conflict with the duties at APUS. Full-time employees must gain approval for outside employment from their supervisor and/or department head.

EMPLOYMENT AS AN APUS INSTRUCTOR
If an employee is qualified to teach courses at APUS and would like to be considered as a part-time instructor, s/he must first notify his/her supervisor and department head. All work as an instructor must be done outside the hours of the employee's full time APUS position, and a maximum of 200 students may be taught annually.

RESIGNATION/SEPARATION
At APUS, employment is "at will." This means that the employee may resign at any time, just as the company can separate the employee at any time, with or without cause. If an employee should find it necessary to leave the company, we ask that s/he notify Human Resources in writing as far in advance as possible. A minimum of two weeks notice is preferred.

CHARITABLE GIVING REQUESTS/POLICY
Employee and external community requests for charitable donations will be handled through the Office of the President. No employee may pledge charitable contributions from the organization without the express approval of the President. The Executive Assistant to the President will be the administrative point of contact for such requests.

In order for a charitable request to be considered, it must meet the following qualifying conditions:

- Causes benefiting the local communities in which APUS maintains offices (Charles Town, WV and Manassas, VA)
- Causes benefiting educational programs
- Causes benefiting the military, public service sectors, or AMU / APU students

Consideration may be given to other causes and may be approved at the discretion of the President.

Requests from employees for charitable donations from APUS will be handled through the following process:

1. Employee submits a formal request to the Executive Assistant to the President, including the following information:
   a. Name of the organization which will benefit from the donation
   b. Purpose for which the donation will be used
   c. Point of contact information for the organization
2. The Executive Assistant to the President will review the request for qualifications and if the request meets the criteria listed above, present it to the President for consideration.
3. The Executive Assistant to the President will formally inform the employee that the request is approved or denied.
4. If the request is approved, the employee making the request will be required to obtain a W-9 if necessary.
5. Once the W-9 is received and processed through the Accounts Payables Department, the Executive Assistant to the President will process the appropriate paperwork for Accounts Payables to cut a check.

6. If the request involves employee participation (i.e., group fundraiser or event), the Committee for Workplace Excellence (CWE) will assist in finding interested employees and coordinating the activity. If the request was brought by an employee, that employee will be encouraged to participate in the activity.
IV. HOURS OF WORK AND PAY PRACTICES

PAY POLICY
Our policy is to pay all employees, according to their job responsibility, job knowledge, quality and quantity of work performed, dependability, experience, and cooperation. Your salary and total compensation is a private matter. It should only be discussed between your supervisors or Human Resources. Salary or bonus information should not be discussed between employees.

PAY DAYS
All employees are paid bi-weekly. The pay period begins on Sunday and ends on Saturday. APUS has 26 pay periods each year. Each paycheck will include earnings for all work performed through the end of the current payroll period.

In the event that a regularly scheduled payday falls on a day off such as a weekend or holiday, employees will receive pay on the last day of work before the regularly scheduled payday.

Employees can access their pay stubs and W2’s through the ADP iPay system using the following link: https://ipay.adp.com.

- When you register, the “code” is APUS- (please note the hyphen after APUS; you must include it).
- Create your password once you log in. Your password must be at least eight characters long and must contain at least one letter and either one number or one special character. Your password is case sensitive.
- You will be prompted to enter a “PIC” identifier. Select “social security number” and enter the information accordingly.
- Your user name is the first part of your e-mail address but without “.edu”. When you log on for the first time, you will need to click the REGISTER NOW button, then follow the steps to set up your account.

Once you successfully log into the system, you will likely not be able to see your information. You need to log out and then log back in once more with your newly created password.

Please refer to the instructions and guides attached to this communiqué for additional information.

If you wish to forgo receiving hard copies of your earnings statements and W2’s, log into the account and click “Things to Do” the “Go Paperless” option.

SALARY REVIEW
Your salary will be reviewed at the time of your performance reviews and as deemed appropriate by management. The review does not mean that your salary will be adjusted at the time of each performance review.

ATTENDANCE
The standard workday at APUS is eight and one half hours, which includes a half hour for lunch.
We need the combined efforts of all employees to ensure uninterrupted and efficient operations. Absenteeism and lateness create burdens on your fellow workers and managers. In order to ensure the best possible customer service and to maintain adequate levels of staffing throughout the day, APUS employees may be required to work staggered shifts within each department. Your supervisor will determine the work hours that will provide the best departmental coverage.

With permission of your supervisor, you may elect to work an alternate work schedule of a different eight and one half hour day or a nine hour day with an hour for lunch. Permission to work an alternate work schedule must be renewed through your supervisor annually and may be rescinded by your supervisor at any time.

When you know you will be absent or late, personally call your supervisor at least 30 minutes prior to the start of the work shift when possible. Excessive tardiness or absence may result in disciplinary action or separation of employment.

BREAKS
Full-time employees are expected to work a 40 hour week, 8 hours per day (time off for lunch not included in the 8 hours). Employees are encouraged and expected to take a lunch break of at least 30 minutes. Employees are encouraged to take brief breaks to refresh themselves and re-focus on their daily tasks.

Breaks must be coordinated with your supervisor. Breaks should be taken away from work areas so others are not disturbed. Use of the rest room is not considered a “break”. Department heads are responsible for developing and enforcing a break policy for their department. Employees taking excessive time off for breaks are subject to counseling followed by appropriate disciplinary action.

TIME RECORDS
APUS expects all employees to fulfill their schedule as agreed upon by the employee and the supervisor. This requirement is accomplished through an honor system in which employees record their own time. In order to provide a record of hours worked, and to properly prepare paychecks, each nonexempt employee is required to submit their time bi-weekly utilizing the ADP EZ Labor system by close of business the last day of the pay period. Employees must accurately report all hours worked, and are not permitted to submit time records for another employee, or to falsify time records in any way. If employees are discovered to have falsified their time records; they may be subject to disciplinary action up to and including separation of employment. Managers are required to approve and finally submit the employee’s time through EZ Labor to Payroll a week prior to payday.

STUDENT SATISFACTION QUOTIENT (SSQ)/VARIABLE INCENTIVE PAY
All full time staff & faculty positions are eligible to participate in the APUS variable pay incentive (bonus) program.

Objectives
- To ensure congruence between our strategic goals and our performance efforts
- To reward the performance of the staff in a clear and consistent manner
- To reward desired behaviors and values which meet the established APUS objectives
- To balance individual and team results with the need to have a unified approach to the mission
APUS leadership believes that the bonus plan must clearly link both individuals and teams with the business strategy. This plan will pay for business performance and is designed to reflect APUS expectations for growth and student satisfaction. Therefore, company performance and student satisfaction are the critical determinant of pay. All company performance targets are linked to pre-determined business goals and expectations.

**Eligibility**

This plan applies to all Full Time APUS staff employees and Full Time Faculty. This plan does not apply to Adjunct Faculty or Part-Time employees. New employees joining APUS after commencement of the annual measurement period will have incentive targets prorated based on days worked within the period. In the event an employee is transferred or promoted to a different APUS position during a measurement period, entitlement to an award will be calculated on a prorated basis for the time spent in the previous position, in conjunction with entitlement calculated on a prorated basis for the time spent in the new position, if applicable.

**Employee Separation**

APUS staff employees are not entitled to receive any quarterly or annual incentive payment under this Plan, unless they are employed by APUS on the last day of that particular quarter/year. If the reason for separation of employment is company directed, the company may grant an exception to the employment date rule. All employees separating voluntarily prior to the quarter or year’s end will forfeit the incentive payment for that specific quarter/year.

**Employer’s Rights**

APUS reserves the right to discontinue or amend this plan, or its applicability in any relevant jurisdiction in which APUS operates, at any time without advance notice or consultation with employees.

APUS reserves all rights pertaining to the assignment of work, accounts, or areas of responsibility.

Nothing in this document is meant to create a contract of employment for one year or for any specific period of time. Regular APUS employees remain "employees at will," and either APUS or the employee may terminate the relationship at any time, with or without cause, unless statutory laws dictate otherwise, and unless, if applicable, otherwise specified in the employee’s individual written employment agreement and subject to any notice periods in such individual written employment agreement.

**Specific Plan Overview and Metrics**

This plan recognizes two primary areas of performance: student satisfaction and individual performance objectives. All employees participate in both areas of performance; however, employees at the AVP/Sr. Director position and above have specific MBOs (management by objective) that must be met to receive the payout for the achievement of Financial Goals.
V. EMPLOYEE BENEFITS

INSURANCE BENEFITS
Eligible Employees – For purposes of benefits coverage, an eligible employee is a full-time employee. Eligible employees are provided a wide range of benefits. A number of the programs (such as Social Security, worker’s compensation, and unemployment insurance) cover all employees in the manner prescribed by law. Employees are eligible to elect insurance products within 30 days of date of hire, during the annual open enrollment period or for a “life status qualifying event”.

Benefits eligibility is dependent upon a variety of factors, including employee classification. Details of the benefits can be obtained on the APUS Intranet, the Employee Self Service (ESS) as well as through the Human Resources Department.

Employee information, including benefits during open enrollment, can be modified through the Employee Self Service portal at https://home.eease.com.

The following insurance benefit programs are available to eligible employees:

- Supplemental Life Insurance
- Disability Insurance
- Medical Insurance
- Dental Insurance
- Vision Insurance
- AD&D and Life Insurance
- Short & Long-Term Disability Insurance
- Flexible Spending Accounts (FSA)
- 401 (k) (Full-time and part-time employees)
- Employee Stock Purchase Plan (ESPP) (Full-time and part-time employees)
- Worker’s Compensation
- Continuing Education through AMU or APU

In order to update your insurance plans at a time other than the annual open enrollment, you must experience a qualifying event. The following are examples of a qualifying event:

- Change in marital status (such as marriage, divorce, or death of a spouse);
- Change in the number of dependants (such as birth or adoption of a child, or death of a dependant);
- Termination or commencement of employment by you, your spouse, or your dependant;
- Change in your, your spouse’s or your dependant’s work hours (including a switch between full and part-time status);
- Your dependant satisfying or ceasing to satisfy an eligibility requirement for a particular benefit; or
- A change in your spouse’s or your dependant’s place of residence or work.

APUS requires the employee to show proof of the allowable life status change by notifying HR within 31 days of the qualifying event.
Declining Coverage – An employee who has declined insurance coverage must wait until the next annual “open enrollment” to apply for those benefits. Similarly, an employee who has elected either of those insurance plans will remain in those plans until the next open season at which time they may decline or modify their participation.

Premium Payments While on Leave – Employees are responsible for their portion of the health insurance. You must make arrangements with the Human Resources Department to coordinate the payment of the premiums. Premium payments are due within 30 days of payment date or insurance coverage may be terminated. You will be required to provide payment to the Payroll department at the beginning of each month you are on leave.

COBRA
The Federal Consolidated Omnibus Budget Reconciliation Act (COBRA) gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under APUS’s health plans when a “qualifying event” would normally result in the loss of eligibility.

Examples of qualifying events are: resignation, termination of employment (other than by reason of gross misconduct), or death of an employee; a reduction in an employee’s hours or a leave of absence; an employee’s divorce or legal separation (legal separation does not exist in Pennsylvania); Medicare, and a dependant child no longer meeting eligibility requirements.

Under COBRA, the employee or qualified beneficiary pays the full cost of coverage at APUS group rates plus an administration fee. APUS provides each eligible employee (and spouse, if married) with a written notice describing rights granted under COBRA when the employee becomes eligible and elect coverage under APUS’s health insurance pay. The notice contains important information about the employee’s rights and obligations.

WORKERS’ COMPENSATION
All employees are covered by workers’ compensation insurance, which compensates an employee for lost time, medical expenses, and loss of life or dismemberment from an injury arising out of or in the course of work. Employees must report any accident or injury immediately to his/her supervisor and the Human Resources Department so that the necessary paperwork may be completed.

401(k) PLAN
APUS has an IRS-certified 401(k) plan in which eligible employees may participate voluntarily. The plan is primarily funded by employee contributions from their paychecks. APUS matches the first 3% of employee contributions on a dollar-for-dollar basis and the next 2% of employee contributions at a rate of 50 cents on the dollar.*

Example: An employee contributing 3% of his or her pay will receive a 3% match from APUS. An employee contributing 4% of his or her pay will receive a 3.5% match from APUS. An employee contributing 5% or more of his or her pay will receive a 4% match from APUS.

The APUS 401(k) plan has four quarterly open enrollment periods annually. Employees must sign up for the plan by the 15th of the month prior to the start of the next quarter.
*APUS is not obligated to match the employee’s 401(k) and may choose to forego that practice at any time.

EDUCATION
Full-time employees are eligible to take courses or pursue a degree at any of the APUS institutions at no cost. All APUS course textbooks** will be paid for by APUS. In addition, the fee for transfer credit evaluations and the graduation application fee is covered by APUS under the Continuing Education Benefit for full-time employees.

CLEP tests will be covered by APUS under this policy. Employees must incur the initial expense of the CLEP and submit an expense report to be reimbursed. The employee will be reimbursed for this expense ONLY if s/he passes. The expense report must be authorized and signed by the employee’s manager.

Part-time employees are eligible for a 50% tuition reduction and all APUS undergraduate course textbooks are covered by APUS.

Part-time employees attending graduate school are responsible for 100% of their textbook expenses.

To receive this benefit, the eligible employee must select “APUS Employee” under the “Pay Type” category. The APUS employee is responsible for completing the “Continuing Education Benefit” form that is available on the Intranet. The completed form, along with the authorizing signatures, must be sent to the TA department. Access to class will not be granted until all necessary items are received. Once enrolled, students will be subject to the regulations and conditions detailed in the Student Handbook and Catalog.

Other Eligible Participants: Spouses, Partners, Children & Dependents
Spouses, partners, children and dependants* of full-time APUS employees, who are not already receiving military tuition assistance or scholarship monies from APUS, are eligible to enroll in AMU or APU courses at a 50% tuition cost reduction. Students will be responsible for paying for all course materials.

If a spouse, partner, child or dependant of a full-time APUS employee withdraws from a course, the full scholarship will be reversed. APUS does not prorate 50% scholarships for these individuals. Therefore any balance due will be owed by the student and if any credit is left after the scholarship is reversed a refund will be issued.

To receive the discounted tuition, the spouse, partner, child or dependant must select “APUS Employee” under the “Pay Type” category when registering for classes. The APUS employee is responsible for completing the “Continuing Education Benefit” form that is available on the Intranet. The completed form, along with the authorizing signatures, must be sent to the TA Department. If any money is due for the spouse, partner, dependant, or child, the form should be sent to the Student Accounts department along with the payment (check or credit card payment authorization). Access to class will not be granted until all necessary items are received. Once enrolled, students will be subject to the regulations and conditions detailed in the Student Handbook and Catalog.

*There is no age limit for the “other eligible participants”.

**APUS will not cover the cost of required “courseware”/software. The employee is responsible for any expenses incurred for these products.
If an employee or family member receives any of the above benefits, they may apply for Financial Aid through any federal, state or local programs in which APUS participates. However, the value of the tuition discount and book grant will be counted as a form of aid or scholarship in determining need or eligibility for other programs. Failure to report these benefits when applying for aid will result in the loss of the APUS benefit. Debt burden from student loans is discouraged unless absolutely necessary.

If an employee receives an external education benefit, such as the GI Bill that covers 100% tuition; the employee may not be eligible to utilize the APUS employee tuition discount.

Employees that are students with the University are to register a personal address in order for their textbooks and materials to be mailed and not the APUS Campus. Mail services are provided by APUS for business and professional purposes only.

OUTSIDE EDUCATION
A professional development opportunity is available for selected employees to receive reimbursement for tuition and fees for completing a degree program at another accredited university, provided that the degree program is not offered by APUS; is job-related and is mutually beneficial for APUS and the employee. All requests must be approved by the employee’s immediate supervisor and department head (VP-Level with budget authority) and coordinated with the President.

Only degree programs that are related to the employee’s role within the company and not offered by APUS will be considered. Employees will be approved on a very selective basis in which the University decides to invest in key individuals for the mutual benefit of APUS and the employee as part of the employee’s professional development plan. It is not meant to be a standard benefit for which everyone should apply.

If you are a full-time regular employee and have completed your probationary period, you are eligible for participation in this program. Employees have a two year obligation of employment to APUS upon their graduation date or must reimburse APUS for the entire amount of the educational expenses. Employees must complete the External Tuition Application located on the Intranet/HR Link.

Employees seeking their graduate degree must obtain a B or higher otherwise the employee will have to reimburse the company for cost of tuition and other fees associated with courses below that level. Employees seeking their undergraduate degree must obtain a C or higher otherwise will have to reimburse the company for the cost of tuition and other fees associated with courses receiving an unsatisfactory grade (D or below).

Employees must submit a copy of the tuition and fees invoices and evidence of payment to Departmental VPs via an Expense Report for reimbursement from the departmental budget. Book and course materials will be the responsibility of the employee. Upon completion of the courses, the employee must submit their grade reports to verify that they attained an acceptable grade or otherwise provide reimbursement as noted above.

Employees who are eligible for VA benefits must use their VA benefit to pay for educational costs and APUS will pay the remaining balance if any payment is needed.

If you are unable to complete this course due to what the company considers extenuating circumstances (such as your illness or the illness of a family member) and
you receive a tuition or materials refund, you agree to give the full refund to the company via personal check within one week of receipt.

If you voluntarily terminate employment with American Public University System prior to completing the program, you will refund the entire amount of the educational expenses provided to you.

If you voluntarily terminate employment with American Public University System after completion of the course and prior to completing two years of active employment from your graduation date, you will refund the entire amount of the educational expenses provided to you.

The Educational Expense Agreement creates no contract of employment between you and American Public University System. You may terminate your employment with this company at any time with or without cause, and American Public University System may terminate your employment at any time with or without cause.

TELECOMMUTING
APUS considers telecommuting to be a viable alternative work arrangement in such cases that the employee and the supervisor agree that the job requirements are best suited to such an arrangement. Telecommuting allows an employee to work at home, on the road, or in a satellite location for all or part of their regular workweek via VPN capability.

Before entering into any telecommuting agreement, the employee and manager, with the assistance of the Human Resources Department, will evaluate the suitability of such an arrangement paying particular attention to the following areas:

*Employee Suitability* - the employee and manager will assess the needs and work habits of the employee, compared to traits customarily recognized as appropriate for successful telecommuters.

*Job Responsibilities* - the employee and manager will discuss the job responsibilities and determine if the job is appropriate for a telecommuting arrangement.

*Equipment Needs* - work space design considerations and scheduling issues.

*Tax and Other Legal Implications* - for the business use of the employee’s home based on IRS and state and local government restrictions. Responsibility for fulfilling all obligations in this area rests solely with the employee.

The availability of telecommuting as a flexible work arrangement for employees of APUS can be discontinued at any time at the discretion of the employer. Every effort will be made to provide 30 days notice of such a change to accommodate commuting, child care and other problems that may arise from such a change. There may be instances, however, where no notice is possible.

If the employee and manager agree, and the Human Resources Department concurs, a draft telecommuting agreement will be prepared and signed by all parties and a 3 month trial period will commence.
TIME OFF WORK
APUS's time off from work policy is designed to provide paid time off for such things as vacations, personal days, sickness, medical and dental care, family emergencies, and other personal reasons.

Employees accrue time off for each hour of regular pay on a bi-weekly basis. The rate of accrual is based on completed years of employment measured from the first day of work.

**Accrual Schedule**

<table>
<thead>
<tr>
<th>Completed Yrs of Service</th>
<th>Vacation days per year</th>
<th>Paid Holidays per yr</th>
<th>Total PTO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 3</td>
<td>13</td>
<td>10</td>
<td>23</td>
</tr>
<tr>
<td>3 or more</td>
<td>18</td>
<td>10</td>
<td>28</td>
</tr>
</tbody>
</table>

**Vacation Time**: Employees with fewer than three years of service accrue vacation time at the rate of 13 days per year; employees with more than three years of service accrue vacation time at the rate of 18 days per year. Employees at the vice president level and above accrue an additional 5 days paid vacation a year.

An employee may accrue up to 80 hours (two weeks) of vacation time at the end of a leave year and carry that balance forward to the next leave year. During the middle of a leave year an employee may have a temporary vacation time balance in excess of 80 hours. Any unused vacation time in excess of 80 hours at the end of a leave year will be forfeited. Employees may be allowed to carry over an excess of 80 hours into the following year for those who have planned medical situations requiring disability time off or adoption of a child. This exception must be approved by the employee’s supervisor.

An employee in good standing who separates employment will be paid in full for any positive vacation balance. Payment for vacation time balance will be made within 30 days after termination of employment and will be subject to FICA and Federal and State income tax withholding.

**Sick Time**: Employees, regardless of length of service, accrue 7 days of sick leave annually. There is no maximum cap on the number of hours that may be accumulated. Unused sick leave has no cash value and will not be “paid out” to employees who terminate their employment under any conditions. Sick time off may be used for the employee’s illness, doctors appointments, or when an immediate family member is sick and the employee is required to assist the family member. Immediate family is defined as spouse, child, or parent of the employee. Sick time may also be used for adoption related activities. Vacation time may be used in lieu of sick time, but sick time is not allowed to be used as vacation time off.

**Vacation Year**: APUS’s vacation year is the period from January 1 to December 31 of the same calendar year. The vacation year establishes key dates when “use or lose” vacation time is forfeited if not used.
FAMILY MEDICAL LEAVE ACT (FMLA)

APUS is covered by the Federal Family and Medical Leave Act. Eligible employees are entitled to take leave without pay for one or more of the following reasons:

- For the birth of a child or the placement of a child for adoption or foster care;
- In order to care for the spouse, or a son, daughter, or parent, of the employee, if such spouse, son, daughter, or parent has a serious health condition.
- Because of a serious health condition that makes an employee unable to perform an essential function of his or her position.
- Family members of covered service members will be able to take up to 26 work weeks of leave in a “single 12-month period” to care for a covered service member with a serious illness or injury incurred in the line of duty on active duty.
- Family members of the National Guard and Reserves to manage their affairs while the member is on active duty in support of a contingency operation. This provision makes the normal 12 work weeks of FMLA job-protected leave available to eligible employees with a covered military member serving in the National Guard or Reserves to use for “any qualifying exigency” arising out of the fact that a covered military member is on active duty or called to active duty status in support of a contingency operation. The Department’s final rule defines qualifying exigency by referring to a number of broad categories for which employees can use FMLA leave: (1) short-notice deployment; (2) military events and related activities; (3) childcare and school activities; (4) financial and legal arrangements; (5) counseling; (6) rest and recuperation; (7) post-deployment activities; and (8) additional activities not encompassed in the other categories, but agreed to by the employer and employee.

An eligible employee is one who has been employed for at least one year and has worked at least 1,250 hours over the 12-month period prior to the commencement of the leave. Eligible employees are entitled to a total of 12 work weeks (or 480 hours) of leave per rolling calendar year.

Entitlement will be determined based on the amount of leave taken during the 12 months immediately preceding the leave.

An employee should provide notice of his or her intention to take a medical or family leave at least 30 days prior to the date the leave is expected to commence, or, if such notice is not possible, as soon as notice is practicable. The notice should include the date the leave is to begin and the expected duration of the leave. Once an employee requests or gives notice of the need for a leave, APUS will provide the employee with written guidelines as to the specific conditions and requirements of the employee's leave.

Certification from a health care provider verifying the need for a leave may be required. Employees must submit the certification documentation to HR within 15 days or leave may be denied. APUS, may, in certain circumstances, require a second and third opinion (at the company’s expense). APUS can request recertification documentation every 30 days if deemed necessary.

Unless the employee is utilizing short-term disability, s/he is required to exhaust any accrued sick time while on FML. Once the sick leave is exhausted, employees are required to utilize any accrued vacation time.
While out on disability and/or FMLA, employees are responsible for their portion of all benefit premiums. Employees must pay their portion of the premiums within 30 days of the due date; otherwise benefits coverage may be terminated.

Employees are required to follow their department’s call-out procedures while on FMLA; specifically while on intermittent leave.

Employees may be required to substitute accrued paid leave for all or part of an unpaid leave taken under this policy.

An employee returning from leave for their own illness will be required to provide medical certification to the HR department of his or her ability to return to work before s/he is permitted to resume working.

TIME OFF TO FULFILL MILITARY OBLIGATIONS (USERRA)
Those employees who serve in a reserve branch of the armed forces and are required to be absent from work to fulfill their obligations may request unpaid leaves of absences for that purpose. Military leave will be handled in accordance with federal and state laws (USERRA).

BEREAVEMENT LEAVE
APUS grants up to three workdays (24 work hours) of leave with pay if there is a death in your immediate family. For this purpose, "immediate family" is defined as your spouse or significant other, parent, grandparent, grandchild, child, brother or sister, or mother-in-law, father-in-law, sister-in-law, or brother-in-law. You must notify your supervisor immediately if you need a bereavement leave.

PERSONAL LEAVE
In an effort to recognize the need of employees who require time off in addition to vacation or sick, APUS may consider a personal leave of absence without pay for up to a maximum of 30 days.

Eligibility
All regular employees employed by APUS for a minimum of 90 days may be eligible to apply for an unpaid personal leave of absence. Job performance, absenteeism and departmental requirements will all be taken into consideration before a request is approved. Requests for unpaid personal leave may be denied or granted by APUS for any reason or no reason and are within the sole discretion of APUS. Approvals of the immediate supervisor, department director and Human Resources are required.

Requesting unpaid personal leave
- The eligible employee should submit a request in writing to his/her immediate supervisor.
- The employee should understand that all requests for personal leaves are not granted.
- The immediate supervisor will review the request, taking workload scheduling and departmental requirements into consideration and will confer with the department manager and Human Resources. A decision will be presented to the employee as soon as feasible after receipt of the written request.
- If APUS does not extend the leave, the employee must then return to work on the originally scheduled return date or be considered to have voluntarily resigned.
from his or her employment. Extensions of leave will only be considered on a case-by-case basis.

- When a personal leave ends, every reasonable effort will be made to return the employee to the same position, if it is available, or to a similar available position for which the employee is qualified. However, American APUS does not guarantee reinstatement in all cases.

**JURY DUTY**

You are encouraged to fulfill your obligation as a citizen of the community, to include serving as a jury member when called upon to do so.

APUS will continue your pay when serving on jury duty for a period of up to 10 working days per year. Notify your supervisor well in advance of your jury duty. You are expected to work on any scheduled workday your jury duty service is not required.

**HOLIDAYS**

APUS observes the following ten paid holidays each year:

- New Year's Day
- Martin Luther King Jr. Day
- Presidents Day
- Memorial Day
- Independence Day
- Labor Day
- Columbus Day
- Veterans Day
- Thanksgiving Day
- Christmas Day

Full-time employees have these holidays off with pay. With advance approval from your supervisor, you may elect to work on a holiday and “bank” it by working on that day and “saving” a day off to be used on another normal work day. You must use this day within 60 days of the holiday.

Part-time employees will be paid for the hours that they would have worked if the particular day was not a holiday. (Ex: if a Monday is a holiday and you would have worked 5 hours you will get paid for 5 hours. If you do not work on Mondays, you will not receive holiday pay).

**SERVICE AWARDS**

Anniversary service awards recognize and reward employees for service with APUS.

Regular Full Time and Part Time APUS employees are eligible to receive an anniversary service award. Full Time Faculty service awards vary. Full Time Faculty should refer to the Faculty Handbook for more information.

**One Year Anniversary:** APUS Mug

**Two Year Anniversary:** APUS Padfolio

**Three Year Anniversary:** APUS Jacket
Five Year Anniversary:
1) A framed portrait of our Academic Center.
2) Five personal days. (Days must be taken within 6 months of your recognition from the company.) Days are not accrued. If you leave APUS prior to taking your five personal days you will NOT be paid the time not taken.
3) An anniversary bonus gift of $325.00 (taxed) will be reflected in your next scheduled paycheck.

Ten Year Anniversary:
1) A framed portrait of our Administration building
2) Ten personal days (Days must be taken within 6 months of your recognition from the company.) Days are not accrued. If you leave APUS prior to taking your ten personal days you will NOT be paid the time not taken.
3) An anniversary bonus gift of $650.00 (taxed) will be reflected in your next scheduled paycheck.
VI. EXPENSES & REIMBURSEMENTS

EMPLOYEE INCURRED EXPENSES AND REIMBURSEMENT
APUS will pay all actual and reasonable business-related expenses incurred by employees in the performance of their job responsibilities. All such expenses incurred by an employee must be approved by their manager before payment will be made.

Expense reports are to be submitted promptly and supported by evidence of proofs of purchase (e.g., receipts) on individual items costing more than $25.00 each. If expense reimbursements are submitted more than 30 days past the date the expense was incurred, they may not be reimbursed. When possible, invoices should be submitted to Accounts Payable for direct payment.

APUS may elect to pay an employee a per diem rate for meals and lodging if an employee is out of town for work-related purposes rather than reimbursing actual costs.

A standard mileage rate has been computed for work-related travel between Virginia and West Virginia locations of the American Public University System. APUS will not reimburse mileage beyond 123 miles round-trip between the two offices.

TRAVEL REIMBURSEMENT
This policy establishes the general guidelines and procedures to be followed when business travel is required.

Travel related expenses are to be detailed in writing on the appropriate APUS form, detailing the event attended and the purpose for the travel.

Employees, who use their personal vehicle for APUS business, including trips to the airport, will be reimbursed at the standard company mileage rate, provided that the time and distance involved is reasonable under the circumstances. The company uses the IRS-approved rate for all business travel reimbursements.

All parking expenses and highway tolls incurred as a result of business travel will be reimbursed.

All air travel should be approved in advance unless unavoidable. All travel will be by coach class. The duplicate airline ticket receipt should be attached to the expense report.

Employee should request advance approval for use of a rental car at their destination, unless unavoidable. A copy of the rental car agreement should be attached to the expense report.

Employees should select moderately priced lodging convenient to their destination to minimize time and expense. A detailed receipt from the hotel or motel must accompany the expense report.

Employees must submit receipts for meals with the expense form. Reasonable tips, when paid by the employee and noted on the receipt, will be reimbursed.

Travel expenses between home and the office are not reimbursable. If employees are required to travel from home directly to a third location on APUS business or between APUS locations, the University System will reimburse employees for the difference
between the mileage employees normally drive to the office and the total miles driven on business.

Written claims for reimbursement for out-of-town travel should be submitted to the Finance Department within five days of completion of travel. Claims for reimbursement of travel between APUS locations, other local travel, and reimbursement for incidental expenses should be submitted at the end of the month in which the expenses were incurred, using the appropriate written form.

RENTAL CAR POLICY AND PROCEDURES
Renting Vehicles in the USA
When renting vehicles for company business, do not purchase the Deductible Waiver Option offered by the rental car companies. The Business Auto Insurance Policy maintained by American Public Education provides this coverage subject to deductibles of $500 for Comprehensive and $500 for Collision. The rental car companies are responsible for providing liability coverage.

If an employee chooses to purchase any of the optional personal injury coverage offered by the rental car companies, this will be at the sole discretion of the employee and any associated cost will be the responsibility of the employee.

In the event of an accident while renting a vehicle, please report any damages immediately to your department manager.

Renting Vehicles Internationally
When renting vehicles outside of the United States of America, please purchase both liability and physical damage coverage offered by the rental car company. Each foreign country has their own specific automobile insurance laws and American Public Education does not carry insurance that meets all of these requirements.
VII. WORKING AND SAFETY CONDITIONS

SAFETY AND REPORTING ACCIDENTS
Safe, pleasant and efficient working conditions are our goals. APUS’s policy is to provide and maintain safe and healthy working conditions and to follow only those operating practices that will result in safe and efficient working conditions. We make every effort to reduce the possibility of accidents, comply with all safety laws and ordinances and provide complete instructions covering safe working methods. Each employee has the obligation to observe general safety principles and to practice safety at all times. Any injury or illness, no matter how slight that arises from your employment must be reported immediately to a supervisor.

Supervisors must report all incidents to the Human Resources Department and complete the “APUS Incident Report Form” from the Intranet within 24 hours of the incident.

Workers’ compensation insurance is provided according to state laws governing industrial injuries or disease.

Any equipment that needs to be repaired should be reported to a supervisor as soon as possible. No APUS employee, contractor or visitor shall be permitted to make use of any device which produces an open flame. This shall include, but is not limited to, candles, oil-burning or kerosene lamps or incense. It shall be the responsibility of the manager hiring the contractor or the employee hosting any visitor to enforce the policy with the non-APUS personnel.

Please refrain from using space heaters in the buildings as they are against fire code. Contact your immediate supervisor if there is an issue with the heating or cooling system. APUS strives to provide a comfortable working environment for employees.

INCLEMENT WEATHER
Manassas and Charles Town Office Employees: The decision to close the offices due to weather conditions will be made by senior management. The call will be made by 6:00 am. The decision will be posted on the answering machine call-in numbers by 6:30 am. A separate decision may be made for each location. Please call in using the following numbers: Charles Town: (304) 724-3798 & Manassas (703) 396-6895.

- If APUS offices are open, but you decide you are unable to make it into the office safely, contact your supervisor and you may utilize your vacation time;
- If APUS announces a delayed opening, we will open at 10:00 am. If you have the capability of working remotely, you are asked to work during this time. If you do not have remote capability; you will not be charged vacation time for the two hours missed.
- If APUS offices are closed and you have remote capability; you are expected to work remotely. If you choose not to work, you must take vacation time.
- If APUS offices are closed and you do not have remote capability; you will not be charged vacation time.

If you are on vacation or sick leave during the inclement weather, you will still be charged your planned vacation time even if the offices are closed. Please note if you come in the office when it is closed you do not get to bank time later. Office closings and delays are a safety precaution.
VIII. EMPLOYEE CONDUCT

CONDUCT STANDARDS
Accepted standards of proper behavior include punctuality, applying yourself to the tasks assigned, respecting your co-workers and cooperating with others.

The following is a list of specific example of conduct that may result in disciplinary action, up to and including termination: (this list is not all inclusive or exclusive)

- Inefficient or careless performance of duties and failure to maintain high standards of operation and service to our customers;
- Unauthorized removal of APUS records and information;
- Excessive tardiness or absenteeism;
- Refusal to do the work assigned;
- Failure to protect proprietary information that could compromise APUS or its employees or be considered harmful to the University System's client relations or reputation;
- Unauthorized departure from your job or APUS premises;
- Dishonesty;
- Under the influence of drugs and/or alcohol;
- Theft of APUS or personal property; and
- Harassment of another employee, vendor, or client.

APUS reserves the right to determine, in its sole and exclusive discretion, whether an employee has committed one of the offenses identified in this list or another offense that warrants discipline, and to determine the degree of discipline that may be appropriate.

All employment at APUS is "at will" and may be separated by the employee or the company at any time, with or without cause, with or without prior notice or warning.

While APUS may separate an employee at will, the company may choose to exercise its discretion to utilize forms of discipline that are less severe than termination. Examples include oral or written warning, suspension from work without pay, and reassignment of responsibilities. Although one or more of these steps may be taken in connection with a particular employee, APUS may separate the employment relationship without following any particular series of steps whenever it determines, in its sole discretion, that such action is appropriate.

CODE OF BUSINESS CONDUCT AND ETHICS

This Code of Business Conduct and Ethics (this “Code”) sets forth standards of conduct for all directors, officers and employees of American Public Education, Inc., and its subsidiaries (each a “Company Representative” and collectively, the “Company Representatives”). Throughout this Code, the terms “American Public Education,” “Company,” “we,” “our” and “us” are used to refer to the enterprise as a whole, including American Public University System.

This Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but sets out basic policies to guide all Company Representatives in their business conduct.
In particular, this Code covers policies designed to deter wrongdoing and to promote:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the “SEC”) and in other public communications made by the registrant;
- compliance with applicable governmental laws, rules and regulations;
- the prompt internal reporting of violations of the code to the Compliance Officer (defined below); and
- accountability for adherence to this Code.

All Company Representatives must conduct themselves in accordance with these policies and seek to avoid even the appearance of improper behavior. The Company’s officers and employees should also direct themselves to our employee manual for further guidance and discussion of many of the topics addressed in this Code. If an applicable law has stricter requirements than a policy in this Code, you must comply with the law. If a local custom or policy conflicts with this Code, you should comply with the Code to the fullest extent possible and refer any questions regarding conflicting provisions to your supervisor or the Company’s Executive Vice President for Institutional Advancement (the “Compliance Officer”).

Each Company Representative is responsible for reading, understanding and complying with this Code. Failure to read or acknowledge the Code does not exempt a Company Representative from his or her responsibility to comply with the Code. Those who violate the policies in this Code will be subject to disciplinary action, up to and including discharge from the Company and, where appropriate, civil liability and criminal prosecution. If you are in a situation that you believe may violate or lead to a violation of this Code, you must report the situation as described in Sections 13 and 14 of this Code.

Nothing in this Code, in any Company policy or procedure, or in other related communications (verbal or written), creates or implies a contract of employment for a definite or indefinite term.

The Company reserves the right to amend, alter or terminate this Code or the policies underlying it at any time for any reason.

1. Compliance with Laws, Rules and Regulations All Company Representative must respect and obey the governmental laws, rules and regulations (including insider trading laws) of the cities, states and countries in which we operate. Although not all Company Representatives are expected to know the details of these laws, rules and regulations, it is important to know enough to determine when to seek advice from your supervisor, the Compliance Officer or other appropriate personnel.

2. Honest and Ethical Conduct Each Company Representative must always conduct him/herself in an honest and ethical manner and act with the highest standards of personal and professional integrity. In addition, Company Representatives must be direct, honest and truthful in discussions with, or requests for information from, regulatory and governmental officials.
3. Conflicts of Interest A “conflict of interest” occurs when a person’s private interest conflicts in any way with the interests of the Company. A conflict situation can arise, for example, when a Company Representative takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest may also arise when a Company Representative, or any Family Member (as defined below) of such person, receives improper personal benefits as a result of his or her position at the Company or has a personal financial or other interest in a transaction involving the Company, even if not involved in the transaction. For purposes of the provisions of this Code, “Family Member” generally means a person’s spouse, parents, children and siblings, whether by blood, marriage (including in-laws) or adoption, or anyone residing in such person’s home. The rules of the SEC and NASDAQ contain different definitions of “family member” and, as such, each director, officer and employee is encouraged to consult with the Appropriate Authority, if a conflict with a Family Member or other relative arises.

Conflicts of interest are generally prohibited as a matter of Company policy. Exceptions may only be made after review and approval of specific or general categories by the Compliance Officer (in the case of employees) or the Nominating and Corporate Governance Committee of the Board of Directors of the Company (in the case of executive officers or directors). Directors should refer to the Company’s Corporate Governance Guidelines for additional policies that specifically govern the conduct of directors. In addition, directors and executive officers of the Company should refer to the Company’s Policy for Related Person Transactions.

Conflicts of interest may not always be clear cut, so if you have a question, you should consult with your supervisor, the Compliance Officer (in the case of employees) or the Nominating and Corporate Governance Committee of the Board (in the case of executive officers or directors) (as applicable, the “Appropriate Authority”). Any Company Representative who becomes aware of a conflict or potential conflict, or knows of any material transaction or relationship that reasonably could be expected to give rise to such a conflict, should promptly bring it to the attention of the Appropriate Authority, as provided in Section 13 of this Code.

4. Insider Trading Company Representatives who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of our business. All non-public information about the Company should be considered confidential information. To use non-public information for personal financial benefit, or to “tip” others (including, without limitation, friends and Family Members) who might make an investment decision on the basis of this information, is not only unethical but may also be illegal. In addition, the Company’s Policy Statement on Insider Trading Compliance should be consulted for a more detailed discussion of, and the Company’s policies regarding, insider trading laws.

5. Corporate Opportunities Company Representatives are prohibited from taking for themselves personally opportunities that are discovered through the use of corporate property, information or position without consent of the Board. No Company Representative may use corporate property, information, or position for improper personal gain, and no such person may compete with the Company directly or indirectly. Company Representatives owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.
6. Competition and Fair Dealing We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner’s consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each Company Representative should endeavor to respect the rights of, and to deal fairly with, the Company’s customers, students, suppliers, competitors and employees. No Company Representative should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair dealing practice.

7. Record-Keeping and Disclosures The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions and to provide full, fair, accurate and timely disclosure pursuant to the rules and requirements of the SEC or otherwise. All of the Company’s books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company’s transactions and must conform both to applicable legal requirements and to the Company’s system of internal controls and procedures. Unrecorded or “off-the-books” funds or assets should not be maintained under any circumstances. The accurate and timely reporting of our financial results and financial condition requires that all financial information be recorded promptly and accurately, and that our system for recording and reporting that information be properly functioning and subject to regular and thorough evaluations. All Company Representatives are responsible to report to the Company, as described in Section 13 of this Code, any concerns regarding questionable operating reports or records prepared for internal or external purposes. False, misleading or incomplete information impairs the Company’s ability to make good disclosure decisions, undermines trust in the long term, and may in some cases, be illegal. Complaints or concerns relating specifically to accounting, accounting controls or auditing matters should be made pursuant to the Company’s Corporate Governance Hotline Policy contained in the Employee Handbook.

Business records and communications often become public, and Company Representatives should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to e-mail, internal memos, and formal reports. Records should always be retained or destroyed according to the Company’s record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, please consult the Compliance Officer.

8. Confidentiality Company Representatives must maintain the confidentiality of confidential information entrusted to them by the Company or its customers, except when the Compliance Officer authorizes disclosure or such disclosure is required by law. Confidential information includes, without limitation:

• all non-public information that might be of use to competitors, or harmful to the Company or its customers if disclosed;
• non-published financial information, forecasts and analyses, offers and proposals for acquisitions, dispositions, leases and other transactions and the appraisals, studies, reports and other documents and analyses related thereto, the Company’s revenues or earnings, a change in control or a significant change in management of the Company, the public or private sale of a significant amount of additional securities of the Company, or the establishment of a program to repurchase securities of the Company;
• information that students, suppliers and customers have entrusted to us and may also include information regarding the Company’s competitors; and

• proprietary information, including intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, designs, databases, records, student lists, student retention and enrollment data, salary information and any unpublished financial data and reports.

Company Representatives are required to keep confidential all confidential information and may not disclose, reveal or discuss this information with persons outside of the Company or use this information for their own direct or indirect benefit, for the direct or indirect benefit of any Family Member, relative, friend or other person. Unauthorized use or distribution of confidential information violates Company policy, could be illegal and result in civil or even criminal penalties. Should you have a question as to whether certain information is considered confidential information, you should contact or consult with the Appropriate Authority.

The Company and Company Representatives are subject to strict rules governing the disclosure of information about students outside of the Company or within the organization. Company Representatives must comply with these rules and all applicable laws. Company Representatives who receive a request for information about students should contact the Registrar before responding to the request. Company Representatives who are students must not access their own student records except through the appropriate channels as any other student, through the Registrar’s office.

The obligation to keep Company information confidential continues following termination of the employment or other relationship with the Company, and the Company will pursue all legal remedies available at law or in equity to prevent any former Company Representative from using confidential Company information. Employees should also refer to our employee manual for additional policies and procedures with respect to confidential information. The requirements and responsibilities set forth in this Section 8 shall be in addition to, and non-exclusive with, any other Company provisions, documents or agreements relating to confidential information.

9. Protection and Proper Use of Company Assets All Company Representatives should protect the Company’s assets and ensure their efficient use. All of the Company’s assets should be used for legitimate business purposes and should not be used for non-Company business, although, for employees, incidental personal use may be permitted with the permission of his/her supervisor.

10. Payments to Government Personnel The U.S. Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make payments to government officials of any country.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities that may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate this Code but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules.
11. Rules for Principal Executive Officer and Senior Financial Officers
In addition to complying with all other parts of this Code, if you are the Company’s principal executive officer, principal financial officer, principal accounting officer or controller, or any person performing similar functions (each referred to in this Code as a “Principal Officer”), you must take the following steps to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the SEC and in other public communications made by the Company:

• carefully review drafts of reports and documents the Company is required to file with, or submit to, the SEC before they are filed or submitted, and Company press releases or other public communications before they are released to the public, with particular focus on disclosures each Principal Officer does not understand or agree with and on information known to the Principal Officer that is not reflected in the report, document, press release or public communication;
• comply with the Company’s disclosure controls, policies and procedures as in effect from time to time, which have been designed to ensure that the information required to be disclosed by the Company in its SEC filings is collected, processed, summarized and disclosed in a timely fashion and accumulated and communicated to the appropriate persons;
• promptly bring to the attention of the Company’s Disclosure Policy Committee or a member thereof any material information of which a Principal Officer may become aware that affects the disclosures made by the Company in its public filings, any material information that may assist the Disclosure Policy Committee in fulfilling its responsibilities, matters that a Principal Officer feels could compromise the integrity of the Company’s financial reports or disagreements on accounting matters;
• always act with the highest standards of personal and professional integrity, and do not tolerate others who, attempt to deceive, or evade responsibility for actions;
• bring to the attention of the Audit Committee disagreements on accounting matters and matters that could compromise the integrity of the Company’s financial reports;
• bring to the attention of the Nominating and Corporate Governance Committee violations of any part of this Code; and
• comply at all times with applicable governmental laws, rules and regulations, including those of NASDAQ.

12. Waivers of or Changes in the Code of Business Conduct and Ethics  It may be appropriate for a provision of this Code to be waived in a particular circumstance. Any employee seeking a waiver should speak to his or her supervisor, who will likely need to involve other persons in consideration of the waiver request. Any change to this Code, or any waiver of this Code that applies to an executive officer, Principal Officer, or director may be made only by the Board and must be promptly disclosed as required by law, regulation or rule of the SEC or NASDAQ.

13. Reporting any Illegal or Unethical Behavior  If you believe that actions have taken place, may be taking place or may be about to take place that violate or would violate this Code, you must bring the matter to the attention of the Appropriate Authority. Failure to do so is itself a violation of this Code. You are encouraged to talk to the Appropriate Authority, about observed illegal or unethical behavior and when in doubt about the best course of action in a particular situation. Any supervisor or manager who receives a report of a potential violation of this Code must report it immediately to the Compliance Officer. Complaints or concerns relating specifically to accounting, accounting controls or auditing matters should be made pursuant to the Corporate Governance Hotline Policy contained in the Employee Handbook.
You may communicate any violations of this Code in writing, either by internal mail or U.S. mail, by e-mail or by telephone:
To the Compliance Officer:
American Public Education, Inc.
111 W. Congress Street Charles Town, WV 25414
Attention: Compliance Officer
E-mail: compliance@apus.edu
Hotline: 866-838-7982

To the Chairman of the Nominating and Corporate Governance Committee:
American Public Education, Inc.
111 W. Congress Street Charles Town, WV 25414
Attention: Nominating and Corporate Governance Committee Chairman
Hotline: 866-838-7982

All employee communications made in good faith will be treated promptly and professionally, shall be kept completely confidential and shall be made without risk of retribution whatsoever. Any use of these reporting procedures in bad faith or in a false or frivolous manner, however, will be considered a violation of this Code.

It is preferred that persons identify themselves in order to facilitate the Company’s investigation of any report. Such reports, however, may be made anonymously. Any retaliation for reports of misconduct by others made in good faith will not be tolerated. Indeed, any Company Representative who engages in retaliation is subject to discipline, up to and including termination, and in appropriate cases, civil and/or criminal liability. Any person involved in any investigation in any capacity of a possible misconduct must not discuss or disclose any information to anyone outside of the investigation unless required by law or when seeking his or her own legal advice, and is expected to cooperate fully in any investigation.

14. Compliance Standards and Procedures We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know right from wrong. Because we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are some steps to keep in mind:

• **Make sure you have all the facts.** In order to reach the right solutions, we must be as fully informed as possible.
• **Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper?** This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
• **Clarify your responsibility and role.** In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
• **Discuss the problem with your supervisor.** For employees generally, this is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor’s responsibility to help solve problems.
• **Seek help from Company resources.** In cases where it may not be appropriate to discuss an issue with your supervisor or where you do not feel comfortable approaching your supervisor with your question, discuss it with the Compliance Officer. For directors...
and executive officers, you may also consult with the Nominating and Corporate Governance Committee.

• Your report of violations of this Code may be made in confidence and without fear of retaliation. If you so request, your anonymity will be protected. We do not permit retaliation of any kind against employees for good faith reports of violations of this Code.

• Always ask first, act later. If you are unsure of what to do in any situation, seek guidance before you act.

15. Administration
Board of Directors. The Nominating and Corporate Governance Committee of the Board, combined with the Compliance Officer, will be responsible for ensuring that this Code is properly administered. The Nominating and Corporate Governance Committee will also be responsible for the annual review of the compliance procedures in place to implement this Code and will recommend clarifications or necessary changes to this Code to the Board of Directors for approval.

Officers, Managers and Supervisors. All officers, managers and supervisors are responsible for reviewing this Code with their employees. Officers, managers and supervisors are also responsible for the diligent review of practices and procedures in place to help ensure compliance with this Code.

VISITORS
You should avoid having social visitors and social telephone calls during work hours. If it is necessary that members of your family or friends call on you during work hours, please make the visit as short as possible.

SOLICITATION
The following activities are prohibited:

• Solicitation of any type on APUS premises at any time by non-employees.
• Solicitation from students towards APUS staff is also prohibited. Students may not solicit in the classroom, on the web, or by contacting other students, faculty, or staff via any means of communication.

APUS’s policy prohibits solicitation by employees in working areas during working time. Violation of this policy may result in immediate disciplinary action, including termination.

DRUGS AND ALCOHOL
APUS is committed to achieving an alcohol and drug-free workplace. Alcohol and other drug abuse is a significant public health problem and has a detrimental effect on the business community in terms of increased medical and workers compensation claims, medical disability costs, decreased productivity, injuries, theft and absenteeism.

Accordingly, APUS has the right and obligation to maintain a safe, healthy and productive working environment and to protect APUS property, operations and reputation.

The use or possession of illegal drugs or having a detectable quantity in one's system of an illegal drug while on work status or on APUS's premises may result in discipline up to and including termination.
The sale, trade, delivery, transfer, or manufacture of illegal drugs while on work status or on APUS's premises may result in termination and possible referral to law enforcement authorities.

The use, possession, sale, trade, delivery, transfer, or manufacture of illegal drugs by employees at any time that may impact the business interests of APUS, including use of drugs by employees on their own time, may result in discipline up to and including termination.

The unauthorized use of alcohol, or being under the influence of alcohol while on work status, may result in discipline up to and including termination. Approved APUS events may include the approved consumption of alcohol.

**WORKPLACE VIOLENCE**

APUS provides a safe workplace for all employees. To ensure a safe workplace and to reduce the risk of violence, all employees should review and understand all provisions of this workplace violence policy.

**Prohibited Conduct**

We do not tolerate any type of workplace violence committed by or against employees. Employees are prohibited from making threats or engaging in violent activities.

This list of behaviors, while not inclusive, provides examples of conduct that is prohibited:

- Causing physical injury to another person;
- Making threatening remarks;
- Aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress;
- Intentionally damaging employer property or property of another employee;
- Possession of a weapon while on company property or while on company business;
- Committing acts motivated by, or related to, sexual harassment or domestic violence.

**Reporting Procedures**

Any potentially dangerous situations must be reported immediately to a supervisor or the Human Resource Department. Reports can be made anonymously and all reported incidents will be investigated. Reports or incidents warranting confidentiality will be handled appropriately and information will be disclosed to others only on a need-to-know basis. All parties involved in a situation will be counseled and the results of investigations will be discussed with them. APUS will actively intervene at any indication of a possibly hostile or violent situation.

**Dangerous/Emergency Situations**

Employees who confront or encounter an armed or dangerous person should not attempt to challenge or disarm the individual. Employees should remain calm, make constant eye contact and talk to the individual. If a supervisor can be safely notified of the need for assistance without endangering the safety of the employee or others, such notice should be given. Otherwise, cooperate and follow the instructions given.
Enforcement
Threats, threatening conduct, or any other acts of aggression or violence in the workplace will not be tolerated. Any employee determined to have committed such acts will be subject to disciplinary action, up to and including termination. Non-employees engaged in violent acts on the employer’s premises will be reported to the proper authorities and fully prosecuted.
VIII. COMPUTER, E-MAIL, TELEPHONE AND INTERNET POLICY

USE FOR BUSINESS PURPOSES
APUS’s computer system is provided to employees at company expense to assist them in carrying out the University System’s business. The system permits employees to perform their jobs, share files, and communicate with each other internally and with selected outside individuals and companies that APUS, in its sole discretion, decides should be communicated with or connected to the system.

The system is to be used for business-related purposes only. APUS treats all information transmitted through or stored in the system, including e-mail messages, as business information.

APUS has the capability to access, review, copy, modify and delete any information transmitted through or stored in the system, including email messages. The University System reserves the right to access, review, copy, modify or delete all such information for any purpose and to disclose it to any party (inside or outside the company) it deems appropriate.

Those files containing the personal information of an employee as a result of the employee making incidental use of the computer for personal purposes, including transmission of personal e-mail messages, will be treated no differently than other files. The company reserves the right to access, review, copy, modify, delete or disclose them for any purpose. Accordingly, employees should not use the computer system to send, receive or store any information that they wish to keep private. Employees must exercise a greater degree of caution in transmitting confidential APUS information on the computer system than they take with other means of communicating information (e.g., written memoranda, letters or phone calls) because of the reduced human effort required to redistribute information electronically.

Passwords
Employees must use passwords as made available by the company computer system to protect against unauthorized access to files on which they are working. Passwords must conform to the policies described in the “Password Policies” section of the APUS Standard Operating Procedures manual. Never disclose personal or system password to anyone other than an authorized company representatives.

Disks and Back-up Tapes
Do not leave disks or backup tapes that contain confidential information out in the open. Keep them locked in drawers or file cabinets.

Laptop Computers
Extra precautions must be exercised when taking confidential information out of the office on a notebook or laptop computer. Never leave a laptop computer unattended while traveling.

Copyrighted Information
Use of the computer system to copy and/or transmit any software programs, documents or other information protected by the copyright laws is prohibited by federal law and may subject you and APUS to civil and criminal penalties. Never copy software programs of any kind without expressed authorization from company representatives. Never accept
copies of any software programs from other employees without approval from authorized company representatives.

**Installation of Software**

The installation of personal software is prohibited in accordance with the “Use of Personal Software” provisions of the APUS Standard Operating Procedures manual.

**Viruses**

Be sure that company-approved virus checking software is installed and always running on your computer. Never disable this software. Never insert any disks into your PC or download any files from any outside source without first checking them for viruses.

**Other Prohibited Uses**

Use of the computer system to engage in communications that are in violation of company policies, including transmission of defamatory, obscene, offensive or harassing messages or messages that disclose personal information without authorization, is strictly prohibited.

To ensure that employees comply with these policies, APUS may conduct periodic audits of the computer system, including individual personal computers, disks or backup tapes. An employee's failure to comply with these policies may lead to disciplinary actions.

**DATA RETENTION**

APUS enters, records, stores, and reports, and uses data on a routine basis which is vital to the operation of the University. These data are an important asset of the University and must be treated as such. Access, storage, availability, security, and control are all important aspects of data control.

The retention of data is key to the University's ability to perform its mission. We operate under legal, fiscal, and business constraints that must be met in a consistent and appropriate way. The Data Retention policy is needed to guide this retention, without which the University cannot meet our obligations to staff, students, and stockholders. This policy covers all data used and generated by the University in the performance of its mission. This includes all data formats, both electronic and hard-copy.

This policy applies to all APUS personnel including directors, officers, employees of, and consultants to the company as well as third parties that record, store, process, and report APUS-owned data. Additional information regarding this policy can be found here [http://Intranet.apus.edu/IT/Help-Desk/email/emailarchive/index.htm](http://Intranet.apus.edu/IT/Help-Desk/email/emailarchive/index.htm).

**E-MAIL**

Electronic mail (e-mail) is an important tool that greatly enhances productivity and communication with and within APUS. The use of e-mail shall be generally limited in scope to support the business needs of APUS and should be used in an ethical and legal manner.

**User Accountability**

Each personal e-mail account is associated with one individual in order to ensure that unique identities can be maintained and that communications can be effectively monitored. All employees are held accountable for their communications via APUS communication systems, including e-mail. No messages will be transmitted under an
assumed name, and users must not attempt to obscure the origin of any message. Passwords to email accounts must not be disclosed or shared.

**Mail Systems**

APUS communications systems, including e-mail, are to be used for the purpose of conducting APUS business. The current acceptable e-mail systems are the APUS corporate MS-Exchange server (for corporate communications) and the Educator mail server (for faculty communications). Limited personal use of APUS communications systems is permitted as long as such use does not interfere with APUS business objectives.

**Corporate and Personal Email System Usage**

APUS e-mail systems should not be used in a manner that will cause degradation of performance or hamper the ability of others to access and use such systems. Examples of prohibited misuse are distributing chain letters and large attachments. Streaming video and audio from the Internet is prohibited.

**Message Content and Public Representations**

APUS personnel must comply with the following guidelines while using APUS e-mail systems:

- APUS has a zero tolerance policy concerning obscene/objectionable communications. E-mail should be free of obscene, harassing, defamatory, or otherwise offensive language or attachments.
- E-Mail must not include rumors or unwarranted speculation. Avoid incomplete, unbalanced, and unprofessional e-mail content.
- E-mail is primarily for business use. Personal communications should be limited to a reasonable level.
- The following uses are not permissible:
  - Derogatory, obscene, defamatory, and harassing communications (including but not limited to the transmission and viewing of sexually explicit material, humor that is off-color or contains racial or ethnic slurs. And abusive, profane, or offensive language).
  - Fraudulent communications.
  - Email used for commercial, charitable, religious, or partisan political purposes.
  - Transmission of trade secrets, confidential, or privileged communications.
  - Unauthorized copying and distribution of copyrighted material.
  - Communications that violate or infringe the rights of others.
  - Automatic forwarding of email outside APUS.

It is the responsibility of every APUS employee to refer to Policy 500-100: APUS Acceptable User Policy for additional details on acceptable use of APUS corporate computing facilities.

The following guidelines should be followed for using e-mail signatures in an appropriate, ethical, and professional manner.

- Email and signatures should be professional and strictly relate to APUS business.
Email signatures must be consistent with the standards and format set forth by the Marketing department. Please see your manager for the appropriate formatting.

Refrain from including other slogans, quotes or other statements in the signature portion of your e-mail messages.

**Harassing or Offensive Material**

APUS systems may not be used for transmittal, retrieval or storage of any communication which is of a discriminatory, harassing, defamatory or threatening nature, or which is derogatory to any individual or group. In addition, APUS systems may not be used for transmittal, retrieval or storage of any obscene or offensive communications or for any other purpose that is illegal or against APUS policy or contrary to APUS interest. Offensive and/or unprofessional communications and any other violations of the aforementioned policies and/or internal controls may result in disciplinary actions, including letters of reprimand, fines, notification of appropriate law enforcement officials, and termination of employment.

**Monitoring and Privacy**

Emails and computer files are the property of APUS. Employees and faculty should not expect their messages to be kept private. At any time, APUS management may access information and files, including e-mails, and reserves the right to monitor and review employee usage of APUS systems to ensure that they are being used in compliance with APUS policies. APUS reserves the right to review or inspect email and files on APUS computer systems periodically as deemed necessary and appropriate and to disclose the contents thereof to law enforcement or other third parties with or without notice to the sender or the recipient.

APUS normally uses software for e-mail supervision, unless extraordinary circumstances warrant other types of supervision, as determined on a case by case basis by department Director or above.

**E-MAIL RETENTION**

The APUS Email Retention Policy provides employees with guidelines and procedures that enable the company to have:

- An accurate accounting of the important records that the company maintains,
- An understanding of how and by whom records are managed, and
- A means for appropriate handling of record retention, hold and disposal.

Compliance with this policy is very important to APUS. Non-compliance may result in disciplinary action for employees who do not comply, including potential termination for violators, and can lead to legal, regulatory, and cost-control issues for the University. Additionally, violation of federal statutes regarding improper document destruction and obstruction of justice may result in the imposition of significant fines and terms of imprisonment for individuals who engage in such activity.

Refer to the Intranet further details: IT\Help Desk\E-mail Archiving Policy
INTERNET USAGE
Access to the Internet through American Public University System is for APUS business use. Users granted this access must adhere to strict guidelines concerning the appropriate use of the web. Users who violate the provisions outlined in this document are subject to disciplinary action up to and including termination. In addition, any inappropriate use that involves a criminal offense will result in legal action.

Acceptable User
Access to the Internet is specifically limited to activities in direct support of official American Public University System business.

In addition to access in support of specific work related duties, the APUS Internet connection may be used for educational and research purposes.

If any user has a question of what constitutes acceptable use he/she should check with their supervisor for additional guidance. Management or supervisory personnel shall consult with the Director of Technology Operations and Services for clarification of these guidelines.

Inappropriate Use
American Public University System Internet access shall not be used for any illegal or unlawful purposes. Examples of this would be the transmission of violent, threatening, defrauding, pornographic, obscene or otherwise illegal or unlawful materials.

Use of APUS e-mail or messaging services shall be for the conduct of APUS business only. These services shall not be used to harass, intimidate or otherwise annoy another person. Please see 530-200: APUS Email Usage Policy for APUS policies regarding the use of email.

American Public University System Internet access shall not be used for private, recreational or other non-company related activity.

American Public University System Internet connections shall not be used for commercial charitable, religious or partisan political purposes.

Use of the American Public University System Internet access shall not be for personal gain such as selling access of a APUS user login. Internet access shall not be used for or by performing work for profit with APUS resources in a manner not authorized by American Public University System.

Users shall not attempt to circumvent or subvert security measures on APUS network resources or any other system connected to or accessible through the Internet.

APUS users shall not use Internet access for interception of network traffic for any purpose unless engaged in authorized network administration.

APUS users shall not make or use illegal copies of copyrighted material, store such copies on APUS equipment, or transmit these copies over the APUS network.

Security
APUS users who identify or perceive an actual or suspected security problem shall immediately contact the AVP, Technology Operations and Services.
Users shall not reveal account password or allow another person to use their account. Similarly, users shall not use the account of another user.

Access to APUS network resources shall be revoked for any user identified as a security risk or a demonstrated history of security problems.

**Penalties**
Any user violating these policies or applicable state, or federal laws is subject to APUS disciplinary actions deemed appropriate. These penalties include termination and/or the notification of the appropriate law enforcement agencies. APUS reserves the right to review and monitor Internet usage periodically or as deemed necessary and reserves the right to disclose the results of this monitoring to law enforcement or other third parties with or without notice to the employee.

**User Compliance**
All terms and conditions as stated in this document are applicable to all users of the network and the Internet connection. These reflect an agreement of all parties and should be governed and interpreted in accordance with the laws of the States of Virginia and West Virginia.

**SOCIAL MEDIA GUIDELINES & POLICY**
The University embraces the use of social media by sponsoring and supporting a host of social communities on the Web – some for professional networking and academic discussion, some for building community and socializing, and some for building brand awareness. Examples include: [www.wallyboston.com](http://www.wallyboston.com), [www.inhomelandsecurity.com](http://www.inhomelandsecurity.com), and the APUS Facebook fan page.

Overall, our social media networks:

- Create and facilitate a sense of community among our students, faculty and alumni
- Create a forum for networking, exchanging ideas and discussing topics related to the university, including academics, opportunities, events, job opportunities, trends, issues and developments
- Promote University events
- Positively reinforce the success of our students
- Provide an outlet for the expression of school spirit
- Enable mentoring among students, alumni and prospects
- Showcase our University positively through authentic commentary and video
- Spread viral/word-of-mouth brand awareness for APUS/APU/AMU

Social media is defined in this document to include any form of online publishing and discussion, including blogs, wikis, file-sharing, user-generated video and audio, and participation in virtual worlds and social networks.

**Overview**
**Responsible engagement in innovation and dialogue**
Whether or not an APUS faculty or staff member chooses to create or participate in a blog, wiki, online social network or any other form of online publishing or discussion is his or her own decision. In general, what you do on your own time is your affair.
However, activities in or outside of work that affect your APUS job performance, the performance of others, or APUS’s business interests are a proper focus for company policy.

When the organization wishes to communicate publicly as a company—whether to the marketplace or to the general public—it has well established means to do so. Only those officially designated by APUS have the authorization to speak on behalf of the company.

APUS embraces individual participation in social media venues. APUS views consumer generated media as a way to empower employees as global professionals, innovators and citizens. These individual interactions represent a new model: not mass communications, but masses of communicators. Therefore, it is very much in APUS’s interest to be aware of and participate in this sphere of information, interaction and idea exchange.

**To learn:** We believe in the importance of open exchange and learning, and social Web applications and networking sites are excellent venues for connecting consumers with similar interests and concerns to share knowledge and develop ideas.

**To collaborate:** As a leader in online higher education, APUS is committed to contributing to the public dialogue on a broad range of societal issues. As we increasingly focus on transformational insight and high-value innovations, we are responsible for sharing these with the world the exciting things we’re learning and doing, and to learn from others.

**Detailed Guidelines and Best Practices**

**Be authentic.** Some bloggers work anonymously, using pseudonyms or false screen names. APUS discourages that in blogs, wikis or other forms of online participation that relate to APUS, our business, or issues with which the company is engaged. It is important to be fully transparent through proper identification of your affiliation so that your actions can be interpreted within the context of your role. (For instance, a positive review of an APU course would be construed much differently coming from a staff member versus a student.) We believe in transparency and honesty. If you are blogging about your work for APUS, we encourage you to use your real name, be clear who you are, and identify that you work for APUS. Nothing gains you more notice in the online social media environment than honesty—or dishonesty. If you have a vested interest in something you are discussing, be the first to point it out. But also be smart about protecting yourself and your privacy.

**Be thoughtful about how you present yourself in online social networks.** The lines between public and private, personal and professional are blurred in online social networks. By virtue of identifying yourself as an APUS professional within a social network, you are now connected to your colleagues, managers and even APUS’s students and alumni.

**Speak in the first person.** Use your own voice; bring your own personality to the forefront; say what is on your mind.

**Use a disclaimer.** Whether you publish to a blog or some other form of social media, make it clear that what you say there is representative of your views and opinions and
not necessarily the views and opinions of APUS. At a minimum in your own blog, you should include the following standard disclaimer: "The postings on this site are my own and don't necessarily represent APUS's positions, strategies or opinions." APUS professionals are personally responsible for the content they publish on blogs, wikis or any other form of user-generated media. Be mindful that what you publish will be public for a long time.

Respect copyright and fair use laws. For APUS's protection and well as your own, it is critical that you show proper respect for the laws governing copyright and fair use of copyrighted material owned by others, including APUS's own copyrights and brands. You should never quote more than short excerpts of someone else's work. And it is good general blogging practice to link to others' work. Keep in mind that laws will be different depending on where you live and work.

Protecting confidential and proprietary information. Social communities blur many of the traditional boundaries between internal and external communications. Be thoughtful about what you publish—particularly on external platforms. You must make sure you do not disclose or use APUS confidential or proprietary information or that of any other person or company in any online social computing platform. Don't provide APUS's or another's confidential or other proprietary information. If you are unclear as to the propriety of a post, it is best to refrain and seek the advice of management. Don't cite or reference students, partners or staff members without their approval. When you do make a reference, where possible link back to the source. Reposting job opportunities, news items and events is encouraged so long as the information is linked to the APUS-original content and is not altered. (e.g., post a link to our employment section versus copy/paste of a job description.) Ask permission before posting someone's picture in a social network or publishing in a blog a conversation that was meant to be private.

Managers and executives take note: A public blog is not the place to communicate APUS policies to APUS employees.

APUS's business performance. You are not authorized to comment on confidential APUS financial information such as APUS's future business performance, business plans, or prospects. This includes statements about an upcoming quarter or future periods or information about alliances, and applies to anyone including conversations with Wall Street analysts, press or other third parties (including friends and family members).

Protect APUS's students, alumni and business partners. Students, alumni and business partners should not be cited or obviously referenced without their approval. Externally, never identify a student, graduate, or business partner by name without permission.

Respect your audience and your coworkers. Remember that APUS is an academic organization whose employees and clients reflect a diverse set of values and points of view. Don't be afraid to be yourself, but do so respectfully. If your blog is self-hosted, use your best judgment and be sure to make it clear that the views and opinions expressed are yours alone and do not represent the official views of APUS. Don't use ethnic slurs, personal insults, obscenity, or engage in any conduct that would not be acceptable in APUS's workplace. You should also show proper consideration for others' privacy. When disagreeing with others' opinions, keep your comments respectful and polite. Always
pause and think before posting. That said, reply to comments in a timely manner, when a response is appropriate.

Add value. APUS's brand is best represented by its people and everything you publish reflects upon it. Blogs and social networks that are hosted on APUS-owned domains should be used in a way that adds value to APUS's business. If it helps you, your coworkers, our students or our partners to do their jobs and solve problems; if it helps to improve knowledge or skills; if it contributes directly or indirectly to the improvement of APUS's academic offerings, processes and policies; if it builds a sense of community; or if it helps to promote APUS's values, then it adds value. Though not directly business-related, background information you choose to share about yourself, such as information about your family or personal interests, may be useful in helping establish a relationship between you and your readers, but it is entirely your choice whether to share this information.

Don't pick fights. When you see misrepresentations made about APUS by media, analysts or by other bloggers, you may certainly use your blog—or join someone else's to point that out. Always do so with respect, stick to the facts and identify your appropriate affiliation to APUS. Also, if you speak about a competitor, you must make sure that what you say is factual and that it does not disparage the competitor. Avoid unnecessary or unproductive arguments. Brawls may earn traffic, but nobody wins in the end. Don't try to settle scores or goad competitors or others into inflammatory debates. Here and in other areas of public discussion, make sure that what you are saying is factually correct.

Direct comments about our competitors should be kept to a minimum, if done at all. Discussing and comparing our programs to others is generally best left to authorized University representatives. In recent years many companies have come under heavy scrutiny for negatively characterizing their competition (even if it was truth-based) and not properly disclosing their sources and/or identities.

Be the first to respond to your own mistakes. If you make an error, be up front about your mistake and correct it quickly. In a blog, if you choose to modify an earlier post, make it clear that you have done so.

Use your best judgment. Remember that there are always consequences to what you publish. If you’re about to publish something that makes you even the slightest bit uncomfortable, feel free to discuss it with your manager. Ultimately, however, you have sole responsibility for what you post to your blog or publish in any form of online social media.

Don't forget your day job. You should make sure that your online activities do not interfere with your job or commitments to our students.

Write what you know. Make sure you write and post about your areas of expertise. If you are writing about a topic that APUS is involved with but you are not the APUS expert on the topic, you should make this clear to your readers. And write in the first person. Remember, you may be personally responsible for your content. Find out who else is blogging or publishing on the topic, and cite them.

It's a conversation. Talk to your readers like you would talk to real people in professional situations. In other words, avoid overly pedantic or "composed" language.
Don't be afraid to bring in your own personality and say what's on your mind. Consider content that's open-ended and invites response. Encourage comments. You can also broaden the conversation by citing others who are blogging about the same topic and allowing your content to be shared or syndicated.

**Be a Leader.** There can be a fine line between healthy debate and incendiary reaction. Do not denigrate our competitors or APUS. Nor do you need to respond to every criticism or barb. Try to frame what you write to invite differing points of view without inflaming others. Some topics—like politics or religion—slide more easily into sensitive territory. So be careful and considerate. Once the words are out there, you can't take them back. And once an inflammatory discussion gets going, it's hard to stop.

**Moderation Guidelines**

Moderation is the act of reviewing and approving content before it's published on the site (This applies to social media content written on behalf of APUS, whether on an APUS-owned Web site or not). APUS does not endorse or take responsibility for content posted by third parties, referred to as user generated content (UGC). This includes text input and uploaded files (video, images, audio, executables, and documents).

**Community moderation.** For established, healthy communities, group moderation by regular users can work well. This will sometimes be allowed to take the place of pre-moderation—it must be applied for and approved.

**Balanced online dialogue.** Whether content is pre-moderated or community moderated, follow these three principles: the Good, the Bad, but not the Ugly. If the content is positive or negative and in context to the conversation, then we approve the content, regardless of whether it's favorable or unfavorable to APUS. But if the content is ugly, offensive, denigrating and completely out of context, then we reject the content.

**CELL PHONE/PDA POLICY & USAGE**

This policy outlines the use of personal cell phones and PDA’s at work and the safe use of APUS cell phones or PDA’s by employees while driving.

**Personal Cellular Phones/PDA’s**

While at work, employees are expected to exercise the same discretion in using personal cell phones and PDA’s as is expected for the use of company issued phones. Excessive personal calls during the work day, regardless of the phone used, can interfere with employee productivity and be distracting to others. Employees are encouraged to make personal calls on non-work time when possible and to ensure that friends and family members are aware of APUS’s policy.

APUS will not be liable for the loss of personal cellular phones or PDA’s brought into the workplace.

**Personal Use of Company-Provided Cellular Phones/PDA’s**

When business needs demand immediate access to an employee; the company may issue a business cell phone or PDA to an employee for work-related communications. Employees in possession of company equipment such as cellular phones or PDA’s are expected to protect the equipment from loss, damage or theft. Upon resignation or termination of employment, or at any time upon request, the employee may be asked to produce the phone for return or inspection.
Safety Issues for Cellular Phone and PDA Use
Employees are expected to follow applicable state or federal laws or regulations regarding the use of cell phones or PDA’s at all times.

Employees who have job responsibilities that include regular or occasional driving and who are issued a cell phone or PDA for business use are expected to refrain from using their phone while driving. Use of a cell phone or PDA while driving is not required by the company. Safety must come before all other concerns. Regardless of the circumstances, including slow or stopped traffic, employees are required to pull off to the side of the road and safely stop the vehicle before placing or accepting a call. Employees can utilize “hands-free” operations such as Blue Tooth. Employees should refrain from discussing complicated or emotional matters and keep their eyes on the road. Special care should be taken in situations where there is traffic, inclement weather or the employee is driving in an unfamiliar area.

Employees who are charged with traffic violations resulting from the use of their phone or PDA while driving will be solely responsible for all liabilities that result from such actions.

Special Responsibilities for Managerial Staff
As with any policy, management staff is expected to serve as role models for proper compliance with the provisions above and are encouraged to regularly remind employees of their responsibilities in complying with this policy.

Violations of this policy will be subject to the highest forms of discipline, including separation of employment.