

Environmental Policy (Global)

Approve	Sarah Abrams, SVP Global Real Estate	Recommend	Kevin Hagen, VP, Environmental Social & Governance Strategy
Approve	Deborah Marson, EVP, General Counsel & Secretary	Recommend	Dan Anninos, VP Global Facility Management and Project Delivery
Informed Person	John Tomovcsik, Executive Vice President, Chief Operating Officer • Global Operations Support	Informed Person	Deirdre Evens, EVP & General Manager, Asset Lifecycle Management
Informed Person	Mark Kidd, EVP & GM, Data Centers	Informed Person	Ted MacLean, EVP, Adjacent Businesses
Effective Date	15-November-2020	Last Review Date	15-November-2022

1.0 Purpose and Scope

Iron Mountain (“the Company”) is a global business dedicated to storing, protecting and managing physical and digital information. Iron Mountain’s commitment to responsible, sustainable growth is critical to Iron Mountain’s success. Iron Mountain focuses its environmental sustainability efforts on the concrete steps the Company can take to minimize the impact Iron Mountain operations have on the environment. This makes us a better partner to Iron Mountain’s communities and a more responsible choice for Iron Mountain’s customers.

This Environmental Policy applies to all Iron Mountain business units, legal entities, controlled joint ventures, affiliates, and partnerships worldwide.

2.0 Policy Statement

- 2.1 Iron Mountain operates its business in a manner that strives to reduce energy consumption and minimizes activities that contribute to greenhouse gas emissions, waste and pollution.
- 2.2 Through the Global Real Estate function, Iron Mountain examines Green Building Standards when planning the design and/or construction of Iron Mountain facilities to identify opportunities to reduce environmental impact while also creating value for the business.
- 2.3 Through the Global Real Estate, Legal, and Procurement functions, Iron Mountain maintains compliance with applicable environmental laws, regulations and other obligations wherever we operate.
- 2.4 Iron Mountain offers solutions that support Iron Mountain’s customers in reducing their own environmental impacts.

- 2.5 Through the Sustainability function, Iron Mountain engages and communicates with relevant stakeholders, including Iron Mountain's employees, about opportunities to improve Iron Mountain's environmental performance.
- 2.6 Through the Sustainability function, Iron Mountain evaluates and reviews annually the impact of Iron Mountain's business on the environment, sets goals to reduce these impacts, measures Iron Mountain's progress and reports performance in the annual Corporate Responsibility (CR) Report.
- 2.7 Iron Mountain strives to continuously improve its environmental performance through the regular evaluation of corporate policies, processes and systems.

3.0 Responsibilities

3.1 Iron Mountain Employees and Associates

- 3.1.1 Be aware of, understand and comply with all environmental policies, procedures and written instructions appropriate to your role and workplace.
- 3.1.2 Cooperate with management and the Company in meeting regulatory requirements and otherwise comply with the Company's statutory duties.

3.2 Vice President, Global Facility Management

- 3.2.1 Ensure Green Building Standards are examined when planning the design and/or construction of Iron Mountain facilities to identify opportunities to reduce environmental impact.
- 3.2.2 Verify that relevant projects maintain compliance with applicable environmental laws, regulations and other obligations wherever we operate.
- 3.2.3 Review and sign off on all Environmental policies globally, and recommend them to the SVP, Global Real Estate and EVP, General Counsel & Secretary for approval.
- 3.2.4 Ensure that Environmental policies are monitored and maintained globally.

3.3 Vice President, Environmental Social and Governance Strategy

- 3.3.1 Review all Environmental policies globally and recommend them to the SVP, Global Real Estate and EVP, General Counsel & Secretary for approval.
- 3.3.2 Ensure appropriate resources, including budget and individuals with the requisite skills, are available to execute against the mandated environmental activities.

3.4 Sustainability Team

- 3.4.1 Manage engagement and communication with relevant stakeholders, including Iron Mountain's employees, about opportunities to improve Iron Mountain's environmental performance.
- 3.4.2 Review the impact of Iron Mountain's business on the environment, recommend goals to the Executive Leadership Team to reduce these impacts, measure Iron Mountain's progress and report performance in the annual Corporate Responsibility (CR) Report.
- 3.4.3 Communicate Environmental policies to all affected Iron Mountain Employees and Associates globally.
- 3.4.4 Ensure that Environmental policies are monitored and maintained globally.

- 3.5 Senior Vice President, Global Real Estate
 - 3.5.1 Review and approve this Policy on a bi-annual basis.
 - 3.5.2 Ensure appropriate resources, including budget and individuals with the requisite skills, are available to Global Real Estate to execute against the mandated environmental activities.
- 3.6 Executive Vice President, General Counsel and Secretary
 - 3.6.1 Review and approve this Policy on a bi-annual basis.
- 3.7 Executive Leadership Team
 - 3.7.1 Provision resources to meet local laws and regulations, and the environmental commitment of the Company.
 - 3.7.2 Assess information provided during a management review, direct actions to continually improve the environmental framework and reduce environment related risk and set goals for reducing the impact of Iron Mountain's business on the environment based on the recommendations of the Sustainability Team (see 3.4.2).

4.0 Definitions

- 4.1 **Environmental Sustainability** – Responsible interaction with the environment to avoid depletion or degradation of natural resources and allow for long-term environmental quality.
- 4.2 **Green Building Standard** – A model that contains minimum requirements for increasing the environmental and health performance of buildings, sites and structures.
- 4.3 **Corporate Responsibility Report** – An annual report using a recognized framework that is published externally and shares the company's progress on environmental, social and governance topics.
- 4.4 **Associate** – A person or organization who on Iron Mountain's behalf, performs or assists in the performance of a function or activity.

5.0 Relevant Control Standards

It is the policy of Iron Mountain to comply with applicable regulatory requirements, guidance and standards in countries in which Iron Mountain conducts business operations. Such laws include, but are not limited to, the Clean Air Act (CAA), Clean Water Act (CWA), Resource Conservation and Recovery Act (RCRA), Energy Saving Opportunity Scheme (ESOS), Streamlined Energy and Carbon Reporting (SECR), and the Law on the Prevention and Control of Soil Pollution.

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. This Policy will be communicated by the Sustainability function to affected Employees and Associates globally.

8.0 Related Policies and Controls

8.1 Code of Ethics and Business Conduct (Global)

8.2 Supplier Code of Conduct

As this Policy is enterprise wide, approved subordinate policies will specifically outline related control standards and frameworks for compliance.

9.0 Change History

Date	Version	Description
15-Nov-2020	1.0	New Policy Issued
15-Nov-2022	2.0	Regular revision and approval
	3.0	
	4.0	
	5.0	