



Iron Mountain (Australia)

**Joint Modern Slavery Statement
for the Financial Year 2022**



Contents

Introduction and Reporting Entities	2
<i>Our Values</i>	3
Organisational Structure, Operations and Supply Chains	4
<i>Organisational Structure</i>	4
<i>Operations</i>	4
<i>Supply Chain</i>	5
Ongoing modern slavery risk assessment and management in IM’s operations and supply chain	6
<i>Modern Slavery</i>	6
<i>Cross Functional Working Group</i>	7
Supplier Management and Due Diligence	8
<i>Supply Agreements and Purchase Order Terms and Conditions</i>	8
<i>IM policies</i>	8
<i>Links</i>	9
<i>Everyone Has a Voice at Iron Mountain</i>	9
<i>Recruitment</i>	10
<i>Training and awareness programs for employees</i>	10
Effectiveness of actions undertaken by IM to assess and address modern slavery risks	11
<i>Remediation</i>	11
<i>Looking ahead</i>	11
Consultation with other IM entities	11
Other Relevant Information	12
<i>Covid-19</i>	12
Board Approval	13

Introduction and Reporting Entities

This modern slavery statement sets out the actions and activities undertaken by Iron Mountain Australia Group Pty Ltd (ABN 25 004 270 991) (“**IMAG**”) and Iron Mountain Australia Group Services Pty Ltd (ABN 19 079 495 346) (“**IMAGS**”) (collectively “**Iron Mountain**”, “**IM**”, “**us**”, “**we**”, “**our**”) during the financial year 1 January 2022 to 31 December 2022 (“**FY22**”).

IMAG and IMAGS are reporting entities within the meaning of section 5 of the *Modern Slavery Act 2018* (Cth) (the “**Act**”). Both IMAG and IMAGS are incorporated in Victoria, Australia and have a shared registered head office located at 465 Plummer Street, Port Melbourne, Victoria 3207.

IMAG and IMAGS share the same directors, managing director, codes, processes and policies. The directors of IMAG and IMAGS are conscious of their responsibilities and obligations under the Act.

IMAG and IMAGS are committed to eradicating modern slavery globally and improving human rights as a whole. This combined modern slavery statement has been developed in accordance with section 14 of the Act.

Living our Values and Protecting What Matters Most

Our Values

Iron Mountain's business values are premised on acting ethically, with transparency, honesty and integrity ("Values"). Our Values define who we are as individuals and as a company. They guide our everyday actions, whether with our employees, our customers, vendors or other third parties.

It is with these Values at the forefront of our operations that Iron Mountain builds on its reputation as an ethical, legally compliant organisation.

By committing to these Values, we respect and protect human rights, within our business, our communities and our supply chains. As our CEO, Bill Meaney says, *"We live our Values every day, everywhere we operate"* and *"Our Values consistently drive our behaviour and represent the ideals we hold most important"*.



Committing to these Values, means Iron Mountain will:

- treat others the way we expect to be treated
- implement measures to uphold and protect human rights in our operations
- provide proper, legal working conditions and remuneration in accordance with applicable legislation
- not engage in deceptive recruiting practices
- only work with persons who freely choose to work with Iron Mountain
- act fairly and with integrity in all our business operations and dealings; and
- monitor our suppliers for compliance with this commitment

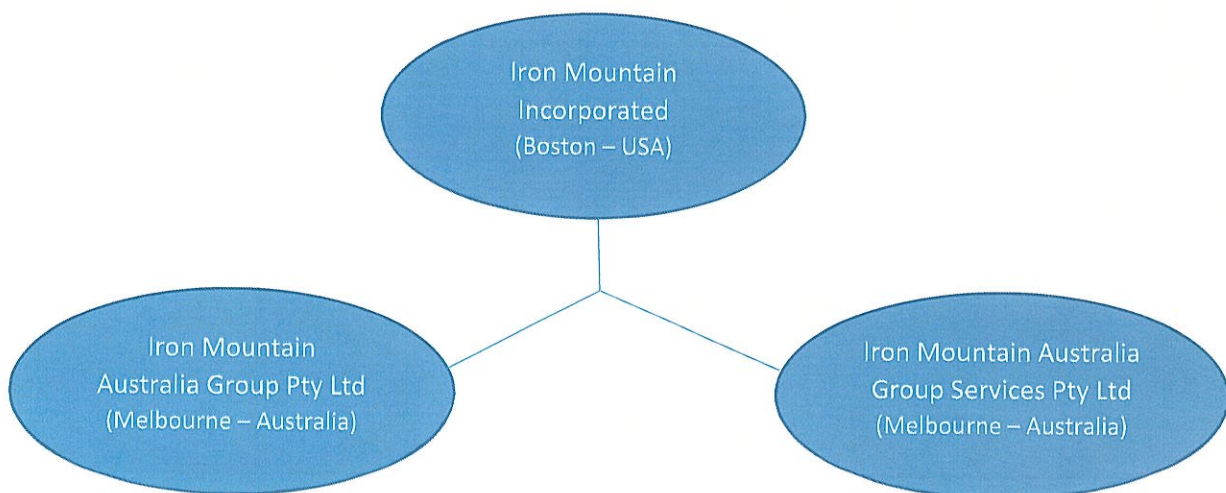


Organisational Structure, Operations and Supply Chains

Organisational Structure

Iron Mountain is part of the Iron Mountain Group, a global business founded in the USA in 1951 dedicated to storing, protecting and managing information and assets. Our parent company, *Iron Mountain Inc.*, is based in Boston, USA and listed on the New York stock exchange.

The Iron Mountain Group operates in over 50 countries in both established and emerging markets and services in excess of 225,000 customers globally. The Iron Mountain Group has over 26,000 employees, with approximately 400 employees based in Australia.



Iron Mountain has offices and facilities in each state and territory of Australia.

Operations

Iron Mountain provides a comprehensive and diverse range of information and asset management services, including storage, destruction, restoration, cloud, digital and protection solutions for a customer base transitioning a large range of industries. We do not manufacture the equipment or goods used or sold in conjunction with the services we provide.

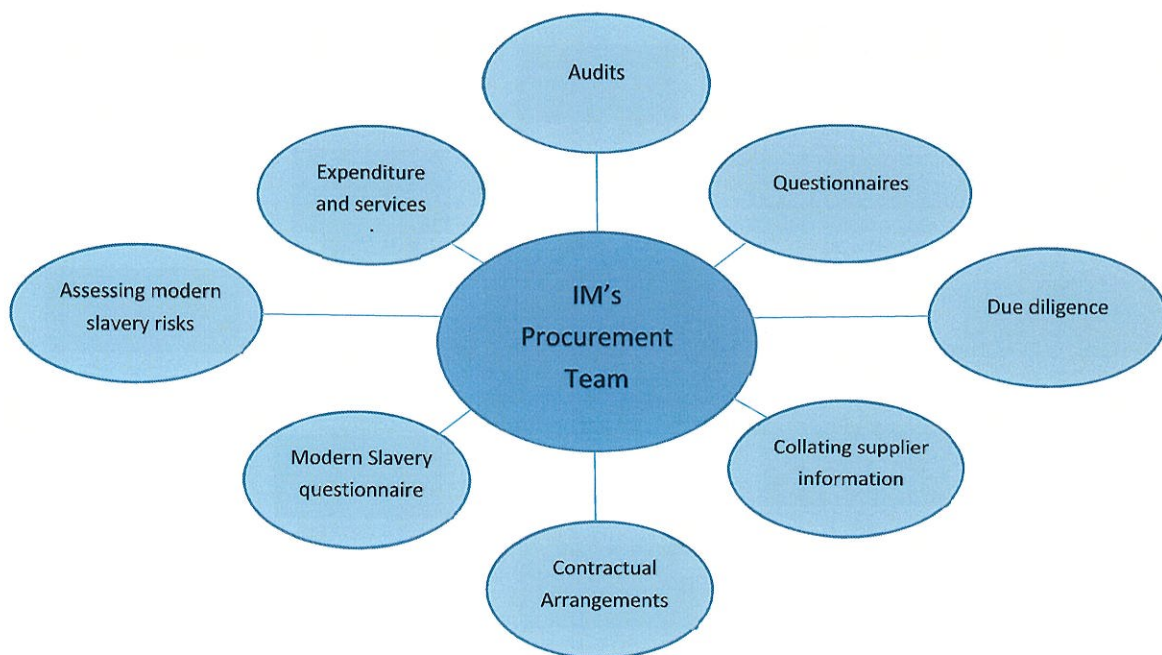
Further information about Iron Mountain and the services we provide can be obtained from our website at: www.ironmountain.com.au.

Supply Chain

The majority of Iron Mountain's supply chain have an Australian presence and are managed by our procurement team. Our suppliers include operators in the service and manufacturing industries. Main expenditure is experienced in facility management, operations and logistics, services, labour hire, equipment manufacturers and maintenance.

When selecting suppliers, Iron Mountain's procurement team considers their commitment to compliance with the Act, compliance with Iron Mountain's Supplier Code of Conduct ("**Supplier Code**"), their approach to preventing modern slavery in their operations and supply chain and their overall commitment to social responsibility and compliance. Our suppliers must demonstrate commitments which align with those of Iron Mountain.

The processes and tools utilised by our procurement team to actively manage and assesses our suppliers, include:



Iron Mountain will not engage suppliers that demonstrate an inability or unwillingness to comply with the Act, our Supplier Code or to complete, and comply with obligations contained within our Modern Slavery Questionnaire.

Iron Mountain recognises the ongoing challenges and risks posed by modern slavery globally but believes that by being proactive, utilising the above processes and tools and actively managing its supply chain, there is minimal risk of modern slavery appearing in Iron Mountain's operations and supply chain.

Ongoing modern slavery risk assessment and management in IM's operations and supply chain

Modern Slavery

The term “modern slavery” broadly means the exploitation of adults and children whether for commercial or personal gain.

Exploitation includes situations such as:

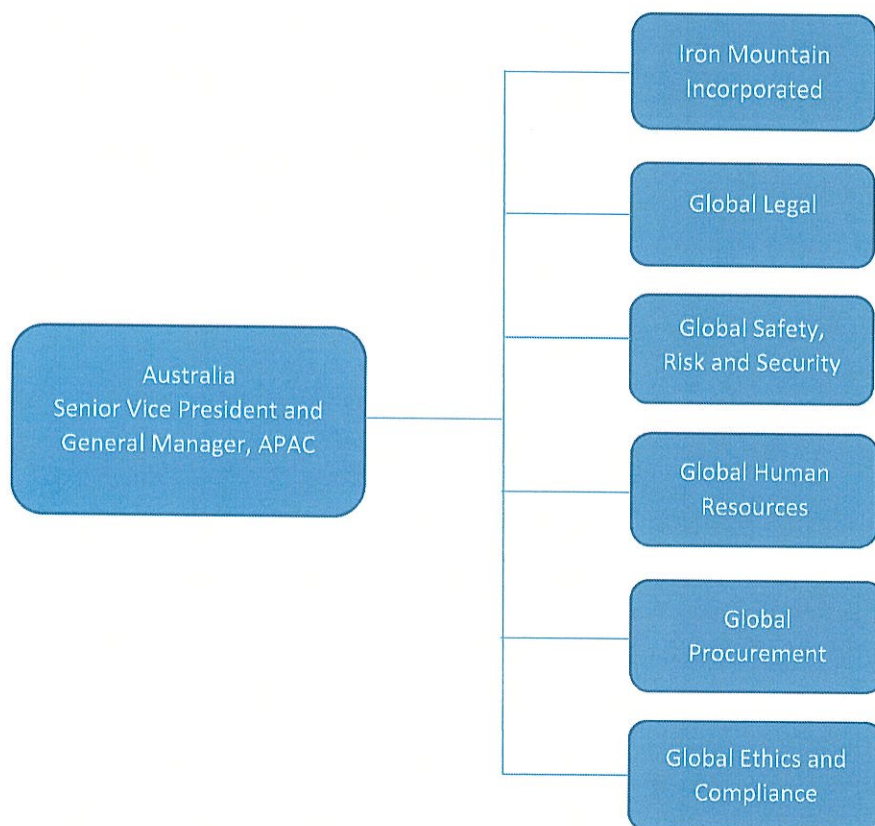
- Human trafficking;
- Slavery and slave like practices;
- Servitude;
- Forced labour;
- Child labour;
- Forced marriage; and
- Debt bondage.

With a belief that unfair or unsafe labour practices have no place in society, Iron Mountain has a zero tolerance approach to all forms of modern slavery. Our commitment to supporting and respecting human rights is part of the promise we make to our employees and global communities to do “*what is right and not just what is legal*”. We expect our business partners to respect and support Iron Mountain in this commitment.

M O D E R N S L A V E R Y
C R I M I N A L T R A D E
D E B T O N T R A F F I C
C H I L D A B U S E A B O L I S H
M A N G E C

Cross Functional Working Group

Iron Mountain’s cross-functional working group focuses on identifying, assessing, mitigating and removing potential modern slavery risks in its operations and supply chain. This group comprises team members from:



Their focus was maintained during the FY22 period.

Key areas on which risk assessments are undertaken, include:

- the nature and location of services we provide to our customers;
- our employees and the functions they performed;
- employee training;
- recruitment processes;
- supplier onboarding processes;
- conducting risk assessments on our suppliers;
- identifying locations of suppliers;
- identifying and indications of modern slavery existing in our operations or supply chains; and
- identifying and monitoring high risk suppliers.

Iron Mountain recognises certain areas within its operations and supply chains may be more susceptible to instances of modern slavery than other areas. However by adhering to these assessments and processes, Iron Mountain considers there are minimal risks of modern slavery appearing in its operations and supply chain. We continue to remain vigilant and implement policies and practices to ensure human rights are respected within our own organisation and our supply chains.

Supplier Management and Due Diligence

Supply Agreements and Purchase Order Terms and Conditions

Iron Mountain's contract and purchase order templates contain provisions requiring compliance with all applicable laws. In particular, our supplier terms and conditions require Iron Mountain's suppliers to comply with our Supplier Code, policies, processes and the Act as well as ensuring compliance with modern slavery laws in their own operations and supply chains.

Iron Mountain's procurement team continually monitor new and existing suppliers to ensure compliance with the Act and Iron Mountain's requirements and expectations.

IM policies

Iron Mountain is committed to applying its Values and ensuring modern slavery does not exist in its operations or supply chain. IM's Code of Business Conduct and Ethics ("**Code of Conduct**") reflects this commitment.

Iron Mountain's Supplier Code identifies the principals, standards and practices expected by Iron Mountain from its suppliers. Suppliers are expected to abide by the letter and spirit of the Supplier Code and applicable laws. Suppliers receive the Supplier Code during onboarding or renewal processes.

The Supplier Code allows Iron Mountain to seek information and verify a supplier's compliance with the Supplier Code.

Should a supplier violate the Supplier Code, the Act or any Iron Mountain policies, Iron Mountain will work with the supplier to remedy identified issues whilst retaining a right to take more formal action, including termination of the relationship, if appropriate.

Iron Mountain regularly reviews the Supplier Code to ensure its suppliers are acting in accordance with best practices, the spirit of the Supplier Code and applicable laws.

Turning specifically to the protection of human rights, to compliment IM's global suite of policies, IM implemented a Global Human Rights Policy. This policy strengthens our position to protect human rights and establishes processes and procedures to promote equal opportunity and eliminate all forms of modern slavery, including but not limited to human trafficking and exploitative forms of labour.

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 Corporate Responsibility Report can be found at:
<https://www.ironmountain.com/about-us/corporate-responsibility>
- IM's Global Human Rights Policy can be found at:
<https://www.ironmountain.com/about-us/corporate-responsibility>

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 the onboarding or renewal processes or as part of any due diligence processes.

Everyone Has a Voice at Iron Mountain

Speak Up Culture

Our employees, partners and suppliers are encouraged to speak up and bring any situation they have concerns with, including suspected or actual violations of Iron Mountain's Code of Conduct, the Supplier Code, non-compliance with Iron Mountain's Values, human rights violations, the law or any other illegal practices, to Iron Mountain's attention.

Whistleblowers may raise concerns anonymously and without fear of retaliation or victimisation through various channels, including Iron Mountain's Ethics Line. Our Ethics Line is monitored by an independent third party provider 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 where appropriate, to take action.

"I'M Listening" Surveys

Iron Mountain encourages its employees to engage with Iron Mountain as a group by participating in an internal survey known as "*I'M Listening*". This survey is conducted on a regular basis and is an opportunity for our employees to openly and freely express their experiences with Iron Mountain and to raise ideas about how Iron Mountain, as a company, could improve or implement additional initiatives to engage with our greater communities, customers and suppliers.

Recruitment

Iron Mountain complies with all applicable work, labour and work health and safety laws.

We have a comprehensive recruitment process which includes conducting pre-employment checks on potential employees, verifying an applicant's right to work in Australia and meeting minimum age and pay requirements. We are confident our pre-employment checks significantly reduce the potential for forced labour to exist within our workforce.

From time to time, we use the services of employees from entities within the Iron Mountain Group to provide certain services to or on behalf of Iron Mountain. Comparable pre-employment checks as those undertaken by Iron Mountain are utilised within the Iron Mountain Group. As such, when utilising the services of employees from other Iron Mountain Group companies, we are confident those employees underwent pre-employment checks and the risk of forced labour appearing in our workforce, is mitigated.

In addition, we engage with recruitment agencies to manage fluctuations within our workforce and any additional workforce requirements that we may have from time to time. Whilst we are conscious that we have less control over personnel obtained through these recruitment agencies, to mitigate modern slavery risks appearing in those relationships we ensure comprehensive contractual provisions exist between us and the recruitment agency, including a requirement for the recruitment agency to comply with all applicable laws, including the Act.

Training and awareness programs for employees

Iron Mountain Group employees participate in mandatory annual training and awareness programs governed by our parent company. Such training is conducted via an online platform with employee participation monitored and recorded.

Topics relevant to the issue of modern slavery and which are included in our mandatory training modules include:

- Our Code of Conduct;
- Modern Slavery;
- Workplace Violence;
- Ethics and Compliance; and
- Anti-Bribery and Corruption;

Additional ad hoc training whether via an online platforms or face to face forums is provided to our employees on a variety of topics throughout the year. The impact of Covid-19 pandemic meant face-to-face training sessions were suspended in favour of training provided to employees via our online platforms.

Effectiveness of actions undertaken by IM to assess and address modern slavery risks

Remediation

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.

Iron Mountain did not receive any reported incidences of modern slavery in its operations or supply chain during the FY22 period.

Looking ahead

Iron Mountain is confident that measures implemented by it to mitigate the potential for modern slavery appearing in its' operations and supply chain, enables us to identify and address modern slavery risks.

We consider modern slavery risks appearing within our operations and supply chain to be low but continue to actively monitor and manage our operations and supply chain, especially in those areas that are more vulnerable to modern slavery by:

- continually reviewing our policies, processes and practices;
- continually engaging with, monitoring and auditing our suppliers;
- continually training our employees and raising awareness on modern slavery and indicators of modern slavery; and
- investigating and where appropriate, to action concerns raised through Iron Mountain's Ethics Line.

Consultation with other IM entities

Iron Mountain does not own or control any other Iron Mountain entities.

In compiling this Statement, Iron Mountain consulted with its parent company, *Iron Mountain Inc.*

As Iron Mountain operates at a global level, it is required to comply with modern slavery laws in a number of other jurisdictions. 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

Covid-19

Iron Mountain experienced some impacts of Covid-19 but took measures to protect its employees and customers from such impacts.

We continued to work with and support our suppliers including those impacted by Covid-19. Taking into consideration any governmental or supplier specified, restrictions in place. Iron Mountain continued to monitor and evaluate potential modern slavery risks in those suppliers.

Board Approval

This statement was approved by Iron Mountain's board of directors on 28/03/2023.

Signed by



GREG LEVER

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