



Iron Mountain (Australia)

Modern Slavery Statement for the Financial Year 2021

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 “**IM**”, “**us**”, “**we**”, “**our**”) during the financial year 1 January 2021 to 31 December 2021 (“**FY21**”).

IMAG and IMAGS are reporting entities within the meaning of section 5 of the *Modern Slavery Act 2018* (Cth) (the “**Act**”) and are both incorporated in Victoria, Australia with a shared registered head office located at 365 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 fully support initiatives to eradicate modern slavery globally and in accordance with section 14 of the Act, developed this combined modern slavery statement.

IM’s business values are premised on acting ethically, with transparency, honesty and integrity (IM’s “**Values**”). In pursuing these Values, IM builds on its reputation as an ethical organisation and it is with these Values at a forefront of our operations that we take our compliance to laws seriously. IM’s Code of Conduct recognises the need to prevent modern slavery, to respect and support human rights and initiatives aimed at eradicating modern slavery and a belief that all individuals have a fundamental right to be treated with dignity and respect.

As part of our commitment to this, IM will:

- provide proper, legal working conditions and remuneration to its employees;
- not use child, forced or bonded labour;
- not engage in deceptive recruiting practices;
- not confiscate or withhold access to, an employees’ personal documents;
- not require any form of payment from employees to secure employment;
- only work with persons who freely choose to work with IM; and
- monitor its’ suppliers for compliance with this commitment

Organisational Structure, Operations and Supply Chains

Organisational Structure

IM is part of the larger Iron Mountain Group with its parent company, *Iron Mountain Inc.*, based in Boston, USA and listed on the New York stock exchange.

Founded in the USA in 1951, the Iron Mountain Group operates in over 60 countries in both established and emerging markets and services in excess of 225,000 customers globally. The Iron Mountain Group has over 24,000 employees, with approximately 400 employees based in Australia.

IM has offices and facilities in each state and territory of Australia.

Operations

IM provides information and asset management, storage and protection solutions for a customer base transitioning a multitude of industries. IM does not manufacture the equipment or goods used or sold by it, in conjunction with the services provided to our customers.

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

Supply Chain

IM's diverse supply chain is managed by its procurement team. During FY21, IM's supply chain involved operators in the service and manufacturing industries. Main expenditure arose in areas such as facility management, outsourced cleaning services, apparel, goods and equipment manufacturers, transport and logistics and labour hire services. The majority of IM's supply chain have an Australia based presence.

When selecting suppliers, IM's procurement team considers a supplier's commitment to compliance with the Act, their approach to preventing modern slavery in their operations and supply chain and their overall commitment to social responsibility and compliance. IM selects suppliers whose commitments and corporate approaches align with those of IM.

IM's procurement team continually assesses and actively manages IM's supply chain, through:

- conducting due diligence on suppliers;
- identifying and mitigating potential risks of modern slavery appearing within the supply chain;
- conducting audits;
- capturing and recording detailed information on suppliers;
- reviewing expenditure and services provided;

- requiring suppliers complete IM’s modern slavery risk and risk management questionnaire (“**Modern Slavery Questionnaire**”); and
- ensuring contractual provisions are in place with its suppliers. Such provisions include capturing pricing and payment terms, modern slavery and ethical conduct, compliance with IM’s codes, processes and policies and legal requirements.

Suppliers unable to demonstrate compliance with the Act and IM’s Modern Slavery Questionnaire, are not engaged by IM.

By utilising such assessments and actively managing its supply chain, IM believes the chances of modern slavery appearing in its operations and supply chain, to be very low.

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

Whilst the Iron Mountain Group has a zero tolerance approach to modern slavery, it recognises that some areas of its operations and supply chain may be more susceptible to instances of modern slavery than others.

Cross Functional Working Group

The Iron Mountain cross-functional working group comprising members of our legal, procurement, ethics and compliances teams, which was created to assess and respond to the need to identify, assess and remove potential risks of modern slavery in its operations and supply chain, continued its focus in FY21.

Assessments of the risk that modern slavery could exist in IM’s operations and supply chain were undertaken. Key focus areas were:

- services IM provides;
- our employees;
- functions performed by our employees
- training provided to employees;
- locations where services are performed and employees located;
- our recruitment processes;
- supplier onboarding processes; and
- a lack of any indication that modern slavery exists in IM’s operations or supply chain.

The ongoing efforts of this group have led IM to conclude the risk of modern slavery appearing in its operations and supply chain to be relatively low. Nonetheless Iron Mountain has implemented a number of policies and practices within the organisation, to ensure we remain vigilant to the potential risks of modern slavery and to ensure human rights are respected both within our own organisation and within our supply chain.

Supplier Management and Due Diligence

Supply Agreements and Purchase Order Terms and Conditions:

IM's supply agreement templates and purchase order terms and conditions contain provisions requiring compliance with all applicable laws. These templates were updated to include modern slavery provisions. The modern slavery provisions require adherence to IM's Supplier Code of Conduct ("**Supplier Code**"), policies and processes and compliance with modern slavery laws in their own operations and supply chains.

IM's procurement team continued to monitor suppliers and supplier agreements, in existing relationships, renewing existing relationships and onboarding new suppliers to ensure compliance with the Act and IM's requirements and expectations.

IM policies

IM is committed to 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.

IM's Supplier Code identifies the principals, standards and practices expected by IM 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 IM to seek information and verify a supplier's compliance with the Supplier Code.

Should a supplier violate the Supplier Code, the Act or any IM policies, IM will work with the supplier to remedy identified issues whilst retaining a right to take more formal action, including terminating the relationship, if required.

IM 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.

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>

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 due diligence processes.

“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 IM’s Code of Conduct, the Supplier Code, non-compliance with IM’s Values, human rights violations, the law or any other illegal practices, to IM’s attention.

Whistleblowers may raise concerns anonymously and without fear of retaliation or victimisation through various channels, including IM’s Ethics Line which is monitored by an independent third party provider and available 24 hours a day, 365 days a year.

IM receives reports of concerns generated through its’ Ethics Line for review, investigation and where appropriate, to take action.

Recruitment

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

Our recruitment process involves conducting pre-employment checks on potential employees including verifying an applicant’s right to work in Australia and meeting minimum age requirements.

From time to time, IM may also use the services of employees from Iron Mountain Group Companies to provide certain services to or on behalf of IM.

IM is confident that the pre-employment checks conducted by it significantly reduce the potential for forced labour existing within our workforce.

IM is conscious that it has less control over personnel obtained through labour hire agencies. To mitigate modern slavery risks appearing in those relationships, IM ensures contractual provisions exist between IM and the labour hire agency which requires the labour hire agency to comply with all applicable laws, including the Act.

Training and awareness programs for employees

Iron Mountain Group employees are required to participate in annual training and awareness programs which are provided in either a face to face format or through an online platform. Whilst Covid-19 impacted face to face training sessions, IM continued to provide its employees with training via the online platform.

Mandatory annual training is governed by IM’s parent company and is conducted through the online platform. Module topics for mandatory training and which are relevant to modern slavery, include:

- IM's Code of Conduct;
- Modern Slavery;
- Anti-Bribery and Corruption;
- Ethics and Compliance; and
- Workplace Violence.

Participation in and completion of mandatory training modules is monitored and recorded.

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

Remediation

IM'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 enables IM employees, partners and suppliers to raise concerns or issues.

IM did not receive any reported incidences of modern slavery in its operations or supply chain during the FY21 period.

Looking ahead

IM is confident that the measures it has implemented to mitigate potential for modern slavery appearing in our operations and supply chain, enables us to identify and address modern slavery risks.

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

- implementing a Global Human Rights Policy which will establish processes and procedures to review, assess and mitigate instances of modern slavery appearing in its operations and supply chain. This policy will compliment IM's existing suite of policies;
- continually reviewing our processes and practices;
- continually engaging with, monitoring and auditing our suppliers;
- continually train our employees and raise awareness on modern slavery and indicators of modern slavery; and
- investigate and where appropriate, action concerns raised through IM's Ethics Line.

Consultation with other IM entities

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

In compiling this Statement, IM 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

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

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

Board Approval

This statement was considered and approved by IM's board of directors on 24 February 2022.

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)