



IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT

This report represents our commitment to enhance stakeholder awareness of our Environmental, Social and Governance (ESG) priorities and discusses how our performance is contributing to long-term value creation and a sustainable, responsible and customer-centric business model.

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LETTER FROM OUR PRESIDENT AND CEO

As I write this, the world is experiencing a war in Europe which most of us could never have contemplated. These recent and horrific events are a real test to assess the strength of our values not only as an enabler for business growth, but as a refuge for people to find trust in a world where we now see trust is far too fragile.

With this in mind, I find it both inspiring and heartening to hear from my fellow Mountaineers in Eastern Europe and around the globe about how our values and genuine caring for both colleagues and strangers is getting us through this unimaginable period. Moreover, this is a follow on from last year which had the global threat of the COVID pandemic.

In the last year, despite the continued challenges and threat to our Mountaineers and their families from the pandemic - both from a physical and mental health point of view - we remained committed to the health and safety of our employees and their families whilst delivering record growth in high-quality and innovative services to our customers. We did not simply achieve this growth through business-as-usual methods but, as you will see in this corporate responsibility report, we did so whilst making steady progress in our goals towards being a more diverse, inclusive, and environmentally responsible company.

As a values-based organization, we have an unwavering focus first and foremost in doing our utmost in keeping our colleagues safe whilst building our platform of growth which has sustainability at its core - all while keeping our service to our customers as our North Star.

As I mentioned, Iron Mountain experienced record growth last year, and we realize the critical role ESG plays in our growth trajectory. I'm proud of the work we've done this past year to make significant progress on our bold ESG goals, and to engage and collaborate with customers to help them with services that not only address real business needs but also help them meet their own ESG goals. As we maintain this path, we are convinced that the future is brighter for my fellow Mountaineers and our customers, in spite of the storms that we as a society are progressing through.

Kind regards,



William L. Meaney
President and CEO, Iron Mountain





ABOUT IRON MOUNTAIN

OUR PURPOSE

To be our customers' most trusted partner for protecting and unlocking the value of what matters most to them, in innovative and socially responsible ways.

WHO WE ARE

Founded in 1951 and trusted by more than 225,000 customers worldwide, Iron Mountain helps customers CLIMB HIGHER™ to transform their businesses. Through a range of services including digital transformation, data centers, secure records storage, information management, Asset Lifecycle Management, secure destruction, and art storage and logistics, Iron Mountain helps businesses bring light to their dark data, enabling customers to unlock the value of their stored digital and physical assets at speed and with security, while helping them meet their environmental goals.

With trust as our legacy and insights as our future, we help our customers extract greater value from all forms of data throughout its lifecycle, while ensuring that they are able to govern their information compliantly, wherever they are in the world. Our commitment to innovation ensures that we continue to meet customers where they need us most, creating new solutions to evolving challenges.



WHO WE ARE

OUR VALUES

ACT WITH INTEGRITY

We are open and honest and live our values every day.

OWN SAFETY AND SECURITY

We protect ourselves and each other from harm, and secure our customers' assets as if they were our own.

BUILD CUSTOMER VALUE

We constantly look for ways to better serve our customers and improve their business.

TAKE OWNERSHIP

We take personal responsibility for the success of our teams, our customers, and our company.

PROMOTE INCLUSION AND TEAMWORK

We look for and value each other's unique ideas and perspectives to get better results.

AWARDS AND RECOGNITION

Ranked #93 on Newsweek's 2022 list of America's Most Responsible Companies

Listed on the 2021 FTSE4Good Index

Received 100% on the Human Rights Campaign 2022 Corporate Equality Index

Scored a 90% on the Disability Equality Index

Google Cloud Customer Award

Top Admired Shared Services Organization Award

KEY FACTS AND FIGURES

63

countries

225K+

customers

6

continents

1951

founded

~1,450

facilities

~25K

employees

\$4.5B

US fiscal 2021 revenue

~95%

of the Fortune 1000

94.6M

SQ FT of real estate



OUR APPROACH TO CORPORATE RESPONSIBILITY – SECURING A SUSTAINABLE FUTURE

We challenge ourselves and inspire others. We aspire to be a force for good by modeling how organizations can be the solution to some of the world's biggest social and environmental challenges while delivering business positive outcomes. We focus our efforts on what matters most, ensuring that we conduct business with integrity and in a way that creates value for all our stakeholders.

We contribute positively to the communities in which we operate by leveraging the unique capabilities of our business. We apply disciplined sustainable business practices to address the most material ESG issues facing our company to deliver positive social, environmental and financial results at scale. Read more about our material issues on [page 43](#) of this report.

SAFEGUARDING CUSTOMER TRUST

To be our customers' most trusted partner for unlocking business value.

PROTECTING OUR PLANET

To take responsibility for a sustainable future by unlocking opportunities in our operations and beyond.

EMPOWERING OUR PEOPLE

To have past, current, and future employees view their experiences at Iron Mountain as an accomplishment and source of pride.

STRENGTHENING OUR COMMUNITIES

To catalyze positive change in the communities in which we operate.



OUR CORPORATE RESPONSIBILITY GOALS

We set ambitious public goals and are transparent in our reporting in order to hold ourselves accountable for the impact of our operations and to focus on how we can create positive change in the communities in which we do business. Our goals encourage us to collaborate across disciplines to innovate, become more inclusive, and grow our business sustainably. We focus on what is most material and most impactful. We create our goals carefully with input from our stakeholder engagement process, function specific subject matter experts, and executive leadership.

Setting goals is one thing, but implementing and achieving those goals requires continued focus and hard work. Our ESG team regularly meets with goal owners to determine goal progress, set benchmarks, and understand the actions we are taking. This information is documented in an internal dashboard which is shared with executive leadership quarterly. Throughout this report, we highlight some of our goals and our progress. A complete list of goals can be found in Appendix C of this report, and on our corporate responsibility website.



CUSTOMER CONNECTIONS

NEW THIS YEAR

We focus on the customer in everything we do, and this customer-centric mindset includes collaboration. New to this year's report are our Customer Connections where we highlight how we are working with our customers to learn and innovate. Keep an eye out for Customer Connections mentioned throughout this report.

EXECUTIVE EXCHANGE AND VIRTUAL FORUM - A FOCUS ON ESG

Each year we host an Executive Exchange series where customers are invited to learn from guest experts in topics relevant to their business. The focus for the 2021 series was ESG and the role each of us can play within our organizations to make a lasting difference. Topics included:

- Digital transformation and its impact on the environment
- Building successful diversity, equity, and inclusion (DEI) practices
- Ensuring ethical practices in an ever-changing world of AI and big data

Review the 2021 ESG Series [here](#).

Our ongoing Virtual Forum allows customers to learn and share best practices, tips and useful tools while also exploring the complex information management landscape. In the summer of 2021, we hosted an immersive, 2-hour virtual session titled Rethink Sustainability. This forum brought in leading sustainability experts who explored topics in sustainable information management.



SAFEGUARDING CUSTOMER TRUST

SUSTAINABLE PRODUCTS AND SERVICES

Iron Mountain provides customers with innovative solutions that bring them closer to achieving their purpose, as well as their environmental, social, and corporate governance aspirations.

We believe that innovation and integrity pave the path to long-term, sustainable success. We build trusted relationships with stakeholders based on this philosophy. Our approach is underpinned by the conviction that ethics and good governance matter to our future success.

ENVIRONMENTALLY CONSCIOUS AND SOCIALLY RESPONSIBLE

Iron Mountain is committed to corporate responsibility and sustainability and strives to deliver services that enable both our organization and our customers to manage information in a manner that is environmentally conscious and socially responsible.

Many of our customers have publicly stated ESG goals. We are developing opportunities for our customers to use our products and services to help them meet those goals. This approach illustrates our belief that doing good and doing business do not have to be independent initiatives.

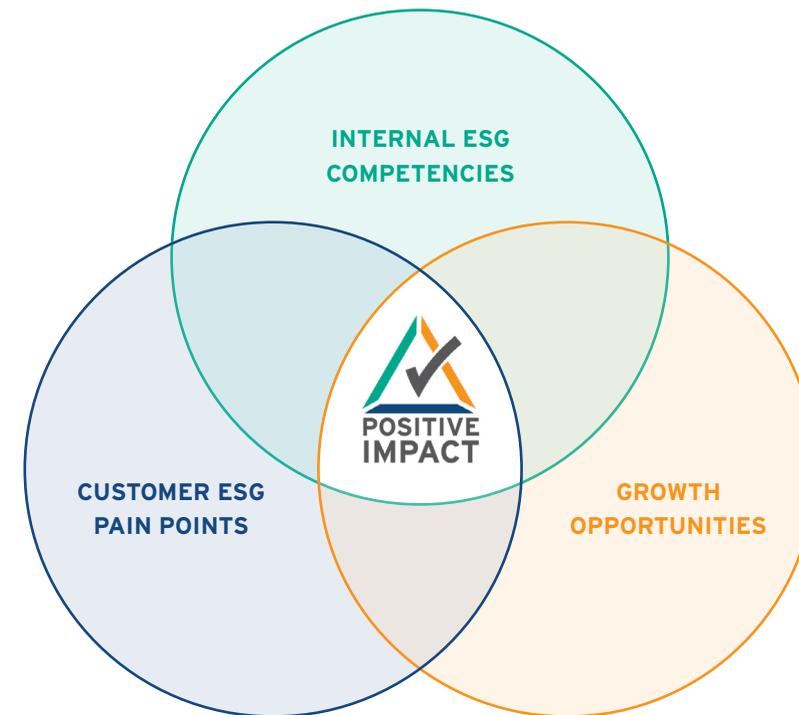
POSITIVE IMPACTS PRODUCT CRITERIA

Our efforts to solve our own internal ESG challenges have resulted in a variety of competencies that we can integrate into our products and services. When combined with our efforts to understand and meet our customers' needs, we continue to refine a portfolio of products and services that support the ESG ambitions of our customers. When we set out to establish this portfolio of products, we recognized that collaboration would be key to our success. Our objective was to create a set of criteria that could be applied to products or services in a way that would allow us to say with confidence and credibility that they could help solve customer's ESG challenges.

To do this, we collaborated with a Fellow from MIT's Sustainability Lab in 2021 to develop a method to determine if an offering can be considered a Positive Impact Product – products that solve ESG customer pain points by using internal ESG competencies.

This engagement resulted in a method to assess the products using the following criteria:

- 1. Solves Customer ESG Need:** The product resolves a significant, relevant, and clearly defined ESG challenge for the customer.
- 2. Comprehensive Evaluation:** The product claims are supported by transparent analysis across the product life cycle.
- 3. External Endorsement:** The ESG claims are the subject of endorsement or collaboration with a credible external organization.
- 4. Responsibly Marketed:** The product marketing accurately represents ESG claims and any risks.



MEASURING TRUST

In order to safeguard customer trust, it is important to understand what trust means to our customers. We set a goal that we intend to develop or adopt a brand trust indicator metric and report our baseline. We want to understand our customer's perception of our brand to evaluate the effectiveness of our initiatives. We define a brand trust indicator as a metric or set of metrics that regularly measures a brand's health by analyzing how audiences think and feel about our brand.

We proposed four ways to measure the trust our audience has in our brand:



ARE WE RELEVANT:

Measuring relevance will indicate if we are in the current public consciousness. If not, we cannot expect to continue to grow.



ARE WE TRUSTED:

We can't expect our customers to do business with a brand they do not trust. If we want to win new business and retain our valued customers, trust is central to our relationships.



ARE WE RELIABLE:

Do we do the things we say we're going to do? Do we meet the expectations we set as a service provider, a company, as part of a global community, and as a publicly traded entity?



ARE WE RESPONSIBLE:

Customers want to do business with organizations that are ultimately positively impacting others.

Our brand trust indicator will combine data from customer surveys, sales data, AI driven online and social media listening tools, anonymous employee company reviews and employee engagement surveys, among others. Our next steps are to assess what can be measured using existing tools, establish a reporting cadence and data gathering process and report our first Brand Health Index score before the end of 2022.



ETHICS AND COMPLIANCE

As a leader in the information management industry, Iron Mountain's reputation is based on our ability to meet our customers' expectations, abide by regulatory requirements, and adhere to internal and external policies. Iron Mountain believes that doing business with integrity is the only way to do business. We are committed to our uncompromising ethical standards and to setting best practices for our industry. Employees can report incidents of fraud, waste, abuse, corruption, or any other ethical concerns to our Ethics Line.

Our Code of Ethics and Business Conduct sets forth our policies and standards on a variety of topics, such as safety and security, inclusion and diversity, harassment and discrimination, conflicts of interest, bribery and corruption, environment and sustainability, and human rights and privacy considerations, among others. We launched a comprehensively updated version of our Code of Ethics in 2021. The new Code is accessible, user-friendly, and a quick resource for the most common compliance questions our employees face. We also made updates to reflect our evolving brand, culture and narrative. The Code is available online at www.ironmountain.com/code.

Our robust compliance training program, required for Mountaineers, is dynamic and tailored to ensure we maintain our certifications, meet our commitments to our customers, and deliver value to all stakeholders (including our employees) by reducing mistakes and unnecessary expenses. Compliance training courses are assigned based on a variety of factors, including role, access to information, policy, regulations, and law.



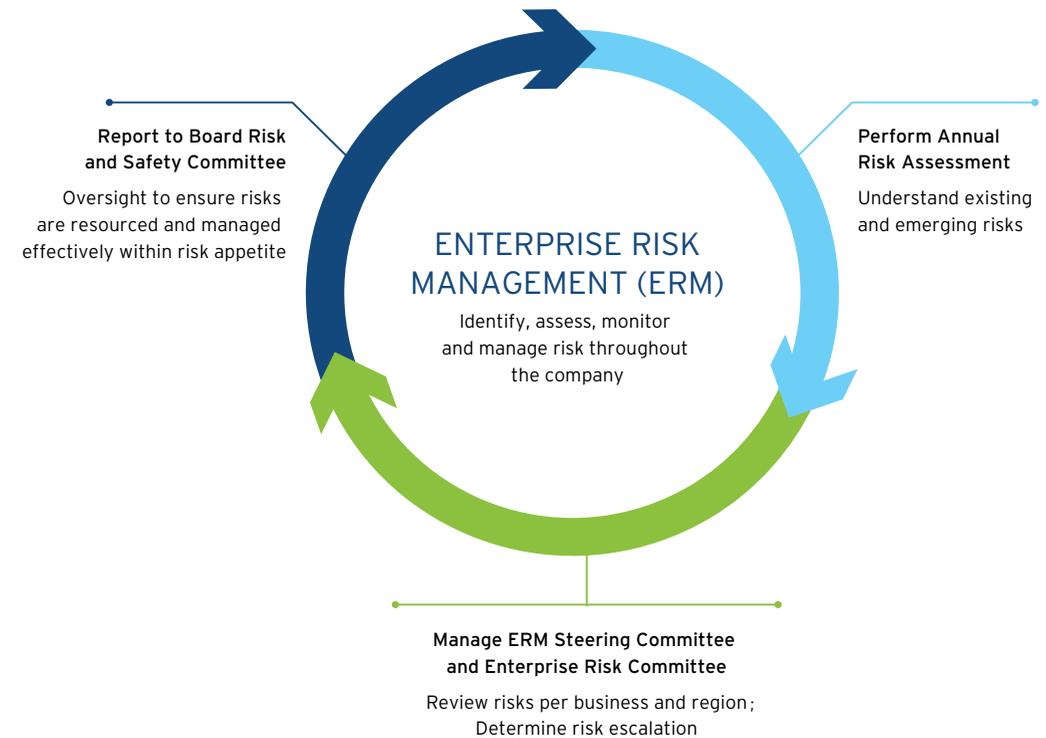
CUSTOMER CONNECTIONS

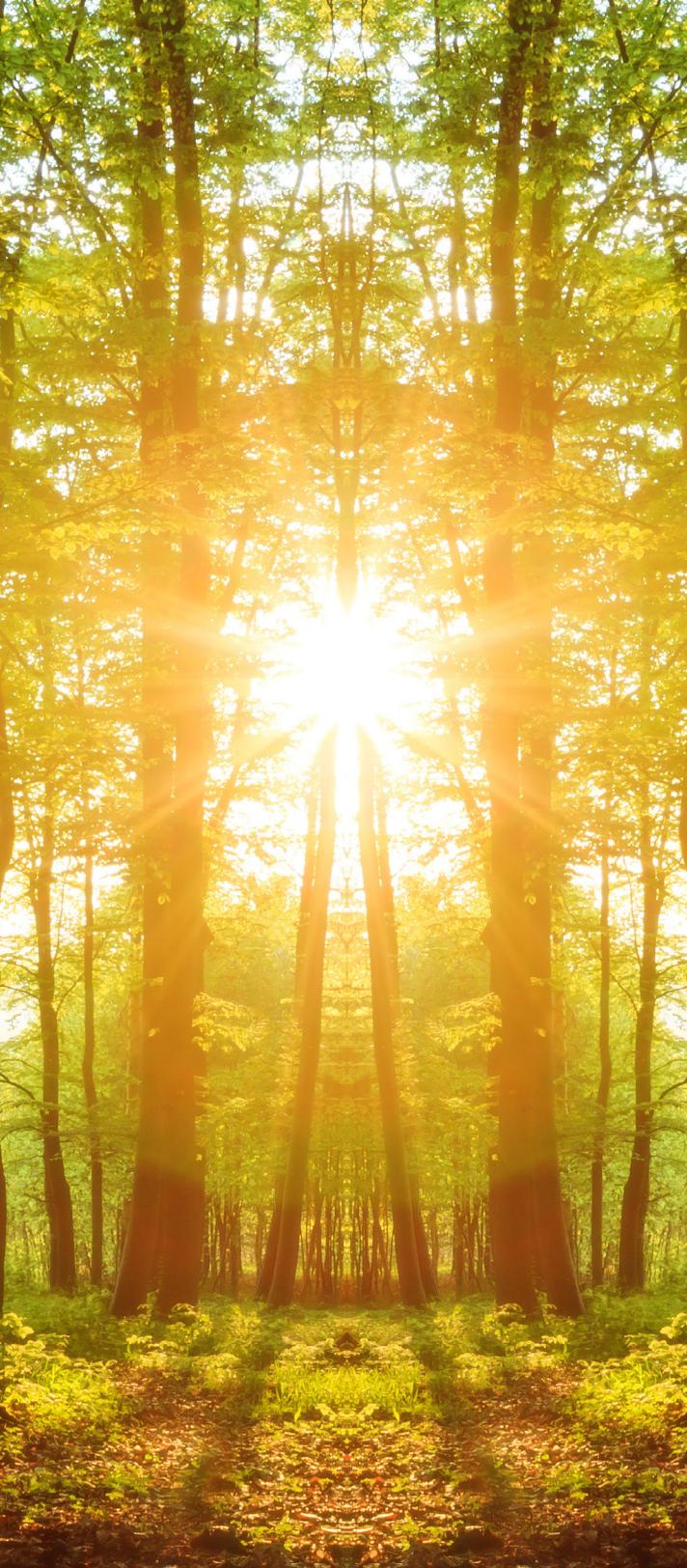
CUSTOMER SATISFACTION

Customer satisfaction is essential to maintain positive, collaborative relationships and to build trust. We deeply value feedback from our customers and seek to continuously improve our services to provide the best possible customer experience. Our Voice of the Customer Program (VoC) measures customer experience through key interactions and is a touch point into our Operational Excellence Program to determine where operational adjustments are necessary. We collect metrics such as Net Promoter Score and Customer Effort Score, and use customer comments and operational data to understand how we can convert numbers into actions - using this information to better understand customer concerns and pain points, and working cross functionally to address those gaps. In addition to tracking customer experience metrics, we have a system in place to ensure that we follow up with dissatisfied customers. Using a "Closed Loop" process, respondents who indicate that their issue was not resolved and request to be contacted are escalated to a trained customer service team, and tracked so that we can better understand how to provide a better experience upon a customer's first interaction.

RISK MANAGEMENT

Our stakeholders place significant trust in us to manage their valuable information and assets and deliver services with as little interruption as possible. To do this, we must effectively identify, assess, and manage risk. Our Risk Management team has developed a comprehensive, global framework for reducing risks based on four dimensions: degree of impact, likelihood of occurrence, control effectiveness, and risk tolerance. As part of our Enterprise Risk Management (ERM) process, we undertake an annual risk assessment to identify and quantify these risks along these dimensions. The Risk Management team regularly engages with business unit and operational leads around these risks through the ERM Steering Committee, and with executive leadership through the Enterprise Risk Committee (ERC). The Board of Directors Risk and Safety Committee is responsible for reviewing the Company's establishment and operation of the ERM program. This comprehensive process ensures that risks are identified, carefully prioritized, appropriately resourced, and effectively managed. ESG risks are embedded in this process. The Vice President, Environmental, Social, and Governance (ESG) Strategy, is a voting member of the ERC and has a remit that includes providing updates to the CEO and Board of Directors on a regular basis.





PROTECTING OUR PLANET

GREENHOUSE GAS EMISSIONS

We embrace our responsibility to contribute to the fight for a net-zero future for our planet. We seek opportunities to improve environmental performance within our operations. We enable our customers to manage information while meeting their environmental goals. And we partner with our suppliers to unlock opportunities to protect our planet, together.

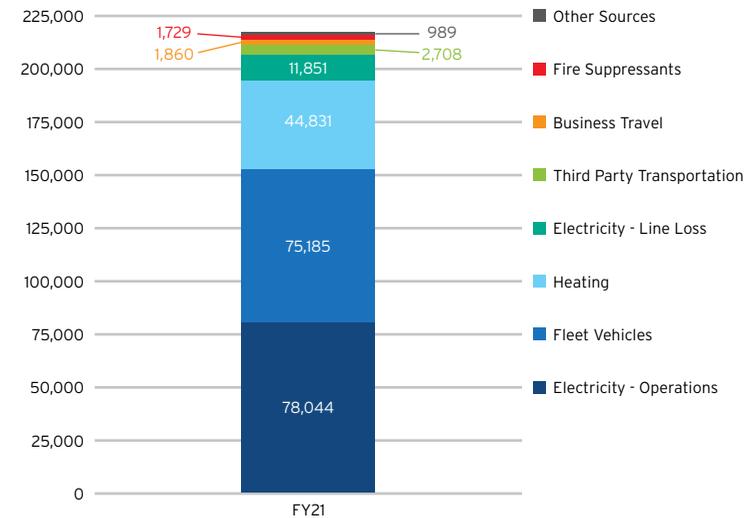
COMMITMENT TO NET ZERO

Our commitment to reducing our emissions was reinforced when we joined the Climate Pledge on May 6, 2021. As part of this commitment, we intend to achieve net zero annual carbon emissions by 2040 - ten years ahead of the Paris Agreement. In addition to pledging to decarbonizing operations, organizations who join the Climate Pledge also agree to regularly report their progress and neutralize any remaining emissions using credible offsets. A key stepping stone to our 2040 ambitions is our commitment as a signatory to the EU Climate Neutral Data Centre Pact that all Iron Mountain Data Centers worldwide will be climate neutral by 2030.

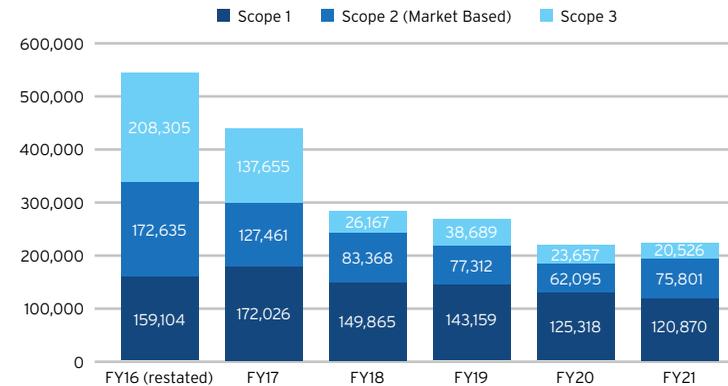
INCREASING DATA VISIBILITY

We believe that we cannot manage what we do not measure. To increase our data visibility efforts, we have worked with a Fellow from the Environmental Defense Fund to facilitate global utility data collection in 17 countries where visibility was previously low. This project then used the acquired energy usage and cost data to identify, analyze, and evaluate potential projects to improve energy efficiency and deploy renewable energy. We have increased our emissions reduction projects globally through this engagement and will continue to invest in methods to improve our data coverage. Through this project, and through additional ongoing data visibility efforts in our global portfolio, we increased our data coverage in electric power, natural gas, water and fleet fuel.

IRON MOUNTAIN TOTAL EMISSIONS BY SOURCE 2021 (MTCO2E)



EMISSIONS OVER TIME BY SOURCE (MTCO2E)



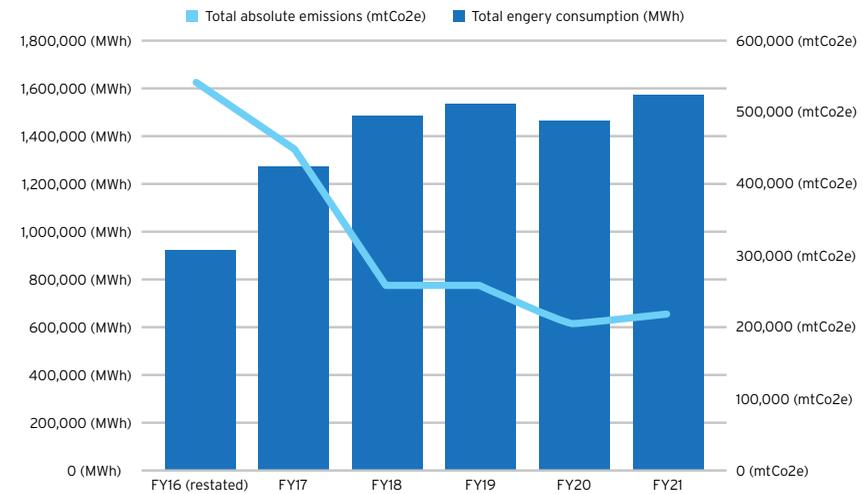
RENEWABLE ENERGY

As a top 30 purchaser of green power in the US, Iron Mountain has built strong renewable energy capabilities and continues to emphasize the importance of renewables on our path to net zero emissions. We set a goal in 2021 to maintain the equivalent of 100% renewable electricity coverage in our data center business and achieve 90% renewable electricity corporate wide by 2025 on our way to being 100% powered by renewable electricity by 2040 as part of our RE100 commitment, the global initiative for businesses to commit to 100% renewable electricity. In 2021, our global operations were 80% powered by renewable energy and we covered 100% of the electricity used in our data centers with renewable electricity for the fifth straight year.

We continue to help green the electric grid through a portfolio of contracting solutions including on-site generation, direct energy contracting, and Power Purchase Agreements for wind and solar power. This includes the 33 facilities with onsite solar arrays in our global real estate portfolio representing a cumulative system size of more than 16.5 MW.

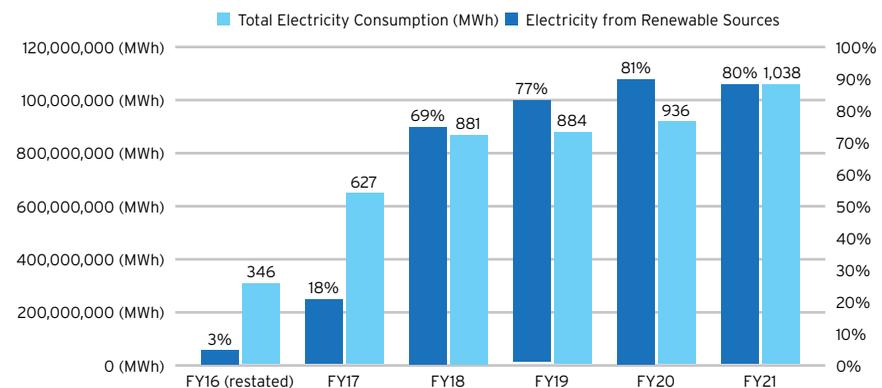
In 2021, we set a goal that, by 2040, we will use 100% clean electricity, 100% of the time in our data centers. Importantly, we plan to use Google's methodology to define site by site electricity. Building on our hourly matched ambitions, we are founding signatories of the United Nations 24/7 Carbon Free Energy Compact which was launched in 2021. This program is made up of a global group of various public and private organizations and is dedicated to a future where every kilowatt-hour of electricity consumed globally is produced from carbon-free sources. This effort requires credible reporting to both understand our progress and to replicate our successes. We announced partnerships to analyze our hourly energy use and the percentage matched by clean energy to determine our progress toward complete decarbonization and strengthen our reporting capabilities for our data centers in the US and UK.

EMISSIONS VS. ENERGY CONSUMPTION OVER TIME



We experienced a slight increase in our total emissions from 2020 to 2021. This increase was anticipated due to impacts from COVID and business growth. We anticipate that we will remain in line with our targeted reductions due to efficiency projects, renewable energy purchases and efforts to electrify our fleet.

ELECTRICITY CONSUMPTION AND PERCENT RENEWABLE OVER TIME

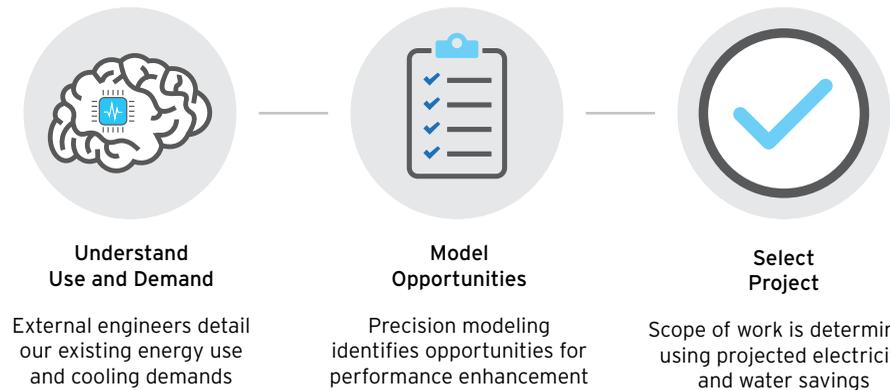


SUSTAINABLE RESOURCE USE

ENERGY EFFICIENCY

It is critical that we increase our energy efficiency in order to reduce our carbon footprint. In 2021, building on the success of our previous HVAC optimization and LED lighting programs, we developed and implemented a programmable thermostat program at more than 40 sites and retrofitted 6,576 fixtures with LED. We also worked closely with landlords to track, measure, and manage energy usage and received energy star certification at an additional two sites.

As part of a comprehensive sustainability program in our data centers, we are implementing formalized practices for improving power use effectiveness (PUE). These practices are identified using the following method:



We piloted this comprehensive analysis and upgrade program in our Denver data center in 2021. The efficiency opportunities identified for the site include upgrades to the chiller plant and the computer room air handling units. We also launched this program in our Scottsdale data center in 2021 and intend to complete the opportunity assessment at this location in 2022.

MANAGING WASTE, REFRIGERANTS AND WATER

Our environmental footprint extends beyond our energy use. In 2021, we also focused on water, waste, and refrigerants. Water is a key resource used in our data center operations. We implemented an irrigation control program at 41 of our facilities, a mix of storage facilities and one data center, that will save an estimated 17.7 million gallons of water per year, and we continue to seek additional water saving opportunities in our data centers by evaluating low-water cooling technologies. To lay a foundation in our efforts to reach zero waste in our operations by 2040, a Zero Waste Program Team was established in 2021. This team is responsible for piloting a Sustainable Resource Management program that will identify opportunities to effectively divert and reduce our waste. We also want to better understand the footprint associated with our refrigerants under management. Through a pilot program launched in 2021 at eight sites, we began to quantify the climate impacts of those refrigerants and will use that information to develop a plan to migrate to lower global warming potential options.



IRON MOUNTAIN ECOBOX

Our Iron Mountain box has long been a visual image that represents one of our key business solutions. Beginning in fall 2021, we announced our EcoBox in the US and Canada, and people who use our boxes began to see a shift that distinctly demonstrates our dedication to improving environmental performance. It's made from 65% recycled materials and 35% from sustainably managed forests and has the same functionality and durability of our previous boxes. The new boxes are certified by the Forest Stewardship Council (FSC), a group that works to ensure forests are properly and responsibly maintained to meet economic needs, conserve biodiversity and preserve species, while also taking into account land rights and the rights of indigenous communities and workers.

[Watch](#) We purchased more than 2.3 million FSC certified boxes in the United States in 2021. If we laid those boxes end to end, it would stretch between New York City and Dallas.



FLEET ELECTRIFICATION

Transportation is a significant component of our greenhouse gas emissions footprint. Reducing the emissions associated with our vehicles is critical for our net zero ambitions. Transitioning our fleet to electric vehicles also reduces our exposure to fuel prices and carbon taxes and allows us to continue servicing customers in the increasing number of locations which are regulating internal combustion engine vehicles. When it comes to electrifying our fleet in 2021, we emphasized learning, testing and building a foundation for a successful program. We continued to grow our fleet of electric vehicles (EV) and identify solutions for charging infrastructure. Our cross-functional teams, executive sponsors, and senior-level EV integration steering committee identified a roadmap toward our EV commitments. We continued to grow our fleet of electric vehicles and identify solutions for charging infrastructure.

We cemented our commitment to an electrified fleet in 2021 by joining EV100, a global initiative for companies who are working to transition their fleet to EVs. As part of our EV100 commitment, we intend to transition 10% of our total fleet to electric by 2025 and expect to exceed 2,000 vehicles by 2030. The EV100 commitment accounts for 100% of our cars and 50% of our vans. An essential component to a successful EV program and meeting our goals is selecting a charging infrastructure partner. We chose a global partner in 2021 to help establish our charging capabilities and ensure our EV fleet is charged and ready to meet the needs of our customers.

Our EV program now includes 54 EVs in service or on order, 32 of which were added in 2021. We added EVs in the UK, North America, Germany, the Netherlands, and several other locations in Europe. We intend to add EVs in France, Poland, Hungary, Singapore, and Brazil in 2022 as well as continue to explore other countries for EV conversion possibilities. As the EV program matures, our next steps will focus on the transition of our truck fleet.



CUSTOMER CONNECTIONS
GREEN REPORT 2.0

Actionable data is important for organizations to make informed decisions. We want to be able to quantify the impact of services that support our customers' sustainability ambitions. To improve our ability to deliver data to the customers who utilize our Secure Shredding and Secure Destruction service, we upgraded our popular Green Report in 2021.

The new report, Green Report 2.0, provides tonnage data for customers to use in their waste diversion accounting. It also reports on key environmental impacts associated with our recycling process in terms that many audiences can understand. New to the Green Report 2.0 is data from the Environmental Paper Network, a non-profit that promotes a sustainable paper life-cycle. Their Paper Calculator, backed by science and trusted by conservation groups, analyzes the full lifecycle of paper from creation to disposal.

There is demand for this data - our Green Report was pulled over 18,000 times in 2021. We will continue to identify opportunities to provide our customers with the high quality data they need to enhance their sustainability reporting.

[Click here to read more about the Green Report 2.0](#)



Paper Calculator

presented by environmental paper network

11 Gas-Powered Cars
Off the Road Per Year
47 MTCO2 avoided

GREENHOUSE GASES

63 Trash Bags Avoided
800 lbs./363 kg of solid waste avoided

SOLID WASTE

240 Trees
Preserved
40 fresh green tons

WOOD

380 Bathtubs of
Water Preserved
19,000 gallons/71,923 liters
of water preserved

WATER

120 Residential Refrigerators Operated Per Year
29,600 kWh/102,069,555 BTUs energy saved

ENERGY

Example Green Report 2.0 output with impact metrics calculated using the Environmental Paper Network's Paper Calculator. Based on 10 tons of paper.



EMPOWERING OUR PEOPLE

TALENT ATTRACTION AND RETENTION

At Iron Mountain, we foster a culture of customer focus, collaboration and courage that all Iron Mountain employees live by.

We work together to create a workplace where employees' authentic selves are welcomed, accepted, and included. When we fuel innovation through diverse ideas, backgrounds, and perspectives, our people thrive, our customers benefit, and our business succeeds.

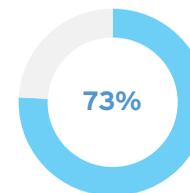
CULTURE AND EMPLOYEE ENGAGEMENT

Iron Mountain established a formal Culture and Engagement (C&E) team in March 2021. This team is charged with forming partnerships with business leaders and business lines across the enterprise to discover opportunities to enrich our culture and showcase how our employees are living our values every day. The C&E team and Diversity, Equity and Inclusion (DEI) team partner to embed these things into the moments that matter and key processes across the employee experience. The C&E team has built a global Culture Network of more than 1,000 Mountaineers to date. Members of the Culture Network are crucial collaborators who provide diverse insight and perspective to the C&E team while sharing information with and inspiring fellow Mountaineers. These collective efforts aim to build and sustain a culture of recognition, continuous learning, wellbeing, innovation, diversity, equity, inclusion and belonging.

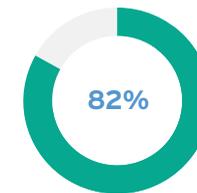
Culture and Engagement highlights from 2021 include:

- Bringing the Employee Engagement Survey and the Net Promoter Score Survey under one vendor to seamlessly compare the two surveys. This allows us to analyze the relationship between culture and engagement and productivity and revenue growth.
- Launching the Values in Practice (VIP) Awards which recognize Mountaineers who demonstrate company values in a way that inspires others. The 2021 inaugural awards elicited over 200 nominees by their direct managers.
- Expanding our employee recognition program to include our global operations while broadening the reach and providing deeper options.

[Watch](#) In our Spirit Of Mountaineers video series, launched in 2021, we hear from Mountaineers throughout the world.



ENGAGEMENT
INDEX SCORE



OVERALL
PARTICIPATION RATE

TALENT, TRAINING, AND DEVELOPMENT

We believe that supporting the personal growth and development of our employees will help deliver a culture of curiosity and continuous learning allowing us to climb higher and achieve our long-term growth ambitions. In 2021, we expanded our Global Management Development Program (MDP), a comprehensive learning framework developed in 2020 in partnership with LinkedIn Learning, an online educational platform. After an initial pilot group, in 2021 the MDP included 131 managers from around the world. We have seen MDP alumni grow in their roles as managers with more than 20% receiving a promotion or role expansion in 2021.

“The Management Development Program (MDP) did help me with my recent promotion, and I think the same benefits I received would apply to someone being promoted after completing the course. Participating in a formalized continuing education program with focus on how to be an inclusive and thoughtful leader should help anyone moving to the next level in their career development.” - MDP participant

Seeing the success of the MDP, and recognizing our employee's thirst for learning, the Global Talent team piloted the Supervisor Development Program (SDP), a similar comprehensive learning framework for supervisors. The initial pilot, including 26 supervisors from 16 different countries, was an incredible success and led to additional SDP pilots.

Iron Mountain will continue to emphasize employee development and expand our talent development offerings. Earlier this year, we introduced our Leadership Essentials Initiative. We provided a virtual LinkedIn Learning license to all Mountaineers with titles from Supervisor to Senior Vice President as part of this program. These leaders will have access to customized online Iron Mountain content to gain a complete picture of what it means to be a leader at Iron Mountain.

2021 Learning and Development Programs	Audience	Number of participants 2021	Number of courses completed 2021	Hours of content consumed 2021
Global Management Development Program (MDP)	People managers	131	2,800+	2,500+
Supervisor Development Program (SDP)	Frontline supervisors	69	680+	760+

Additional Programs	Audience	Program offerings
Leadership Essentials initiative	Supervisor to Senior Vice President	Unlimited, 24/7 access to more than 16,000 courses and 6,500 video tutorials taught by expert instructors with personalized recommendations



DIVERSITY, EQUITY, AND INCLUSION

OUR NEW GLOBAL CHIEF DIVERSITY, EQUITY AND INCLUSION OFFICER

In the spring of 2021, Iron Mountain announced the new Global Chief Diversity, Equity, and Inclusion (DEI) Officer, Charlene Jackson. Charlene has more than two decades of experience driving culture transformation through innovative diversity strategies. To help Iron Mountain set a standard of excellence where DEI is embedded in our DNA, and help us achieve our public DEI goals, Charlene and her team began the process of developing a Strategic DEI Framework that will be operational in 2022. The framework is a multi-pronged, multi-phased approach that includes measurement and evaluation of our data; revisions to structural systems, policies, processes and practices; a comprehensive training strategy; and, most importantly, accountability - all of which is necessary to create a culture of equity, inclusion, and belonging. Along with our new Chief DEI officer, our newly-established Global DEI Council, composed of key executives and chaired by our CEO Bill Meaney, will oversee the implementation of our DEI strategy.



“Our goal is to create a culture where DEI is in our DNA.”

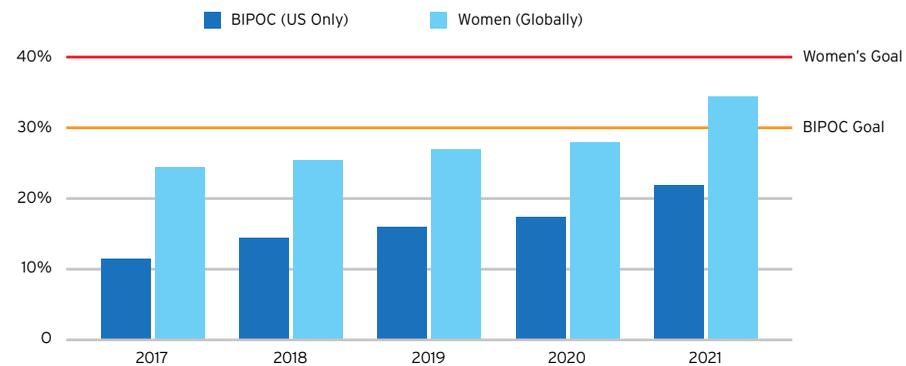
Charlene Jackson
Global Chief Diversity Officer

GLOBAL DIVERSITY SUMMIT

We held our inaugural Global Diversity Summit in the fall of 2021 where the DEI team virtually hosted Mountaineers from across the globe to share their vision and perspective on DEI at Iron Mountain. The Summit marked an exciting step forward in our cultural transformation journey. Program highlights included:

- An address from CEO Bill Meaney focused on the critical importance of DEI and how we embed DEI in our DNA.
- A fireside chat with members of the Iron Mountain senior leadership team who discussed DEI in their respective organizations.
- A keynote address that provided a unique and powerful perspective of DEI as a core competency of leadership.
- A panel of leaders from our Employee Resource Groups (ERGs) discussed the global expansion of our ERGs.

2021 DIVERSITY IN LEADERSHIP ROLES



THE INCLUSION PLEDGE

We launched The Inclusion Pledge in the spring of 2021 to reinforce our commitment to creating a physically and emotionally safe, inclusive, and diverse work environment that aligns with our core values. The pledge was created by a group of volunteer employees who are champions of our DEI work. Mountaineers were asked to take the Pledge, discuss with their teams, and consider individual actions to help make a positive impact.

I PLEDGE TO:



MAKE IRON MOUNTAIN a physically and emotionally safe place that fosters a culture of belonging for all Mountaineers



ENGAGE in respectful dialogue that embraces our different backgrounds, diverse thoughts, and experiences



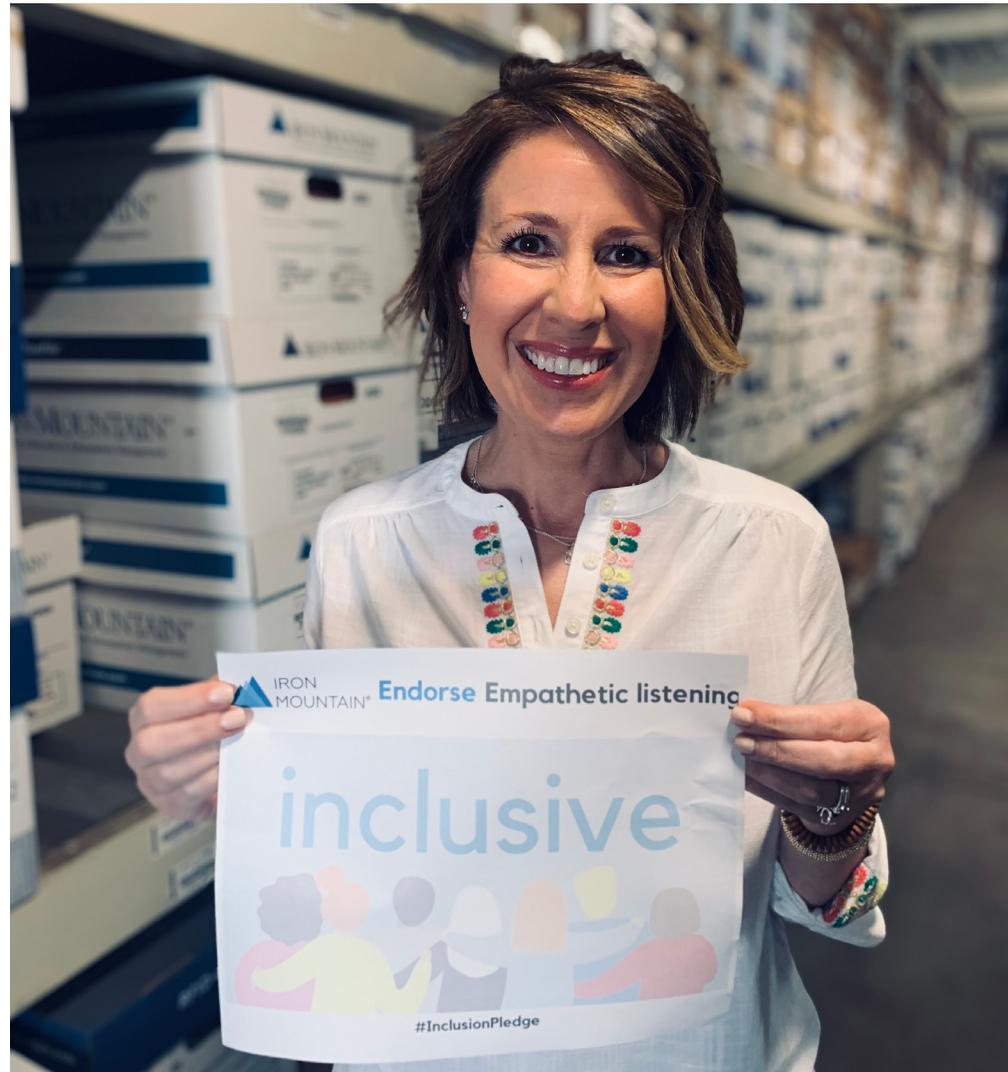
SEEK to understand perspective and opinions in all interactions



BE ACCOUNTABLE for my words and actions and to hold others to the same standard



LIVE & MODEL Iron Mountain's Core Values



EMPLOYEE RESOURCE GROUPS

At Iron Mountain, an Employee Resource Group (ERG) is defined as an employee-led group organized by volunteers based on shared life experiences, backgrounds, or characteristics. These groups typically represent cultural or marginalized groups, as well as allies who support these groups. ERGs create a safe, inclusive environment where employees from around the world can connect to share experiences, bring relevant programming to the company, and support DEI efforts, globally. More than 1,500 employees participate with one or more of our eight ERGs.

In 2021, our ERGs hosted a variety of educational sessions and community conversations. In June, the Black Colleagues ERG hosted a celebration of Juneteenth. The event included a guest keynote speaker who discussed how to be a better ally and tied this to Juneteenth history. Our ERGs also launched the Antiracist Allyship Advancement Series, a quarterly conversation using the ALLY model as a frame to discuss how to be actively antiracist. The series included the following topics:



A FOR ACCEPT

ALLY model, key definitions and terms

- *“Kitchen Table Discussion” with senior leaders*

L FOR LISTEN

The ways bias presents in business

- *Presentation on bias, ethics and compliance in Artificial Intelligence (AI) and Machine Learning (ML)*
- *Expert panel discussion on inclusion in technology and what we are doing as a company to combat bias*

L FOR LEARN

Microaggressions, code-switching, stereotypes, and culture

- *Panel of Mountaineers shared their experiences with microaggressions, code-switching, stereotypes, and what they would like us to celebrate from their culture or identity*

Y FOR YOU

Doing the work, apologies, becoming an accomplice and more

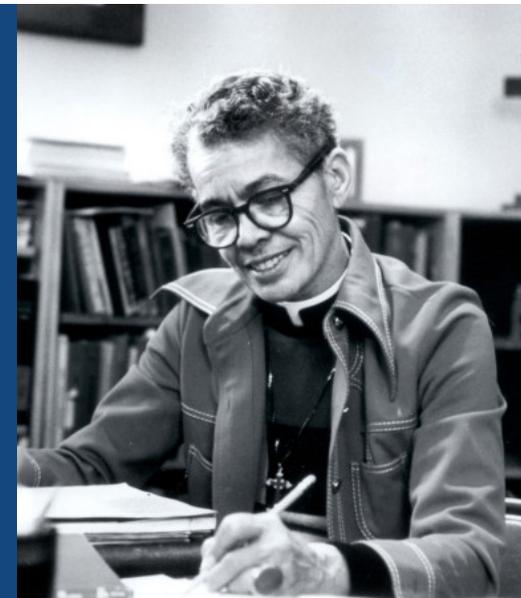
- *Presentation about how we can all do the work and continue the journey of moving from an ally to accomplice*



CUSTOMER CONNECTION

MY NAME IS PAULI MURRAY PANEL DISCUSSION

The Diversity, Equity and Inclusion (DEI), Corporate Responsibility teams and Employee Resource Groups (ERG) Leaders collaborated to facilitate a panel discussion of the film “I am Pauli Murray.” The Panel included one of the film’s producers, the Executive Director of the Pauli Murray Center of History and Social Justice, and three leaders from our ERGs. Customers were among those invited to participate in a screening of the film along with the panel discussion to learn about the significance of Pauli Murray. Customers also had the opportunity to learn more about Iron Mountain’s DEI efforts and our Journey To Equal Rights collection as part of our Living Legacy Initiative.



HEALTH AND SAFETY

At Iron Mountain, we hold true to our value of owning safety and security. Safety is our first consideration in everything we do, and ultimately becomes the foundation of how we do business. Making safety a living value requires an engaged workforce at every level.

In 2021 we continued to improve our health and safety programs while simultaneously improving the way we track and measure key safety metrics. To focus on leading safety indicators, we developed a new course, Hazard and Near Miss Reporting, and added mobile reporting functionality. To improve our trend analysis, we developed a new global safety dashboard. These reporting tools will give us greater access to actionable data, allowing us to continue to make informed decisions about the safety of our employees. Over 600 employees have completed our internal safety advocate certification globally. Those employees took on additional safety tasks such as Safety 24/7 briefings, safety inspections and employee communications.

Our Health and Safety teams also spent time in 2021 to lay the foundation for programs to be launched in 2022. To ensure that employees and visitors are familiar with the sites in which we operate, we created new bespoke site induction materials with instructional content that will launch in 2022. Our ultimate goal is to achieve zero injuries and establish a “zero incident safety culture” throughout our operations.



HEALTH AND SAFETY

OUR RESPONSE TO COVID-19

We built a strong foundation to respond to the pandemic in 2020 when we established our Crisis Management Core Team and implemented COVID-19 protocols in line with the Centers for Disease Control (CDC) and the World Health Organization (WHO). Our initial efforts combined monitoring key metrics, adjusting workplace practices, providing personal protective equipment to ensure optimal working conditions for on-site employees, and supporting our employee's physical and mental health.

In 2021, the second year of the COVID-19 pandemic, we continued to improve our practices and adapt our strategy to maintain the health and safety of our employees and our customers. Examples of our response to the virus in 2021 include:

- Enhanced testing capabilities through procuring various tests for our frontline employees, including at-home testing kits.
- Launched the CVS Return Ready Testing Pilot in North America where employees could obtain on-site testing through their local CVS.
- Implemented a vaccine strategy to support increasing customer requirements for services to be provided by vaccinated employees, including vaccinations programs and required vaccine attestations.
- Procured vaccines for employees in India, Indonesia, and Malaysia.
- Deployed a pilot contact tracing application in some of our facilities in North America.

The Richard Reese Employee Relief Fund, a 501(c)(3) charitable organization dedicated to supporting Iron Mountain employees impacted by catastrophic events, together with the Iron Mountain Charitable Foundation, also provided financial support to employees globally.

The safety of our employees extends beyond the walls of our facilities. Iron Mountain encourages our employees to monitor their mental health and to check in on their teammates regularly. We offer resources to employees and their families, such as our Global Employee Assistance Program (EAP), which provides support for any work or personal issues, including short-term professional counseling.

WORKPLACE FLEXIBILITY

Recent events have shown us that the future of work is different. From the beginning of the COVID-19 pandemic, our frontline employees have continued their dedication and commitment to serving our customers globally, while our office workforce adopted a hybrid approach in which we leverage tools enabling collaboration and productivity whether in the office or at home. We recognize the need to adapt and formalize our remote and hybrid work practices to ensure that flexibility is built into how we work and where we work. In 2021, we conducted interviews across the globe to understand and evaluate our current remote and hybrid work strategies to ensure our ability to meet our customers needs, promote the safety of our employees, and attract and retain the best talent. That work will result in the launch of our formal remote and hybrid work strategy this year.





STRENGTHENING OUR COMMUNITIES

CORPORATE PHILANTHROPY

Our impact extends beyond the walls of our facilities. We contribute positively to the communities in which we operate by leveraging the unique capabilities of our business. We go beyond philanthropy to conduct business in a way that leads to a prosperous future for communities.

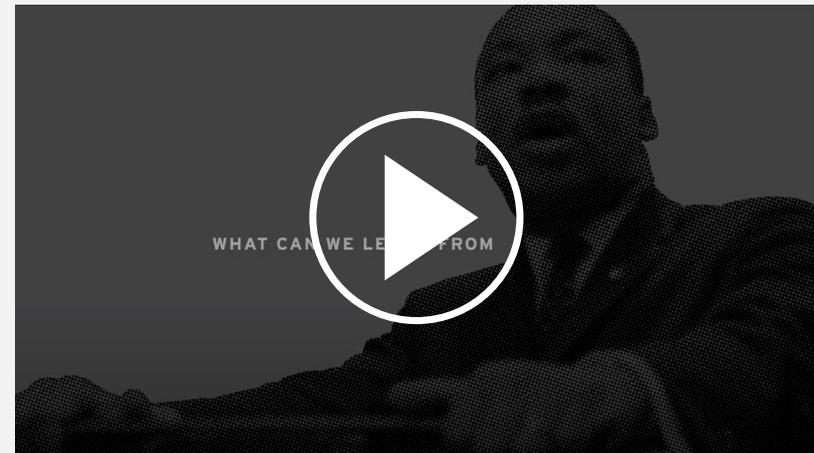
LIVING LEGACY

Every day, we protect our customers' most vital assets and information and extend that same level of care and service to nonprofits and non-governmental organizations through our corporate philanthropy efforts. The Living Legacy Initiative is Iron Mountain's charitable commitment to preserve cultural and historical information and artifacts and make them accessible to the public globally. Grants from the initiative provide nonprofit agencies, museums, and other nongovernmental organizations with cash contributions, in-kind services, or customized solutions that help to advance their missions. We are proud of each of our partnerships and invite you to read more about them [here](#).

In 2021 we announced that we would work with our partners to focus on delivering educational resources to the public in order to share the important lessons of our past to help shape a brighter future. Those resources include lesson plans, guided virtual tours, online databases and more. A few of the partners that have been part of this work are:

- [Angel Island Immigration Station](#)
- [British Film Institute](#)
- [Military Women's Memorial](#)

[Watch](#) Our Journey to Equal Rights Collection is the first of many formal Living Legacy Initiative collections.



We announced that we intend to meet the following public commitment in 2021:
Through our Living Legacy Initiative we will launch 50 new educational resources that unlock the value of the past and help shape the future and strengthen our communities by 2025.

We launched
34
educational resources in 2021

VOLUNTEERISM

MOVING MOUNTAINS

Iron Mountain champions volunteerism in the communities in which we live and work. Our Moving Mountains volunteer program encourages our workforce to contribute to positive change in their communities by providing full-time employees 16 hours and part-time employees 8 hours of annual paid time off to volunteer for a community or civic cause. In 2021, we expanded our Moving Mountains volunteer program to include all global operations.

The social and environmental benefits from Iron Mountain's Moving Mountains program are local in focus and global in impact, and are chosen by our Mountaineers around the world.

Examples of volunteerism in 2021 included:

- Creating 400 hygiene kits for people experiencing homelessness
- Coordinating with a local food pantry to help collect 3,000 boxes of dry goods
- Collaborating with a local crime stoppers program in their annual "Shred A Thon" event to help raise \$38,000 in donations and shred 176,800 pounds (84.4 tons) of paper to prevent identity theft and ensure that shredded documents are properly recycled
- Collecting and distributing necessary items and toys to 1,073 children across Brazil in honor of Children's Day

To help measure and track our 2025 volunteerism goal, we launched the Moving Mountains Portal in 2021. The portal allows employees to easily track volunteer hours, find new volunteer opportunities, recruit volunteers to causes close to their hearts, and share stories with their fellow Mountaineers.



Mountaineers volunteered
10,447 hours
On our way to 100,000 hours by 2025



SUPPLY CHAIN RESPONSIBILITY

SUPPLIER DIVERSITY

Iron Mountain believes the use of diverse suppliers bridges the wealth gap, promotes better business, and positively impacts our company, customers, and communities. The use of diverse suppliers also helps us make our own products and services more accessible and relevant while improving our ability to deliver the highest quality services at the best price.

In 2020 we set out to increase our diverse-supplier spend with minority, women, veteran, disabled and LGBTQ-owned businesses by 16% by 2023 from our 2020 baseline. We are proud to report that we achieved a 20% increase from 2020 to 2021. We also track our spend with small businesses. Our small business spend combined with our diverse-supplier spend exceeded \$225M in 2021, which was an increase of 6.7% compared to the previous year.

Supplier diversity is an ever-evolving program and in order to continue to meet our commitments our supply chain teams have expanded their outreach efforts. In 2021, a team of Iron Mountain sourcing professionals attended the National Minority Supplier Development Council (NMSDC) Virtual Conference and Business Opportunity Fair. We are also increasing efforts to identify new suppliers through memberships including:

- National Minority Supplier Development Council
- National LGBT Chamber of Commerce
- Women's Business Enterprise National Council
- Disability:IN
- Australia's Supply Nation
- Minority Supplier Development UK

We have received positive recognition from some of our business partners for our efforts globally. Iron Mountain recently achieved a Level 2 rating on South

Africa's Broad-Based Black Economic Empowerment (B-BBEE) scorecard, an effort to address historical imbalances in the country by facilitating the participation of black people in the mainstream economy. To learn more about how Iron Mountain South Africa was able to achieve this recognition [click here](#).



CUSTOMER CONNECTION

JPMORGAN CHASE FOR ADVANCING SUPPLIER DIVERSITY EXCELLENCE

As a result of our increased focus on supplier diversity, JP Morgan Chase recently named us as one of its Gold Suppliers, that committed to increasing their own spending with diverse suppliers. We welcome opportunities to collaborate with our customers to meet their goals and support their ambitions with regard to supplier diversity.

+20% spend with diverse suppliers

WORKING WITH OUR SUPPLIERS

We are committed to using supply chain partners that share our dedication to responsible business. The Iron Mountain Supplier Code of Conduct, which supplements our Code of Ethics and Business Conduct, outlines the principles, standards, and practices required for doing business with us. All suppliers must accept and agree to our Supplier Code of Conduct, which requires compliance with laws governing employment, environmental practices, anti-corruption, antidiscrimination, and other similar issues. Our internal procurement policy, launched in 2021, also outlines our procurement team's responsibility to assist Iron Mountain to achieving our supplier diversity and sustainability goals.

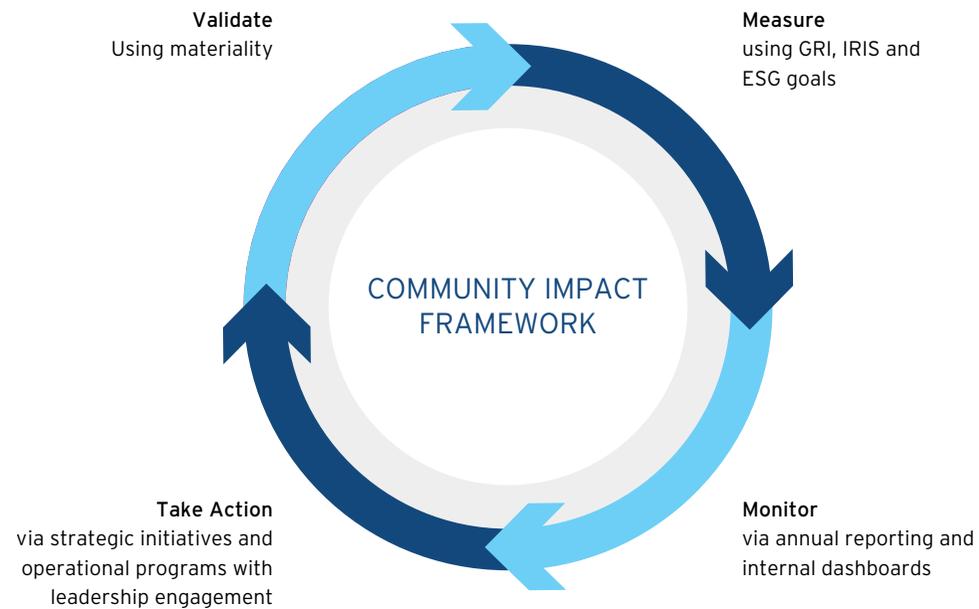
To evaluate our suppliers' ESG performance and identify potential ESG risks in our supply chain, in 2021 we completed a supplier ESG analysis. We looked at our critical suppliers, as well as 50 of our top suppliers by spend, and evaluated their performance in six key ESG topics: human rights, codes of conduct and ethics, transparency and targets, carbon emission, environmental policies, and supplier diversity. We will build on our supply chain ESG efforts in 2022 through a formal engagement process with suppliers who did not meet performance thresholds in our initial supply chain ESG analysis. We also intend to launch an ESG supplier survey in 2022 to gain greater visibility into the ESG practices of many of our top suppliers to supplement our supplier ESG analysis.



MEASURING COMMUNITY IMPACT

Iron Mountain believes it has a responsibility to create social value in the communities in which we operate. We set a goal in 2021 that our business decisions will have a net positive impact on our communities by 2040. To quantify our impact, we set an interim goal to create or adopt a process to measure, by 2022, the community impact of our business decisions. We are proud to announce that we have achieved this goal with the creation of our Community Impact Framework.

Our materiality assessment will serve as the foundation for the framework and will allow us to determine our stakeholders and define community. We will measure the impacts from business decisions using a combination of Global Reporting Initiative (GRI) standards and metrics sourced from IRIS+ Catalog of Metrics (formerly the Impact Reporting and Investment Standards). We will transparently report on key impacts in our annual Corporate Responsibility Report - this annual impact report will augment our current GRI index with additional standards and IRIS+ metrics. We intend to publish the initial results of our Community Impact Framework in our 2023 Corporate Responsibility Report.





ESG PERFORMANCE SUMMARY

PERFORMANCE TABLES

Iron Mountain has received external assurance for content in this report as described in Appendix D. We have indicated which metrics received assurance throughout the performance tables.



Greenhouse Gas Emissions							
Greenhouse Gas Emissions (metric tons of CO2e)	FY16 (original)	FY16 (restated)	FY17	FY18	FY19	FY20	FY21
Total absolute emissions	334,581	540,044	437,142	259,400	259,160	211,071	217,197
Scope 1	153,037	159,104	172,026	149,865	143,159	125,318	120,870
Scope 2 market-based	152,902	172,635	127,461	83,368	77,312	62,095	75,801
Scope 2 location-based	157,172	-	167,478	400,045	370,167	208,150	213,000
Scope 3	28,642	208,305	137,655	26,167	38,689	23,657	20,526
GHG Intensity (mtCO2e/sq ft)	0.0038	0.0062	0.0051	0.0029	0.0028	0.0023	0.0023
Verified Carbon Offsets							-1,000

Note: Emissions data in 2016 restated to establish baseline for science-based target. Scope 1 and 2 emissions data includes all Iron Mountain operations and includes a gap analysis and estimated amount to cover all operations. We are completing a final scope 3 analysis and, as such, figures reported in this report may differ from our CDP response.



Energy						
Energy Consumption (megawatt-hours)	FY16	FY17	FY18	FY19	FY20	FY21
Total energy consumption	938,491	1,269,146	1,481,040	1,533,552	1,486,012	1,581,434
Total electricity consumption from operations	346,274	627,434	880,654	883,974	935,791	1,037,686
Total renewable electricity consumption	8,784	110,646	607,749	683,919	758,595	830,702
Percentage electricity consumption from renewable sources	3%	18%	69%	77%	81%	80%
Energy intensity* (MWh/sq ft)	0.011	0.015	0.016	0.017	0.016	0.017

Data includes all Iron Mountain operations and includes a gap analysis and estimation process to cover all operations. Energy intensity is calculated using total energy consumption and total facility area.

PERFORMANCE TABLES

 Third Party Assured

 Waste Management						
Waste Category (metric tons)	FY16	FY17	FY18	FY19	FY20	FY21
Total	6,363	6,899	8,242	9,399	8,605	10,484
Landfill	5,842	6,246	6,936	7,073	6,103	7,030
Recycling/Composting	521	653	657	1,359	2,501	3,091
Recovery (energy from waste)			648	967	382	364
Diversion Rate	8%	9%	16%	25%	34%	33%

Waste data for FY16, FY17, FY18, FY19 and FY21 represents approximately 65%, 64%, 62%, 67%, 66%, and 65%, respectively, of our total global square footage. This data included in this table represents waste from our operations. See GRI 306-2 for information about the waste processed on behalf our customers.

 Water						
Water consumption (cubic meters)	FY16	FY17	FY18	FY19	FY20	FY21
Water consumption	438,913	418,112	794,378	924,515	1,007,077	1,105,168
Water intensity (m ³ /sq ft)	0.014	0.012	0.020	0.022	0.025	0.025

Water data for FY16, FY17, FY18, FY19 and FY21 represents approximately 35%, 41%, 44%, 45%, 43%, and 46%, respectively, of our total global square footage.

Facility Area						
Facility Area (square feet)	FY16	FY17	FY18	FY19	FY20	FY21
Total square footage	87,485,682	86,195,979	89,876,628	91,380,966	92,739,141	94,667,336

PERFORMANCE TABLES

 Third Party Assured


Workforce - Gender								
Workforce Breakdown by Gender	Total		Female		Male		Not Declared	
	FY20	FY21	FY20	FY21	FY20	FY21	FY20	FY21
Employment Contract								
Permanent	22,295	22,379	8,296	8,639	13,998	13,740	1	0
Temporary	999	644						
Employment Type								
Full-Time	21,646	21,717	7,902	8,264	13,743	13,453	1	0
Part-Time	649	662	394	375	255	287	0	0
Workforce by Region								
North America	9,851	9,841	2,911	3,085	6,940	6,756	0	0
Latin America	4,726	4,927	2,310	2,474	2,416	2,453	0	0
Asia Pacific	2,406	2,427	812	856	1,594	1,571	0	0
Europe, Middle East and Africa (EMEA)	5,312	5,184	2,263	2,224	3,048	2,960	1	0
Employee Category								
VP and above	153	137	34	29	119	108	0	0
Director	461	486	145	180	315	306	1	0
Supervisor/Manager	2,317	2,264	710	733	1,607	1,531	0	0
Individual Contributor	19,364	19,492	7,407	7,697	11,957	11,795	0	0
Board of Directors								
Board of Directors	13	11	4	4	9	7	0	0

Workforce data is as of 1/1/2022. Data boundary is all active employees in our internal human resources database. This represents 22,379 of approximately 25,000 employees, or approximately 90% of the global Iron Mountain workforce. The time frame for this data is January 1, 2021 to December 31, 2021.

PERFORMANCE TABLES

 Third Party Assured

Workforce - Gender		
Percentage of Female Employees	FY20	FY21
Company-wide	37.2%	38.6%
North America	29.6%	31.3%
Latin America	48.9%	50.2%
Asia Pacific	33.7%	35.3%
Europe, Middle East and Africa (EMEA)	42.6%	42.9%

Workforce data is as of 1/1/2022. Data boundary is all active employees in our internal human resources database. This represents 22,379 of approximately 25,000 employees, or approximately 90% of the global Iron Mountain workforce. The time frame for this data is January 1, 2021 to December 31, 2021.

Workforce - Age								
Age Composition of Employees	Under 30 Years Old		30-50 Years Old		Over 50 Years Old		Not Declared	
	FY20	FY21	FY20	FY21	FY20	FY21	FY20	FY21
VP and above	0%	0%	52.9%	47.4%	47.1%	52.6%	0%	0%
Director	0%	0%	61.2%	59.1%	38.6%	40.9%	0.2%	0%
Supervisor/Manager	5.5%	3.0%	70.1%	71.2%	24.5%	25.8%	0%	0%
Individual Contributor	25.2%	22.1%	54.0%	56.6%	20.7%	21.3%	0.1%	0%
Board of Directors								
Board of Directors	0%	0%	0%	0%	100%	100%	0%	0%

Workforce data is as of 1/1/2022. Data boundary is all active employees in our internal human resources database. This represents 22,379 of approximately 25,000 employees, or approximately 90% of the global Iron Mountain workforce. The time frame for this data is January 1, 2021 to December 31, 2021.

PERFORMANCE TABLES

 Third Party Assured



Workforce - Ethnic Composition										
Ethnic Composition of US Employees	Total		VP and above		Director		Supervisor/ Manager		Individual Contributor	
	FY20	FY21	FY20	FY21	FY20	FY21	FY20	FY21	FY20	FY21
American Indian or Alaskan Native	0.3%	0.5%	0%	0%	0.3%	0.3%	0.2%	0.4%	0.3%	0.5%
Asian	4.5%	4.7%	7.8%	5.9%	11.6%	12.6%	5.2%	5.9%	4.1%	4.2%
Black or African American	24.5%	25.0%	3.5%	7.8%	4.1%	3.6%	12.4%	14.0%	27.2%	27.6%
Hispanic/Latino	20.3%	19.9%	0.9%	0%	4.8%	5.8%	14.6%	14.2%	21.9%	21.5%
Native Hawaiian or Other Pacific Islander	0.6%	0.5%	0%	0%	0%	0%	0.1%	0.2%	0.7%	0.6%
Two or More Races	1.8%	1.9%	0.9%	1.0%	0.7%	0.6%	1.0%	1.7%	1.9%	1.9%
White	46.1%	45.7%	85.2%	83.3%	77.6%	76.4%	65.3%	62.3%	41.7%	41.6%
Decline to state/not specified	2.0%	2.0%	1.7%	2.0%	1.0%	0.6%	1.1%	1.3%	2.1%	2.1%
Special Populations										
Veteran	4.9%	5.0%	7.8%	8.8%	6.5%	7.1%	7.0%	5.7%	4.5%	4.8%
Disability	3.1%	3.5%	4.4%	4.9%	1.7%	3.2%	3.4%	3.2%	3.1%	3.6%

Data is representative of voluntary employee self-identification. Workforce data is as of 1/1/2022. Data boundary is all active US employees in our internal human resources database. The time frame for this data is January 1, 2021 to December 31, 2021.

PERFORMANCE TABLES

 Third Party Assured

New Employees		
New Employee Hires	FY20	FY21
Total	5,180	6,736
New Hires by Region		
North America	3,366	3,479
Latin America	764	1,914
Asia Pacific	363	563
Europe, Middle East and Africa (EMEA)	687	780
New Hires by Gender		
Female	2,172	3,067
Male	3,008	3,666
Not Declared	0	3
New Hires by Age Group		
Under 30 years old	2,367	3,065
30-50 years old	2,145	2,962
Over 50 years old	663	706
Not declared	5	3

Workforce data is as of 1/1/2022. Data boundary is all active employees in our internal human resources database. This represents 22,379 of approximately 25,000 employees, or approximately 90% of the global Iron Mountain workforce. The time frame for this data is January 1, 2021 to December 31, 2021.

Employee Turnover						
Employee Turnover and Rate	Total Employees		Turnover		Turnover Rate	
	FY20	FY21	FY20	FY21	FY20	FY21
Voluntary			3,455	4,338	15.5%	19.4%
Involuntary			4,401	2,431	19.7%	10.9%
Total	22,295	22,379	7,856	6,769	35.2%	30.2%
Turnover by Region						
North America	9,851	9,841	3,619	3,528	36.7%	35.9%
Latin America	4,726	4,927	2,355	1,718	49.8%	34.9%
Asia Pacific	2,406	2,427	616	504	25.6%	20.8%
Europe, Middle East and Africa (EMEA)	5,312	5,184	1,266	1,019	23.8%	19.7%
Turnover by Gender						
Female	8,296	8,639	2,829	2,743	34.1%	31.8%
Male	13,998	13,740	5,027	4,023	35.9%	29.3%
Turnover by Age Group						
Under 30 years old	5,007	4,376	2,895	2,393	57.8%	54.7%
30-50 years old	12,444	12,997	3,603	3,296	29.0%	25.4%
Over 50 years old	4,826	5,007	1,356	1,075	28.1%	21.5%

Workforce data is as of 1/1/2022. Data boundary is all active employees in our internal human resources database. This represents 22,379 of the approximately 25,000 employees, or approximately 90% of the global Iron Mountain workforce. The time frame for this data is January 1, 2021 to December 31, 2021.

PERFORMANCE TABLES

 Third Party Assured

US Maternity and Paternity Leave			
FY21 US Maternity and Paternity Leave	Total	Female	Male
Employees on maternity or paternity leave at some time during FY21	280	122	158
FY20 US Maternity and Paternity Leave			
Employees on maternity or paternity leave at some time during FY20	141	55	86
FY20 employees who returned to work after maternity or paternity leave ended	141	55	86
Total number of employees who returned from maternity or paternity leave during FY20 and are still employed 12 months after their return	141	55	86
FY20 Retention Rate	100%	100%	100%

Workforce data is as of 1/1/2022. Data boundary is all active employees.

Union Representation		
Union	FY20	FY21
Percent of employees covered by union representation	6.7%	7.0%

Figures are as reported in Iron Mountain Form 10-K, page 5.

Health and Safety		
Total Recordable Incident Rate (TRIR)	FY20	FY21
Asia	0.3	0.1
Australia and New Zealand	0.4	0.2
Europe, Middle East and Africa	0.8	0.1
Latin America	0.8	0.1
North America	1.7	2.2
Worldwide	1.0	1.1
Lost Time Incident Rate (LTIR)	FY20	FY21
Asia	0.3	0.1
Australia and New Zealand	0.2	0.2
Europe, Middle East and Africa	0.7	0.6
Latin America	0.8	0.8
North America	0.8	1.1
Worldwide	0.7	0.7

Volunteerism	
Volunteerism	FY21
Employee Volunteer Hours	10,477

Workforce data is as of 1/1/2022. Data includes self reported volunteer hours via internal volunteerism tracking mechanisms or via time-off requests for volunteering

PERFORMANCE TABLES

Female to Male Average Compensation Ratios											
Management Level	United States of America		Canada		Brazil	Chile	Colombia	Mexico	France	Poland	United Kingdom
	2020	2021	2020	2021	2021	2021	2021	2021	2021	2021	2021
SVP	101.6%	104.9%	*	*	*	*	*	*	*	*	*
VP	106.0%	106.1%	*	*	*	*	*	*	*	*	*
Director	100.5%	102.4%	*	*	*	*	*	*	*	*	87.3%
Manager	100.6%	100.2%	96.7%	94.9%	87.4%	*	*	82.6%	104.9%	*	85.8%
Supervisor	94.8%	91.3%	97.4%	93.9%	101.1%	*	102.9%	84.6%	106.3%	92.8%	90.6%
Individual Contributor (Professional)	84.7%	84.7%	79.5%	78.6%	72.3%	69.3%	91.0%	91.1%	85.6%	101.5%	87.1%
Individual Contributor (Support)	89.6%	86.1%	92.8%	91.7%	93.6%	86.4%	93.3%	91.8%	104.4%	89.7%	95.4%

*Too few to report and maintain confidentiality

Professional: Non-managerial roles whose work supports strategic objectives through the application of specific conceptual knowledge of theories, practices, and procedures. In the US, these would be categorized as exempt from overtime provisions of local labor regulations.

Support: Non-managerial roles whose work is through the completion of tasks and skills-based contributions that are administrative, clerical, or manual in nature. In the US, these roles would be eligible for overtime as outlined in local labor regulations.

Charitable Contributions				
Charitable Contributions Category	FY18	FY19	FY20	FY21
Living Legacy	\$545,000	\$545,000	\$655,000	\$545,000
Local Charitable Giving	\$515,000	\$300,000	\$166,000	\$106,000

Supply Chain				
Supplier Designation	FY18	FY19	FY20	FY21
Diverse-supplier spend	\$38,146,836	\$41,283,169	\$60,010,765	\$72,392,839
Small-business spend	\$154,927,555	\$151,468,128	\$151,259,507	\$152,967,607



STAKEHOLDER ASSESSMENT

STAKEHOLDER ASSESSMENT

In order to prioritize economic, environmental, social, and governance (ESG) topics, we periodically engage with internal and external stakeholders, including investors, non-profit partners and customers, by conducting materiality assessments. This process helps us manage ESG risks and identify the topics that are most relevant to the success of our company. We revisit this process every two to three years to account for changes to the business, regulations, and climate.

In 2020, we engaged an independent consultant to conduct a materiality assessment. During this assessment, we examined the universe of potential ESG topics and refined the list based on a given topic's prevalence in:

- Iron Mountain's public disclosures, purpose statement, and priorities
- Leading reporting frameworks and standards, including the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB), the Task Force on Climate-Related Financial Disclosures (TCFD), and the United Nations Sustainable Development Goals (SDGs)
- Leading investor ESG ratings and industry-specific evaluations

We also surveyed and interviewed internal and external stakeholders to socialize and validate the proposed material topics below. The results of those interviews are represented in the chart that follows.

- Community impact
- Customer-centric approach
- Diversity, equity, and inclusion
- Environmental responsibility
- Ethics, compliance, and fair business practices
- Risk management
- Safety and wellness
- Supply chain responsibility
- Talent attraction and development

We intend to complete our next materiality assessment in 2022.



MATERIALTY ASSESSMENT RESULTS

In our stakeholder interviews we identified several specific topics under each material issue that internal and external stakeholders identified as important. The chart below details those results:

STAKEHOLDER GROUP

● External Stakeholders

● Internal Stakeholders

CUSTOMER-CENTRIC APPROACH	INDICATED AS IMPORTANT BY:
Customer service and support	● ●
Satisfaction with service, reliability, scale, technological capabilities, and price	● ●
Innovative products and services to help customers meet ESG goals	● ●
DIVERSITY, EQUITY, AND INCLUSION	
Practices to promote a culture of diversity and inclusion	● ●
Employee diversity	● ●
Pay equity	● ●
Board and Executive diversity	●
RISK MANAGEMENT	
Enterprise risk management	● ●
Data privacy and protection	● ●
ENVIRONMENTAL RESPONSIBILITY	
Climate change (greenhouse gas [GHG] and non-GHG emissions)	● ●
Energy consumption, including renewables	● ●
Fleet management	●
Facilities management, including waste management and water consumption	● ●
Innovative solutions and potential circular economy opportunities	● ●
ETHICS, COMPLIANCE, AND FAIR BUSINESS PRACTICES	
Anti-corruption and anti-bribery policies	● ●
Ethical guidelines and training	● ●
Compliance	● ●

SUPPLY CHAIN RESPONSIBILITY	INDICATED AS IMPORTANT BY:
Supplier diversity	● ●
Human rights in the supply chain	● ●
Product sourcing and vendor selection	●
Supplier risk management	●
COMMUNITY IMPACT	
Philanthropic strategy, including in-kind donations	● ●
Employee volunteering	● ●
Community impacts of operations	● ●
Disaster response	●
SAFETY & WELLNESS	
Occupational health and safety initiatives and performance	●
Safety standards	● ●
Security and emergency management	● ●
Health and wellness programs	●
Innovative solutions and potential circular economy opportunities	● ●
TALENT ATTRACTION & DEVELOPMENT	
Attracting and retaining employees	● ●
Career development planning and performance reviews	●
Leadership development planning and performance reviews	●
Training and professional development opportunities	● ●

STAKEHOLDER ENGAGEMENT SUMMARY

KEY STAKEHOLDER GROUPS ENGAGED	MAIN DIALOGUE MECHANISMS AND FREQUENCIES	MAIN TOPICS OF INTEREST RAISED
<p>CUSTOMERS</p>	<ul style="list-style-type: none"> • Regular customer feedback collected via a variety of channels including <ul style="list-style-type: none"> – Customer Advisory Board (CAB) – Executive Forums Global Industries – Customer Experience Surveys – Polls and interviews – Law Firm Information Governance Symposium – Service Experience follow-up calls from the Customer Advocacy Center • Regular customer-initiated requests for information or annual audits • Education series (formal program) allows for feedback • Association event attendance as sponsor/presenter 	<ul style="list-style-type: none"> • Safety and security of information • Compliance with data privacy regulations and understanding data sources and use across the organization • Service-level agreements and convenience of access to stored information • Price point and a sense of urgency and consistency in relationship management • Iron Mountain's ESG performance and how it can assist customers in achieving their sustainability goals • Use of artificial intelligence/machine learning and automating work processes
<p>EMPLOYEES</p>	<ul style="list-style-type: none"> • Regular employee surveys • Regular performance evaluation, including end-of-year discussions and periodic career conversations • Regular feedback via frontline managers in daily pre-shift meetings and monthly team meetings • Regular roundtable discussions held with employees • Multiple one-way and two-way communication channels, including investment in new digital platforms 	<ul style="list-style-type: none"> • Professional development and career opportunities, compensation, and health and safety protection • Company performance, business strategy, and future direction • Iron Mountain ESG performance: how employees can impact our results in areas relevant to them, such as paid time off for volunteerism, safety, ethical behavior, energy savings, and data privacy

STAKEHOLDER ENGAGEMENT SUMMARY

KEY STAKEHOLDER GROUPS ENGAGED	MAIN DIALOGUE MECHANISMS AND FREQUENCIES	MAIN TOPICS OF INTEREST RAISED
<p>SHAREHOLDERS</p>	<ul style="list-style-type: none"> • Annual Shareholder Meeting • Quarterly earnings teleconferences and webcasts • Published annual sustainability reports • Discussion with interested and socially responsible investors during materiality process review • Frequent industry and broker-sponsored conferences, facility tours and non-deal roadshows 	<ul style="list-style-type: none"> • Earnings updates, company strategy, and business risks/opportunities outlook • Iron Mountain's ESG performance or implementation of sustainability initiatives and how they create value for our business • Understanding what ESG issues investors see as most relevant to Iron Mountain's success and strategy (during focused materiality process reviews)
<p>NONPROFIT PARTNERSHIPS</p>	<ul style="list-style-type: none"> • Feedback from partner organizations and grant recipients • Discussion with prospective grant recipients • Regular volunteer events and activities 	<ul style="list-style-type: none"> • The role of Iron Mountain in furthering social and environmental causes and its mitigation of any adverse effects of business activities • Ensuring the preservation of and access to historically and culturally significant artifacts, records, and information • Understanding how Iron Mountain and its employees and services can have a positive societal impact



GRI CONTENT INDEX

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

The Global Reporting Initiative (GRI) provides the world's most widely used framework for sustainability reporting. The GRI Standards offer a structured format to coherently and comprehensively share information about material issues, performance metrics, and the management of sustainability-related issues within the organization. This report has been prepared in accordance with the GRI Standards: Core option. This report was prepared using the 2016 version of the General Disclosures and the Management Approach disclosures of the GRI Standards. The reporting principles for defining report content and quality have been applied throughout the information collection and report development process. Iron Mountain publishes sustainability reports annually. Iron Mountain's last report was released in 2021. Iron Mountain's 2021 Corporate Responsibility Report covers the calendar year 2021. Data presented in the report represent all wholly owned Iron Mountain operations unless explicitly noted otherwise. Any questions regarding the report should be sent to Jennifer Grimaudo, Director of Corporate Responsibility at Iron Mountain (Jennifer.Grimaudo@ironmountain.com).

GRI 101: FOUNDATION 2016

GRI 102: GENERAL STANDARD DISCLOSURES: CORE IN ACCORDANCE

ORGANIZATIONAL PROFILE

102-1	Name of the organization	Iron Mountain Incorporated
102-2	Activities, brands, products, and services	About Us, pages 4-8 2021 10-K , pages 1-7 We offer several products and services to help customers achieve their environmental goals including our Green Power Pass, Secure IT Asset Lifecycle Management, Iron Mountain Sterilization Wrap Recycling, and more.
102-3	Location of headquarters	Boston, Massachusetts, United States
102-4	Location of operations	Operations in 63 countries. 2021 10-K , pages 22-24
102-5	Ownership and legal form	2021 10-K , pages 1-7
102-6	Markets served	2021 10-K , pages 1-7
102-7	Scale of the organization	Who We Are section, page 7 2021 10-K , pages 1-7
102-8	Information on employees and other workers	Performance Tables, pages 37-42 Iron Mountain's work is not performed by a substantial number of independent contractors or supervised workers. There is no significant variation in Iron Mountain's employment numbers during the year.

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

102-9	Supply chain	Iron Mountain's value chain includes the communities where we operate and where our employees' families and prospective employees live; our suppliers of services, energy and vehicle fuel, and materials; our customers including government agencies; and regulatory bodies.
102-10	Significant changes to the organization and its supply chain	2021 10-K , pages 1-7
102-11	Precautionary Principle or approach	The Precautionary Principle is considered in the evaluation of our key corporate responsibility (CR) issues and opportunities and determined which CR topics were most critical to address. We also involve an external expert and incorporate feedback from our most senior managers and representatives of key stakeholder groups in this process.
102-12	External initiatives	<p>UN Global Compact: Iron Mountain joined the UNGC in 2016. We are committed to pursuing policies, strategies and procedures, as well as creating a culture of integrity that meets fundamental responsibilities in the areas of human rights, labor, environment and anti-corruption.</p> <p>Science Based Target Initiative (SBTi): As a global organization, we recognize the impact that our daily operations can have on the world, and in 2013 began a journey to better understand and mitigate that impact. That understanding has led us to today, where we look at sustainability as an opportunity to make our operations more efficient and uncover insights that we can pass on to our customers and industry peers to do the same. Our commitment and progress to realizing this opportunity has helped us improve both our business and our customers' businesses, and we're proud to join the ranks of the SBTi-approved companies in setting aggressive targets to reduce our GHG emissions.</p> <p>The Climate Pledge: We embrace our responsibility to contribute to the fight for a net zero future for our planet, seeking opportunities to improve environmental performance within our operations. Iron Mountain is a signatory to The Climate Pledge - committing to achieve Net Zero emissions by 2040, 10 years ahead of the Paris Climate Accord.</p>

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

102-12	External initiatives	<p>RE100: Understanding the impact of our energy usage has led to the adoption of energy and greenhouse gas reduction strategies that are helping the company save money, reduce environmental impacts and better serve our customers. In making these commitments today, we are setting aggressive public goals with the endorsement of well-respected nonprofit organizations, accelerating our efforts to foster strong economic growth while operating as a responsible, ethical and sustainable nonprofit company.</p> <p>EV100: We recognize the need to decarbonize our transportation in order to reach our Net Zero ambitions. Iron Mountain began the electrification of its fleet a few years ago with 24 EV vans in the UK and continental Europe. We have committed to transitioning 100% of company cars and 50% of vans to EVs by 2030, as part of EV100.</p> <p>UK Modern Slavery Act: Our business and core values are premised on compliance and activity with integrity therefore we take adherence to laws, including the Act, seriously and we are fully supportive of initiatives aimed at the eradication of both slavery and human trafficking across the globe.</p> <p>Australia Modern Slavery Statement: Iron Mountain's Code of Conduct recognizes 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.</p> <p>You can read more about our awards, certifications, and initiatives here.</p>
102-13	Membership of associations	<p>Aerospace Industries Association (AIA), American Health Information Management Association (AHIMA), ARMA International (ARMA), Armed Forces Communications and Electronics Association (AFCEA), Association for Information and Image Management (AIIM), Association of Corporate Counsel (ACC), BSR, Business-Government Relations Council, Clean Energy Buyers Association (CEBA), Disability:IN, Healthcare Information and Management Systems Society (HIMSS), Information Governance Initiative, International Legal Technology Association (ILTA), National Association for Information Destruction (NAID), National Association of Real Estate Investments Trusts (NAREIT), National LGBT Chamber of Commerce, National Minority Supplier Development Council, Northern Virginia Technology Council, Professional Records and Information Services Management International (PRISM), , Supply Nation Australia, Sustainable Brands Corporate members, The New England Council, World Business Council for Sustainable Development (WBCSD), Women's Business Enterprise National Council</p>

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

STRATEGY		
102-14	Statement from senior decision-maker	Letter from President and CEO, page 3
ETHICS AND INTEGRITY		
102-16	Values, principles, standards, and norms of behavior	Code of Ethics and Business Conduct
GOVERNANCE		
102-18	Governance structure	Governance Documents 2022 Proxy Statement
STAKEHOLDER ENGAGEMENT		
102-40	List of stakeholder groups	Stakeholder Engagement, pages 46, 47
102-41	Collective bargaining agreements	Approximately 7% of our workforce was covered by union representation in 2021, including approximately 500 employees in North America and approximately 1,250 employees in Latin America (in Argentina, Brazil, Chile and Mexico). All union employees are currently under renewed labor agreements or operating under an extension agreement.
102-42	Identifying and selecting stakeholders	In Q4 2020, Iron Mountain, with the help of an external expert, conducted our second materiality assessment. The selected stakeholders represent key target groups of our CR Report, including customers, investors, peers and nonprofit organizations. These dialogues have provided recommended next steps to further advance our CR efforts and are used as a tool for continuous improvement. We intend to conduct a third materiality assessment in 2022. See page 43-47 for more details.
102-43	Approach to stakeholder engagement	We engage with our stakeholders regularly, using channels that are most convenient to them. Throughout 2021 we engaged with a number of stakeholders regarding the format, depth and coverage of our annual CR Report. The selected stakeholders represent key target groups of our CR Report. We value their feedback, and they have provided recommended next steps to further advance our CR efforts and are used as a tool for continuous improvement. See page 43-47 for more details.
102-44	Key topics and concerns raised	Stakeholder Engagement, page 43-47

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

REPORTING PRACTICE		
102-45	Entities included in the consolidated financial statements	2021 10-K , page 3 and Exhibit 21.1
102-46	Defining report content and topic Boundaries	Iron Mountain conducted its second materiality assessment in 2020 to determine our priority ESG issues. These issues reflect the topics of highest concern to Iron Mountain and its stakeholders and guide our ESG strategy and disclosures. Our materiality process is based on the Global Reporting Initiative's (GRI) Principles for Defining Report Content and applies the Ten Principles of the United Nations Global Compact (UNGC) and Sustainable Development Goals (SDGs). We regularly review our priority issues with key stakeholders, including employees, customers and investors. We also pinpointed related opportunities in order to manage corresponding challenges in a precautionary manner. We intend to conduct a third materiality assessment in 2022. See page 43-47 for more details.
102-47	List of material topics	Material CR Topics are listed on pages 54-65 ; Material GRI aspects are as listed in this Index.
102-48	Restatements of information	On page 44 of the 2020 Iron Mountain Corporate Responsibility Report the stated percentage of employees covered by union representation was 7.2% for 2020. We have revised this figure in this year's report to 6.7% for 2020 to align with our 2020 10-K.
102-49	Changes in reporting	None
102-50	Reporting period	January 1, 2021 - December 31, 2021
102-51	Date of most recent report	May 2021
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Jennifer Grimaudo, Director of Corporate Responsibility Jennifer.Grimaudo@IronMountain.com
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option.

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

102-55	GRI content index	GRI Content Index, pages 48-66
102-56	External assurance	Appendix D: External Assurance Statement, pages 77-79
MATERIAL TOPIC: ECONOMIC PERFORMANCE		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71
GRI 201: ECONOMIC PERFORMANCE 2016		
201-1	Direct economic value generated and distributed	2021 10-K
MATERIAL TOPIC: ANTI-CORRUPTION		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

GRI 205: ANTI-CORRUPTION 2016		
205-2	Communication and training about anti-corruption policies and procedures	Iron Mountain requires employees in Legal, Sales, Real Estate, Finance, HR, Procurement, Marketing and other functions to complete an annual anti-bribery and anti-corruption course. Employees can also report any incident of fraud, waste, abuse, corruption or other related to our Ethics Line at www.imethicsline.com , or by calling 1-866-668-3837. In 2021, there were 115 cases reported through the Ethics Line. In any instance where a substantiated violation was identified, appropriate action was taken. In addition to the anti-corruption and anti-bribery training, our Chief Compliance Officer and his team travel to various countries to provide in-person training for the local Sales, Marketing, Procurement, Legal, Finance and leadership teams. We are not aware of any cases of violation of Anti-bribery/Anti-corruption laws at Iron Mountain globally in 2021.
205-3	Confirmed incidents of corruption and actions taken	Iron Mountain believes that doing business with integrity is the only way to do business. We are not aware of any cases of violation of anti-bribery/anti-corruption laws at Iron Mountain globally in 2021. Iron Mountain's Supplier Code of Conduct (which supplements our Code of Ethics and Business Conduct) sets forth the principles, standards and practices required for doing business with Iron Mountain. All contractors are required to abide by the code. http://www.ironmountain.com/utility/legal/supplier-code-of-conduct . If a vendor violates the code, their contract may be terminated. We are not aware of any instances where a supplier violated our code of conduct in 2021.
MATERIAL TOPIC: ANTI-COMPETITIVE BEHAVIOR		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016		
206-1	Legal actions for anti-competitive behavior, antitrust, and monopoly practices	Iron Mountain believes that a free and competitive marketplace offers us the best opportunity to succeed. By delivering value and providing best-in-class service, we strive to outperform the competition and build long-term trust with our customers. We recognize that even the appearance of unfairness or deception in our competitive practices can directly impact our chances of success. Our Code of Ethics and Business Conduct also demands that we be aware of and respect fair competition and antitrust requirements worldwide. This includes legal requirements as well as our company policies and procedures. Employees who may come into contact with competitors or competitively sensitive information are required to complete Antitrust and Fair Competition training, and to certify to company policies. We are not aware of any new cases of violation of antitrust and fair competition laws initiated during 2021.
MATERIAL TOPIC: MATERIALS		
GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71
GRI 301: MATERIALS 2016		
301-2	Recycled input materials used	A significant source of the materials we purchase is the corrugated cardboard boxes used to store our customers' records. Given this significant volume, we carefully select the boxes we purchase to minimize environmental impacts. Our new EcoBox, currently available in the US and Canada, is made from 65% recycled materials and 35% sustainably managed forests, and has the same functionality and durability of our previous boxes. The new boxes are certified by the Forest Stewardship Council (FSC), a group that works to ensure forests are properly and responsibly maintained to meet economic needs, conserve biodiversity, and preserve species, while also taking into account land rights and the rights of indigenous communities and workers. These boxes are recycled once they reach the end of their storage life.

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

MATERIAL TOPIC: ENERGY		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71
GRI 103: MANAGEMENT APPROACH 2016		
302-1	Energy consumption within the organization	Protecting Our Planet, pages 14-19 ESG Performance Summary, pages 34-42
302-3	Energy intensity	ESG Performance Summary, pages 34-42
302-4	Reduction of energy consumption	Protecting Our Planet, pages 14-19 ESG Performance Summary, pages 34-42
MATERIAL TOPIC: EMISSIONS		
GRI 305: EMISSIONS 2016		
305-1	Direct (Scope 1) GHG emissions	ESG Performance Summary, pages 34-42 Iron Mountain's emission figures are calculated in accordance with the WRI and the WBCSD GHG Protocol. Scope 1 emissions are related to natural gas and fuel consumption of our directly managed properties and fleet and fire suppressants.
305-2	Energy indirect (Scope 2) GHG emissions	ESG Performance Summary, pages 34-42 Iron Mountain's emission figures are calculated in accordance with the WRI and the WBCSD GHG Protocol. Scope 2 emissions are related to electricity and district energy consumption of our directly managed assets.

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

305-3	Other indirect (Scope 3) GHG emissions	<p>ESG Performance Summary, pages 34-42</p> <p>Iron Mountain's emission figures are calculated in accordance with the WRI and the WBCSD GHG Protocol. Scope 3 emissions include air travel, rail travel and rental cars, hotel stays and energy and fuel- related activities not covered in Scope 1 or Scope 2. Iron Mountain recognizes the importance of a complete and accurate greenhouse gas inventory as a step to reduce greenhouse gas emissions from our value chain. We are in the process of completing a full scope 3 inventory. The scope 3 figures that we report in our 2022 CDP response may differ from the figures reported on page 35 of this report for this reason.</p>
305-4	GHG emissions intensity	<p>ESG Performance Summary, pages 34-42</p>
305-5	Reduction of GHG emissions	<p>Protecting Our Planet, pages 14-19</p>
305-6	Emissions of ozone-depleting substances (ODS)	<p>One source of our GHG emissions and our largest source of ozone depleting substances is the inadvertent release of Halon and/or FM200 gas from the fire suppression systems in our facilities. We carefully monitor these systems to prevent inadvertent releases; however, through human error or mechanical failure, unintended releases are possible.</p> <p>Safe, effective and environmentally benign Halon alternatives are readily available and are now our standard for all new and upgraded installations. However our ability to retrofit systems has been hampered by the fact that there has not been an economically viable, environmentally responsible solution for what to do with decommissioned halon. The best solution would be to destroy the gas using the same process used to destroy other Ozone Depleting Substances (ODS). In 2017 we successfully lobbied for inclusion of halon in the American Carbon Registry (ACR) methodology for destruction of ODS. In late 2021 we completed a pilot program with key industry partners to launch the world's first halon destruction project in accordance with the ACR methodology. The resulting offsets from this pilot were sold to companies seeking to meet carbon commitments, making this an economically viable solution that we will continue to explore.</p> <p>Protecting Our Planet, pages 14-19</p>

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

MATERIAL TOPIC: EFFLUENTS AND WASTE		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71
GRI 306: EFFLUENTS AND WASTE 2016		
306-1	Water discharge by quality and destination	Water removed from site is typically done by municipal water and sewage systems. Iron Mountain predominantly operates in commercial or industrial areas, which minimizes the impacts of water consumption and discharge. As our colocation Data Center business grows we recognize that water used in evaporative cooling systems will become a larger issue. Under our ISO140001 process for data center sites we will be increasing our measurement, management and reporting of this impact in the future. In 2021, we implemented an irrigation controls program at 41 of our facilities, a mix of storage facilities and data centers, which will save an estimated 17.7 million gallons of water per year. We continue seeking additional water saving opportunities in our data centers by evaluating low-water cooling technologies.

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

306-2	Waste by type and disposal method	<p>ESG Performance Summary, pages 34-42</p> <p>In addition to our own waste stream, Iron Mountain is committed to being a responsible partner to our customers. To this end, we continuously seek innovative ways to help minimize the environmental impacts of our service offerings. One example is our Secure IT Asset Disposition (SITAD) service in the United States, which provides a safe and responsible way for our customers to dispose of or recycle their electronic waste. As an E-stewards Enterprise, when customers choose Iron Mountain for the disposal of their electronic waste, they are assured that all of our processors meet stringent environmental and social standards. We also offer secure destruction of paper documents and used boxes through our shredding service. This offering provides a safe and environmentally conscious solution for our customers looking to dispose of documents. We offer on-site and off-site shredding services on a one-time or recurring basis to tailor each solution to the customer's needs. One hundred percent of paper shredded through this service is recycled, and customers using this service are given reports that outline the environmental benefits attributed to their document disposal.</p> <p>In 2021, we helped our customers to responsibly dispose of:</p> <ul style="list-style-type: none"> • 4,845 tons of eWaste • 7,860 tons of backup tapes and miscellaneous media • 1,759 tons of X-ray film • 3,633 tons of plastic pharmacy bottles • 448,324 tons of cardboard and paper
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MATERIAL TOPIC: EMPLOYMENT		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

GRI 401: EMPLOYMENT 2016		
401-1	New employee hires and employee turnover	ESG Performance Summary, pages 34-42
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Empowering Our People, pages 20-27 Full-time employees regularly scheduled to work 30 or more hours per week are eligible for benefits. Part-time employees regularly scheduled to work between 20 and 30 hours per week are eligible for certain benefits, including healthcare, commuter, EAP, wellness and legal benefits.
401-3	Parental leave	ESG Performance Summary, pages 34-42 Iron Mountain's parental and maternity benefits vary by country in order to ensure compliance with local laws and regulations. In the United States, our parental leave policy provides up to 8 weeks of fully paid leave to birth and non-birth parents. A disability benefit is available to employees following the birth, adoption or fostering of a child. This benefit provides 100% of pay for up to 8 weeks. New parents are offered a variety of resources, including backup dependent care, Employee Assistance Program, and a Dependent Care Flexible Spending Account.
MATERIAL TOPIC: OCCUPATIONAL HEALTH AND SAFETY		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71
GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2016		
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work related fatalities	Empowering Our People, pages 20-27 ESG Performance Summary, pages 34-42

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

MATERIAL TOPIC: TRAINING AND EDUCATION		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71
GRI 404: TRAINING AND EDUCATION 2016		
404-2	Programs for upgrading employee skills and transition assistance programs	<p>Iron Mountain offers a wide array of learning and development programs for different roles, business functions and geographies. See Empowering Our People, pages 20-27</p> <p>Our annual Code of Ethics training, which is mandatory for all employees around the globe, 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. Examples include Data Privacy, Information Security, Workplace Violence Prevention, Anti-Harassment and Discrimination, AntiBribery & AntiCorruption, Insider Trading, Records and Information Management, HIPAA, and Sanctions & Trade Law training. The Compliance Training Curriculum also includes other training and refresher modules to ensure employees keep current with requirements, which can include Fair Labor Standards, ADA, AntiTrust & Fair Competition, among others.</p>
404-3	Percentage of employees receiving regular performance and career development reviews	<p>We value our employees' perspectives and believe regular employee engagement is essential for attracting and retaining top talent. We prioritize opportunities in which employees can provide feedback on how they feel about working for Iron Mountain, what's working well, and what else we can do to make our company a better place to work. We use an integrated Talent Management approach that balances our employees' past accomplishments with future aspirations. It shifts the focus from systems and processes to meaningful conversations about development, potential and career aspirations. This helps our employees grow and deliver strong performance, gives them clear expectations of what they need to deliver aligned to business performance, prepares them for the future, and helps us both attract and retain critical talent.</p>

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

MATERIAL TOPIC: DIVERSITY AND EQUAL OPPORTUNITY		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016		
405-1	Diversity of governance bodies and employees	Empowering Our People, pages 20-27 ESG Performance Summary, pages 34-42 2021 Proxy Statement
405-2	Ratio of basic salary and remuneration of women to men	Empowering Our People, pages 20-27 ESG Performance Summary, pages 34-42
MATERIAL TOPIC: LOCAL COMMUNITIES		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

GRI 413: LOCAL COMMUNITIES 2016		
413-1	Operations with local community engagement, impact assessments, and development programs	Strengthening Our Communities, pages 28-33 ESG Performance Summary, pages 34-42
MATERIAL TOPIC: CUSTOMER PRIVACY		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71
GRI 418: CUSTOMER PRIVACY 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	To support our culture of continuous improvement, we capture “near-miss” indicators relating to the handling of customer materials. These incidents are reported via our Event Reporting Management System (ERMS) and are triaged, investigated and assessed by an experienced team of professionals. The ERMS allows the team to efficiently track incidents, identify trends and develop processes and procedures to prevent recurring incidents. On the rare occasion when customer data is or could have been compromised, the incident is brought to the customer’s attention. In 2021, there were no significant complaints from regulatory bodies on data protection and privacy issues.

IRON MOUNTAIN 2021 CORPORATE RESPONSIBILITY REPORT: CONTENT INDEX

MATERIAL TOPIC: SOCIOECONOMIC COMPLIANCE		
GRI 103: MANAGEMENT APPROACH 2016		
103-1	DMAs	Explanation of the Material Topic and its Boundary. See Appendix A, pages 68-71
103-2	DMAs	The Management Approach and its Component. See Appendix A, pages 68-71
103-3	DMAs	Evaluation of the Management Approach. See Appendix A, pages 68-71
GRI 419: SOCIOECONOMIC COMPLIANCE 2016		
419-1	Non-compliance with laws and regulations in the social and economic area	<p>We are committed to demonstrating responsible behavior in the communities where we operate, and in 2021 there were no significant fines or non-monetary sanctions for noncompliance with laws and regulations that are not disclosed in this report or our public findings.</p> <p>In respect to public policy, Iron Mountain does not make political contributions from corporate funds or resources. All company donations and charitable contributions worldwide are controlled through a compliance policy, ensuring that these gifts are free of conflicts of interest and aligned with national and local laws. As stated in our 2022 Proxy Statement, corporate funds are not used in support of or opposition to political candidates, political parties, political committees and other political entities organized and operating for political candidates. In addition, corporate funds are not used for “electioneering” communications. The Company administers IMPAC (Iron Mountain Incorporated Political Action Committee), which is a non-partisan political action committee supporting congressional candidates at the federal level only. IMPAC allows eligible employees to pool their resources to support candidates who understand the issues important to the Company’s business and its employees. Participation in IMPAC is strictly voluntary. Except for administrative expenses, IMPAC is funded solely by the Company’s employees and directors and is not supported by funds from the Company. IMPAC complies with federal election laws and all other applicable laws and reports regularly to the Federal Election Commission. In addition, IMPAC is governed by a set of bylaws and supervised by a board of directors composed of senior managers from different areas of the Company.</p>



TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURE INDEX

TCFD SUMMARY

Iron Mountain prepares an annual disclosure according to the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD). This report summarizes how we manage climate-related risks, what those risks are, our strategy for addressing them, and our relevant performance metrics. We anticipate building upon this disclosure, in breadth and depth, in subsequent reporting cycles.



GOVERNANCE	STRATEGY	RISK MANAGEMENT	METRICS
<p>The Board of Directors has a Risk Committee which reviews the Company’s establishment and operations of its enterprise-wide risk management (“ERM”) program which is designed to identify, assess, monitor and manage risk through the Company, and includes an annual management ERM report to the Board. The Board’s Nominating and Governance Committee receives periodic reports of ESG strategy and initiatives from the VP, ESG Strategy. Climate-related issues are currently integrated into reviewing and guiding strategy, setting performance objectives, and overseeing progress against goals and targets.</p>	<p>Our product and services strategy has been influenced by climate-related risks and opportunities through both the development of new products and services and the identification of enhancements for current products and services to help customers solve their own climate related challenges. Our operations strategy has also been influenced by climate-related risks and opportunities through consideration of extreme weather related events and consumption of energy. We intend to complete a climate scenario analysis in 2022 and will publish our results in our next TCFD report.</p>	<p>Iron Mountain’s process to identify, assess, and respond to climate related risks and opportunities that pose a substantive financial or strategic impact includes a risk identification and assessment methodology that focuses on a set of risk rating criteria to calculate overall risk scores, and various risk management techniques relating to climate-related risks and opportunities. The Risk Management team regularly engages with business unit and operational leads around these risks through the ERM Steering Committee, and with executive leadership through the Enterprise Risk Committee.</p>	<p>We set ambitious public environmental goals and are transparent in our reporting of our environmental data in order to hold ourselves accountable for the impact of our operations and to focus on how we can create positive change in the communities in which we do business. Our ESG team regularly meets with goal owners to determine goal progress, set benchmarks, and understand the actions we are taking. This information is documented in an internal dashboard which is shared with executive leadership quarterly.</p>

The full Iron Mountain 2021 (TCFD) Report is available on our Corporate Responsibility webpage.

<https://www.ironmountain.com/about-us/corporate-responsibility>



APPENDIX A: GRI DISCLOSURES ON MANAGEMENT APPROACHES

GRI DISCLOSURES ON MANAGEMENT APPROACHES

ECONOMIC TOPICS

The Disclosures on Management Approach Economic refer to the GRI topic “201 – Economic Performance.” The economic success of our business determines Iron Mountain’s ability to create value for all of our stakeholders, including shareholders, employees, partners, and the communities in which we work. The topics described here are material to our shareholders and our employees. Iron Mountain’s strategy, financial performance, and risk management are the responsibility of the executive leadership team under the oversight of the Board of Directors. Annual targets are established across all aspects of financial performance, and performance against those targets is monitored throughout the year. Ultimate oversight of strategic financial and non-financial goals for the company are reassessed in quarterly review processes, annual performance reviews, and as part of our annual strategic planning with senior management and the Board of Directors. When deviations from projections and goals are anticipated, a variety of remedial actions are considered, including cost-saving measures, enhanced revenue generation, and other measures as deemed appropriate.

ENVIRONMENTAL TOPICS

The Disclosures on Management Approach Environmental refer to the GRI topics “301-Materials,” “302-Energy,” “305-Emissions,” and “306-Effluents and Waste.” They also cover Iron Mountain’s material topics priority issue(s): “Environmental Impact.” Iron Mountain strives to responsibly limit our impact on the environment. Our service offerings include solutions that support our customers in reducing their own environmental impacts, and we regularly assess these offerings to ensure they are meeting our customers’ needs. The topics described here are relevant to our employees, customers, partners, and, indirectly, to our shareholders. The Risk and Safety Committee of the Board of Directors considers climate risks as part of the corporate risk evaluation process and receives quarterly reports on climate risk. The Vice President, Environmental Social & Governance Strategy, who reports to the Executive Vice President, General Counsel & Secretary (a member of our Executive Leadership Team led by the CEO), has responsibility for our environmental sustainability strategy. The Senior Vice President Global Real Estate, who reports to the Executive Vice President Chief Operating Officer (a member of our

Executive Leadership Team led by the CEO), has operational responsibility for environmental management. Our Global Environmental Policy outlines our commitments, processes, and responsibilities to and for environmental management. Our Code of Ethics and Business Conduct includes our views on protecting the environment and building sustainability. The Senior Vice President of Global Procurement is responsible for overseeing corporate-wide purchasing, and we have engaged primary and secondary vendors to source more environmentally-responsible materials. Current efforts to measure and reduce environmental impacts at sites and regional levels are regularly assessed through data collection and analysis. Emissions resulting from energy use, direct releases of GHG emissions, and business travel are closely tracked. Additionally, some metrics, such as energy use and utility spend, are reviewed monthly at the VP level. We are implementing a global environmental data collection system with improved measuring and monitoring of impact, with the ability for real time data review.

SOCIAL TOPICS

The Disclosures on Management Approach Social cover the GRI topics “401-Employment,” “403-Occupational Health and Safety,” “404-Training and Education,” “405-Diversity and Equal Opportunity,” “205-Anti-Corruption,” “206-Anti-Competitive Behavior,” “413-Local Communities,” “418-Customer Privacy,” and “419-Socioeconomic Compliance.” They also cover Iron Mountain’s material topics priority issue(s): “Safety,” “Inclusion and Diversity,” “Data Privacy,” “Ethics and Anti-Corruption,” and “Customer Impact.” Ensuring we have a healthy, well-trained, and ethical workforce that feels safe and represents the demographics of the communities we serve is essential for our business performance. It supports the well-being and professional fulfillment of our people and allows us to provide quality service to our customers. These topics are most material to our employees, shareholders, customers, regulators, and suppliers. Iron Mountain is also a signatory to the UN Global Compact, a voluntary initiative based on CEO commitments to implement universal sustainability principles and to undertake partnerships in support of UN goals. This demonstrates our ongoing commitment to upholding human rights, including the elimination of discrimination, forced labor, and child labor. Our Code of Ethics and Business Conduct guides the behavior and culture of our workforce, allowing us to put our values into action every day. Our Chief Compliance Officer is responsible for monitoring compliance with the Code. He presents to the full Board on an annual basis and attends each regularly scheduled Audit Committee meeting to uphold an ongoing dialogue that includes addressing evolving risks and, when necessary, enhancing our standards, controls, training, and monitoring mechanisms. These efforts are led by the Chief Compliance Officer, who reports to the EVP, General Counsel & Secretary, who is accountable to the Board of Directors and attends all Audit Committee meetings.

GRI DISCLOSURES ON MANAGEMENT APPROACHES

EMPLOYMENT

Our Senior Vice President of Total Rewards oversees enterprise-wide compensation and benefits with a team of internationally-based compensation and benefit professionals.

OCCUPATIONAL HEALTH AND SAFETY

Meeting our commitment to operate safely and responsibly is overseen by the EVP, Chief Risk Officer. Our Global Health and Safety Policy defines the basic requirements of our health and safety management system and serves as the foundation of our safety endeavors. The Risk and Safety Committee, based on reports provided by the Company's management, monitors the adequacy of material fire, health, safety, security, business continuity, chain of custody, cybersecurity and information security, and risk management strategies and systems for the reporting of accidents, incidents and risks, and material investigations and remedial actions.

TRAINING AND EDUCATION

The Global Talent Solutions Program Manager oversees our enterprise-wide learning and development framework and reports to the Chief Human Resources Officer.

DIVERSITY AND EQUAL OPPORTUNITY

The Chief Diversity, Equity and Inclusion Officer is responsible for the policies for diversity and equal opportunity and reports to our Chief Human Resources Officer. Inclusion and diversity and preventing harassment and discrimination are addressed in our Code of Ethics and Business Conduct.

ANTI-CORRUPTION AND ANTI-COMPETITIVE BEHAVIOR

Our Code of Ethics and Business Conduct demands that we respect and comply with fair competition and antitrust requirements worldwide. This includes legal requirements, as well as our company policies and procedures.

PROHIBITING RETALIATION

Iron Mountain strictly prohibits retaliation of any kind—including threats, harassment, reduction of hours, release from employment, or any other negative consequence—against anyone who raises a concern in good faith.

LOCAL COMMUNITIES

Iron Mountain's robust network and infrastructure of approximately 25,000 employees and approximately 1,450 facilities are actively engaged with our global community. We offer volunteerism, financial grant awards, and in-kind service to nonprofits and nongovernment organizations to strengthen our communities. Our philanthropic initiatives are led by Iron Mountain's Director of Corporate Responsibility and our volunteerism programs are led by Iron Mountain's Events, Volunteerism & Operations Specialist and are regularly assessed for their effectiveness.

CUSTOMER COMMITMENT

Ensuring a positive customer experience is essential for both our customers and the growth of our business. Customer surveys allow us to keep the pulse of the marketplace. The Director, Global Customer Experience is responsible for our Customer Experience program. Our management approach to the customer experience is continuously reviewed for any needed changes based on the feedback received from our customers.

GRI DISCLOSURES ON MANAGEMENT APPROACHES

CUSTOMER PRIVACY

Data security and privacy are at the core of our business and are addressed in our Code of Ethics and Business Conduct. They are also essential parts of our compliance programs. We work closely with customers represented in our Customer Advisory Board and Executive Exchange Program to anticipate and meet future needs in the market. We are continually developing innovative new methodologies for strengthening privacy across all information types while also meeting evolving regulatory, customer, and legal obligations. And, as our customers face ever-growing volumes of information, from business records to their customer and employee personal data, we remain committed to ensuring our suite of services can help them protect their data, comply with regulations, and quickly respond to any kind of breach or cyberattack while minimizing the impact to their brand reputation and business processes. In 2021, we continued to assist clients with creating retention policies that are compliant with the California Consumer Privacy Act (CCPA) and GDPR, identify classes of records that are likely to contain personal data, and apply stricter retention rules to such classes based on regulatory requirements. We also hosted digital forums where experts helped customers navigate the costs and risks of managing physical and digital information, comply with changing industry regulations, and gain greater control, access, and visibility over their information.

SOCIOECONOMIC COMPLIANCE

Our Chief Compliance Officer provides an annual report on compliance-related issues to the Iron Mountain Board Audit Committee.





APPENDIX B: SUSTAINABLE DEVELOPMENT GOALS

SUSTAINABLE DEVELOPMENT GOALS

During 2021, all Iron Mountain activities and operations supported the following Sustainable Development Goals (SDGs). As a signatory to the UNGC, Iron Mountain is committed to pursuing their policies, strategies, and procedures, as well as to creating a culture of integrity that supports all 10 principles of the UNGC, as well as the SDGs.

GOAL	SUPPORTED BY ACTIVITIES	GOAL	SUPPORTED BY ACTIVITIES	GOAL	SUPPORTED BY ACTIVITIES
3 GOOD HEALTH AND WELL-BEING 	GRI 404-2, 401-3, 403-2	8 DECENT WORK AND ECONOMIC GROWTH 	GRI 102-2, 102-7, 201-1, 404-2, 404-3	13 CLIMATE ACTION 	GRI 301-2, 302-4, 305-5, 305-6
4 QUALITY EDUCATION 	GRI 404-2, 404-3	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 	GRI 102-2, 102-7, 102-13, 201-1	14 LIFE BELOW WATER 	GRI 306-1
5 GENDER EQUALITY 	GRI 405-1, 405-2	10 REDUCED INEQUALITIES 	GRI 405-1, 405-2	15 LIFE ON LAND 	GRI 301-2, 306-2
6 CLEAN WATER AND SANITATION 	GRI 306-1	11 SUSTAINABLE CITIES AND COMMUNITIES 	GRI 413-1	16 PEACE, JUSTICE AND STRONG INSTITUTIONS 	GRI 205-2, 205-3, 206-1, 419-1
7 AFFORDABLE AND CLEAN ENERGY 	GRI 302-1, 302-3, 302-4	12 RESPONSIBLE CONSUMPTION AND PRODUCTION 	GRI 102-2, 102-10, 301-2	17 PARTNERSHIPS FOR THE GOALS 	GRI 102-12, 12-13



APPENDIX C: ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) GOALS

ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) GOALS

At Iron Mountain we are proud of our commitment to be a force for good. We recognize that we have a responsibility to all of our stakeholders to be a catalyst for positive change. In order to deliver on that promise we intend that:

GOAL	LOCATION
By 2022 we will develop or adopt a Brand Trust indicator metric and report our baseline.	Page 11
By 2023 we will complete a climate scenario analysis.	Page 67
Iron Mountain will achieve Net Zero emissions by 2040, 10 years ahead of the Paris Climate Accord.	Page 15
By 2040 we will use 100% clean electricity, 100% of the time in our data centers. To accelerate decarbonization of the grid, we are going beyond our RE100 commitment of 100% renewable electricity. We will use the Google methodology for matching site by site electricity use with local clean power generation every hour, every day to achieve 24/7 clean power	Page 16
By 2040 we will drive Circular Economy innovation by working toward zero waste in our operations and collaborating with others to create closed-loop Products and Services.	Page 17
By 2030 all Iron Mountain Data Centers worldwide will be Climate Neutral, as part of our commitment as a signatory to the EU Climate Neutral Data Centre Pact.	Page 15
We will maintain 100% renewable electricity supply for our global data center business and achieve 90% renewable electricity corporate wide by 2025—15 years ahead of our RE100 commitment.	Page 16
By 2025 all new construction multi-tenant data center facilities will be certified to the BREEAM Green Building Standard	Read more here
We will go beyond our current Science-Based Target (25% reduction of absolute GHG emissions from our 2016 baseline) and by 2025 will achieve a reduction of 25% of GHG emissions from Scope 1 & 2 energy sources from our 2019 baseline.	Page 15
By 2023 we will increase our reporting coverage of waste and recycling data to at least 90% of our global operations.	Page 36

ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) GOALS (CONT.)

At Iron Mountain we are proud of our commitment to be a force for good. We recognize that we have a responsibility to all of our stakeholders to be a catalyst for positive change. In order to deliver on that promise we intend that:

GOAL	LOCATION
We will relentlessly strive to be a world-class employer in every region in which we operate.	Read more here
By 2025, we will tighten our threshold for gender pay parity from +/-10% to achieve +/- 5% across all organizational levels in all countries where we are reporting (US, Canada, UK).	Page 41
By 2025, women will represent 40% of global leadership.	Page 23
By 2025, people who identify as BIPOC will represent 30% of US leadership.	Page 23
By 2023, we will expand gender pay parity reporting to cover all global operations by 2023.	Page 41
By 2022, will create or adopt a process to measure the community impact of our business decisions.	Page 33
By 2040, our business decisions will have a net positive impact on our communities.	Page 33
By 2025, Iron Mountain employees will contribute a total of 100,000 hours of volunteer time to our communities through our Moving Mountains program.	Page 30
Through our Living Legacy Initiative we will launch 50 new educational resources that unlock the value of the past and help shape the future and strengthen our communities by 2025.	Page 29
By 2023, we will adopt and implement a global human rights policy.	Read more here



APPENDIX D: EXTERNAL ASSURANCE STATEMENT



Independent Assurance Report

DNV Business Assurance USA, Inc. (DNV) has been commissioned by the management of Iron Mountain, Incorporated (Iron Mountain) to carry out an independent limited level assurance engagement of Selected Information for calendar year 2021 as presented in the company's Corporate Responsibility Report (the "Report"). The assurance was carried out March through April 2022.



Our Conclusion:

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Selected Information is not fairly stated and has not been prepared, in all material respects, in accordance with the criteria stated. This conclusion relates only to the Selected Information and is to be read in the context of this Assurance Report, in particular, the inherent limitations explained below.

Selected Information

The scope and boundary of our work is restricted to the performance indicators included within the Report (the Selected Information) listed below:

Data verified for the period January 1, 2021-December 31, 2021:

- Greenhouse Gas Emissions Scope 1 and 2
- Greenhouse Gas Emissions Scope 3
 - Upstream Leased Assets
 - Downstream Leased Assets
- Energy Consumption
- Water Consumption
- Waste Generated
- Solar Energy Generated
- Green Power (Renewable Energy Credits and Renewable Energy Consumption)
- Workforce Data
 - Percent of Female Employees (Global)
 - Ethnic Composition (US only)
 - Special Populations, Veterans & Disability (US only)
 - New Employee Hires
 - Employee Turnover and Turnover Rate
 - Total Recordable Incident Rate (TRIR) per 200,000 hours
 - Lost Time Incident Rate (LTIR) per 200,000 hours

We do not express any conclusions on any other information that may be published on Iron Mountain's website or Corporate Responsibility Report for the current reporting period or for previous periods.

Our competence, independence, and quality control

DNV's established policies and procedures are designed to ensure that DNV, its personnel and, where applicable, others are subject to independence requirements (including personnel of other entities of DNV and maintain independence where required by relevant ethical requirements. This engagement work was carried out by an independent team of sustainability assurance professionals. DNV was not involved in the preparation of any part of Iron Mountain's data or report. This is our second year of providing assurance for Iron Mountain. We adopt a balanced approach towards all stakeholders when performing our evaluation.



Scope and approach

We performed a **limited level** assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 revised – ‘Assurance Engagements other than Audits and Reviews of Historical Financial Information’ (revised), issued by the International Auditing and Assurance Standards Board. This standard requires that we comply with ethical requirements and plan and perform the assurance engagement to obtain limited assurance.

DNV applies its own management standards and compliance policies for quality control, in accordance with ISO/IEC 17021:2015 - Conformity Assessment Requirements for bodies providing audit and certification of management systems, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The GHG emissions inventories have been evaluated against the following reporting criteria:

- World Business Council for Sustainable Development (WBCSD) / World Resources Institute (WRI) Greenhouse Gas Protocol, Corporate Accounting Standard REVISED EDITION
- WBCSD/WRI Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Scope 3)

DNV used a risk-based approach throughout the assurance engagement, concentrating on the areas that we believe are most material for both Iron Mountain and its stakeholders. DNV applied a materiality threshold of five percent for the Selected Information. The boundary of our work includes global operations for all Selected Information in scope except for Ethnic Composition of Employees and Special Populations which includes US operations only.

Selected Information

Greenhouse Gas Emissions

▪ 2021 Scope 1 Emissions	120,870 MtCO ₂ e
▪ 2021 Scope 2 Emissions (Location-Based)	213,000 MtCO ₂ e
▪ 2021 Scope 2 Emissions (Market-Based)	75,801 MtCO ₂ e
▪ 2021 Scope 3 Emissions	
○ Upstream Leased Assets (Location-Based)	971 MtCO ₂ e
○ Upstream Leased Assets (Market-Based)	0 MtCO ₂ e
○ Downstream Leased Assets (Location-Based)	150,986 MtCO ₂ e
○ Downstream Leased Assets (Market-Based)	2,356 MtCO ₂ e

Energy

▪ 2021 Total Energy Consumption	1,581,434 MWh
▪ 2021 Total Green Power	830,702 MWh

Water Consumption

▪ 2021 Total Water Consumption	1,105,168 m ³
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Waste

▪ 2021 Total Waste Generated	10,484 tonnes
▪ 2021 Total Waste Diverted	3,455 tonnes

WHEN TRUST MATTERS

Responsibilities of Iron Mountain and DNV

Iron Mountain has sole responsibility for:

- Preparing and presenting the Selected Information in accordance with the criteria
- Designing, implementing, and maintaining effective internal controls over the information and data, resulting in the preparation of the Selected Information that is free from material misstatements
- Measuring and reporting the Selected Information
- Contents and statements contained within the websites

In performing our assurance work, our responsibility is to the management of Iron Mountain; however, our assurance report represents our independent opinion and is intended to inform all stakeholders. DNV was not involved in the preparation of any statements or data included in the Report or website except for this Assurance Statement.

Level of Assurance

We are providing a **‘limited level’** of assurance. We planned and performed our work to obtain the evidence we considered necessary to provide a basis for our assurance conclusion, so that the risk of this conclusion being in error is reduced but not reduced to very low. A ‘reasonable level’ of assurance would have required additional work at headquarters and site levels to gain further evidence to support the basis of our assurance conclusion. DNV’s assurance engagements are based on the assumption that the data and information provided by the client to us as part of our review have been provided in good faith. DNV GL expressly disclaims any liability or co-responsibility for any decision a person or an entity may make based on this Independent Assurance Statement.



2021 Workforce Data

▪ 2021 Female Employees (Percent)	38.6%
▪ 2021 Ethnic Composition - US only (Percent)	
○ American Indian or Alaska Native	0.5%
○ Asian	4.7%
○ Black or African American	25%
○ Hispanic or Latino	19.9%
○ Native Hawaiian or Other Pacific Islander	0.5%
○ Two or More Races	1.9%
○ White	45.7%
○ Decline to state/not specified	2%
▪ 2021 Special Populations – US only (Percent)	
○ Veteran	5%
○ Disability	3.5%
▪ 2021 New Employee Hires	6,736
▪ 2021 Total Employee Turnover and Turnover Rate	6,769 30.2%
▪ 2021 Total Recordable Incident Rate	1.1
▪ 2021 Lost Time Incident Rate	0.7

Basis of our conclusion

We are required to plan and perform our work in order to consider the risk of material misstatement of the Selected Information; our work included, but was not restricted to:

- Conducting interviews with Iron Mountain’s management to obtain an understanding of the key processes, systems and controls in place to generate, aggregate and report the Selected Information
- Performing limited substantive testing on a selective basis of the Selected Information to check that data had been appropriately measured, recorded, collated and reported;
- Reviewing that the evidence, measurements and the scope provided to us by Iron Mountain for the Selected Information is prepared in line with the agreed upon procedures and criteria
- Reading the Report and narrative accompanying the Selected Information within it with regard to the criteria
- Reviewing global employee rosters at year-end at individual contributor, supervisor/manager, director, and executive leadership levels to determine percent breakdown by gender, ethnic composition, and special populations
- Reviewing recordable incidents, lost time incident, number of employees, hours worked, employee categories (TRIR and LTIR)
- Replicating the TRIR and LTIR following the reporting criteria below:
 - OSHA Recording and Reporting Occupational Injuries and Illness
- Reviewing sample of recordable incidents and lost time incidents

WHEN TRUST MATTERS

Independence

DNV’s established policies and procedures are designed to ensure that DNV, its personnel and, where applicable, others are subject to independence requirements (including personnel of other entities of DNV) and maintain independence where required by relevant ethical requirements. This engagement work was carried out by an independent team of sustainability assurance professionals.



The following methods were applied during the verification of Iron Mountain’s environmental footprint inventories and management processes:

- Review of documentation, data records and sources relating to the corporate environmental data claims and GHG emission assertions;
- Review of the processes and tools used to collect, aggregate and report on all environmental data and metrics;
- Assessment of environmental information systems and controls, including:
- Selection and management of all relevant environmental data and information;
- Processes for collecting, processing, consolidating, and reporting the relevant environmental data and information;
- Design and maintenance of the environmental information system;
- Systems and processes that support the environmental information system.
- Performed sample-based audits of the processes for generating, gathering and managing the quantitative and qualitative environmental data;
- Examination of all relevant environmental data and information to develop evidence for the assessment of the environmental claims and assertions made;
- Confirmation of whether the organization conforms to the verification criteria

In addition to the above, specific to the environmental indicators, the following steps were conducted for the Water and Waste:

- Water:
 - Review of the water consumption methodology;
 - Conduct data checks for the water data collected, transferred and calculated;
 - Perform sample-based assessment of data reported against the source data water consumed provided by utility company and metered data;
 - Evaluate whether assumptions and methodology used in cases of data estimation for whole year data are valid.
- Waste
 - Review of the waste segregation methodology and description of waste categorization;
 - Conduct data checks for the waste data collected, transferred and calculated;
 - Perform sample-based assessment of data reported against the source data (waste collected to landfill and waste diverted) provided by waste management companies.

For and on behalf of DNV Business Assurance USA, Inc.
 Katy, TX
 April 15, 2022



WHEN TRUST MATTERS

DNV Business Assurance

DNV Business Assurance is a global provider of certification, verification, assessment and training services, helping customers to build sustainable business performance.
<https://www.dnv.com/assurance/>

Assurance Team

Role	Name
Project Manager & Verifier	Angela V. Reed
Verifier	Kyle Silon
Technical Reviewer	Shruthi Bachamanda



One Federal Street, Boston, MA 02110 USA www.ironmountain.com

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