



## Modern Slavery Statement for the Financial Year 2020 (Australia)

### Introduction

This modern slavery statement is provided on behalf of Iron Mountain Australia Group Pty Ltd and Iron Mountain Australia Group Services Pty Ltd (collectively “IMAG”). As both companies operate in the same sector and have many shared suppliers, both entities share the same policies and processes to prevent modern slavery in its business and supply chain. In addition, the two entities share the same directors and Managing Director, which allowed the entities to develop this statement together.

This statement was approved Iron Mountain Australia Group’s board of directors on 22 June 2021 in relation to its actions and activities during the financial year 1 January 2020 to 31 December 2020 in accordance with the *Modern Slavery Act 2018* (Cth) (the “Act”).

### IM Overview

IMAG is part of the Iron Mountain group, the world’s largest provider of records and information management services. IMAG’s ultimate parent company is Iron Mountain Incorporated an American publicly listed entity.

The Iron Mountain group operates in over 50 countries and employs over 24,000 people, approximately 400 of which are based in Australia. More information about our business is available from our website: [www.ironmountain.com.au](http://www.ironmountain.com.au).

Our business and core values are premised on compliance and acting with integrity therefore we take adherence to laws, including the Act, seriously and we are fully supportive of initiatives aimed at the eradication of modern slavery across the globe. Further, we are committed to providing equal opportunities for all as described within our ethics code which underpins all aspects of our organisation.

IMAG will not employ or condone forced, bonded or child labour. Further, we do not confiscate personal documents of any of our employees nor do we force them to make any form of payment to secure their employment and all overtime is voluntary.

Following the introduction of the Act, IM created a cross-functional working group (including members of our legal, procurement and risk teams) to assess and respond to its requirements with the intention of identifying and removing any possible existence of modern slavery within IMAG and within our supply chain. The ongoing analysis and efforts led by this group has led us to conclude that neither IMAG, nor our supply chain, are particularly susceptible to these risks but nonetheless, as outlined in this document, we have taken a number of steps to achieve our aim alongside compliance with the Act.



## **Analysis of the Risks of modern slavery within IM's own Operations and Supply Chain**

IMAG's supply chains include facility management services, professional services, employment agency services, information technology and office equipment. During FY20, 98% of our suppliers had an Australian presence. The top spend categories include: transport, employment agency services and property.

We have undertaken a risk assessment of the likelihood of modern slavery existing within our own organisation and conclude the likelihood to be very low. This finding was based upon analysis of: the nature of work performed by our personnel; the locations of our facilities and personnel; our recruitment and vetting processes; and the lack of any indication of the existence of modern slavery.

Whilst the Iron Mountain group operates in over 50 countries, IMAG's supply chain is relatively small compared to that of other companies of similar size and scale with the majority of IMAG's suppliers being based in Australia. Further, as our business is primarily focused on the delivery of services, we are not exposed to many of the risks involved in the manufacturing sector to the same extent as many companies of our size. Similar to the assessment that we undertook in relation to our own business, we have assessed the risks of modern slavery existing within our supply chain and consider this to be relatively low. However, there are areas within our supply chain which we have identified as being more susceptible to modern slavery than others (including outsourced cleaning services and the manufacturing of uniforms) so it is our understanding and expectation that the steps detailed below will act to reduce this risk.

### **Our policies on modern slavery**

IMAG's supplier code of conduct (the "Code"), which has been in place for a number of years, require all of our suppliers to adhere to our Code sets forth the principles, standards, and practices we expect to see from our suppliers.

IMAG's view is that these standards should also apply to their own supply chain and sub-contractors. The Code reserves IMAG the right to seek information and verify compliance of suppliers and their operations.

The Code is provided to all new suppliers who are required to read and acknowledge this as part of the onboarding process. This Code is periodically reviewed to ensure that suppliers are required to act in accordance with best practice and both the letter and spirit of all legislation.

### **Speak-up culture**

IMAG works hard to create an open culture in which all employees are actively encouraged to speak openly, through various channels, about any concerns or suspicions they may have.



## **Recruitment**

We are confident that the extensive pre-employment screening checks we undertake in relation to our own employees (including verifying their right to work) reduce the possibility of modern slavery existing. Further, where we use employees of Iron Mountain group companies to provide services to, or for, IMAG we are confident that the pre-employment screening checks undertaken by our group companies are sufficient to minimise the possibility of modern slavery. However, we do use employment agencies to help manage fluctuations in our staffing requirements and we are aware that we have less control over personnel provided through these channels. Consequently, we have contractual requirements in place with the agencies we use to comply with applicable laws (which includes the Act).

## **Training**

A mandatory modern slavery specific training program was introduced in FY20 for all IMAG employees and new employees will be required to undertake. The training focused on how to identify modern slavery risk indicators and report to senior personnel.

## **Compliance Helpline**

IMAG is committed to its values and promoting a culture of ethical behavior. It has a helpline that enables employees (and suppliers) to anonymously whistleblow on suspected misconduct or illegal practices without the risk of victimisation thereby creating an environment in which any non-compliant practices may be brought to the attention of IMAG.

## **Supplier selection**

In selecting suppliers, IMAG focuses on their overall ability to work with IMAG (including their commitment to corporate social responsibility and compliance) and not just on price alone. In doing so, we do not always choose to work with the least expensive suppliers who arguably may be more likely to use forced labour or behave contrary to the Act. In addition, we request information from potential suppliers on their approach to the Act and any areas of specific risk.

## **Supplier Onboarding**

Our procurement team conducts supplier due diligence assessments during our supplier onboarding procurement process. In 2019, a Modern Slavery risk assessment was included as a key area of IMAG's supplier vetting process. The Supplier is required to complete a questionnaire to outline modern slavery risks and how they manage such risks. We will not engage with a supplier that is unable to demonstrate compliance with the Act.



## **Supplier Agreements**

IMAG have introduced modern slavery provisions within our supplier template agreements, including our standard purchase order terms and conditions, to impose obligations on our suppliers to seek to ensure that the suppliers implement systems, policies and processes to control modern slavery risks in their supply chain.

In addition, where a supplier is seeking to renew their contract, IMAG's Procurement team determine whether further assessments on Modern Slavery compliance are required before new agreements are finalised and we have also sent a letter agreement to certain existing suppliers which outlines our expectations as regards identifying, remedying, and reporting modern slavery issues and requires the supplier's compliance with the Act.

## **Remediation**

IMAG's Compliance Helpline and its Code of Ethics, General Grievance Handling Policy (ANZ) and Equal Employment Opportunity Policy (ANZ) policies provide a framework where employees and suppliers can raise any concerns or issues.

Where a supplier fails to act in compliance with the Code, the Act or Iron Mountain's policies, IMAG would try to work with the supplier to remediate the situation in a timely manner but if necessary would terminate the relationship.

No modern slavery related complaints were received or actioned by IMAG in FY20.

## **Moving forwards**

We are conscious that the above does not provide IM with absolute certainty that modern slavery have been eradicated from our organisation and supply chain. Consequently, whilst we consider ourselves low risk, to strengthen our ability to identify and address modern slavery risks, we will continue to review on a regular basis:

- Engagement with suppliers to increase awareness
- Feedback from suppliers and stakeholders
- Training and awareness for internal stakeholders
- Investigating concerns received through our framework such as the Compliance Helpline
- Audit activities and the inclusion of modern slavery risks into the scope of our risk assessments of Suppliers.