

Iron Mountain (Australia)

Modern Slavery Statement
FY2025



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Acknowledgment of Country



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Artist: Caroline Dallinger

Iron Mountain acknowledges the Traditional Owners of the many Countries throughout Australia and their connection to the land and sea on which we live and work. We pay our respects to their Elders past and present and extend that respect to the Torres Strait Islander people.

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

I am pleased to present Iron Mountain's FY2025 Modern Slavery Statement.

As a global organisation, Iron Mountain remains firmly committed to ethical conduct and the protection of human rights across all aspects of our business. We recognise that, as a large multinational business, we have both the responsibility and the opportunity to proactively identify, assess and mitigate modern slavery risks within our operations and supply chains.

Guided by the UN Guiding Principles on Business and Human Rights and underpinned by our Corporate Sustainability Report and Code of Ethics and Business Conduct, we have continued to strengthen our governance frameworks, enhance due diligence processes, and improve transparency and accountability across our global business. Throughout FY2025, we have focused on embedding these practices more deeply into our operations, increasing awareness, and driving continuous improvement in the oversight of modern slavery risks

Garry Valenzisi

Introduction

Pursuant to the *Modern Slavery Act* 2018 (Cth) (the “**Act**”), 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 periodⁱ, must comply with the Act and publish a Modern Slavery Statement (“**Statement**”).

This Statement is Iron Mountain’s 6th Modern Slavery Statement published pursuant to section 14 of the Act. In preparing this Statement, Iron Mountain considered the 7 mandatory reporting compliance requirements in section 16ⁱⁱ of the Act to:

1. identify the reporting entity;
2. describe the reporting entity’s structure, operations and supply chain;
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)
7. provide any other relevant information

Our Statement describes the potential for risks of modern slaveryⁱⁱⁱ to appear in our businesses, operations and supply chains and the steps undertaken to address those risks during the period 1 January 2025 to 31 December 2025 (“**FY25**” or “**Reporting Period**”).

Reporting Entities

During FY25 period, Iron Mountain expanded its information and data management and asset lifecycle management services in the region through the acquisitions of ACT Holding Co Pty Ltd, ACT Logistics Pty Ltd, ACT Networks Pty Ltd, Australian Computer Traders Pty Ltd, and Advance Record Management Pty Ltd.

This Statement is a joint statement issued by Iron Mountain Australia Group Pty Ltd (ABN 25 004 270 991) (“**IMAG**”) on behalf of itself and its related entities:

- Iron Mountain Australia Group Services Pty Ltd (ABN 19 079 495 346) (“**IMAGS**”)
 - APCD Pty Ltd (ABN 69 101 231 332) (“**APCD**”)
 - ACT Holding Co Pty Ltd (ABN 14 606 739 271)
 - ACT Logistics Pty Ltd (ABN 59 077 294 734)
 - ACT Networks Pty Ltd (ABN 15 133 307 570)
 - Australian Computer Traders Pty Ltd (ABN 75 063 483 474)
 (collectively “**ACT**”)
- Iron Mountain Australia Group Pty Ltd (ABN 25 004 270 991)
 - Advance Record Management Pty Ltd (ABN 21 060 092 944) (“**ARM**”)

(IMAG, IMAGS, APCD, ACT and ARM are collectively referred to as “**Iron Mountain**”, “**IM**”, “**we**”, “**us**”, “**our**”).

IMAG and IMAGS are reporting entities within the meaning of section 5 of the Act.

Iron Mountain entities share a registered address at 37 Logistics Drive, Truganina VIC 3029 and shared vice presidents, directors, management, codes, policies, processes and procedures.

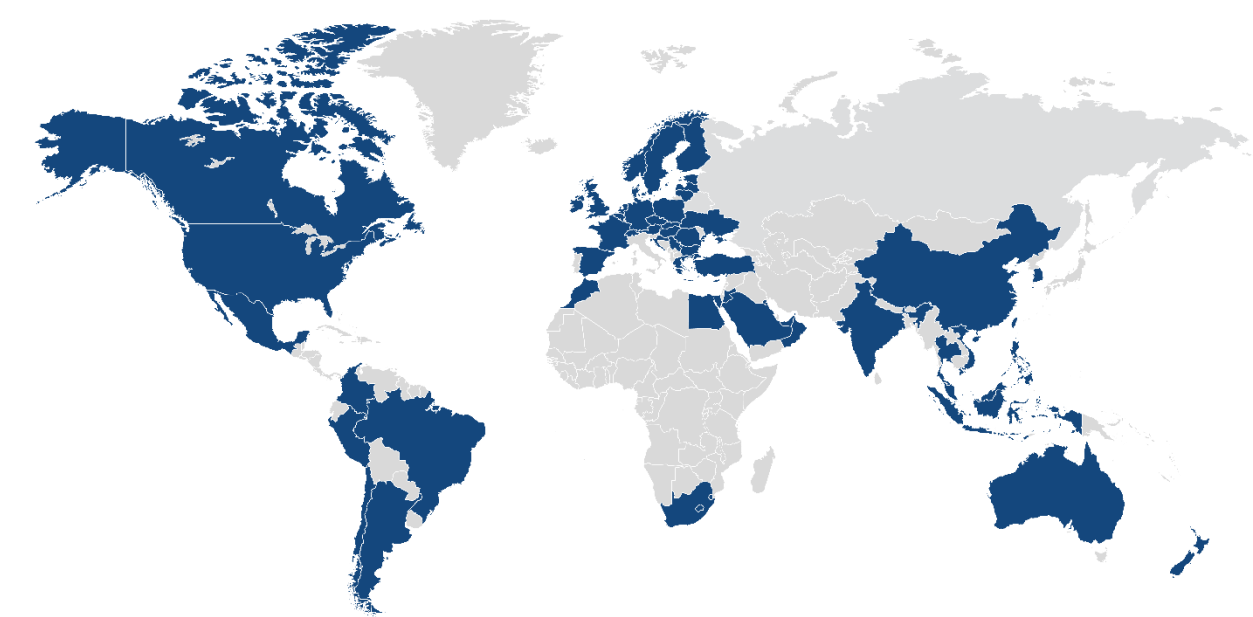
Organisational Structure, Operations and Supply Chain

Structure

Corporate overview

Iron Mountain is a global leader in innovative secure storage, secure destruction, data centre infrastructure, digital transformation, art storage, warehousing and logistics, information and asset lifecycle management services. We enable our customers to manage their digital and physical assets throughout their lifecycle.

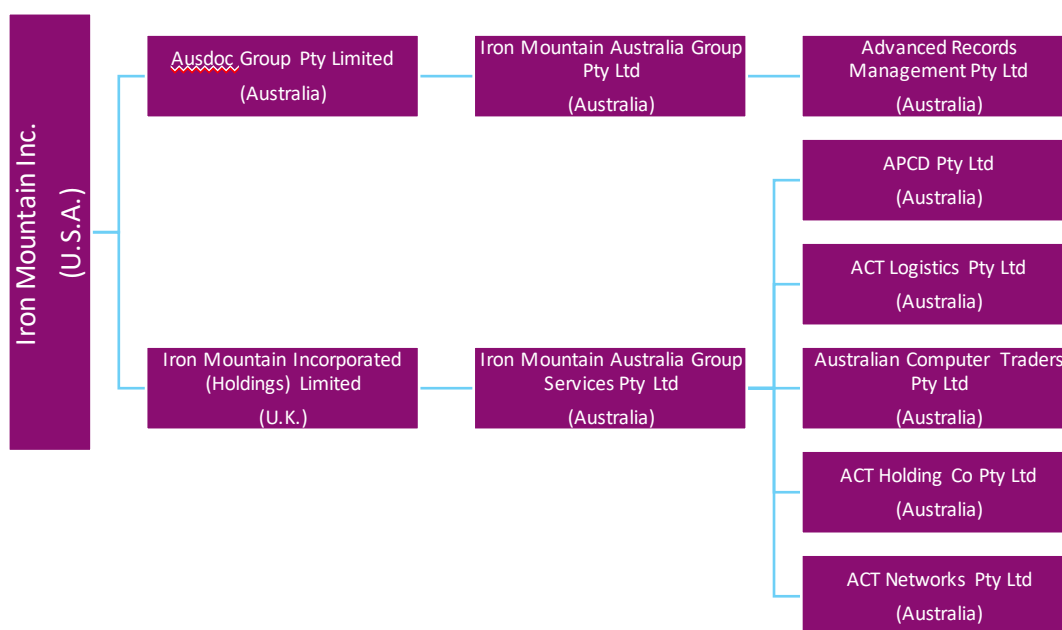
At the time of publication and from more than 1,400 facilities globally, we proudly service and are the trusted partner for over 240,000 customers across 61 countries and 6 continents.



Our corporate parent is *Iron Mountain Inc.*, headquartered in Portsmouth, New Hampshire, USA and listed on the New York Stock Exchange.

We have been operating in Australia for over 26 years servicing over 11,000 customers.

Organisational Hierarchy



Senior Management

- **Iron Mountain, APCD, ACT, ARM**
 - Garry Valenzisi
*Vice President & General Manager, Australia & New Zealand
Asia Pacific – Global Industries & Strategic Verticals
ASIC: Director/ Company Secretary*
 - Lance Paczkowski
*VP, Head of Global Operations
Head of Operations, APAC
ASIC: Director*
 - Stuart Dahlenburg
ASIC: Director, APCD and ACT.
 - Mathew Spratling
Senior Director, Sales, Australia & New Zealand
 - Matthew Goldsack
*Managing Director, BFSI & Country Manager ANZ
Global Industries & Strategic Verticals*



Our Values

Iron Mountain is committed to improving our sustainability and to support and respect human rights in all aspects of our business and operations. We fully support global initiatives to eradicate modern slavery and human rights abuses. We expect our business partners and suppliers to support us in this commitment.

Our Values are the foundation on which our business and operations are based. They represent our most important ideals and enable us to continue as an ethical, trustworthy and legally compliant organisation.

In committing to our Values, we will:

- respect human rights, and treat people respectfully;
- provide safe, secure legal and compliant working conditions;
- be fair, honest and transparent in our day to day actions;
- embrace diversity;
- work with people who want to work with us; and
- monitor suppliers and partners to ensure compliance with our commitment.

Iron Mountain's Values are underpinned by:

- our Code of Ethics and Business Conduct ("**Code of Conduct**"):
- our Supplier Code of Conduct ("**Supplier Code**"):
- our Global and local policies and statements, including our:
 - *Third Party Risk Management Policy*
 - *Background Investigation Policy*
 - *Fair Work Information Statement*
 - *Fair Work Casual Employee Information Statement*
 - *Global Flexible Workplace Model Policy*
 - *General Grievance Policy*
 - *Workplace Violence Prevention Policy*
 - *Occupational Health & Safety Policy*
 - *Policy against Anti-Discrimination, Harassment and Bullying*
 - *Global Human Rights Policy*
 - *Equal Employment Opportunity Policy*
 - *Whistleblowing processes*
 - *International Sanctions and Trade Policy*
 - *Anti-Bribery and Anti-Corruption*
 - *Procurement Policy*
 - *Information Security Policies and Standards*
 - *Occupational Health and Safety Policy*
- stringent Australian workplace laws, including:
 - the *Fair Work Act 2009* (Cth) (including National Employment Standards); and
 - the *Fair Work Regulations 2009* (Cth)
- registered Enterprise Agreements
- Modern Awards
- State and Territory Work Health and Safety laws
- National, State and Territory, anti-discrimination laws;
- Employment contractual arrangements; and
- the United Nations' Guiding Principles on Business and Human Rights.

Australian Operations

Iron Mountain offers a comprehensive and diverse range of information and asset management service solutions for a large and diverse customer base. Currently, we have 49 facilities and business operations located throughout Australia.

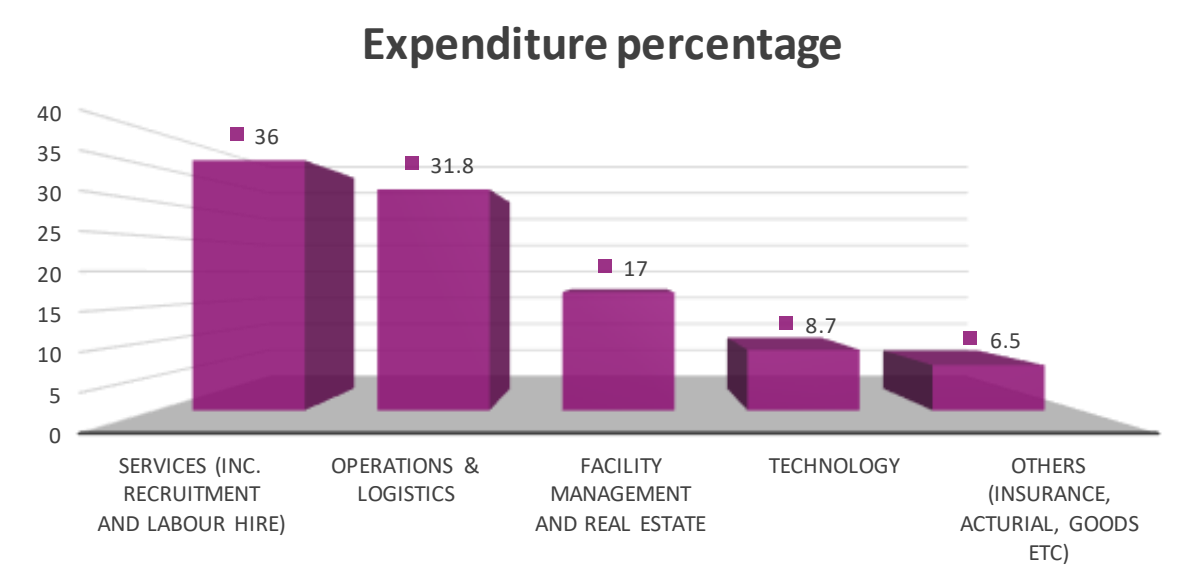
We do not manufacture the equipment or goods used or sold in conjunction with our services.

See our website at www.ironmountain.com/en-au for more information about us and the Services we offer.

Supply Chain

Iron Mountain’s supply chain management, including sourcing, selections, onboarding and management, is overseen by our global procurement team. Our Australian operations are supported by approximately 371 suppliers, with the majority of suppliers, based in Australia. Outside of Australia, we are generally supported by suppliers located in New Zealand, the United Kingdom and the U.S.A.

The table below identifies our main supplier industries and where the majority of our expenditure is incurred:



Supplier Selection

In determining what suppliers are best placed to partner with Iron Mountain, we consider a supplier’s:

- geographic location
 - the raw materials in certain products used by Iron Mountain may have their origin in regions associated with higher risks of modern slavery;
- industry sector
 - industries such as commercial/industrial cleaning are more widely recognised as industries in which modern slavery risks are prevalent;

- commitment to working with Iron Mountain
 - compliance with our Supplier Code of Conduct, policies and procedures;
- their alignment with Iron Mountain's Values;
- their compliance with all relevant laws
 - includes modern slavery, human rights, work health and safety and any industrial / employment laws;
- their general approach human rights and the eradication of modern slavery
 - not only within their own business operations but extends to their supply chains;
- their supply chain management;
- employment practices;
 - compliance with relevant laws;
 - ensuring workers freely engage with them;
 - employee rights are complied with;
- their overall commitment to social responsibility and compliance;
- their willingness and responsiveness to modern slavery questionnaires issued by Iron Mountain and any additional due diligence requests; and
- outcome of any vetting against our internal third party risk management policy.

Iron Mountain rejects suppliers failing to demonstrate a willingness to align themselves with our Values and practices. Suppliers are allocated a risk rating depending on the industries in which they operate. Suppliers most susceptible to, or at higher risk of modern slavery in their supply chains are allocated a higher risk rating and managed accordingly.

Additional processes and tools utilised in our supply chain management, include:



Supply Agreements

All suppliers must execute a formal agreement with Iron Mountain formalising the rights, obligations, understandings and expectations between the parties.

Supplier agreements will *inter alia*, outline:

- duration of the agreement;
- termination of the agreement;
- payment;
- pricing and price review mechanisms;

- service delivery requirements; and
- legal requirements, including:
 - compliance with Iron Mountain's Supplier Code;
 - alignment with Iron Mountain's policies;
 - legislative compliance, including the Act,
 - background checks;
 - work health and safety;
 - subcontracting;
 - ethical conduct;
 - diversity;
 - record maintenance and audit provisions; and
 - flow down of crucial terms through a supplier's own supply chain;

Execution of supplier agreements are processed in accordance with Iron Mountains' authorised signatory policy and transaction reporting requirements.

Modern Slavery Risk Assessment and Management in our Operations and Supply Chain

Modern Slavery Risk Assessment Tools: Internal Compliance

Internal Compliance Team Framework

Iron Mountain's Compliance Team Framework is comprised of representatives from the following:

- Our shareholders
- Our global and local board of directors
- Our global, regional and local directors and executive management
- Our global sustainability team
- Third Party Risk Management Team
- Internal global stakeholder teams with representatives from our procurement; security and risk; human resources; payroll; legal; and privacy and compliance teams.

These stakeholders form the basis for our internal codes, policies and compliance structure.

United Nations Global Compact ("UNGC")

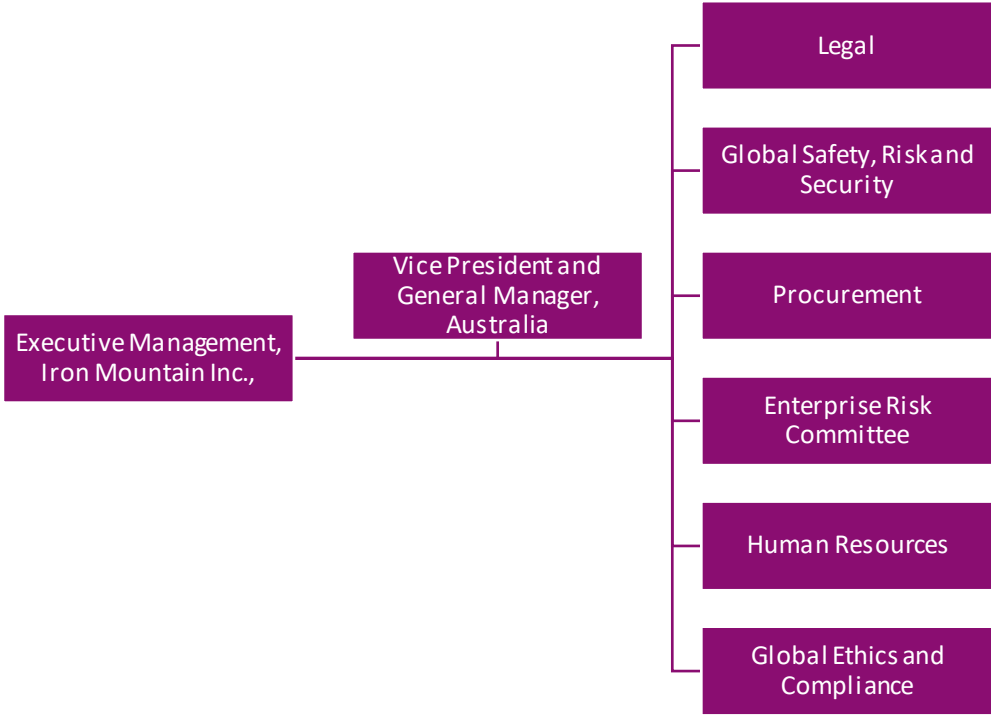
As a signatory to the UNGC, Iron Mountain continues to align itself with its 10 principles ("Principles") and is committed to pursuing strategies, policies and procedures in support of those Principles.

Sustainability Group

Iron Mountain is committed to transparent reporting on sustainability efforts in accordance with the guidelines of the Global Reporting Initiative^{iv}. Our sustainability team actively collaborates with our suppliers, communities and customers to ensure sustainable behaviours are accessible and achievable. Our Sustainability Report captures Iron Mountain's commitment to sustainable ways of working, both within our communities and our organisation.

Third Party Risk Management Team

Our Third Party Risk Management Team comprises representatives from key stakeholders, including:



This teams’ remit is to identify, assess, mitigate and remove potential risks for human rights abuses and modern slavery, from our supply chains and operations, and to improve the mechanisms we use to recognise, mitigate and/or remove those risks.

During the FY25 Reporting Period, the teams’ focus included:

- the types of services performed, where those services were performed and how those services were performed;
- our third party risk management processes, use of supplier assessments, onboarding processes, due diligence mechanisms and self-assessments;
- cross-functional engagement;
- supplier engagement and relationship management;
- identifying potential modern slavery risks in our supply chains and business operations;
- the functions and training requirements for our employees;
- our recruitment and due diligence processes; and
- ongoing review of our policies, practices, standard operating procedures, policies (internal and external) and processes to ensure they remain current, a true reflection of our Values and they are applied effectively.

Modern Slavery Risk Assessment Tools: Partnerships

Partnerships utilised by Iron Mountain to assess modern slavery risks, include:

- | | |
|---|---|
| 1. United Nations Global Compact (“UNGC”) | 2. Supplier Ethical Data Exchange (“Sedex”) |
| 3. Supply Nation | |

Risk of Modern Slavery appearing in Iron Mountain's Supply Chain

Modern Slavery is broadly defined to capture slavery and slavery like offences^v, the most abhorrent forms of the exploitation of vulnerable persons, and includes forced labour, servitude, debt bondage, deceptive recruitment, coercion, trafficking in persons, slavery, servitude, forced marriages and the worst forms of child labour^{vi}.

The 2023 Global Slavery Index^{vii} (the "Index") published by Walk Free highlighted the significant number of people, including children still living in or subject to modern slavery. Modern slavery is still prevalent in large areas of Asia and Africa. Of the Governments identified globally, the United Kingdom at 68% had the highest governmental response to modern slavery, followed closely with 67% governmental response by Australia and the Netherlands. For the Asia-Pacific region, Australia had the highest governmental response^{viii}.

Due to the nature and characteristics of their individual industries, the sectors posing the main risks for modern slavery within Iron Mountain's supply chain include:

- IT technology and electronic equipment suppliers;
- uniform suppliers;
- maintenance and cleaning services for our various offices and facilities;
- suppliers with international based suppliers;
- waste collection;
- supplier partnerships with international affiliates; and
- international suppliers.

Electronics and Garments^{ix} were identified by the Index as products having the highest risks of being produced with modern slavery or forced labour.

The risks of modern slavery or forced labour to appear in these sectors include demands for low skilled, migrant and cheap labour; weak governance and compliance legislation; inequality in labour practices, as well as any potential political and economic instability.

At Iron Mountain we focus on engaging Australian based suppliers and partners for our operations with those suppliers and partners having a similar approach and stance as Iron Mountain to combatting modern slavery and respect for human rights.

Some of our partners and suppliers are also reporting entities for purposes of the Act and publish their own modern slavery statements, whether as part of a group or a single entity, with those statements addressing the mandatory reporting criteria contained in the Act. Remaining smaller or international based suppliers may be reporting entities for purposes of foreign legislation or publish codes of conduct, supplier codes of conduct and policies similar to those of Iron Mountain, including human rights compliance initiatives and requirements.

Iron Mountain considers the potential for instances of modern slavery or forced labour to appear in its supply chain as low. This is based on Australia's strong legislative framework, a general compliance stance to the protection of human rights, and our comprehensive supplier onboarding, maintenance and due diligence processes.

Despite mechanisms we put in place, our rigorous and comprehensive due diligence and onboarding practices, we cannot guarantee modern slavery or human rights abuses will not appear somewhere in our supply chain. However, we are committed to remaining vigilant and will continue to monitor and actively manage our supply chain.

Supplier Management in our Operations and Supply Chain

Iron Mountain uses EcoVadis to annually assess 100% of our global suppliers across four key risk categories: Environment, Labour & Human Rights, Ethics, and Sustainable Procurement. An additional assessment is completed within the EcoVadis platform by suppliers that Iron Mountain has identified as potential high-risk or strategic, representing high spend and/or high impact. The results from these efforts will guide further supplier engagement.

Underpinning all supplier relationships is a formal supplier agreement. These agreements are comprehensive and require compliance with applicable laws as well as Iron Mountain's own codes, policies and practices. We actively monitor and manage our supplier relationships, and if a supplier or partner were to contravene our agreement, we would work with that supplier to remedy the situation, implement measures to mitigate a recurrence of identified issues, whilst retaining the right to terminate the relationship if appropriate.

Further Information:

Can be found at the following links:

- Code of Ethics and Business Conduct can be found at:
<https://www.ironmountain.com/utility/legal/code-of-ethics>
- Supplier Code of Conduct can be found at:
<https://www.ironmountain.com/utility/legal/supplier-code-of-conduct>
- Corporate Sustainability Documents can be found at:
<https://www.ironmountain.com/about-us/sustainability>
- Corporate Sustainability Report can be found at:
<https://www.ironmountain.com/about-us/sustainability#report>
- United Nations Global Compact – Participants
<https://unglobalcompact.org/what-is-gc/participants/91841-Iron-Mountain>

Review of the Act

The Act must be reviewed every 3 years to determine the operation of and compliance with the Act, and to determine if anything further needs to be undertaken to improve operation of the Act^x.

The first review undertaken by Professor John McMillan, AO^{xi} made a number of recommendations in support of amending the Act, including to:

- lower the reporting threshold to \$50m^{xii};
- expand the mandatory reporting criteria^{xiii};
- introducing a positive duty to conduct due diligence on supply chains^{xiv}; and
- introduce penalties^{xv}.

Iron Mountain does not foresee issues in complying with these recommendations, if implemented. Our annual consolidated revenue exceeds the current threshold limit, and as a very large multi-national organisation, we have similar obligations and requirements to publish human rights or modern slavery statements in other jurisdictions. Our comprehensive due diligence processes,

procedures, practices and requirements, are applied to our supply chains globally.

Culture & Engagement

Recruitment and workforce training

Iron Mountain is compliant with applicable work, labour, and work health and safety laws. We are a diverse, inclusive equal opportunity employer, and will not confiscate employee personal documents, require payment for services or to secure employment, tolerate coercion or deception and will only employ people who freely want to work with and for, Iron Mountain.

Iron Mountain has business operations in countries recognised as high risk or potentially high risk for modern slavery and human rights abuses. However, Iron Mountain's approach to respecting human rights applies in those countries as well. Our stringent and comprehensive codes, policies and processes are applied equally across our global businesses.

We utilise comprehensive recruitment processes that include pre-employment checks which capture, a right to work in Australia, and ensuring minimum age and payment requirements are complied with.

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

Our workforce is supplemented through labour hire and recruitment agencies. Comprehensive contractual arrangements with those agencies incorporate pre-employment checks and compliance with our Supplier Code and modern slavery obligations.

We are confident these processes significantly reduce potential for modern slavery risks to exist within our workforce.

All 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. The modern slavery training module provides employees with guidance on identifying and reporting on the existence of human trafficking and modern slavery.

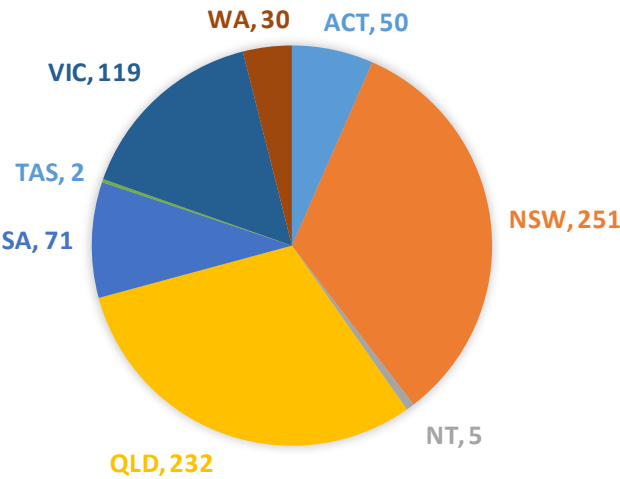
Iron Mountain is proud of its employees and strives to give them the best tools and opportunities to support their general wellbeing and career development.

Employee overview

Currently Iron Mountain employs over 28,850 Mountaineers globally, with 760 of those Mountaineers, based in Australia, servicing almost 13,000 customers across a diverse range of industries.

Below is a breakdown of our employees by location:

EMPLOYEE NUMBERS BY LOCATION



Everyone has a voice at Iron Mountain

Ethics Line and Whistleblowing

Our Ethics Line is independently monitored and available 24 hours a day, 365 days a year. Employees are encouraged to use this mechanism to raise concerns or whistle blow potentially illegal practices.

“IM Listening” surveys

We encourage our employees to participate in our annual “IM Listening” survey and share their experiences of working at Iron Mountain or to offer feedback on how employee experiences can be enhanced.

The 2025 survey results for Australia and New Zealand showed a positive increase in responses compared to 2024. With over 80% submission rates year over year, the 2025 survey indicated a marked increase in employees:

- feeling valued, respected and able to be themselves at work;
- having a sense of belonging;
- there are equal opportunities in the company;
- there is open and honest communication;
- being comfortable voicing their ideas and opinions; and
- their wellbeing cared for.

Taking Care of our Employees and Communities

We endeavour to contribute positively to the wellbeing of our employees, their families and our communities.

Our robust global network of 28,850 employees and 1,400 offices and facilities is actively engaged in our global community. We offer volunteerism, financial grant awards and in-kind service to nonprofits and non-governmental organisations to help make our neighborhoods a better place to work and live. We offer multiple initiatives and programs to our employees including educational support and wellness and health platforms available on a 24 hour, 7 day a week basis.

For our Australian and New Zealand employees, we have an Employee Engagement Council. The Council regularly creates fun activities for employees and their families. Employees are encouraged to contact council members to discuss or raise any ideas or concerns they may have concerning our business operations.

Awards and Recognition

In 2025, Iron Mountain was honoured to receive the following top scores, awards and recognition:

- *Listed on the 2025 FTSE4Good Index
- Scored 100 on the 2025 Disability Index
- Named a Top Performer in Employee Wellness by JUST Capital
- *Achieved the Equality 100 Award from the Human Rights Campaign Foundation
- Awarded Silver Medal Sustainability Rating by EcoVadis
- Recognised as a Great Place to Work in 12 locations, including Australia

*i in compliance with Regulation (EU) 2024/3005, please visit the FTSE Russell ESG Ratings Disclosure page (https://www.lseg.com/content/dam/ftse-russell/en_us/documents/policy-documents/esg-disclosures-metric-methodology-and-calculation-guide.pdf) and EcoVadis ESG Ratings Methodology page (<https://support.ecovadis.com/hc/en-us/articles/115002531507-What-is-the-EcoVadis-methodology>) for detailed information on the rating methodologies, data sources, and ESG weighting factors.

Effectiveness of Actions Undertaken to Assess Modern Slavery Risks

Reporting

Iron Mountain maintains its commitment to assessing and investigating modern slavery risks within its operations and supply chain. Our policies, processes and procedures are premised on an understanding of the types of situations or circumstances presenting the most risk to our operations.

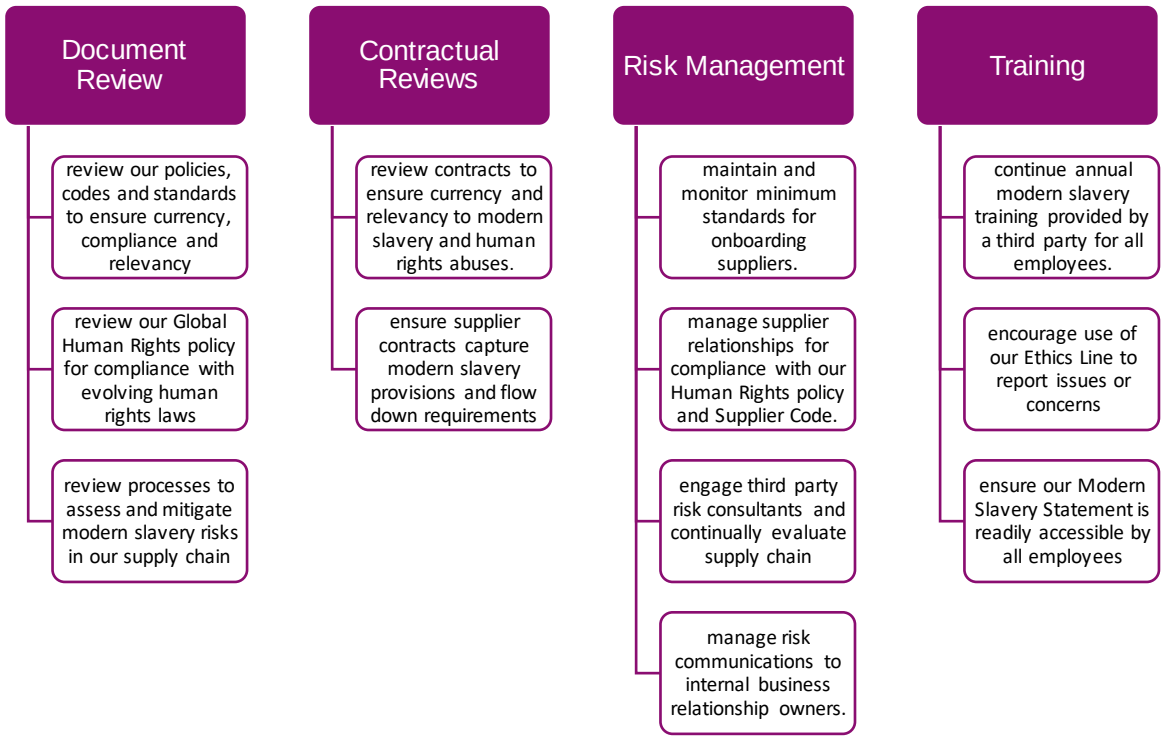
Our Ethics Line, Code of Conduct, Supplier Code and Global Human Rights policy, in conjunction with Australian and New Zealand General Grievance Handling Policy and Equal Employment Opportunity policies enable employees, partners and suppliers to raise concerns or issues.

No reported incidents of actual or potential breaches of human rights, modern slavery or our Supplier Code, were reported to or identified in our business operations and supply chain.

The Future

Iron Mountain is committed to applying our core values, processes and policies across our operations and supply chain in an endeavour to continue efforts to combat modern slavery and human rights abuses.

We aim to achieve this by:



We are confident that the mechanisms we have in place to monitor our business operations and supply chain for risks of modern slavery or human rights abuses, will enable us to quickly identify and address such risks. We remain committed to monitoring relevant legislation and to capture any amendments to the legislation in our policies.

For further information about how Iron Mountain is building a better and more sustainable future, please refer to our Sustainability Report.

Consultation with other Iron Mountain entities

In preparing this Statement and to ensure its content aligns with Iron Mountains’ strategies, processes, initiatives and Values, Iron Mountain consulted with:

- its parent company, *Iron Mountain Inc.*;
- internal leadership;
- IMAGs;
- Our Global Sustainability corporate team; and
- Our Human Resources, Global Procurement, Sales Enablement and Commercial Teams.

Consultation included:

- identifying supplier industries and potential risk areas;
- supplier management;

- policies and processes available (currency and monitoring);
- incident reporting (if any, why and how).

Global reporting

Iron Mountain entities publishing similar statements are:

- Iron Mountain (UK) PLC:
 - Statement Type: *Slavery and Human Trafficking Transparency Statement*
 - Legislation: *United Kingdom's Modern Slavery Act 2015*;
 - Link: <https://www.ironmountain.com/en-gb>; and
- Iron Mountain Norge A/S:
 - Statement Type: *Norway Transparency Act Statement*
 - Legislation: *Norwegian Transparency Act*
 - Link: www.ironmountain.com/nn-no/about-us/sustainability
(refer to the tab: Norges åpenhetslov)

Other Relevant Information

Iron Mountain acknowledges its obligations in respect to and the importance of, identifying, addressing and mitigating risks of modern slavery risks appearing in its business operations, supply chain and to globally respect human rights. We enhance this commitment through our policies and processes and the expectation that our Mountaineers and partners are aligned with this commitment.

In compiling this Statement, Iron Mountain considered the 7 key mandatory criteria^{xvi} contained in the Act (refer to Appendix 1).

Board Approval

This Statement was approved by Iron Mountain's board of directors on 27 May 2026.

Signed by

Signed by:

 3AA215D4DFED438...

GARRY VALENZISI

Vice President and General Manager, Australia and New Zealand
 Asia Pacific – Global Industries & Strategic Verticals
 Director / Company Secretary

Appendix 1: Modern Slavery Act Reporting Compliance Requirements

Mandatory Criteria	Relevant Section	Statement Section(s)	Page(s)
1. Identify the Reporting Entity	s16(1)(a)	➤ Reporting Entities ➤ Organisational Structure, Operations and Supply Chain	3, 4, and 5
2. Describe the reporting entity's structure, operations and supply chains	s16(1)(b)	➤ Organisational Structure, Operations and Supply Chain ➤ Australian Operations ➤ Supply Chain	4, 5, and 7
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	s16(1)(c)	➤ Supply Chain ➤ Supplier Selection ➤ Supply Agreements	7, 8, and 11
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	s16(1)(d)	➤ Supplier Selection and Agreements ➤ Modern Slavery Risk Assessment Tools: Internal Compliance ➤ Modern Slavery Risk Assessment Tools: Partnerships ➤ Risk of Modern Slavery appearing in Iron Mountain's Supply Chain ➤ Supplier Management in our Operations and Supply Chain ➤ Recruitment and Workforce Training	7, 8, 9, 11, 12 and 13
5. Describe how the reporting entity assesses the effectiveness of these actions	s16(1)(e)	➤ Modern Slavery Assessment Tools: Internal Compliance ➤ Modern Slavery Assessment Tools: Partnerships ➤ Supplier Management in our Operations and Supply Chain ➤ Third Party Risk Management Team ➤ Effectiveness of Actions Undertaken to Assess Modern Slavery Risks	9, 10, 11, 12, 15 and 16
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)	s16(1)(f) (i) and (ii)	➤ Consultation with other IM entities	16, and 17
7. Provide any other relevant information	s16(1)(g)	➤ The Future ➤ Other Relevant Information	16, and 17

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- ⁱ Statements are due within six months after the end of the reporting entity's financial year end.
- ⁱⁱ s16 *Modern Slavery Act 2018* (Cth)
- ⁱⁱⁱ 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.
- ^{iv} <https://www.globalreporting.org/>
- ^v Criminal Code Act 1995 (Cth) s270 and s271
- ^{vi} Worst Forms of Child Labour Convention, 1999 (No. 182) – International Labour Office (<https://www.ilo.org/international-programme-elimination-child-labour-ipecl/what-child-labour/ilo-conventions-child-labour>)
- ^{vii} <https://www.walkfree.org/global-slavery-index/>
- ^{viii} <https://www.walkfree.org/global-slavery-index/findings/regional-findings/asia-and-the-pacific/>
- ^{ix} <https://www.walkfree.org/global-slavery-index/>
- ^x s24 *Modern Slavery Act 2018* (Cth)
- ^{xi} Report of the statutory review of the *Modern Slavery Act 2018* (Cth) *The first three years*, A report by Professor John McMillan, AO
- ^{xii} Recommendation No. 4
- ^{xiii} Recommendation No. 8
- ^{xiv} Recommendation No. 11
- ^{xv} Recommendation No. 20
- ^{xvi} s16 *Modern Slavery Act 2018* (Cth).

Disclaimer: The information provided in this document is done so for the sole purpose of Iron Mountain's Modern Slavery Statement FY2025, taking into consideration Iron Mountain's services, policies, codes, locations and information available to Iron Mountain. Iron Mountain has endeavoured to ensure the information and any images contained in this statement, is accurate at the time of publication. This statement nor any of the information contained in it, may be used, copied, extracted, quoted, duplicated, referenced or otherwise made available to any person or entity, in whole or in part and whether electronically, orally or by some other means, without Iron Mountain's express consent. Iron Mountain reserves the right to make changes to its information, service lines, locations, images or similar documentation or information, without notice. Iron Mountain will not be liable for any injury or loss or damage whatsoever, arising from any errors or omissions in the information or images contained in this statement or from any use or reliance of such information or image.