



# Iron Mountain (Australia)

Modern Slavery Statement  
2023





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## A Message from our Vice President and General Manager, Australia and New Zealand

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I am pleased to present Iron Mountain's Modern Slavery Statement for the 2023 financial year.

At Iron Mountain we are proud to be an ethical, sustainable and socially responsible organisation committed to respecting, protecting, upholding and advancing human rights. As part of a multi-national organisation providing services and goods to a large and diverse range of customers, we appreciate the challenges presented by modern slavery and our role in minimising the risks of modern slavery appearing in our organisation and supply chain.

Our commitment to human rights is guided by the UN Guiding Principles on Business and Human Rights and underpinned by our Corporate Sustainability Report and Code of Business Conduct and Ethics, a global trend for transparency in human rights and our drive to continually improve our practices and engagement with other parties.

Whilst we recognise there is no "one size fits all" approach to modern slavery, we are determined to remain vigilant. We will continue to raise awareness about modern slavery and monitor, assess and improve upon the effectiveness of our practices to manage and remove risks of modern slavery appearing within our organisation.



Paul Lamb



## Introduction

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Iron Mountain has a zero tolerance approach to all forms of modern slavery.

Our commitment to supporting and respecting human rights is a promise we make to do “*what is right and not just what is legal*”. This commitment is important to Iron Mountain and one that we expect our business partners and suppliers to support.

Pursuant to the *Modern Slavery Act 2018* (Cth) (the “**Act**”), all entities with an annual consolidated revenue threshold over \$100,000,000 and which are either an Australian entity or a foreign entity carrying on business in Australia within the reporting period<sup>i</sup>, must comply with the Act and publish a Modern Slavery Statement (“**Statement**”). This Statement is published pursuant to section 14 of the Act.

## Reporting entities

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This Statement is a joint statement issued by Iron Mountain Australia Group Pty Ltd (ABN 25 004 270 991) (“**IMAG**”) and its’ related entity, Iron Mountain Australia Group Services Pty Ltd (ABN 19 079 495 346) (“**IMAGS**”)(collectively “**Iron Mountain**”, “**IM**”, “**we**”, “**us**”, “**our**”). IMAG and IMAGS are both reporting entities within the meaning of section 5 of the Act.

Our Statement captures the 7 mandatory criteria for reporting<sup>ii</sup> and describes the potential for risks of modern slavery<sup>iii</sup> appearing in our business, operations and supply chains and the steps we undertook to address such risks, during the period 1 January 2023 to 31 December 2023 (“**FY23**” or “**Reporting Period**”).

With a focus on developing and implementing procedures, processes and strategies to mitigate exposure to modern slavery risks appearing in its business, operations and supply chain, Iron Mountain continues its commitment to eradicating modern slavery and to the global improvement of human rights

IMAG and IMAGS are incorporated in Victoria, Australia and share:

- a registered head office located at 37 Logistics Drive, Truganina VIC 3029; and
- senior vice presidents, vice presidents, directors, codes, policies and processes and procedures.



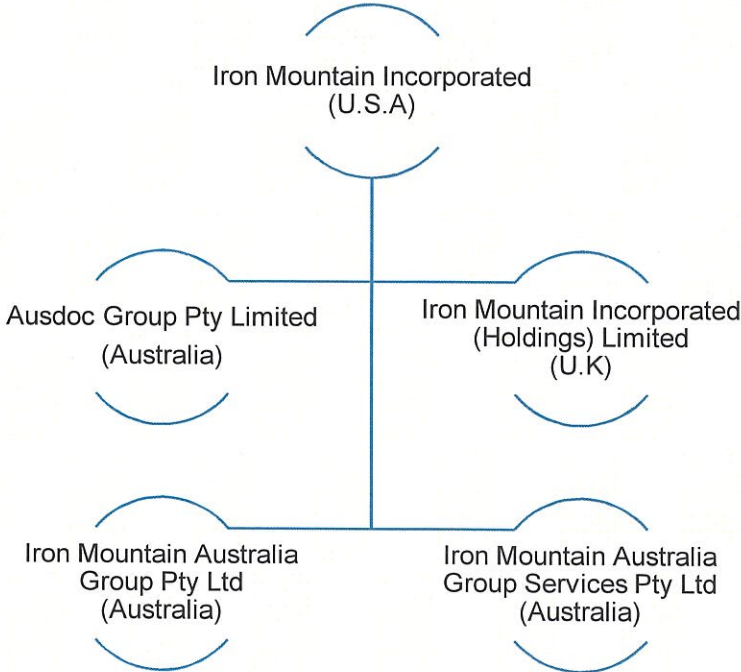
# Organisational structure, operations and supply chains

## Organisational structure

### Who we are: corporate overview

Originally founded by Herman Knaust in 1951 and listed on the New York Stock Exchange, the Iron Mountain Group of companies operates in over 50 countries worldwide and is the trusted partner to over 225,000 customers globally, including more than 90% of the Fortune 1000 companies. We are a global leader for innovative storage, data centre infrastructure, asset lifecycle management, shredding and information management services and have been operating in Australia for almost 24 years.

Iron Mountain is a subsidiary of *Iron Mountain Inc.*, an entity listed on the New York Stock Exchange and headquartered in Portsmouth, New Hampshire, USA.



### Senior management

- Gregory Lever – Senior Vice President & General Manager, Asia Pacific
- Richard Johnstone – Chief Financial Officer & Company Secretary, Asia Pacific
- Paul Lamb – Vice President and General Manager, Australia & New Zealand
- Garry Valenzisi – Vice President, Strategic Account Sales, Global Industries
- Mathew Spratling – Commercial Director, Australia & New Zealand
- Matthew Goldsack – Country Manager, ANZ GISV

## Our values

Our values are central to who we are as a company and as individuals. Guiding our interactions and relationships, our values are premised on acting ethically, transparently, honestly and with integrity (“**Values**”).

With our Values taking centre stage of our operations, Iron Mountain is cementing its global reputation as an ethical, legally compliant organisation. By committing to these Values, we respect and protect human rights and our promise to:

- treat others with respect
- uphold and protect human rights in our operations
- provide safe, secure legal working conditions
- not engage in deceptive recruiting practices and only work with persons who choose freely to work with Iron Mountain
- act fairly and with integrity;
- embrace diversity; and
- monitor our suppliers for compliance with this commitment

## Operational structure

Iron Mountain offers a comprehensive and diverse range of information and asset management service solutions, including storage, destruction (document and IT asset), restoration, cloud and digital protection solutions for a customer base transitioning a multitude of industries ranging from a single, residential person to multi-national corporations.

Our service solutions incorporate equipment, goods and the information and asset management service solutions.

We do not manufacture the equipment or goods used or sold in conjunction with our services.

We have facilities and business operations in each state and territory

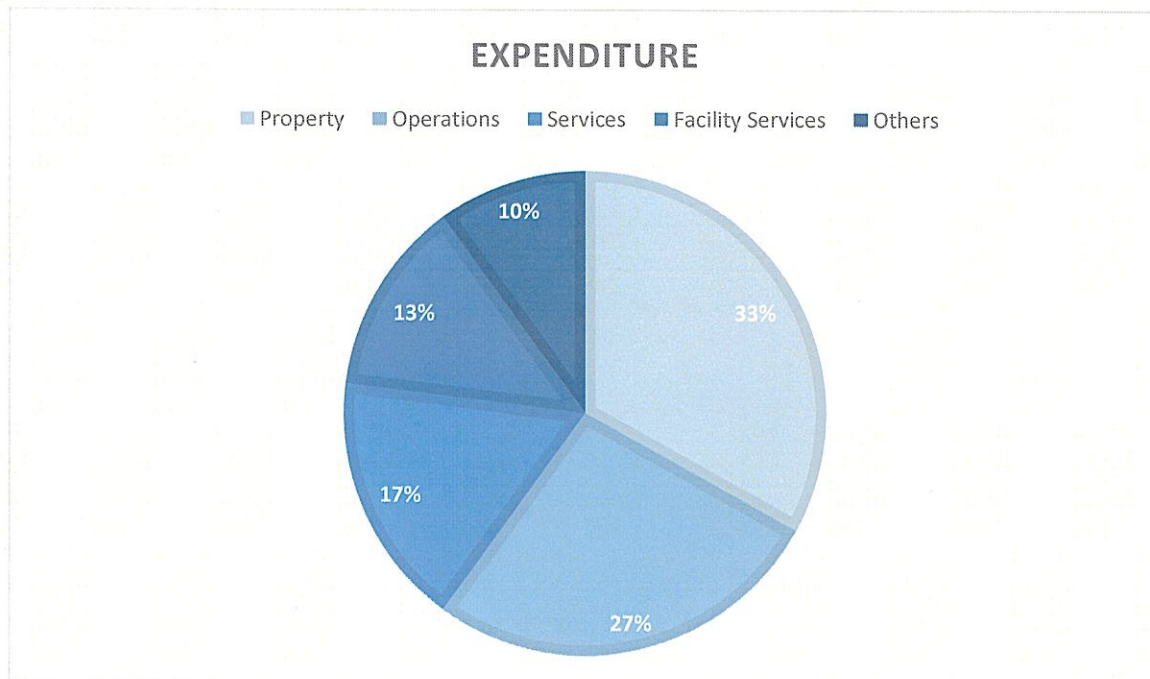
More information about Iron Mountain and the service solutions we provide can be obtained from our website at: [www.ironmountain.com.au](http://www.ironmountain.com.au).



## Supply chain

Iron Mountain's global procurement team oversees the management of our supply chain. The majority of our Tier 1 suppliers have an Australian presence. Other material suppliers are located in the United Kingdom, the USA and New Zealand.

Iron Mountain currently has approximately 122 active suppliers in its' Australian operations. Our main expenditure occurs in property, facility management, operations (incl. transport, logistics, labour hire, equipment and apparel) and services (incl. outsourced cleaning services).

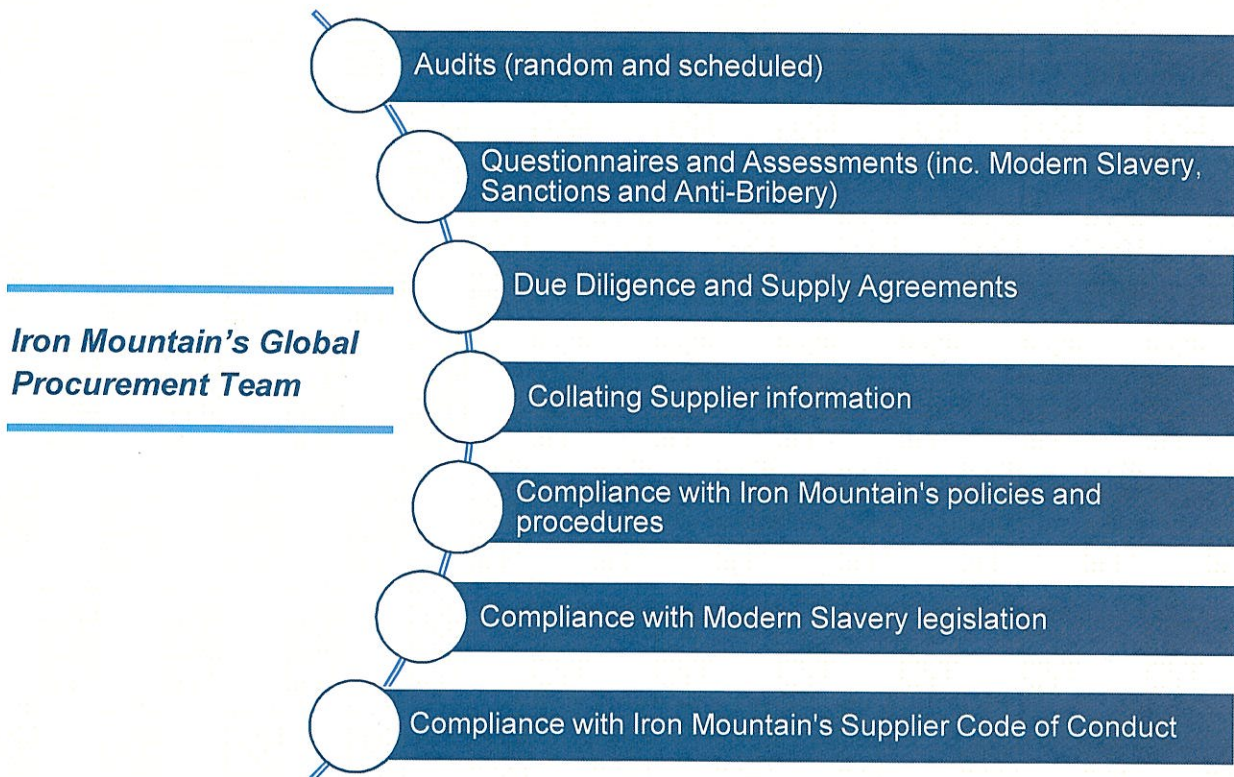


## Supplier selection

When selecting suppliers, our procurement team considers their geographical location, commitment to working with us and abiding by our Supplier Code of Conduct ("**Supplier Code**"), complying with the Act, their general approach to preventing modern slavery in their operations and supply chain and their overall commitment to social responsibility and compliance. This approach includes suppliers completing our modern slavery questionnaires and due diligence requests.

In this respect, Iron Mountain does not necessarily consider the cheapest supplier as being the most appropriate one to work with Iron Mountain as we also consider the potential for higher risk of practices appearing in their workforce and business, which are not necessarily aligned with Iron Mountain's and may be contrary to the protection of human rights, including modern slavery.

To become an Iron Mountain Supplier and to ensure supplier commitments are aligned with Iron Mountain's expectations, suppliers must demonstrate commitments that compliment those of Iron Mountain. All suppliers must agree to comply with Iron Mountain's Supplier Code and the Act before Iron Mountain will issue any purchase or work orders to those entities. We will not engage suppliers who are unable or unwilling to make those commitments or whose responses to our modern slavery questionnaires or due diligence requests, are inadequate or incomplete. The processes and tools utilised by our local and global procurement teams to manage and assess suppliers, include:



### Supply agreements

All supplier arrangements with Iron Mountain are subject to execution of a formal, written Agreement between the parties prior to the supplier commencing any services for Iron Mountain. Whilst suppliers are managed by Iron Mountain's procurement team, all Agreements with such suppliers are reviewed by Iron Mountain's legal team in compliance with internal policies and guidelines. Execution of these Agreements is undertaken in compliance with Iron Mountain's internal authorised signatory policy.



# Modern slavery risk assessment and management in our operations and supply chain

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## United Nations Global Compact (“UNGC”)

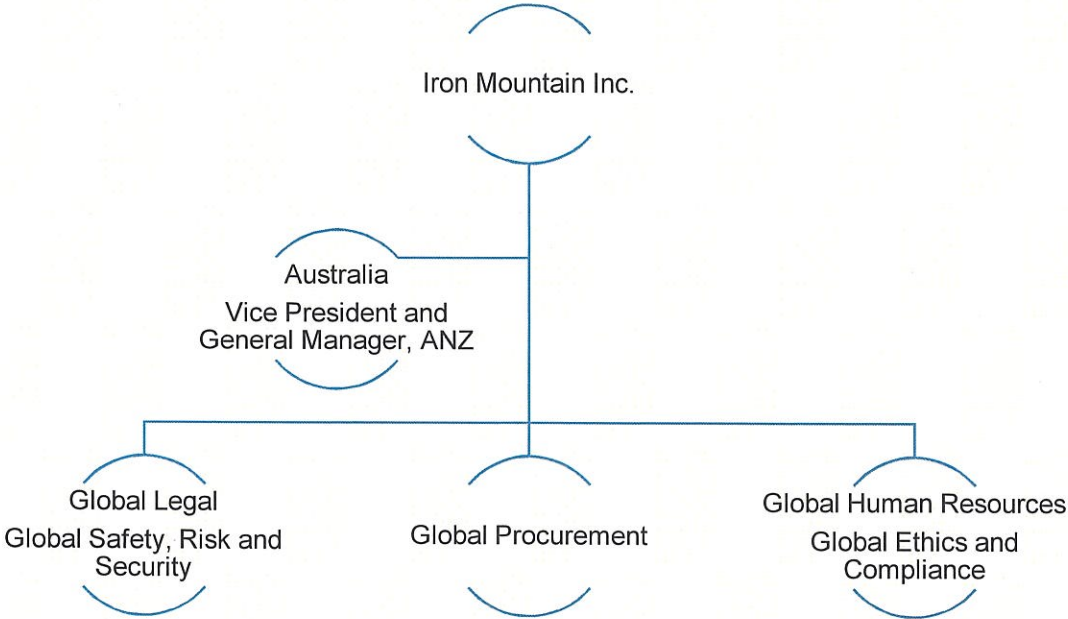
As a signatory to the UNGC Iron Mountain is committed to pursuing strategies, policies and procedures, as creating a culture of integrity to support all 10 of the UNGC principles in respect of human rights, labour, the environment and anti-corruption.

## Sustainability report

At Iron Mountain, we are committed to transparent reporting on sustainability efforts in accordance with the guidelines of the Global Reporting Initiative<sup>iv</sup>. We support our employees through a diverse and cultural inclusive workplace. Our Sustainability Report outlines our commitments and progress against key measures of success for our efforts in the community, our environment, and for our people and is available at: <https://www.ironmountain.com/about-us/sustainability>.

## Cross functional working group

Iron Mountain’s cross-functional working group continues focusing on identifying, assessing, mitigating and removing potential modern slavery risks in its operations and supply chain. This group comprises representatives of the following key internal stakeholders:



## Modern slavery assessment tools: partnerships

### Sedex

Iron Mountain is becoming a member of the Supplier Ethical Data Exchange organisation (“Sedex”) which is a global organisation committed to assisting its members with improving their supply chains and utilises an audit process that enables those members to understand the labour, health and safety, environmental performance and ethics within their supply chains. The audit process aims to protect employees and workers from unsafe conditions, discrimination, forced labour and low pay.

### Cm3

Iron Mountain subscribes to Cm3, which is an online contractor safety management and pre-qualification platform onto which suppliers, including Iron Mountain, can upload information relevant to that supplier. Information collated includes ethical sourcing practices, modern slavery and human rights compliance, insurances, certifications and policies.

### Avetta

Avetta is a global contractor risk management platform used by businesses to manage their supply chains. Iron Mountain subscribes to this platform which is also used by our customers and partners to verify Iron Mountain’s own practices and compliance in risk management.

## Key focus areas during the FY23 period

- the nature and location of services we perform;
- our employees, their functions and ongoing training;
- recruitment and due diligence processes;
- supplier assessments and onboarding processes; and
- identifying potential modern slavery risks in our operations or supply chains.

Iron Mountain believes the business sector risks posing the highest risks of modern slavery appearing in its’ supply chain are:

- maintenance and cleaning services for our various offices and facilities;
- suppliers sourcing services, products and components from overseas countries;
- supplier partnerships with overseas based entities; and
- overseas based suppliers.

with associated risks often driven by demands for low skilled, migrant and cheap labour.



Iron Mountain endeavours to engage Australian based suppliers and partners for our operations. Given Australia's strong legislative framework and general compliance stance with respect to human rights, Iron Mountain considers the potential for modern slavery to appear in those suppliers and partners, as low.

We acknowledge the ongoing challenges and risks posed by modern slavery but believe that by taking a proactive position to actively monitor and manage our supply chain as well as continually reviewing and improving upon our internal and external supply chain processes, there is minimal risk of modern slavery appearing in our operations and supply chain.

We recognise that the practices, procedures and measures we utilise to mitigate modern slavery appearing in our business and operations are no guarantee that modern slavery will not arise. However, we are committed to monitoring, investigating and addressing such risks.

## Supplier management and due diligence

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We are compliant with laws and standards that are applicable to our business and operations and expect that our partners are equally compliant. Our contracts and purchase orders also require compliance with applicable laws and standards. Iron Mountain's supplier terms and conditions require compliance with our Supplier Code, the Act and to flow down such compliance through their own operations and supply chains.

If an Iron Mountain supplier or partner would contravene our Supplier Code, the Act or our policies, we will work with them to remedy identified issues whilst retaining the right to terminate the relationship where appropriate.

Iron Mountain actively manages its relationships with its suppliers to ensure they are acting in accordance with best practices, the spirit of the Supplier Code and applicable laws.

No supplier was found to be in breach of the Act, applicable laws or our Supplier Code during FY23.

Underpinning Iron Mountain's commitment to its Values and removing modern slavery risks appearing in its operations or supply chain is its:

- ❖ Code of Business Conduct and Ethics ("**Code of Conduct**"). Our Code of Conduct applies to Iron Mountain employees, regardless of their role. The Code of Conduct:
  - requires everyone is protected and treated with respect and dignity
  - prohibits workplace violence and discrimination
  - values inclusion and diversity
  - risk management and importance of a safe and secure workplace
  - holds people accountable for their actions
  - to respect human rights and prevent modern slavery
  - immediately raise concerns if human rights violations are witnessed or suspected
  
- ❖ Supplier Code of Conduct ("**Supplier Code**");
  - identifies the principals, standards and practices expected from Iron Mountain's suppliers including modern slavery, workplace behaviour and conduct and ethical sourcing
  - Suppliers are expected to abide by the spirit of the Supplier Code and applicable laws
  - Suppliers receive the Supplier Code during onboarding, renewal and due diligence processes
  - for Australian suppliers, an annexure to the Supplier Code specific to modern slavery, applies and is provided to the supplier with the Supplier Code, during onboarding or renewal processes or as part of any due diligence processes
  
- ❖ Global and local policies and statements, which include:
  - Global Human Rights Policy
  - Background Investigation Policy
  - Equal Employment Opportunity Policy
  - Fair Work Information Statement
  - Fair Work Casual Employee Information Statement
  - General Grievance Policy
  - Anti-Bribery and Anti-Corruption
  - International Sanctions and Trade Policy
  - Workplace Violence Prevention Policy
  - Occupational Health and Safety Policy
  - Anti-Discrimination, Harassment and Bullying
  - Third-Party Risk Management Policy
  - Procurement Policy
  - Whistleblowing processes



## Links

- IM's Code of Conduct can be found at:  
<https://www.ironmountain.com/utility/legal/code-of-ethics>
- IM's Supplier Code can be found at:  
<https://www.ironmountain.com/utility/legal/supplier-code-of-conduct>
- IM's Sustainability Report and Global Human Rights Policy can be found at:  
<https://www.ironmountain.com/en-au/about-us/sustainability#report>



# Culture & Engagement

## Employee overview

The Iron Mountain Group employs over 27,000 employees globally with approximately 380 of those employees based in Australia. In Australia we service more than 13,000 customers across a diverse range of industries.

## Everyone has a voice at Iron Mountain

### Speak up culture and whistleblowing

Employees, partners and suppliers are encouraged to speak up (anonymously if preferred) and raise concerns or whistle blow on potentially illegal practices without fear of retribution, retaliation or victimisation.

Concerns may be raised through Iron Mountain's Ethics Line. Our Ethics Line is independently monitored and available 24 hours a day, 365 days a year. Iron Mountain receives reports of concerns generated through its' Ethics Line for review, investigation and action, where appropriate.

### "IM Listening" surveys

Iron Mountain encourages employees to engage with it through regular internal engagement surveys known as "IM Listening". These surveys allow employees to openly and freely express their experiences with Iron Mountain.

The response to Iron Mountain's 2023 IM Listening Survey, was that the vast majority of respondents are proud and committed to work for Iron Mountain, felt managers supported their growth and well-being and 97% felt comfortable speaking up.



## Employee assistance and wellbeing

Iron Mountain recently upgraded its employee assistance program and introduced a *Resources for Living* (“RfL”) program. The RfL is a global network of employee assistance program clinicians and experts supporting our employees’ physical, emotional, social and financial wellbeing. The program is open to Iron Mountain employees and members of their household. Services offered are provided on a confidential, fee free basis and available 24 / 7 from any location and in any language.

In addition to internal surveys and the RfL, Iron Mountains’ various employee assistance programs include access to the “*Wellbeing Skill Building*” program and to “*PsychHub*”, the world’s largest mental health education platform.

During FY23, Iron Mountain created an employee engagement council comprising members of our various internal departments. Employees are encouraged to reach out to council members to discuss or raise any ideas or concerns they may have with respect to Iron Mountain’s business and operations generally. Ideas or concerns raised are raised to Iron Mountain’s senior leadership where appropriate.

## Recruitment and workforce training

Iron Mountain complies with all applicable work, labour and work health and safety laws. We have comprehensive recruitment processes in place, including pre-employment checks on potential employees, ensuring minimum age and pay requirements are complied with and vetting an applicant’s right to work in Australia.

We also use the services of employees from entities within the Iron Mountain Group. Comparable pre-employment checks as those we undertake in Australia are utilised within the Iron Mountain Group.

To supplement Iron Mountain’s workforce, Iron Mountain also utilises services from labour hire and recruitment agencies. Stringent contractual arrangements are in place with those entities including pre-employment checks and compliance with Iron Mountain’s Supplier Code and modern slavery obligations.

We are confident our pre-employment checks significantly reduce the potential for forced labour to exist within our workforce.

All Iron Mountain Group employees must:

- attest to compliance with Iron Mountain’s Code of Conduct on hire; and
- complete mandatory annual training and awareness programs developed in association with independent experts. These programs are presented via an online platform with participation levels monitored and recorded. Our modern slavery training module provides employees with guidance on identifying and reporting on the existence of human trafficking and modern slavery.

Iron Mountain is proud of its employees and strives to give them the best tools and opportunities to support their general wellbeing and career development. All employees are encouraged to take advantage of opportunities to participate in mental health forums and to develop and upskill their knowledge, credentials and experience whether via Iron Mountain’s learning and development program, a trusted partners’ online platform or at in-person educational facilities.

## Effectiveness of actions undertaken to assess modern slavery risks

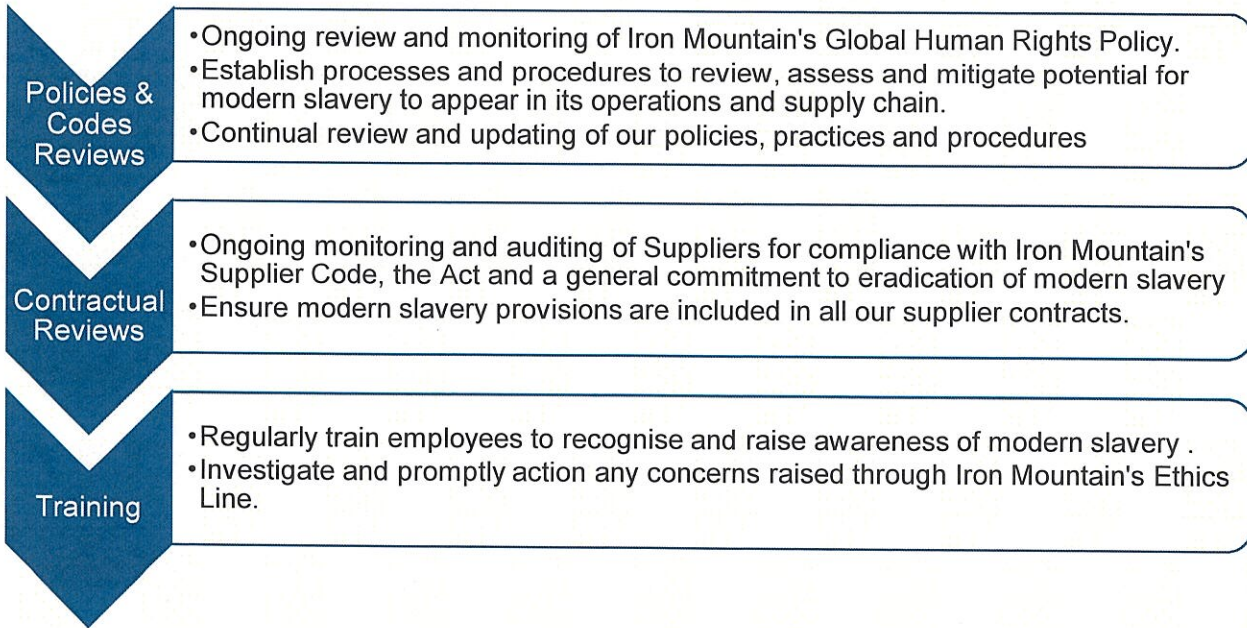
### Reporting

Iron Mountain is committed to assessing and investigating modern slavery risks that may appear in its operations and supply chain. Our processes, procedures are premised on an understanding of what situations or circumstances may constitute a modern slavery risk. Our internal policies and procedures are managed and regularly reviewed by senior management, both at a local and global level.

Iron Mountain’s Ethics Line, Code of Conduct and Supplier Code in conjunction with our General Grievance Handling Policy (ANZ) and Equal Employment Opportunity Policy (ANZ) policies enable our employees, partners and suppliers to raise concerns or issues.

During the FY23 period, Iron Mountain did not receive any reported incidences of modern slavery or breaches of the Act or Iron Mountain’s Supplier Code, in its operations or supply chain.

### The future





Iron Mountain is confident that measures implemented by it to mitigate modern slavery appearing in its' operations and supply chain, enables us to identify and address modern slavery risks. As such, we consider modern slavery risks appearing within our operations and supply chain to be low but will continue to actively monitor any changes to the Act, to review and where appropriate, update our manuals, processes, policies and contracts to capture any changes to the Act and to continually manage our operations and supply chain.

## Consultation with other Iron Mountain entities

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Iron Mountain consulted with its parent company, *Iron Mountain Inc.*, to prepare this Statement. We do not have any subsidiaries.

### Global reporting

Iron Mountain's United Kingdom based entity, *Iron Mountain (UK) PLC* and its affiliates operating in the United Kingdom publish a *Slavery and Human Trafficking Transparency Statement* under the United Kingdom's *Modern Slavery Act 2015*.

## Other relevant information

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Iron Mountain acknowledges its obligations in respect to and the importance of, identifying, addressing and mitigating instances of modern slavery risks that may appear in its business operations, supply chain and to globally respect human rights.

Iron Mountain's commitment to this is enhanced through its policies and processes and the expectation that our employees and partners are aligned with this commitment.

In compiling this Statement, Iron Mountain considered the following 7 key Modern Slavery Act Reporting Compliance Requirements:

1. Identify the reporting entity
2. Describe the reporting entity's structure, operations and supply chains
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
5. Describe how the reporting entity assesses the effectiveness of these actions
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement); and
7. Provide any other relevant information.

## Board approval

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This Statement was approved by Iron Mountain's board of directors on 22<sup>nd</sup> May 2024.

Signed by



**PAUL LAMB**

Vice President and General Manager, Australia and New Zealand  
Iron Mountain Australia Group Pty Ltd (ABN 25 004 270 991)  
Iron Mountain Australia Group Services Pty Ltd (ABN 19 079 495 346)





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<sup>i</sup> Statements are due within six months after the end of the reporting entity's financial year end.

<sup>ii</sup> S16 *Modern Slavery Act* 2018 (Cth)

<sup>iii</sup> Broadly defined, "*modern slavery*" means exploiting persons for commercial or personal gain by engaging in practices including: human trafficking; slavery and associated practices; servitude; forced and child labour.

<sup>iv</sup> <https://www.globalreporting.org/>

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