

Human Rights Policy (Global)

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Informed Individual	Ray Fox, EVP, Chief Risk Officer,	Informed Individual	John Tomovcsik, EVP, Chief Operating Officer
Informed Individual	Tom Jeter, Sr Director, Global Investigations	Informed Individual	Kevin Hagen, VP, Environmental Social & Governance Strategy
Effective Date	14-November-2022		

1.0 Purpose and Scope

Iron Mountain is committed to protecting, upholding, and advancing respect for human rights throughout its operations. This includes promoting equal opportunity, as well as eliminating modern slavery, human trafficking, and harmful or exploitative forms of labor, including child and indentured labor. The Company works diligently to ensure the rights of everyone at every level of involvement with the company—within the business, across the supply chain, and in the community at large—are respected at all times.

This Human Rights Policy applies to employees and business practices of all Iron Mountain business units, legal entities, controlled joint ventures, affiliates, and partnerships worldwide as well as Iron Mountain third party vendors.

2.0 Policy Statement

- 2.1 **International Standards.** Iron Mountain recognizes and is committed to respect all international human rights standards, guided by the principles set forth in the International Bill of Human Rights and the United Nations Guiding Principles on Business and Human Rights.
- 2.2 **Non-Discrimination.** Iron Mountain acknowledges that its policy of non-discrimination, while necessary, is not sufficient by itself to achieve full equality. As a baseline, Iron Mountain provides equal opportunities for employment across all demographics and does not discriminate on the basis of race, ethnicity, gender, identity, sexuality, religion, age, disability, marital status, veteran status, or any characteristic protected by applicable laws and regulations. Iron Mountain also mandates annual training on discrimination and harassment for all employees.

- 2.3 **Working Conditions.** Iron Mountain commits to providing a work environment that is safe, free from harassment or intimidation and that meets local regulatory requirements. We also commit to providing fair working hours and compensation to all global employees; and to never use child, prison, or slave labor.
- 2.4 **Iron Mountain's and Business Partners' Accountability.** Iron Mountain has a Third-Party Risk Management Policy and Supplier Code of Conduct that outlines our internal processes for supplier risk management and details our standards for suppliers, including issues related to human rights.
- 2.5 **Reporting Violations.** In addition to our Open Door Policy, which encourages every employee to offer suggestions or provide feedback to any Iron Mountain leader, Iron Mountain partners with a third-party to provide an ethics hotline, known as the Iron Mountain Ethics Line, where anyone may report misconduct confidentially, and where it is legal to do so, anonymously. Iron Mountain's Code of Ethics and Business Conduct empowers employees to escalate workplace issues internally without fear of retaliation through the Ethics Line.
- 2.6 **Code of Ethics Training.** Our annual global Code of Ethics training, which is mandatory for all employees, is part of a global compliance training strategy. In addition to the Code of Ethics training, employees are required to complete assigned compliance training programs in accordance with our Compliance Training Strategy based on their role and legal requirements.

3.0 Responsibilities

3.1 Global Privacy & Compliance

- 3.1.1 Administer this policy in line with the Code of Ethics and Business Conduct and associated policies and training.
- 3.1.2 Where applicable, coordinate with Global Investigations and Human Resources when alleged violations of the Iron Mountain Code of Ethics and Business Conduct, including human rights violations, are reported to the Ethics Line.
- 3.1.3 Collaborate with appropriate functional owners to guide, recommend and implement appropriate remedies for violations of this Policy.

3.2 Global Investigations

- 3.2.1 Continually monitor the Ethics Line which is administered by a third party. Assesses all reports and assigns an investigation team. Matters may be assigned to Privacy and Compliance, Human Resources, Information Security, Global Safety and Security, or a combination thereof.

- 3.2.2 Investigate alleged major violations of the Iron Mountain Code of Ethics and Business Conduct, including human rights violations, reported to the Ethics Line.

3.3 Iron Mountain Employees and Associates

- 3.3.1 Be aware of and understand and comply with all policies, procedures and written instructions appropriate to your role and workplace including, but not limited to, this Policy, Iron Mountain's Code of Ethics and Business Conduct and the Supplier Code of Conduct.
- 3.3.2 Cooperate with management and the Company in meeting regulatory requirements and otherwise comply with the Company's statutory duties.
- 3.3.3 Remain vigilant and report any suspected violations of this Policy:
 - 3.3.3.1 To your manager or another member of management;
 - 3.3.3.2 Through the Compliance Helpline (www.IMComplianceHelpline.com) or 1-866-668-3837) or emailing misconduct@ironmountain.com; or
 - 3.3.3.2 Via Iron Mountain's Open Door Process.

3.4 People Managers

- 3.4.1 Report any allegation or concern regarding compliance with this Policy either directly observed or reported immediately to the Ethics Hotline. Failure to promptly report or escalate any allegations witnessed by or raised to a supervisor or manager may result in discipline of the supervisor or manager.
- 3.4.2 Prevent retaliation against any employee who makes a good faith report of a violation of this policy or who participates in any investigation as a witness.
- 3.4.3 Encourage use of the Ethics Line when suspected violations are noted.

3.5 Corporate Responsibility (ESG Team)

- 3.5.1 Make recommendations for process, practice, and policy adjustments to this policy to ensure continued alignment with regulatory changes and best practices.
- 3.5.2 Communicate this policy and future updates to all affected Employees and Associates globally.

4.0 Definitions

- 4.1 **Human Rights** – As defined by the United Nations, human rights are rights belonging to all human beings, regardless of any category of identity (e.g., race, gender, nationality, sexuality.)

- 4.2 **Associate** – A person or organization who on Iron Mountain’s behalf, performs or assists in the performance of a function or activity.
- 4.3 **People Managers** – An Iron Mountain employee who directs, supervises, or oversees the responsibilities of one or more Iron Mountain employees.
- 4.5 **Open Door Policy** – Our Open-Door Policy means that every leader's door is open to every employee to offer suggestions, provide feedback, or address concerns within our company.

5.0 Relevant Control Standards

- 5.1 International Bill of Human Rights
- 5.2 United Nations Guiding Principles on Business and Human Rights

6.0 Frequency of Amendments

This Policy will be updated as needed to support changes in law, operating conditions and Company values. At a minimum, this Policy will be reviewed every two years for applicability, appropriateness, and effectiveness.

7.0 Implementation

This Policy is effective once approved by the Approvers and Recommenders and published on [Archer](http://archer.ironmountain.com) (<http://archer.ironmountain.com>). This Policy will be communicated by the Corporate Responsibility function (aka ESG Team) to affected Employees and Associates globally.

8.0 Related Policies and Controls

- 8.1 Iron Mountain Code of Ethics and Business Conduct
- 8.2 Supplier Code of Conduct
- 8.3 Anti-Bribery and Anti-Corruption Policy
- 8.4 International Sanctions and Trade Policy
- 8.5 Policy Against Discrimination, Harassment, and Bullying (US and Canada)
- 8.6 Workplace Violence Prevention Policy
- 8.7 Third Party Risk Management Policy

- 8.8 Procurement Policy
- 8.9 Enterprise Event Reporting Policy
- 8.10 Occupational Health and Safety Policy

9.0 Version/Change History

Date	Version	Change Description
14-Nov-2022	1.0	Policy First Published
	2.0	
	3.0	
	4.0	