2019 CORPORATE RESPONSIBILITY REPORT

IRON MOUNTAIN

CONTENTS

CEO STATEMENT

GREEN POWER, EMPLOYEE SAFETY,
LOWER EMISSIONS: WE'VE MADE REAL
PROGRESS THIS YEAR

A MESSAGE FROM OUR CEO

There's a lot more which needs to be done, yet at the same time there is much to be proud of as we look back over 2019. Of course, a year ago, we never imagined that the next time we published this, things would look as they do. So before we start, I want to point you to this message from me to our customers that explains our response to help our people, communities and customers during the COVID-19 pandemic.

As you read this report, I hope you'll see that our values have not only driven our response to the COVID-19 pandemic, they shape and influence how we run our business and how we've supported employees, customers, communities and shareholders – who, each year, rightly up their expectations of what a sustainable business looks like. In 2019, we made real progress.

First and foremost, we continue to make real progress in safety. Our worldwide Total Recordable Incident Rate (TRIR) improved to 1.2 in 2019, down from 1.5 last year and over 2.4 five years ago. This focus in safety has further assisted us as we navigate the health and safety risk from the invisible yet lethal COVID-19 virus. We feel certain, that whilst a number of our colleagues have fallen ill from

the virus and one person ill is too many, our attention to safety with "Mates taking care of Mates" has allowed a number of our fellow Mountaineers and their loved ones to avoid the illness. As I said, one person injured or ill is too many, and we will continue to focus on improving the safety of our fellow team members and their families.

SUSTAINABILITY IS IN EVERY CORNER OF OUR BUSINESS – IT'S NOT A SIDE PROJECT

Increasing the coverage and depth of our environmental, social and governance (ESG) data has helped us collaborate better, empower our employees and further embed ESG principles across the business. As we make progress in our business, it enables us to champion sustainability for our customers and industry, too.

Take the Green Power Pass as an example. Launched in early 2019, it was the first of its kind in the data center industry. All the electricity in our data centers is 100% renewable, and the Green Power Pass lets customers count the green power they use from us as part of their own sustainability reporting.

GROWING OUR BUSINESS AND REDUCING OUR FOOTPRINT

We've cut our greenhouse gas emissions by 52% since 2016, meeting our science-based target six years ahead of plan. This is largely attributable to progress against our RE100 pledge, a commitment to reach 100% renewable energy by 2050. In 2019, 77% of our global electricity consumption came from wind, solar and other renewable energy sources.

We can be proud of our progress so far – but there's more to come. We will continue to invest in renewables and work to minimize the impact of our facilities and fleet. And we can keep pushing our supply chain to follow our lead.

OUR PEOPLE ARE OUR BIGGEST STRENGTH

And they're always stronger as part of a diverse group. It's what makes our company interesting and gives us the right mix of talent and perspectives to serve our global customers.

We've made inroads with many of our inclusivity goals this year. The number of women in leadership roles in our business across the globe is up to 27%. I'm really pleased with how we're shaping up, but this work still has a way to go to create the diverse company we want to be.

I'M EXCITED ABOUT HOW THE FUTURE LOOKS FOR OUR BUSINESS AND ESG STRATEGY

We're becoming a more efficient and innovative business, attractive to top talent and able to serve our customers and communities better. We might not know what the immediate future looks like. But the progress we've made on ESG this year, and what's coming next, makes me certain we're in the right place to become a safer, more inclusive and sustainable, and – ultimately, a more successful business in the long run.

Yours sincerely,

Bill Meaney
President and CEO, Iron Mountain

OUR BUSINESS

ADDRESSING CUSTOMER NEEDS, TODAY AND IN THE FUTURE.

OUR BUSINESS

Iron Mountain, founded in 1951, is the global leader for storage and information management services. Trusted by more than 225,000 organizations around the world, and with a real estate network of more than 91 million square feet across nearly 1,450 facilities in approximately 50 countries, Iron Mountain stores and protects billions of valued assets, including critical business information, highly sensitive data, and cultural and historical artifacts.

Taken together, our values are central to our unique culture. Our people live our values every day − regardless of their roles. With our values as a guide, we will continue to be the trusted guardian of the assets most important to our customers and communities, securing their past, current and future value.

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.

CORPORATE RESPONSIBILITY RECOGNITION

- Ranked #136 on **Newsweek's 2020 list of America's Most Responsible Companies**

- Listed on the **2019 FTSE4Good Index**

- Received the **U.S. Department of Energy Better Buildings Goal Achiever Award**

- **CoreNet Global 2019 Professional Excellence Award** given to Iron Mountain & CBRE

- **2019 Nareit Leader in The Light Award** for Kevin Hagen, VP, ESG Strategy, in the category of Leadership Personified

- Mark Kidd, EVP & GM, Data Centers, Field Operations, named to **Data Economy Climate's Power 50**

- Received a 100% on the **Human Rights Campaign 2020 Corporate Equality Index** for the third year in a row

- Recognized by **2020 Women on Boards**

OUR CAPABILITIES

Destroy
Dispose/Recycle
> Document Shredding
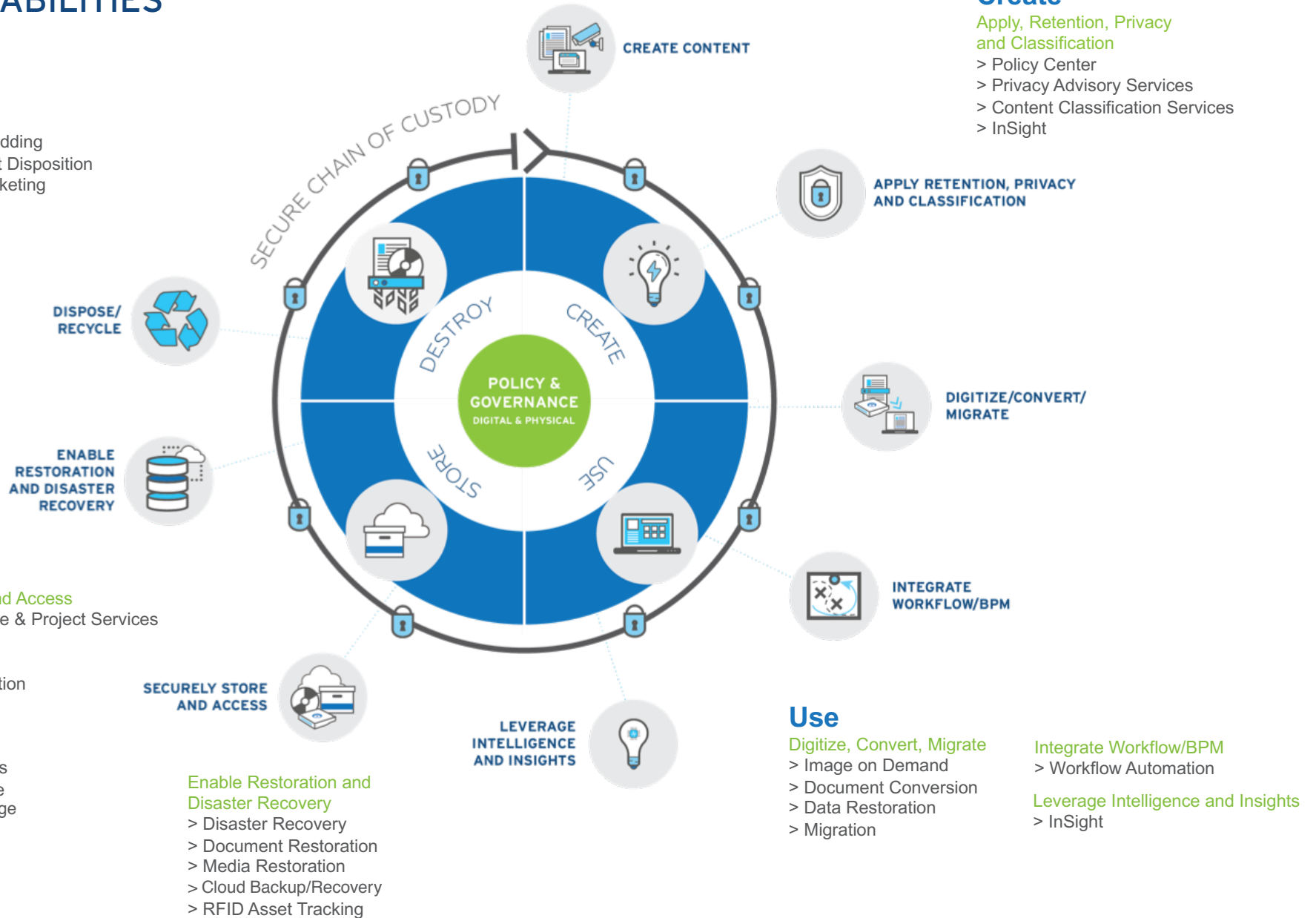> Secure IT Asset Disposition
> IT Asset Remarketing

Store
Securely Store and Access
> Records Storage & Project Services
> IM Connect
> Accutrac
> File Room Solution
> Tape Storage
> Iron Cloud
> Data Centers
> Escrow Services
> Fine Art Storage
> Consumer Storage

Enable Restoration and Disaster Recovery
> Disaster Recovery
> Document Restoration
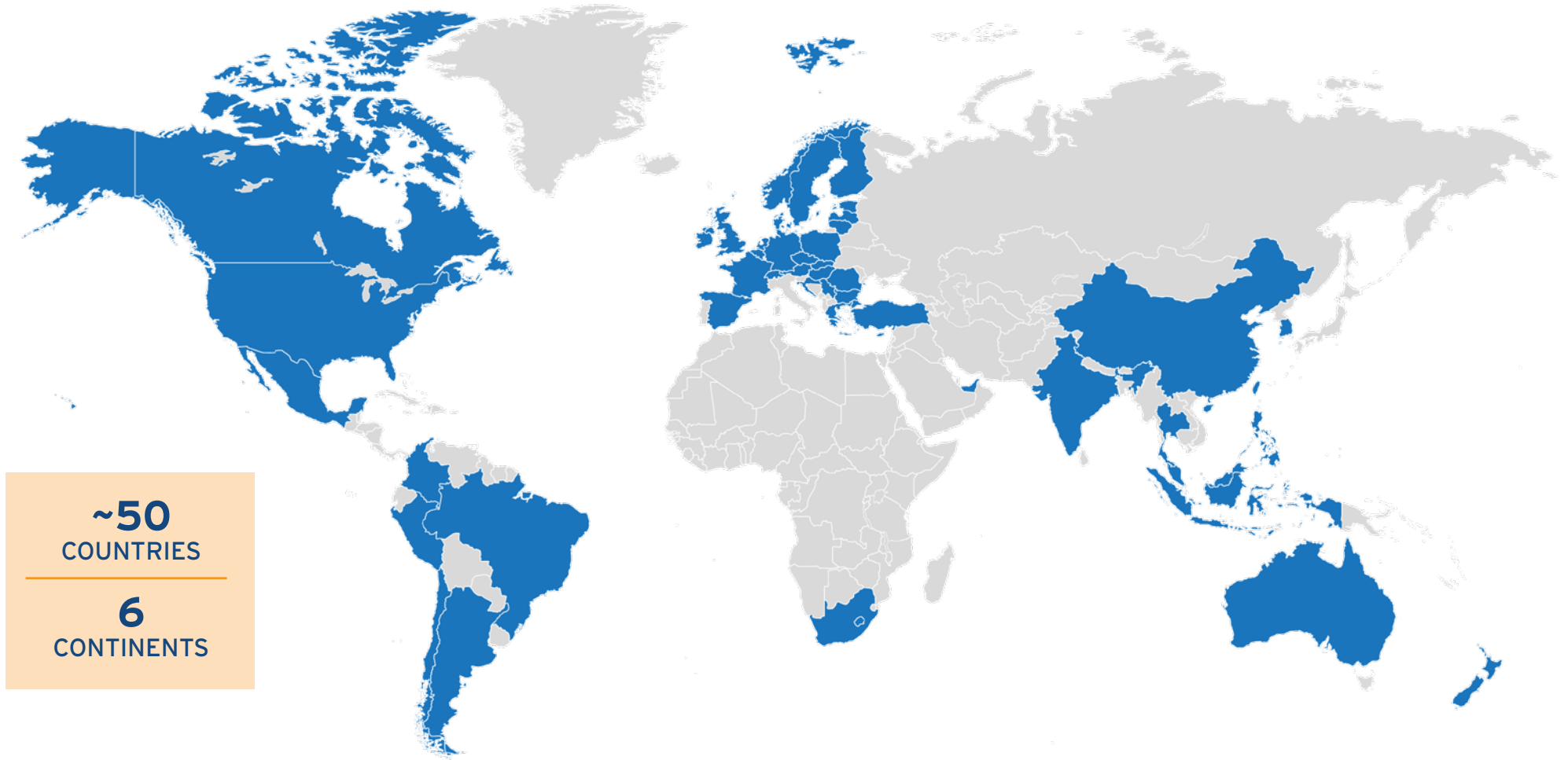> Media Restoration
> Cloud Backup/Recovery
> RFID Asset Tracking

Create
Apply, Retention, Privacy and Classification
> Policy Center
> Privacy Advisory Services
> Content Classification Services
> InSight

Use
Digitize, Convert, Migrate
> Image on Demand
> Document Conversion
> Data Restoration
> Migration

Integrate Workflow/BPM
> Workflow Automation

Leverage Intelligence and Insights
> InSight

Diagram labels: CREATE CONTENT; APPLY RETENTION, PRIVACY AND CLASSIFICATION; DIGITIZE/CONVERT/MIGRATE; INTEGRATE WORKFLOW/BPM; LEVERAGE INTELLIGENCE AND INSIGHTS; SECURELY STORE AND ACCESS; ENABLE RESTORATION AND DISASTER RECOVERY; DISPOSE/RECYCLE; SECURE CHAIN OF CUSTODY. Center: POLICY & GOVERNANCE DIGITAL & PHYSICAL (DESTROY, CREATE, USE, STORE).
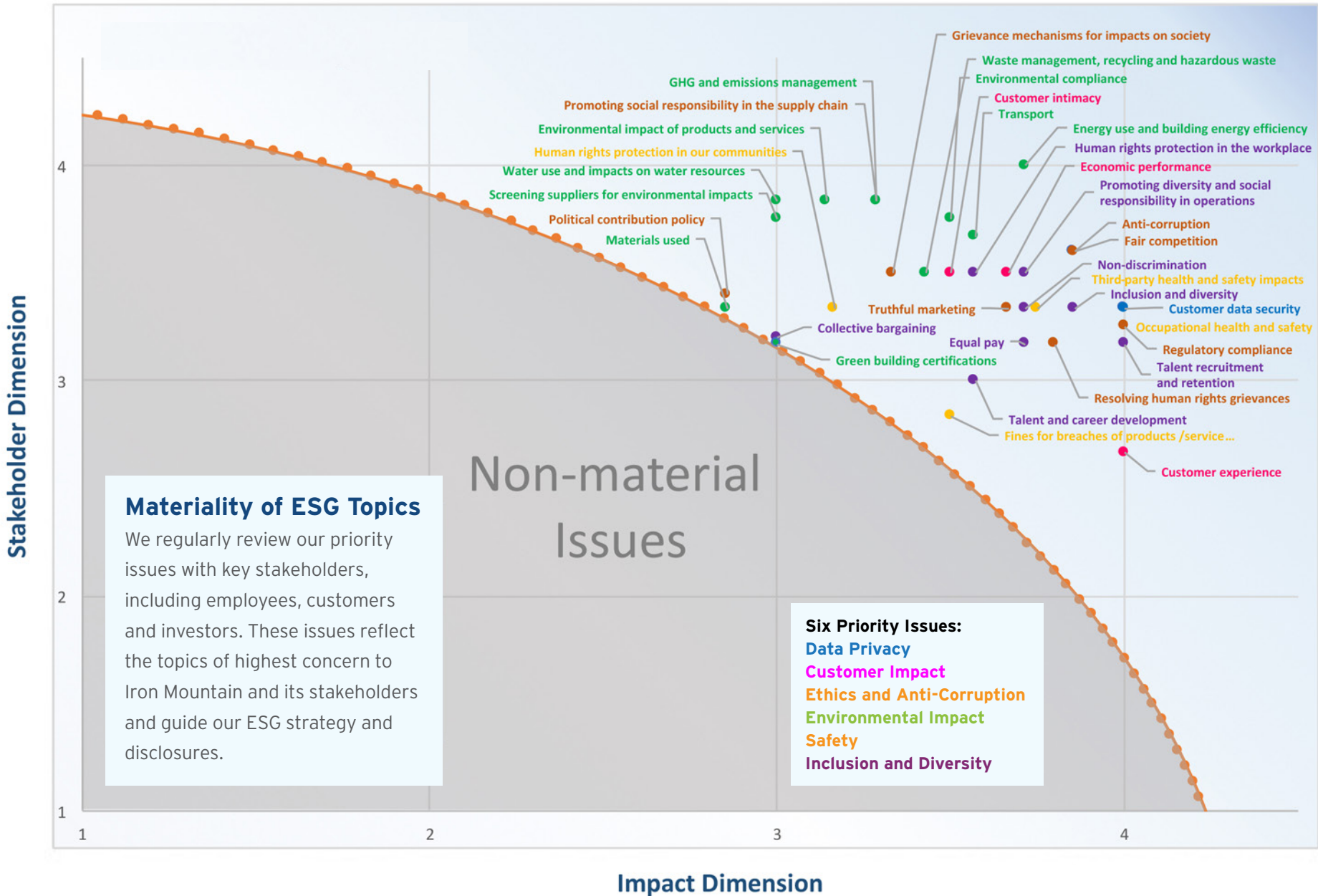
OUR GLOBAL PRESENCE

~50
COUNTRIES

6
CONTINENTS

~225,000
CUSTOMERS

96%
FORTUNE 1000 COMPANIES

91MM
SF OF REAL ESTATE

~1,450
FACILITIES

Stakeholder Dimension

Impact Dimension

Non-material Issues

Grievance mechanisms for impacts on society
Waste management, recycling and hazardous waste
Environmental compliance
GHG and emissions management
Customer intimacy
Promoting social responsibility in the supply chain
Transport
Environmental impact of products and services
Energy use and building energy efficiency
Human rights protection in our communities
Human rights protection in the workplace
Water use and impacts on water resources
Economic performance
Screening suppliers for environmental impacts
Promoting diversity and social responsibility in operations
Political contribution policy
Anti-corruption
Materials used
Fair competition
Non-discrimination
Third-party health and safety impacts
Inclusion and diversity
Truthful marketing
Customer data security
Collective bargaining
Occupational health and safety
Equal pay
Regulatory compliance
Green building certifications
Talent recruitment and retention
Resolving human rights grievances
Talent and career development
Fines for breaches of products /service...
Customer experience

Materiality of ESG Topics

We regularly review our priority issues with key stakeholders, including employees, customers and investors. These issues reflect the topics of highest concern to Iron Mountain and its stakeholders and guide our ESG strategy and disclosures.

Six Priority Issues:
Data Privacy
Customer Impact
Ethics and Anti-Corruption
Environmental Impact
Safety
Inclusion and Diversity

KEY STAKEHOLDER GROUPS ENGAGED	MAIN DIALOGUE MECHANISMS AND FREQUENCIES	MAIN TOPICS OF INTEREST RAISED BY STAKEHOLDERS

CUSTOMERS	• Regular customer feedback collected via a variety of channels including:
	  • Customer Advisory Board (CAB)
	  • Transactional surveys
	  • Focus groups
	  • Polls
	  • Interviews
	  • Legal symposium
	  • Service Experience follow-up calls from the Customer Advocacy Center
	• Regular customer-initiated requests for information or annual audits
		• 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

EMPLOYEES	• Regular employee surveys • Regular performance evaluation, including midyear and end-of-year discussions • Regular feedback via frontline managers in daily pre-shift meetings and monthly team meetings • Regular roundtable discussions held with Operations and Customer Care employees • Multiple one-way and two-way communication channels	• 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 safety, ethical behavior and data privacy
STOCKHOLDERS	• Annual Stockholder Meeting and Investor Day (does not occur annually) • Quarterly earnings teleconferences and webcasts • Published annual sustainability reports • Discussion with interested and socially responsible investors during materiality process review • Regular industry and broker-sponsored conferences, facility tours and non-deal roadshows	• Earnings updates 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)
NONPROFIT PARTNERSHIPS	• Feedback from partner organizations and grant recipients • Discussion with prospective grant recipients • Regular volunteer events and activities	• 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

OUR COMMITMENTS

Iron Mountain is committed to living by our core values and putting them into action every day and in everything we do – from safeguarding our customers' information to empowering employees, serving our communities and protecting the environment. ESG principles are integrated across the business, and we strive to deliver solutions that enable both our organization and our customers to manage information in a manner that is environmentally conscious and socially responsible.

COMMITMENT	2019 PROGRESS
ENVIRONMENTAL IMPACT We are committed to reducing our impact on the environment while driving value to our customers, investors and the communities in which we operate. We strive to improve our environmental performance and initiate innovative projects and activities that reduce cost, build resiliency and further reduce our impacts on the environment.	• Our GHG emissions reduction goal was approved by the Science Based Targets initiative (SBTi). In 2019, we reduced our carbon impact by 52% from a 2016 baseline. • As a member of RE100 we remain committed to achieving our goal of 100% renewable energy by or before 2050. In 2019, we used 683,919 MWh of renewable energy, accounting for 77% of our global electricity use.
INCLUSION AND DIVERSITY We will accelerate our global Inclusion and Diversity strategy to ensure we have the best talent to deliver our business objectives, enable an innovative, high-performance culture and deliver superior performance to our customers and shareholders. In order to reach our goals, we will build an inclusive environment that can ensure the diversity we are building is sustainable.	• We remain committed to +/- 10% parity in gender pay. In 2019, we continued to perform well with regard to parity in gender pay. • Iron Mountain received a perfect score of 100% on the Human Rights Campaign 2020 Corporate Equality Index.
CUSTOMER IMPACT We will accelerate growth and create incremental value for customers, investors and other stakeholders by delivering products and services that help address environmental, social and governance challenges faced by our customers.	• We formalized several products and services to help customers achieve their environmental goals. Customers can meet their GHG goals with **Green Power Pass Data Centers**, contain e-waste with **Secure IT Asset Remarketing and Recycling**, and reduce plastic waste with **Sterilization Wrap Recycling**.

COMMITMENT	2019 PROGRESS
ETHICS AND ANTI-CORRUPTION We are committed to being recognized for our uncompromising ethical standards and to helping set best practices for our industry. We believe that doing business with integrity is the only way to do business. It is inherent in our Company Code of Ethics.	• We continued to reinforce the call to action for employees to speak up regarding concerns of unethical behavior. In 2019, our ethics hotline processed 234 cases. • We continued to conduct and monitor results from culture surveys and identified potential areas of focus for improvement. • We remain committed to the Ten Principles of the United Nations Global Compact.
SAFETY We have an uncompromising approach to Safety, which is one of our Core Values. We protect ourselves and each other from harm, and secure our customers' assets as if they were our own. Safety is our first consideration in everything we do, and ultimately becomes the foundation of how we do business.	• In early 2019, we launched a global campaign to promote our commitment to employee safety. The campaign, **Make It: Personal, Safe, Home 24/7**, promotes safe behavior at work, in transit and at home. • We decreased our worldwide Total Recordable Incident Rate (TRIR) and Lost Time Incident Rate (LTIR) by 20% and 22%, respectively.
DATA PRIVACY As the global leader in information management, we are uniquely positioned to be a leader in safeguarding information and data privacy. We aspire to be an innovator in the development of new methodologies that safeguard data privacy, no matter what form the information is in, while continuing our commitment to meeting evolving regulatory, customer and legal obligations. We know our customers are facing ever-growing volume and variety of information, from business records to their customer and employee personal data, distributed across their organizations. We are committed to ensuring our suite of services can help customers protect their data, support evolving regulations and be prepared to respond in the event of any kind of breach or cyberattack in a way that minimizes any impact to their brand reputation and business processes.	• 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 continued to host digital forums where experts helped customers and others to navigate the costs and risks of managing physical and digital information, comply with ever-changing industry regulations and gain greater control, access and visibility over information.

A MESSAGE FROM OUR VP, ESG STRATEGY

We've come a long way since we formalized our Corporate Responsibility program in 2013. And we couldn't have done it by ourselves. Developing the company skills to collaborate internally and externally to solve problems together has been critical to delivering bigger results and long-term success. We regularly advance our understanding of ESG issues and impacts through partnerships with our customers and suppliers, peer companies, communities, NGOs, academics and government agencies. Together we're able to make a bigger difference.
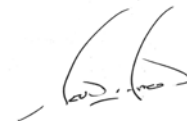
As we learn from our own ESG efforts, we have begun to see ways to help customers solve similar challenges with products and services that have high-value ESG features and benefits. To be successful, these products often have a supporting ecosystem of peers and NGOs that makes them more valuable, difficult to replicate and highly differentiated. Iron Mountain's Green Power Pass is an example of a product that does just that. Green Power Pass is a renewable energy reporting solution that is built on the Future of Internet Power (FoIP) carbon reporting protocol and based on our 100% renewable energy colocation offering. We've invested heavily in wind farms and solar power plants, and I'm proud our colocation customers now have a way to stake their own claim in the usage of that green power.

Learning more sometimes means adjusting our sights to make sure that our goals and actions help drive bigger system results. One example is our effort to adopt renewable energy.

Beyond our own RE100 commitment, we want to ensure that we're helping to create a greener grid for everyone. Our fast-growing data center business unit now accounts for about 2/3 of our global electricity use and has been operating on 100% renewable electricity since 2017. However, working with utilities and peers, we've realized that the generally accepted method of measuring annual total KWhrs can result in negative side effects for the system due to solar and wind supply variability. As a result, we are adding a time and place condition to our 100% renewable energy commitments – aspiring to be 100% carbon free, 100% of the time. This shift will begin to impact the way we contract for future energy deals, and we'll work with other users to develop the metrics and reporting tools we'll need to achieve this goal.

Green power is just one example of working together and getting the goals right to help deliver better environmental, social and business results for all our stakeholders. Thank you for your support, collaboration and feedback.

Very sincerely,

Kevin Hagen
Vice President
Environmental Social & Governance Strategy

ESG-ADVANTAGED SERVICES

The majority of our B2B customers have publicly stated sustainability goals. As we use ESG thinking to solve challenges and deliver better financial, environmental and social results, we are also finding new ways to enhance our products and services to help customers solve similar challenges. These new aspects of our offer can help differentiate our products as they add more value to our customer relationships. This is new territory for our ESG efforts and requires new levels of collaboration within the company, with our customers and other stakeholders. In 2019, three such services represented over $50M in sales.

Data privacy and security continues to be a high-priority ESG issue to our stakeholders. As the global leader in information management, we are uniquely positioned to set industry standards for safeguarding information and data privacy. We are committed to ensuring our suite of services can help customers protect their data, support evolving regulations and be prepared to respond in the event of any kind of breach or cyberattack in a way that minimizes any impact to their brand reputation and business processes.

GREEN POWER PASS

Iron Mountain Data Centers have been powered by 100% renewable electricity since 2017. In early 2019, we launched the Green Power Pass (GPP) to pass those renewable energy benefits on to our customers. With GPP, our customers can certify that 100% of the electricity they use at Iron Mountain Data Centers comes from renewable sources, while avoiding complex carbon offsetting or renewable credit processes to meet their sustainability targets. Companies like Akamai, The Boeing Company, Boston Medical Center, Credit Suisse and Goldman Sachs joined our Early Adopter program, and we continued to expand our GPP portfolio throughout the year.

We were proud to introduce this first-of-its-kind product that uses the Future of Internet Power's (FoIP) Requirements for Supplier-Procured Renewable Energy. GPP is a demonstration of the power of collaboration between industry and NGOs. It was built on an "open-source" protocol with the hope that our industry peers will develop similar offerings and help realize the goal of an internet powered by 100% renewable energy.

SUSTAINABILITY WITH A LIKE-MINDED PARTNER

Akamai is a cloud provider with a big heart. Throughout the organization, innovation and excellence go hand in hand with a profound sense of social responsibility. As part of its sustainability policy, Akamai is committed to reducing greenhouse gas emissions.

In 2019, Akamai was the official launch partner for Iron Mountain's Green Power Pass. "The Green Power Pass doesn't just help Akamai reach its business and sustainability goals, it helps everyone," said Mike Mattera, Director of Sustainability at Akamai. "A critically important aspect of our business case was finding a partner who not only met our renewable energy requirements but also understood what we were trying to do and could help us to achieve our goals. With Iron Mountain, we found a partner who could do all that — in ways that gave us a competitive advantage."

CHALLENGE:
Targeting 50% renewable energy for its worldwide operations by 2020, Akamai needed sustainable space in the New York tri-state area. A critical success factor for getting to more sustainable operations included access to wind, solar or other renewable electricity to power the Akamai Intelligent Edge Platform in the New York metro area. Affordability, innovation and efficiency were vital for this essential data center project.

SOLUTION:
Green Power Pass gives Akamai the contractual right to claim environmental benefits and report notable reductions in greenhouse gas emissions. Instead of buying offsets, Akamai can count its entire data center electricity use as green in external reporting such as the CDP.

RESULTS:
The new data center, once it is running at 90% full, will account for about 6% of Akamai's total US electricity load and about 4% of its global load, making vast inroads into the company's renewables target. Cost savings and efficiency gains are certain, leaving Akamai strongly placed to make its operations even more sustainable.

SECURE IT ASSET DISPOSITION

E-waste is the fastest-growing municipal waste stream in the world with over 48 million tons produced in 2018. As technology advances, old IT assets pile up. Iron Mountain Secure IT Asset Disposition (SITAD) enables our customers to destroy, recycle or remarket your end-of-life data center and IT assets – such as backup tapes, hard drives, laptops and other IT equipment – in a manner that is secure and environmentally friendly.

Using an e-Stewards recycling process built to reduce greenhouse gas emissions, cut pollution and save both energy and resources, our SITAD service enables customers to dispose of old IT assets in a manner that minimizes e-waste, reduces their carbon footprint and improves their overall green IT posture.

STERILIZATION WRAP RECYCLING

With Iron Mountain Sterilization Wrap Recycling, our health care customers can dispose of sterilization wrap in a safe and cost-effective manner. This process eliminates unnecessary disposal in a landfill and frees up the resin to create new medical products for the circular economy, such as recycle bins, bed pans and distribution totes. Equally important, this service can also yield significant financial benefits by saving costs associated with disposing in a landfill.

HOW DOES IT WORK?

COMPLETE CHAIN OF CUSTODY

ASSET ITEMIZATION

SECURE TRANSPORT: TRUCKS EQUIPPED WITH GPS, PATENTED SECURITY

CERTIFIABLE TRACK RECORD ON ENVIRONMENTAL RESPONSIBILITY

e-Stewards ENTERPRISE

HOW DOES IT WORK?

YOU COLLECT YOUR CLEAN USED WRAP

IRON MOUNTAIN PICKS UP WRAP

PELLETS MADE INTO MEDICAL PRODUCTS

PROCESSOR CREATES RESIN PELLETS
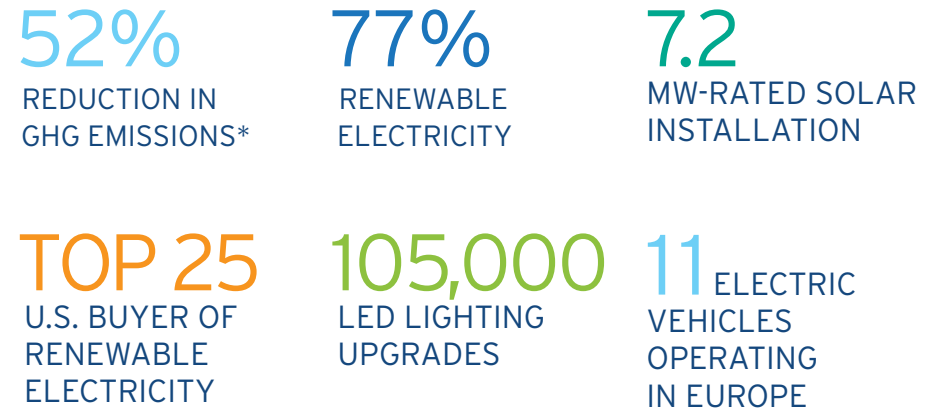
RECYCLER BUYS WRAP FROM COLLECTOR

OUR PLANET

WE ARE COMMITTED TO REDUCING OUR IMPACT ON THE ENVIRONMENT WHILE DRIVING VALUE TO OUR CUSTOMERS AND THE COMMUNITIES IN WHICH WE OPERATE.

OUR PLANET

Iron Mountain focuses its environmental sustainability efforts on the concrete steps the company can take to minimize the impact our operations have on the environment. We are driven by close customer collaboration, and, as a result, our customers can use our services as a force for good – by minimizing the environmental impact of managing information in a meaningful and measurable way. It is through the collective commitment of our customers and communities that we are able to amplify positive environmental impacts and address global challenges such as climate change, natural disasters and other environmental risks.

While the vast majority of our carbon footprint is attributable to the electricity, heating and transportation required to operate our business, we will continue to improve our management systems to better understand the full spectrum of environmental resources and impacts associated with our operations.

2019 ENVIRONMENTAL HIGHLIGHTS

52%
REDUCTION IN GHG EMISSIONS*

77%
RENEWABLE ELECTRICITY

7.2
MW-RATED SOLAR INSTALLATION

TOP 25
U.S. BUYER OF RENEWABLE ELECTRICITY

105,000
LED LIGHTING UPGRADES

11 ELECTRIC VEHICLES OPERATING IN EUROPE

WE'VE HAD OUR
SCIENCE-BASED TARGET APPROVED

SCIENCE BASED TARGETS
DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

RE 100

*Reductions compared to a 2016 baseline.

ACHIEVING OUR SCIENCE-BASED TARGET

We are committed to reducing our greenhouse (GHG) emissions to help mitigate the effects of climate change. In early 2019, Iron Mountain's science-based target (SBT) was approved by the Science Based Targets Initiative (SBTi). Later in the year, responding to calls from leading climate institutions, we voluntarily revised our SBT to align with a scenario well below 2°C.

Using 2016 as a baseline, Iron Mountain committed to reduce absolute GHG emissions 25% (initially 20%) by 2025. As of year-end 2019, we are thrilled to announce we've already achieved our goal – six years early – and reduced emissions by 52%.

We owe this accomplishment to cross-functional collaboration, product innovation, enhanced data management and support from our leadership. In recent years, we've made significant investments in renewable energy sources which allowed us to drastically decrease our Scope 2 (indirect) emissions, even as our energy-intensive Data Center business experienced tremendous growth. In addition, energy efficiency projects in buildings and improved fleet fuel management contributed to our overall reductions.

While we're proud these reductions exceed even a 1.5°C pathway, we acknowledge there is much work left to be done to maintain our performance. As our business continues to grow, our commitment to aggressive carbon reduction targets will remain a priority.

2019 GHG EMISSIONS BY SCOPE [259,160 MTCO$_2$e]
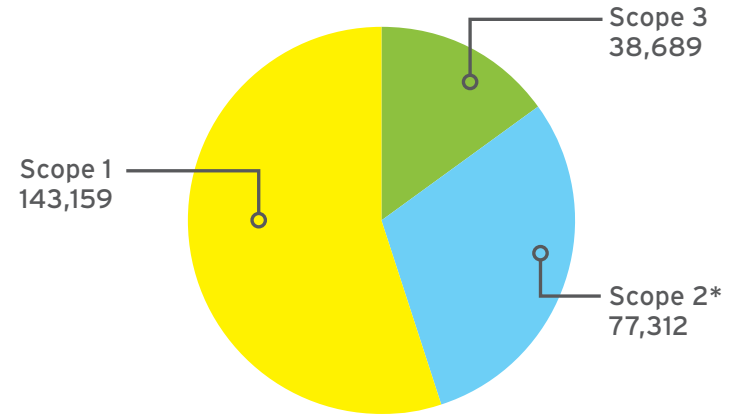
Scope 3
38,689

Scope 1
143,159

Scope 2*
77,312

* 2019: calculated using the "market-based" approach, taking into account 683'919 MWh of electricity from renewables (backed by RECs).

GHG INTENSITY [MTCO$_2$e/FT^2]

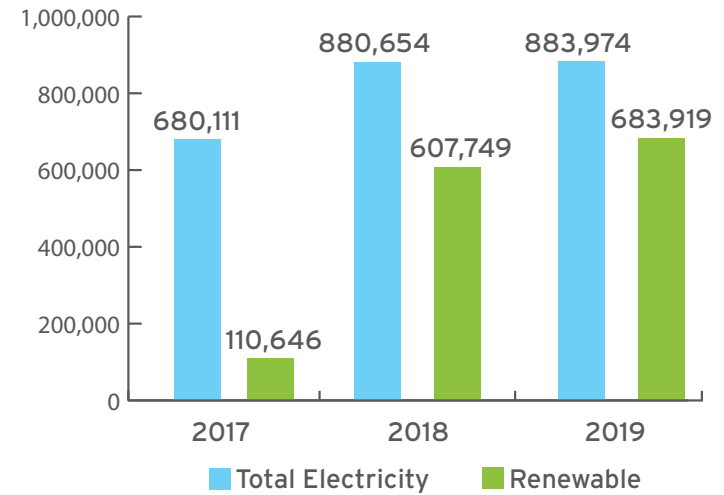| Year	Value
2016	0.0063
2017	0.0050
2018	0.0029
2019	0.0028
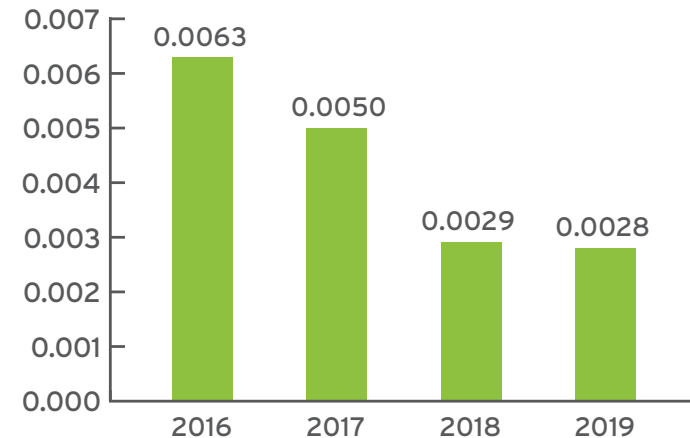
RENEWABLE ENERGY PROGRESS

We continue to make steady progress toward our renewable energy goals, even as our portfolio has continued to expand due to acquisitions and organic growth. In 2019, 77% of our global electricity consumption came from renewable energy contracts, up from 69% in 2018. As a member of RE100, we remain committed to achieving our goal of 100% renewable energy by or before 2050.

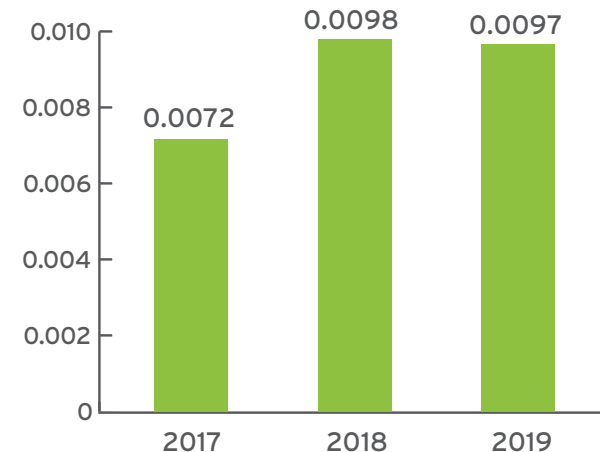Our commitment is evident across our business, including:
- Iron Mountain Data Centers have been powered by 100% renewable electricity since 2017.

- In 2018, the United Kingdom, Ireland, the Netherlands and Belgium became the first company territories to achieve 100% renewable electricity. France and Germany will join that list in 2020. By the end of 2019, the majority of our sites in Connecticut, New York and Ohio were covered by 100% renewable power.

- We are one of the largest purchasers of renewable power in the U.S. In 2019, we commenced construction of the largest Data Center rooftop solar system in the U.S., a 7.2 MW project in Edison, New Jersey.

As we progress toward our goal, certain limitations become evident. The conventional measurement of comparing annually contracted renewable purchases with annual consumption does not account for how well the renewable generation matches an organization's load. With this in mind, Iron Mountain aspires to achieve 100% load-matched renewable power. This will help deliver a greener, more cost-effective grid for everyone.
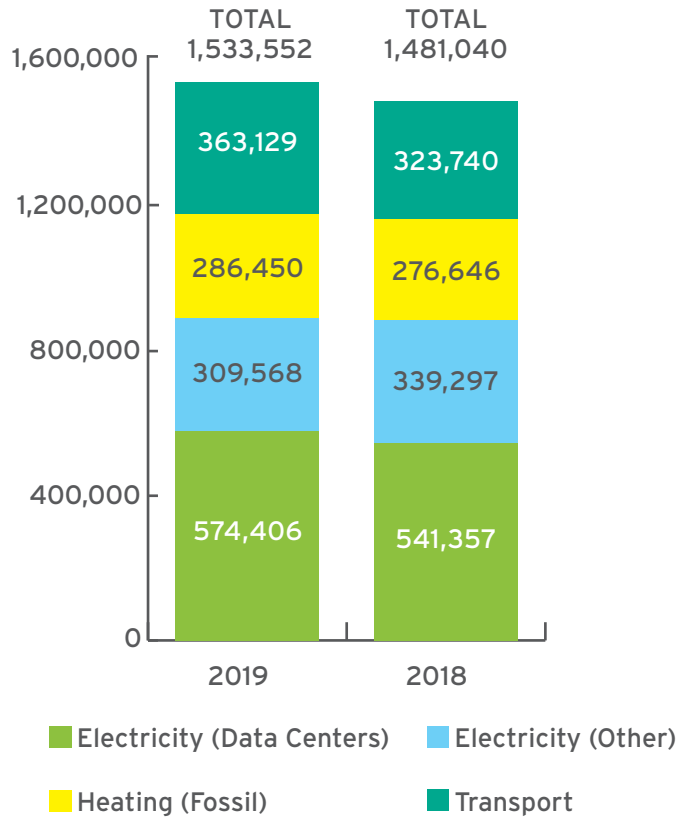
GLOBAL ELECTRICITY CONSUMPTION (MWh)

Bar chart showing Total Electricity and Renewable values:
- 2017: Total Electricity 680,111; Renewable 110,646
- 2018: Total Electricity 880,654; Renewable 607,749
- 2019: Total Electricity 883,974; Renewable 683,919

Legend: Total Electricity (blue), Renewable (green)

ENERGY INTENSITY [MWh/FT²]

Bar chart:
- 2017: 0.0072
- 2018: 0.0098
- 2019: 0.0097

ENERGY CONSUMPTION [MWh]

TOTAL 1,533,552   TOTAL 1,481,040

	2019	2018
Transport	363,129	323,740
Heating (Fossil)	286,450	276,646
Electricity (Other)	309,568	339,297
Electricity (Data Centers)	574,406	541,357

- Electricity (Data Centers)
- Electricity (Other)
- Heating (Fossil)
- Transport

GHG EMISSIONS BY SOURCE [MTCO$_2$e]

TOTAL 259,160   TOTAL 259,400

2019: 1,447 / 7,376
2018: 274 / 11,048 / 8,949

	2019	2018
Vehicles	100,752	95,507
Heating	51,016	56,129
Electricity (incl. line loss)*	98,568	87,493

- Electricity (incl. line loss)*
- Vehicles (incl. outsourced third-party fuel)
- Heating
- Fire suppressants
- Business travel
- Other sources (diesel backup generators, refrigerants)
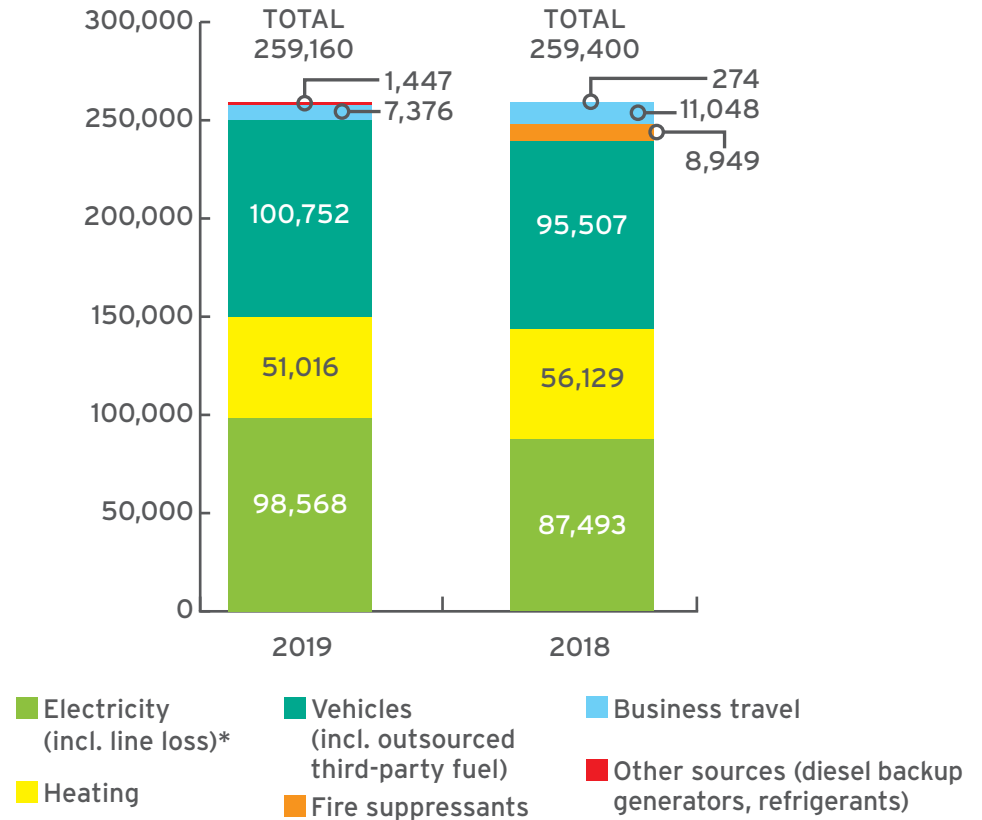
Note: Additional environmental data is available in the Performance Tables.

* 2019: calculated using the "market-based" approach, taking into account 683'919 MWh of electricity from renewables (backed by RECs)

GREEN BUILDING STANDARDS

In 2019, our Data Centers represented 65% of Iron Mountain's global electricity consumption. By year-end, all of our Data Centers were ISO 50001 Energy Management System certified, ensuring continuous improvement of energy efficiency practices across the global portfolio. In addition, our existing ISO 14001 Environmental Management System certification, currently active at our Amsterdam Data Center, will go through a scope expansion to include all sites in the enterprise by the end of 2020. This process will significantly improve the environmental performance of our data centers and enhance the trust of our stakeholders.

In 2016, we joined the U.S. Department of Energy (DOE) Better Buildings Challenge, pledging to reduce Data Center energy intensity by 20% over a 10-year period. In 2019, we

surpassed our original goal – seven years early – achieving a 25% reduction in non-IT energy intensity. As a result, we were presented the Better Buildings Goal Achiever Award at the annual DOE Better Buildings Summit. We remain committed to improving our power usage effectiveness (PUE) and have a number of energy efficiency projects in progress or planned throughout the enterprise.

Due to the efforts of our Global Real Estate team, we also saw significant improvements to our energy efficiency in 2019. We installed over 105,000 LED lighting upgrades throughout facilities in the U.S., Canada and the United Kingdom. These upgrades are expected to save 65,000,000 kWh per year and are largely responsible for our total energy consumption increasing by only 3,000 MWh while the Data Center business grew by more than 30,000 MWh.

ENVIRONMENTAL GOALS

OUR GOALS	PROGRESS AS OF YEAR-END 2019
We remain committed to achieving 80% renewable energy use globally by 2025.	77% of our global electricity consumption came from renewable energy contracts, up from 69% in 2018.
We will maintain our 2018 Scope 1 performance.	We maintained our Scope 1 performance relative to 2018, all while expanding our business and data collection efforts.
We will remain committed to our approved science-based target to reduce absolute GHG emissions 25% (initially 20%) by 2025.	Using 2016 as a baseline, we have reduced absolute emissions by 52%, exceeding our goal six years early.
We will formalize a written environmental policy that will help form the basis for an environmental management system.	We developed an environmental policy statement. 100% of our global Data Center portfolio is certified under ISO 50001.

LOOKING AHEAD:

- As a member of RE100, we remain committed to achieving 100% renewable energy by 2050, and we believe we can get there early.

- We commit to reevaluating our long-term GHG emissions reduction target.

- We will aim to reduce our Scope 1 emissions 20% by 2025.

- We commit to reevaluating our full Scope 3 emissions.

- In 2020, we will develop a better understanding of water consumption within our Data Center business for inclusion in future reporting.

- In 2020, we will develop a better understanding of our global waste data for inclusion in future reporting.

- In 2020, we will publish our written environmental policy.

OUR PEOPLE

WHEN WE VALUE DIVERSE IDEAS, BACKGROUNDS AND PERSPECTIVES, OUR PEOPLE THRIVE, OUR CUSTOMERS BENEFIT—AND OUR BUSINESS SUCCEEDS.

OUR PEOPLE

At Iron Mountain, our people are our greatest assets. We are committed to the safety and well-being of our employees and strive to cultivate a culture of inclusion that values diverse perspectives across our global workforce. Through surveys and other mechanisms, we regularly engage employees and seek their feedback on a variety of issues.

EMPLOYEE SAFETY

Safety is the first consideration in everything we do at Iron Mountain. We protect ourselves and each other from harm, and secure our customers' assets as if they were our own. Our ultimate goal is to achieve zero injuries and establish a "zero incident safety culture" throughout our operations.

In early 2019, we launched a global campaign to promote our commitment to employee safety. The campaign, **Make It: Personal, Safe, Home 24/7**, promotes safe behavior at work, in transit and at home and is guided by two safety principles:
    1) Nothing is worth the risk of an injury.
    2) Safety must be actively managed.

Safety materials and campaign assets were translated into 29 languages, and local teams worked creatively to deliver the program across a complex global workforce. Throughout the year, employees received trainings and personalized packets on a variety of workplace and personal safety topics. As a result, we have seen an increase in employee engagement around our safety programs along with improvements in our injury rates.

TOTAL REWARDS

Iron Mountain Total Rewards includes market-competitive pay, incentive compensation and a comprehensive benefits portfolio that ensures access to high-quality, affordable health care as well as retirement schemes that support retirement readiness. An Employee Stock Purchase Plan is also available.

Iron Mountain values and culture are the foundation of our commitment to well-being – physical, emotional, social and financial, and our Total Rewards reflects this belief. For example, in 2019, employee financial well-being was strengthened by making the decision to increase the 401(k) match. In a similar fashion, 2019 saw the launch of our global Employee Assistance Program – a critical program to ensuring the emotional and social well-being of our employees worldwide.
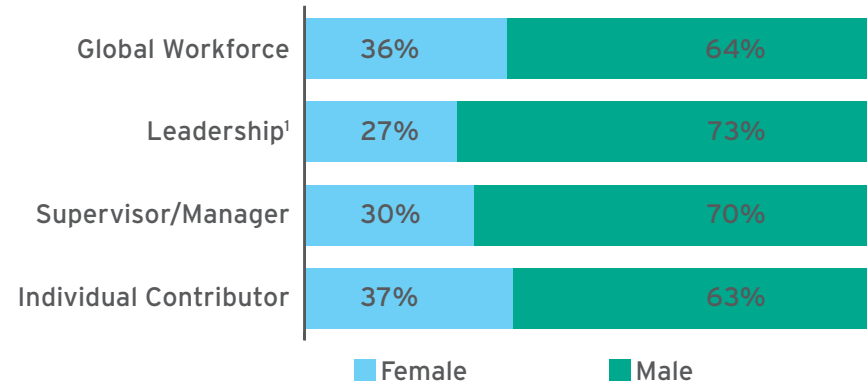
GRI 401-2, 403-2

INCLUSION AND DIVERSITY

Iron Mountain is committed to building a culture of inclusion that allows all our employees to thrive. We believe that having a diverse employee base that reflects our customers and communities not only sustains our business, but is critical for our success. We strive to attract, develop and empower individuals with diverse perspectives, without regard to race, color, religion, sex (including pregnancy), national origin, disability, age, sexual orientation, veteran status, genetic information, gender identity, gender expression or any other factor prohibited by law. To that end, our leadership team insists on diverse candidate slates.

At the end of 2014, Iron Mountain set a goal to increase the percentage of women in North American leadership to 30% by 2020. At the end of 2019, women represented 27% of our leadership (Directors and above) and 27% of our overall workforce in the U.S. and Canada. In addition, minorities represented 15% of leadership roles, continuing to exceed our 2020 goal. We also received recognition from 2020 Women on Boards for increasing the percentage of women on our Board of Directors to 29%.
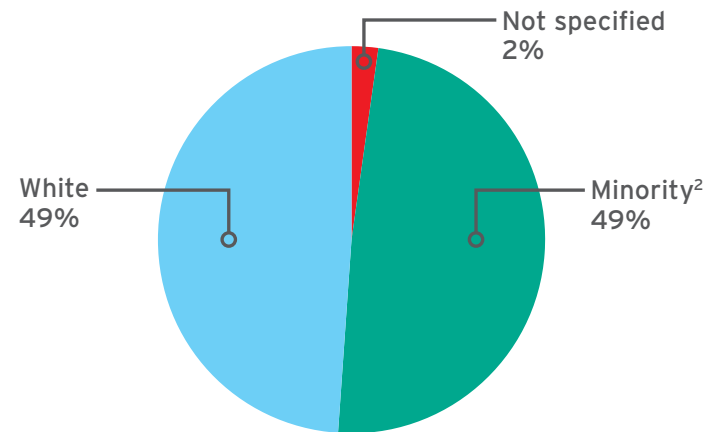
2019 WORKFORCE DIVERSITY

	Female	Male
Global Workforce	36%	64%
Leadership[1]	27%	73%
Supervisor/Manager	30%	70%
Individual Contributor	37%	63%

1. Defined as Director and above.

2019 US WORKFORCE BY ETHNICITY

Not specified 2%
White 49%
Minority[2] 49%

2. Minority category includes American Indian or Alaskan Native, Asian, Black or African American, Hispanic/Latino, Native Hawaiian or Other Pacific Islander, and Two or More Races. "Decline to state/ not specified" was included in the denominator.

EMPLOYEE RESOURCE GROUPS

Through our Employee Resource Groups (ERGs) we seek to create a safe, inclusive environment where all employees around the world feel connected, valued and inspired to build customer value and be able to contribute to our company's success. Our groups' goals are designed to:

- Encourage dialogue about the impact of diversity on our business and our employees
- Build inclusive recruiting and on-boarding experiences
- Offer professional development opportunities
- Research and recommend programs and policies to support diversity
- Pursue activities in the workplace and community that promote Iron Mountain as a great place to work

Nearly 1,400 Iron Mountain employees participate with one or more of our seven ERGs, including more than 1,000 employees in the U.S. In 2019, our ERGs engaged our people and communities in a variety of ways, including:

- To recognize Suicide Prevention Awareness Month and Suicide Prevention Day, our ERGs worked together to launch the "I Have Value" campaign. ERG members shared statistics and personal stories on how suicide has affected them and the groups they represent.
- Our Women@IM ERG launched the "#IMUnique" campaign to celebrate and embrace the uniqueness of our employees across the globe.
- Our annual "I'm an Ally" campaign, led by our LGBTA@IM ERG, celebrated National Coming Out Day and asked fellow employees to show support for Iron Mountain's LGBTQ+ community by "coming out" as an ally.

OPPORTUNITIES FOR VETERANS

We don't only hire veterans because we believe it is the right thing to do. While we recognize veterans for their service and sacrifices − for safeguarding our freedoms and values − we know that members of our armed forces bring valuable skills to our workplace. That's why we actively seek to employ and develop veterans, active duty guard members and reservists, who are sources of strength, courage and integrity.

More than 450 military veterans work for Iron Mountain in North America, and many other military spouses are Mountaineers. In 2019, our Talent Acquisition group continued efforts to make Iron Mountain a preferred employer of veterans and their spouses. Our team is forging partnerships to expand our digital footprint within channels where veterans transitioning to civilian life are active. Additionally, we developed resources and strategies to help the team communicate with veterans and military members, as well as better understand how military experience translates to civilian jobs.

TRAINING AND PROFESSIONAL DEVELOPMENT

To better serve our people and our customers, Iron Mountain seeks to provide our employees with opportunities for personal and professional development. Our 2019 CLIMB class successfully graduated from a yearlong leadership program. CLIMB stands for Creating Leaders and Inspiring Management Behavior, and is a leadership development program designed to assist high-potential employees to reach their full potential at Iron Mountain.

The program consists of a yearlong commitment geared toward improving overall leadership effectiveness and self-awareness. The program revolves around development activities like individual development plans tailored to the needs of each participant; a virtual learning series with topics like strategic thinking, inclusion and diversity, and financial skills; and the most challenging piece of the program, which involves creating and implementing a group special project to innovate and help improve the business.

GENDER PAY GAP REVIEW

Iron Mountain has a merit-based compensation philosophy that strives to ensure gender parity in pay. The North American, Canadian and UK businesses continued to monitor pay by gender among job groups to identify discrepancies. In 2017, we did additional analysis to understand the gap reflected at the Individual Contributor–Exempt level in the United States.

FEMALE TO MALE AVERAGE COMPENSATION RATIOS

(BASE SALARY)	UNITED STATES	CANADA	UNITED KINGDOM
Senior Vice President	103%	*	*
Vice President	106%	*	*
Director	99%	87%	93%
Manager	102%	105%	100%
Supervisor	95%	98%	101%
Individual Contributor—Exempt[1]	87%	83%	95%
Individual Contributor—Non-Exempt	91%	91%	n/a

* Too few to report and maintain confidentiality

1. We discovered that this particular grouping is quite broad and encompasses a wide variety of roles across many levels, skill sets and functions, and the gap identified may be caused more by this wide variation than anything else. For future reporting, we may shift our reporting to better organize this broad group into smaller subcategories for comparison.

OUR COMMUNITIES

WE ENGAGE WITH OUR LOCAL COMMUNITIES
AND SUPPORT CHARITABLE CAUSES.

OUR COMMUNITIES

Iron Mountain believes it has a responsibility to create social value in the communities in which we operate. We have a robust network of 25,000 employees and 1,450 facilities actively engaged in our global community. We offer employee volunteer opportunities and support deserving nonprofits and non-governmental organizations to help make our neighborhoods a better place to work and live.

LIVING LEGACY INITIATIVE

The Living Legacy Initiative is Iron Mountain's charitable commitment to preserve and make accessible cultural and historical information and artifacts. We aim to build mutually beneficial partnerships that are aligned to our business priorities and produce the best outcomes for our philanthropic mission, communities and partners. Living Legacy grants provide nonprofit agencies, museums and other non-governmental organizations with cash contributions, in-kind services or customized solutions. In 2019, Iron Mountain provided over half a million dollars to four Living Legacy partners including:

- British Film Institute
- CyArk
- The Ohio University Foundation
- Women In Military Service For America
  Memorial Foundation, Inc.

SPANISH-AMERICAN WAR COLLECTION AT THE WOMEN IN MILITARY SERVICE FOR AMERICA MEMORIAL

In 2019, we announced our support of the preservation of the Spanish-American War collection at the Women In Military Service For America Memorial, the only major national memorial honoring all women who have defended America since the American Revolution. Iron Mountain's financial support enabled the Women's Memorial Foundation to digitize its significant Spanish-American War collection, which documents the superior service of the more than 1,500 contract nurses who served in the Army and Navy general hospitals, aboard the hospital ship Relief, in stateside camps, the Philippine Islands, Puerto Rico and Hawaii during the conflict. "We are profoundly grateful that Iron Mountain's support of this digitization will allow us to make

these women's invaluable contributions visible to the world," said retired Army Major General Jan Edmunds, chair of the board of the Women's Memorial Foundation. "The exceptional service of the dedicated and determined nurses who participated in the Spanish-American War created a lasting legacy and made possible the establishment of the Army Nurse Corps giving women a permanent place in the U.S. Armed Forces."

The collection will be used in future permanent exhibits at the Women's Memorial as well as included in a new, digital, online archive that will be available for researchers and the general public. The Foundation maintains a vast collection that continues to grow as today's servicewomen take on new roles and participate in every aspect of our national defense.

CYARK: PRESERVING THE STONEWALL NATIONAL MONUMENT AND SAN SEBASTIAN BASILICA

Our ongoing partnership with CyArk, a heritage preservation nonprofit, continued its shared mission to digitally capture, share and archive the world's cultural and historical heritage. CyArk, with Iron Mountain's financial support, completed a 3D scan of the historic Stonewall National Monument in New York, site of the 1969 Stonewall Uprising. The scan is incorporated into both virtual and augmented reality, featuring voices associated with Stonewall then and now. Now, any member of the LGBTQ community or ally can walk into this important historic site and connect with history. "We are very proud that Iron Mountain supported CyArk's digital capture and virtual experience of the

Stonewall National Monument," said Cristina Escobar, Chair of Iron Mountain's LGBTQ employee resource group. "This site was a key turning point in the LGBTQ rights movement, and it's important to recognize these milestones and celebrate diversity in our communities and our workplaces."

The San Sebastian Basilica, located in Manila, Philippines, was first constructed in 1621. Since then, it has been rebuilt four times due to damage from conflict, fire and earthquakes. Today, the steel basilica faces new challenges, including corrosion and water infiltration. The San Sebastian Basilica Conservation and Development Foundation and The International Council on Monuments and Sites (ICOMOS) Philippines engaged CyArk and Iron Mountain to digitize the Basilica's interior and exterior for future preservation efforts. "The San Sebastian Basilica represents so much cultural and religious history as one of

the few all-metal churches in the world, and the country's first basilica," said Claire Vitug, technical director of the San Sebastian Basilica Conservation and Development Foundation. Through the power of 3D digital documentation, CyArk, Iron Mountain and our local partners can help ensure both the physical integrity of the Basilica as well as share the digital replica with a global audience.

A backup copy of all of CyArk's cultural heritage blueprints is stored in a highly secure Iron Mountain facility, including the Stonewall National Monument and San Sebastian Basilica, ensuring the safety, protection and availability of the digital record for future use.

SUPPORTING OUR COMMUNITIES

Moving Mountains is our volunteer initiative that encourages, rewards and shares the ways our employees support their communities. Iron Mountain offers 16 hours of paid time off to employees to volunteer in some countries, including the United States, Canada, the United Kingdom, Belgium and the Netherlands. Employees can volunteer on their own or as a group at charities of their choice. It's a great way to connect with each other while contributing to an organization that benefits their community.

MAY IS MOVING MOUNTAINS MONTH

May is Moving Mountains Month and is an annual campaign across the globe to remind employees to make time to volunteer in their respective communities. While we encourage volunteerism all year long, the month of May is bountiful with volunteer opportunities – with some schools still in session and warmer weather ushering in outdoor events and community activities to support various causes and organizations.

For Sharyn Friesen, an Operations Manager based out of Houston, Texas, volunteering was always second nature. "It wasn't a second thought," Sharyn said. "In the household that I was raised in, service goes without question. You volunteer your time; you volunteer your services." It was that mindset that led her to begin volunteering with Friends of Cozumel, an organization devoted to aiding families and the broader community on the island of Cozumel, Mexico.

In May 2019, Sharyn and 12 others traveled to Cozumel and spent 10 days volunteering with the organization. During their time there they worked on a variety of projects ranging from building cabinets to teaching women how to sew. The cost of tuition, supplies and uniforms can make it difficult for children to attend school on the island. Sharyn helped put together backpacks of donated supplies for children, and her group donated 23 suitcases – totaling 1,500 lbs. – of other supplies, like clothes, personal items, nearly 100 pairs of shoes and two sewing machines.

Sharyn is grateful for the impact she was able to make through the Moving Mountains program and looks forward to future opportunities to volunteer her time with fellow Iron Mountain employees.

PERFORMANCE
TABLES

Greenhouse Gas Emissions (metric tons of CO2e)	FY19	FY18	FY17	FY16*
Total absolute emissions	259,160	259,400	437,142	540,044
Scope 1	143,159	149,865	172,026	159,104
Scope 2 market-based	77,312	83,368	127,461	172,635
Scope 2 location-based	370,167	400,045	167,478	--
Scope 3	38,689	26,167	137,655	208,305
GHG Intensity (mtCO2e/sq ft)	0.0028	0.0029	0.0050	0.0063

*Emissions data in 2016 restated to establish baseline for science-based target.

Energy Consumption (megawatt-hours)	FY19	FY18	FY17	FY16
Total energy consumption	1,533,552	1,481,040	1,269,146	938,491
Total electricity consumption from operations	883,974	880,654	627,434	346,274
Total renewable energy consumption	683,919	607,749	110,646	8,784
Total electricity consumption from renewable sources (%)	77%	69%	18%	3%
Energy Intensity (MWh/sq ft)*	0.0097	0.0098	0.0072	0.0040

*Calculated using total electricity consumption.

Waste Management* (metric tons)	FY19	FY18	FY17	FY16
Total	9,399	8,242	6,899	6,363
Landfill	7,073	6,936	6,246	5,842
Recycling	1,359	657	653	521
Recovery (energy from waste)	967	648		

*The waste data for FY16, FY17, FY18 and FY19 represents approximately 65 percent, 64 percent, 62 percent and 67 percent, respectively, of our total global square footage.

Water	FY19	FY18	FY17	FY16
Water consumption (m³)	924,515	794,378	438,913	418,112
Water intensity (m³/sq ft)	0.010	0.009	0.005	0.005

*The water data for FY16, FY17, FY18 and FY19 represents approximately 35 percent, 41 percent, 44 percent and 42 percent, respectively, of our total global square footage.

Global Workforce Breakdown by Gender	Total		Female		Male	
Employment Contract	FY19	FY18	FY19	FY18	FY19	FY18
Permanent	24,993	25,315	8,941	8,849	16,052	16,466
Temporary*	763	1,203				
Employment Type						
Full-Time	15,107	24,560	6,310	8,430	8,797	16,130
Part-Time	9,886	755	2,631	419	7,255	336
Workforce by Region						
North America	10,198	10,156	2,759	2,576	7,439	7,580
Latin America	6,336	7,048	2,961	3,209	3,375	3,839
Asia Pacific	2,578	2,386	814	810	1,764	1,576
Europe, Middle East and Africa (EMEA)	5,881	5,725	2,407	2,254	3,474	3,471
Employee Category						
VP and above	191	204	45	40	146	164
Director	457	489	130	144	327	345
Supervisor/Manager	2,392	2,382	713	702	1,679	1,680
Individual Contributor	21,953	22,240	8,053	7,963	13,900	14,277
Board of Directors						
Board of Directors	14	12	4	3	10	9

*Demographic information unavailable. Remaining data in this section excludes our temporary workforce.

Percentage of Female Employees	FY19	FY18
Company-wide	35.8%	35.0%
North America	27.1%	25.4%
Latin America	46.7%	45.5%
Asia Pacific	31.6%	33.9%
Europe, Middle East and Africa (EMEA)	40.9%	39.4%

Age Composition of Global Employees	Under 30 Years Old		30-50 Years Old		Over 50 Years Old		Not Declared	
Employee Category	FY19	FY18	FY19	FY18	FY19	FY18	FY19	FY18
VP and above	0.0%	0.0%	52.9%	52.5%	47.1%	47.5%	0.0%	0.0%
Director	0.2%	0.2%	63.0%	65.6%	36.5%	33.9%	0.2%	0.2%
Supervisor/Manager	4.7%	4.7%	72.8%	73.9%	22.4%	21.3%	0.0%	0.0%
Individual Contributor	24.2%	26.2%	56.4%	55.6%	19.4%	18.2%	0.0%	0.0%
Board of Directors								
Board of Directors	0.0%	0.0%	0.0%	0.0%	100%	100%	0.0%	0.0%

Ethnic Composition of US Employees	Total		VP and above		Director		Supervisor/ Manager		Individual Contributor	
	FY19	FY18	FY19	FY18	FY19	FY18	FY19	FY18	FY19	FY18
American Indian or Alaskan Native	0.3%	0.3%	0.0%	0.0%	0.4%	0.0%	0.1%	0.1%	0.4%	0.3%
Asian	4.3%	4.4%	5.7%	4.1%	8.5%	7.3%	4.4%	3.8%	4.2%	4.4%
Black or African American	22.8%	21.7%	1.4%	1.4%	3.9%	5.0%	11.5%	12.1%	25.4%	24.2%
Hispanic/Latino	19.3%	19.0%	1.4%	4.1%	4.3%	2.6%	14.8%	13.0%	20.8%	20.8%
Native Hawaiian or Other Pacific Islander	0.5%	0.5%	0.0%	0.0%	0.0%	0.0%	0.1%	0.2%	0.6%	0.6%
Two or More Races	1.4%	1.4%	1.4%	0.7%	0.4%	1.3%	1.2%	1.5%	1.5%	1.4%
White	49.0%	51.5%	87.9%	89.1%	81.2%	83.5%	66.9%	68.6%	44.8%	47.0%
Decline to state/not specified	2.2%	1.1%	2.1%	0.7%	1.4%	0.3%	1.0%	0.7%	2.4%	1.2%

New Employee Hires	FY19	FY18
Total		
Total	6,624	5,834
New Hires by Region		
North America	2,666	2,470
Latin America	1,988	1,823
Asia Pacific	571	446
Europe, Middle East and Africa (EMEA)	1,399	1,095
New Hires by Gender		
Female	2,645	2,159
Male	3,971	3,670
Not declared	8	5
New Hires by Age Group		
Under 30 years old	3,101	2,714
30-50 years old	2,882	2,548
Over 50 years old	621	564
Not declared	20	8

Employee Turnover and Rate	Employee Turnover		Turnover Rate	
	FY19	FY18	FY19	FY18
Voluntary	3,992	1,931	15.9%	7.6%
Involuntary	3,238	1,138	13.0%	4.5%
Total	**7,230**	**3,069**	**28.9%**	**12.1%**
Turnover by Region				
North America	2,696	1,898	10.8%	7.5%
Latin America	2,684	418	10.7%	1.7%
Asia Pacific	511	62	2.0%	0.2%
Europe, Middle East and Africa (EMEA)	1,339	691	5.4%	2.7%
Turnover by Gender				
Female	2,617	1,012	10.5%	4.0%
Male	4,605	2,051	18.4%	8.1%
Not declared	8	6	0.0%	0.0%
Turnover by Age Group				
Under 30 years old	2,874	874	11.5%	3.5%
30-50 years old	3,379	1,625	13.5%	6.4%
Over 50 years old	962	564	3.8%	2.2%
Not declared	15	6	0.1%	0.0%

Health and Safety*	FY19	FY18
Total Recordable Incident Rate (TRIR)**		
Asia	0.3	0.9
Australia, New Zealand & South Africa	0.8	1.3
Latin America	1	1.6
Middle East, India & Eastern Europe	0.2	1.5
North America	2.2	2.4
NEEI (South Eastern Europe)	0.0	0.2
Western Europe	1.4	1.6
Worldwide	**1.2**	**1.5**
Lost Time Incident Rate (LTIR)		
Asia	0.3	0.7
Australia, New Zealand & South Africa	0.4	0.2
Latin America	0.9	1.4
Middle East, India & Eastern Europe	0.2	1.1
North America	0.8	0.7
NEEI (South Eastern Europe)	0.0	0.1
Western Europe	1.3	1.5
Worldwide	**0.7**	**0.9**

*In 2019 there were no workforce fatalities from a work-related accident, injury or disease.

**TRIR = # of injuries * 200,000 / Actual Hours Worked

US Maternity and Paternity Leave	Total	Female	Male
FY19 US Maternity and Paternity Leave			
Employees on maternity or paternity leave at some time during FY19	150	48	102
FY18 US Maternity and Paternity Leave			
Employees on maternity or paternity leave at some time during FY18	252	101	151
FY18 employees who returned to work after maternity or paternity leave ended	215	71	144
Total number of employees who returned from maternity or paternity leave during FY18 and are still employed 12 months after their return	190	55	135
FY18 Retention Rate	88%	77%	94%

Other Global Workforce Data	Female	Male
% of employees receiving performance reviews in 2019		
VP and above	49%	53%
Director	66%	61%
Supervisor/Manager	71%	75%
Individual Contributor	28%	31%

	FY19	FY18
% of employees covered by union representation	7.0%	7.3%

Philanthropic Giving	FY19	FY18	FY17
Living Legacy	$545,000	$545,000	$545,000
Additional charitable contributions	$300,00	$515,000	$236,415

GLOBAL REPORTING INITIATIVE

CONTENT INDEX

IRON MOUNTAIN 2019 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, with Iron Mountain's last report released in 2019.

Iron Mountain's 2019 Corporate Responsibility Report covers the reporting period of calendar year 2019.

Data presented in the report represents all wholly owned Iron Mountain operations unless explicitly noted otherwise.

Contact point for questions regarding the report is Ryan Brandenburg, Manager of ESG Projects and Reporting at Iron Mountain Ryan.Brandenburg@ironmountain.com. At this time, Iron Mountain has decided to not seek external assurance for the report.

GRI 101: FOUNDATION 2016 GRI 102: GENERAL DISCLOSURES 2016		
		ANSWER OR LOCATION IN REPORT
ORGANIZATIONAL PROFILE		
102-1	Name of the organization	Iron Mountain Incorporated
102-2	Activities, brands, products and services	About Us 2019 10-K, pages 1-4
102-3	Location of headquarters	Boston, Massachusetts, United States
102-4	Location of operations	Operations in more than 50 countries. 2019 10-K, pages 22-23
102-5	Ownership and legal form	2019 10-K, page 1
102-6	Markets served	2019 10-K, pages 2-3

102-7	Scale of the organization	2019 10-K, pages 1, 27-28
102-8	Information on employees and other workers	Performance Tables, pages 38-43 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.
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	2019 10-K, page 2
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	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. https://www.unglobalcompact.org/what-is-gc/participants/91841-Iron-Mountain Science Based Targets 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. 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. UK Modern Slavery Act: Our business and core values are premised on compliance and acting with integrity; therefore, we take adherence to laws, including the Act, seriously, and we are fully supportive of initiatives aimed at the eradication of both slavery and human trafficking across the globe. http://www. ironmountain.co.uk/-/media/files/About-Us/uk_modern_slavery_compliance_statement.pdf

| 102-13 | Membership of associations | 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), Business-Government Relations Council, 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), Northern Virginia Technology Council, Professional Records and Information Services Management International (PRISM), Renewable Energy Buyers Alliance (REBA), Sustainable Brands Corporate members, The New England Council |

STRATEGY

| 102-14 | Statement from senior decision-maker | CEO Statement, pages 3-5 |

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

2020 Proxy Statement |

STAKEHOLDER ENGAGEMENT

102-40	List of stakeholder groups	Stakeholder Engagement, page 11
102-41	Collective bargaining agreements	Approximately 7.0% of our workforce was covered by union representation in 2019, including approximately 550 employees in North America and approximately 1,200 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. All union and non-union employees are generally eligible to participate in our benefit programs, which include medical, dental, life, accidental death and dismemberment, short- and long-term disability and retirement savings plans as well as a well-being and resiliency program, LiveWell.
102-42	Identifying and selecting stakeholders	In Q4 2016, Iron Mountain, with the help of an external expert, refreshed our initial 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. See page 10 for more details.

102-43	Approach to stakeholder engagement	We engage with our stakeholders regularly, using channels that are most convenient to them. Throughout 2017 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, including customers, investors, peers and nonprofit organizations. 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 11 for more details.
102-44	Key topics and concerns raised	Stakeholder Engagement, page 11

REPORTING PRACTICE

102-45	Entities included in the consolidated financial statements	2019 10-K
102-46	Defining report content and topic Boundaries	Iron Mountain conducted its first materiality assessment in 2016 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. In 2019, we confirmed and validated that these issues are still the most relevant to our business. 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. See pages 10-13 for more details.
102-47	List of material topics	Material CR Topics are listed on page 10; Material GRI aspects are as listed in this Index.
102-48	Restatements of information	In 2019, Iron Mountain's environmental data collection platform was expanded to additional countries. During completion of our 2019 inventory, data gaps were identified and corrected for countries where we previously relied on estimated data. As a result, this report restates our total GHG emissions and energy consumption in 2018 and 2017. Iron Mountain's 2016 emissions data is restated to reflect the baseline established for our science-based target. See pages 20 and 37 for more details.
102-49	Changes in reporting	None
102-50	Reporting period	January 1, 2019 - December 31, 2019
102-51	Date of most recent report	May 2019
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Ryan Brandenburg, Manager, ESG Projects and Reporting Ryan.Brandenburg@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.
102-55	GRI content index	GRI Content Index, pages 44-58
102-56	External assurance	At this time, Iron Mountain has decided to not seek external assurance for the report. Iron Mountain will investigate this for future years.

TOPIC-SPECIFIC DISCLOSURES
GRI 103: MANAGEMENT APPROACH 2016

GRI 200: ECONOMIC

	ANSWER OR LOCATION IN REPORT

MATERIAL TOPIC: ECONOMIC PERFORMANCE

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 59	
103-2	The Management Approach and its Component. See Appendix A, page 59	
103-3	Evaluation of the Management Approach. See Appendix A, page 59	

GRI 201: ECONOMIC PERFORMANCE 2016

201-1	Direct economic value generated and distributed	2019 10-K, pages 27-29, 33, 46-51

MATERIAL TOPIC: ANTI-CORRUPTION

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 61
103-2	The Management Approach and its Component. See Appendix A, page 61
103-3	Evaluation of the Management Approach. See Appendix A, page 61

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 2019, there were 234 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 2019.
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 2019. 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 2019.

MATERIAL TOPIC: ANTI-COMPETITIVE BEHAVIOR

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 61
103-2	The Management Approach and its Component. See Appendix A, page 61
103-3	Evaluation of the Management Approach. See Appendix A, page 61

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 2019.

GRI 300: ENVIRONMENTAL

ANSWER OR LOCATION IN REPORT

MATERIAL TOPIC: MATERIALS

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 59
103-2	The Management Approach and its Component. See Appendix A, page 59
103-3	Evaluation of the Management Approach. See Appendix A, page 59

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. The boxes we purchase in North America are made with approximately 65% recycled material, and roughly 71% in Europe. These are purchased from preferred suppliers with chain-of-custody certification who follow environmentally responsible practices. These boxes are recycled once they reach the end of their storage life.

MATERIAL TOPIC: ENERGY

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 59	
103-2	The Management Approach and its Component. See Appendix A, page 59	
103-3	Evaluation of the Management Approach. See Appendix A, page 59	

GRI 302: ENERGY 2016

302-1	Energy consumption within the organization	Renewable Energy Progress, page 21 Performance Tables, page 37
302-3	Energy intensity	Performance Tables, page 37
302-4	Reduction of energy consumption	Renewable Energy Progress, page 21 Performance Tables, page 37

MATERIAL TOPIC: EMISSIONS

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 59	
103-2	The Management Approach and its Component. See Appendix A, page 59	
103-3	Evaluation of the Management Approach. See Appendix A, page 59	

GRI 305: EMISSIONS 2016

305-1	Direct (Scope 1) GHG emissions	Performance Tables, page 37 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.

305-2	Energy indirect (Scope 2) GHG emissions	Performance Tables, page 37 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.
305-3	Other indirect (Scope 3) GHG emissions	Performance Tables, page 37 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.
305-4	GHG emissions intensity	Performance Tables, page 37
305-5	Reduction of GHG Achieving Our Science-Based Target	Achieving Our Science-Based Target, page 20
305-6	Emissions of ozone-depleting substances (ODS)	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. We have identified an alternative to Halon and FM200 that has no GHG or ozone impact and meets all of our performance, safety and system requirements; however, it is substantially more costly. In 2016, we continued to have success with pilot test installations. Based on these results, we have banned Halon for all new systems, and we are evaluating system conversion on a site-by-site basis, particularly when building changes or capital projects require system upgrades. We are supporting policy changes to make destroying Halon eligible for carbon credits so we have a viable commercial alternative to reselling it to other users where it will likely be released into the atmosphere in the future.

MATERIAL TOPIC: EFFLUENTS AND WASTE

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 59
103-2	The Management Approach and its Component. See Appendix A, page 59
103-3	Evaluation of the Management Approach. See Appendix A, page 59

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.

306-2	Waste by type and disposal method	Performance Tables, page 37 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. Read more about this certification here http://e-stewards.org/learn-more/for-enterprises. In 2019, we helped our customers to responsibly dispose of 10,272 tons of electronics and backup tapes, 4,120 tons of X-ray film and 6,775 tons of plastic pharmacy bottles. 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 reoccurring 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. In 2019, 597,000 tons of cardboard and paper were recycled through this service.

GRI 400: SOCIAL

	ANSWER OR LOCATION IN REPORT

MATERIAL TOPIC: EMPLOYMENT

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 60
103-2	The Management Approach and its Component. See Appendix A, page 60
103-3	Evaluation of the Management Approach. See Appendix A, page 60

GRI 401: EMPLOYMENT 2016

401-1	New employee hires and employee turnover	Performance Tables, pages 40-41

401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Total Rewards, page 26 Full-time employees scheduled to work 30 or more hours per week are eligible for all of Iron Mountain's benefit programs. Part-time employees scheduled to work between 20 and 30 hours per week are eligible for certain benefit programs, including healthcare, commuter, EAP, wellness and legal benefits.
401-3	Parental leave	Performance Tables, page 43 Iron Mountain's parental and maternity leave benefits vary by country in order to ensure compliance with local laws and regulations. In the United States, our parental leave policy provides two weeks of fully paid leave to non-birth parents. A maternity disability benefit is available to employees following the birth of a child. This benefit provides 100% of pay for the first six to eight weeks of maternity disability. New parents are offered a variety of resources, including Employee Assistance, LiveWell as well as a Dependent Care Flexible Spending Account.

MATERIAL TOPIC: OCCUPATIONAL HEALTH AND SAFETY

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 60
103-2	The Management Approach and its Component. See Appendix A, page 60
103-3	Evaluation of the Management Approach. See Appendix A, page 60

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	Employee Safety, page 26 Performance Tables, page 42

MATERIAL TOPIC: TRAINING AND EDUCATION

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 61
103-2	The Management Approach and its Component. See Appendix A, page 61
103-3	Evaluation of the Management Approach. See Appendix A, page 61

GRI 404: TRAINING AND EDUCATION 2016

404-2	Programs for upgrading employee skills and transition assistance programs	Iron Mountain offers a wide array of learning and development programs for different roles, business functions and geographies. Our annual Code of Ethics training, which is mandatory for all employees around the globe, is part of a global compliance training strategy. Our award-winning Sentinel Program allows our frontline employees to be better prepared and supported in their daily responsibilities. New employees work with a Certified Coach and a Supervisor to complete e-learning, self-study, on-the-job and coach-led activities followed by in-market assessments and practice, before they are allowed to work independently and interface with our customers and their information. We offer many leadership programs, including the Sentinel Management Training Program, which emphasizes our core values, leadership characteristics, safety-always culture, our commitment to operational excellence and continuous improvement, and our ongoing dedication to positive employee engagement and customer experience.
404-3	Percentage of employees receiving regular performance and career development reviews	Performance Tables, page 43 We continue working hard to achieve our ambitious growth targets, ensuring we're building a strong culture that's focused on driving innovation and supporting our customers now and into the future – our people are vital to our success. At the end of 2017, we introduced a new global, 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 in turn will help our employees grow and deliver strong performance, give them clear expectations of what they need to deliver aligned to business performance, prepare them for the future and help us both attract and retain critical talent.

MATERIAL TOPIC: DIVERSITY AND EQUAL OPPORTUNITY

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 61
103-2	The Management Approach and its Component. See Appendix A, page 61
103-3	Evaluation of the Management Approach. See Appendix A, page 61

GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016

405-1	Diversity of governance bodies and employees	Performance Tables, pages 38-39 2020 Proxy Statement Leadership
405-2	Ratio of basic salary and remuneration of women to men	Gender Pay Gap Review, page 30

MATERIAL TOPIC: LOCAL COMMUNITIES

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 61
103-2	The Management Approach and its Component. See Appendix A, page 61
103-3	Evaluation of the Management Approach. See Appendix A, page 61

GRI 413: LOCAL COMMUNITIES 2016

413-1	Operations with local community engagement, impact assessments and development programs	Our Communities, pages 31-35 Performance Tables, page 43

MATERIAL TOPIC: CUSTOMER PRIVACY

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 62
103-2	The Management Approach and its Component. See Appendix A, page 62
103-3	Evaluation of the Management Approach. See Appendix A, page 62

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 2019, there were no significant complaints from regulatory bodies on data protection and privacy issues.

MATERIAL TOPIC: SOCIOECONOMIC COMPLIANCE

GRI 103: MANAGEMENT APPROACH 2016

103-1	Explanation of the Material Topic and its Boundary. See Appendix A, page 62
103-2	The Management Approach and its Component. See Appendix A, page 62
103-3	Evaluation of the Management Approach. See Appendix A, page 62

2. TOPIC-SPECIFIC DISCLOSURES

419-1	Non-compliance with laws and regulations in the social and economic area	We are committed to demonstrating responsible behavior in the communities where we operate, and in 2019 there were no significant fines or non-monetary sanctions for noncompliance with laws and regulations that are not disclosed in this report. 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 2020 Proxy Statement, https://investors.ironmountain.com/financials/annual-reports/default.aspx (page 26, PDF), 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, which is a nonpartisan 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.

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 our stakeholders, particularly stockholders, employees and our local communities. The topics described here are material to our shareholders and our employees.

Iron Mountain's financial performance and control of the company, including strategy and risk management, is the responsibility of the executive leadership team overseen by the Board of Directors. Annual targets are established across all aspects of financial performance, and performance against these 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. When deviations from projections and goals are encountered, a variety of remedies 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 offering includes 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 and, indirectly, our shareholders.

The Vice President, Environmental Social & Governance Strategy, who reports to the Executive Vice President Chief People Officer (a member of our Senior 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 Senior Leadership Team led by the CEO), has operational responsibility for environmental management. Our Code of Ethics and Business Conduct includes our views on protecting the environment and building sustainability (page 48) www.ironmountain.com/code. Our Chief Compliance Officer is responsible for monitoring compliance with the Code and provides a dashboard and an annual report on compliance to the Iron Mountain Board's Audit Committee. Our Chief Compliance Officer is responsible for monitoring compliance with the Code. He presents to the full Board on an annual basis and attends Audit Committee meetings to uphold an ongoing dialogue that includes addressing evolving risks and the need to enhance our standards, controls, trainings and monitoring mechanisms. Environmental policies are implemented at individual sites to ensure compliance with local environmental regulations.

A significant source of the materials we purchase is the corrugated cardboard boxes used to store our customers' records. Given the significant volume, we carefully select the boxes we purchase to minimize environmental impacts. The Senior Vice President of Procurement is responsible for overseeing corporate-wide purchasing, ensuring these boxes are purchased from preferred suppliers with chain-of-custody certification who follow environmentally responsible practices. Reducing our energy consumption and greenhouse gas emissions is a key focus in both our storage and data center businesses. Emissions resulting from energy use, direct releases of GHG emissions and business travel are closely tracked. In 2017, we began the process of implementing a system to globally aggregate all utility data. The process is now nearly complete for all utility providers across the globe. We are now adding GHG emissions from other sources that are currently tracking in separate systems so we will have a single system of record. Our telematics technology helps monitor fuel efficiency and identify opportunities

for improving fleet operations, which is overseen by country managers at the local level and a fleet manager at the corporate level. Iron Mountain reports energy and greenhouse gas impacts via the CDP climate change survey which lists the governance, strategy, risks, opportunities, projects and initiatives to reduce energy and emissions, and targets regarding our response to climate change in detail. Our response is accessible online at www.cdp.net. We have annual and long-term goals for energy and emissions that are described in this report. In 2018, we developed a science-based target for our carbon emissions, which was approved by the Science Based Targets initiative (SBTi) in Q1 2019. We also became a member of RE100 in 2018.

Our shred-all policy results in 100% recycling rate of paper in the United States and Canada. 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 site and regional levels are regularly assessed through data collection and analysis. Additionally, some metrics such as energy use and utility spend are reviewed monthly at the SVP 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. Ultimate oversight of strategic financial and non-financial goals for the company is reassessed in quarterly review processes and our annual strategic planning.

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 represents the demographics of the communities we serve and feel safe to bring their whole selves to work 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. We make the best decisions when we leverage the diversity of our talents, backgrounds and perspectives.

Iron Mountain believes that a free and competitive marketplace free of corruption offers us the best opportunity to succeed. By delivering value and providing best-in-class service, we 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. These topics are most material to our employees, shareholders, customers, regulators and suppliers. Iron Mountain is 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. Being a signatory to the UNGC requires annual disclosures of progress against the principles of the Compact, which Iron Mountain complies with as part of its annual reporting process.

EMPLOYMENT
Our 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. Our goal is to demonstrate a "zero incident" safety aspiration and culture across Iron Mountain's global footprint by 2025. In 2017, the Senior Executive Team prioritized the global safety framework and agreed to a timeline for implementation. Full implementation will take seven to eight years to achieve globally. In 2018, the program reached a major milestone by ensuring that all countries developed a country-specific roadmap that was approved by the Vice President of Global Safety in place.

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, cybersecurity, chain of custody and information security and risk management strategies and systems for the reporting of accidents, incidents and risks, and material investigations and remedial actions, as appropriate; it also reviews the Company's establishment and operation of its enterprise-wide risk management, or ERM, program which is designed to identify, assess, monitor and manage risk throughout the Company, and includes an annual management ERM report to the Board; it monitors the Company's insurance program and examines any other matters referred to it by the Board. The Risk and Safety Committee also considers climate risks as part of the corporate risk evaluation process.

TRAINING AND EDUCATION

The Vice President of Global Talent Management and Organizational Development oversees our enterprise-wide, end-to-end talent process, including learning and development.

DIVERSITY AND EQUAL OPPORTUNITY

The Senior Vice President and Chief Diversity Officer is responsible for policies and programs for diversity and equal opportunity and reports to our Senior Leadership Team led by the CEO. Inclusion and diversity and preventing harassment and discrimination are addressed in our Code of Ethics and Business Conduct.

ANTI-CORRUPTION

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 www.ironmountain.com/code. 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 Audit Committee meeting to uphold an ongoing dialogue that includes addressing evolving risks and the need to enhance our standards, controls, trainings and monitoring mechanisms. These efforts are led by the Senior Director, Privacy and Compliance, who reports to the EVP, General Counsel, who is accountable to the Board of Directors via the Audit Committee.

ANTI-COMPETITIVE BEHAVIOR

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. 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 Audit Committee meeting to uphold an ongoing dialogue that includes addressing evolving risks and the need to enhance our standards, controls, trainings and monitoring mechanisms. These efforts are led by the Senior Director, Privacy and Compliance, who reports to the EVP, General Counsel, who is accountable to the Board of Directors via the Audit Committee.

LOCAL COMMUNITIES

Iron Mountain's robust network and infrastructure of more than 25,000 employees and more than 1,450 facilities are actively engaged with our global community. We offer volunteerism, financial grant awards and in-kind service to nonprofits and non-government organizations to help make our neighborhoods a better place to work and live. Through our strategic charitable investment program, the Living Legacy Initiative, we help museums and other nonprofit institutions protect and provide access to cultural and heritage information. In addition, we also support our communities through our Moving Mountains volunteer program, which encourages employees to volunteer by offering paid time off and awards for their activism. These programs are led by Iron Mountain's Community Engagement Manager.

CUSTOMER IMPACT

Ensuring a positive customer experience is essential for both our customers and the growth of our business. Comprehensive customer surveys allow us to keep the pulse of the marketplace. In North America, our chief marketing officer is responsible for our Customer Experience program. We are currently aligning our international Customer Experience efforts more closely with the North American program and will report on progress in future reports.

CUSTOMER PRIVACY

Data security and privacy are at the core of our business and addressed in our Code of Ethics and Business Conduct and essential parts of our compliance programs. We work closely with customers represented in our Customer Advisory Board to anticipate and meet future needs in the market.

SOCIOECONOMIC COMPLIANCE

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 www.ironmountain.com/code. Our Chief Compliance Officer is responsible for monitoring compliance with the Code. He presents to the full Board on an annual basis and attends Audit Committee meetings to uphold an ongoing dialogue that includes addressing evolving risks and the need to enhance our standards, controls, trainings and monitoring mechanisms. These efforts are led by the Senior Director, Privacy and Compliance, who reports to the EVP, General Counsel, who is accountable to the Board of Directors via the Audit Committee.

Our Chief Compliance Officer provides an annual report on compliance with our Code of Ethics and Business Conduct to the Iron Mountain Board's Audit Committee.

The Risk and Safety Committee (1) based on reports provided by the Company's management, monitors (A) the adequacy of material fire, health, safety, security, business continuity, cybersecurity, chain of custody and information security and risk management strategies and systems for the reporting of accidents, incidents and risks, and (B) material investigations and remedial actions, as appropriate; (2) reviews the Company's establishment and operation of its enterprise-wide risk management, or ERM program, which is designed to identify, assess, monitor and manage risk throughout the Company, and includes an annual management ERM report to the Board; (3) monitors the Company's insurance program; and (4) examines any other matters referred to it by the Board.

The Board is responsible for oversight of the Company's management of enterprise risks. Iron Mountain senior management is responsible for the Company's risk management process and the day-to-day supervision and
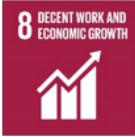
mitigation of enterprise risks. We have a comprehensive risk management program, where our executive leadership team is provided regular reports by our operational teams and standing committees on enterprise risk, emerging trends and issues. Our executive leadership team reviews and prioritizes significant risks, allocates resources for mitigation and provides the Board with regular reports on areas of potential Company risk, including strategic, operational, information security, human resources, financial, legal, compliance, REIT and regulatory risks. The Board, or the committee of the Board assigned responsibility for a specific area of risk, receives updates from the Company executive accountable for understanding and mitigating the identified risk. The chair of each committee provides a summary to the Board of such committee's risk discussions during the next regularly scheduled Board meeting. The Board also formally reviews the Company's overall risk position and risk management processes at least annually. This practice allows the Board and each of its committees to remain coordinated in their oversight of enterprise risk. The Risk and Safety Committee provides additional support to the Board in ensuring that the Company's enterprise risk management program includes the enterprise risk management framework and governance structures are appropriate and operating effectively and to ensure sufficient expertise and continuity between the Board's annual reviews.

Our management approach to the customer experience is continuously reviewed for any needed changes based on the feedback received from our customers.

SUSTAINABLE DEVELOPMENT GOALS

The following Sustainable Development Goals (SDGs) were supported by Iron Mountain activities and operations during 2019. As a signatory to the UNGC, Iron Mountain is committed to pursuing policies, strategies and procedures, as well as creating a culture of integrity that supports all 10 principles of the UNGC as well as the SDGs.

GOAL	DESCRIPTION	SUPPORTED BY ACTIVITIES
3 GOOD HEALTH AND WELL-BEING	Ensure healthy lives and promote well-being for all at all ages	See 201-1; 305-1; 305-2; 305-3; 305-4; 305-5; 305-6; 401-2; 413-1; 403-2
4 QUALITY EDUCATION	Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all	See 102-8; 404-3; 405-1
5 GENDER EQUALITY	Achieve gender equality and empower all women and girls	See 102-8; 404-3; 405-1; 102-8; 102-18; 102-16; 401-1; 401-2; 401-3; 401-13
6 CLEAN WATER AND SANITATION	Ensure availability and sustainable management of water and sanitation for all	See 306-1
7 AFFORDABLE AND CLEAN ENERGY	Ensure access to affordable, reliable, sustainable and modern energy for all	See 302-1; 302-3; 302-4

8 DECENT WORK AND ECONOMIC GROWTH	Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all	See 403-2; 102-8; 102-41; 401-2; 401-13; 302-4; 305-5; 413-1
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation	See 302-4; 305-5; 413-1
10 REDUCED INEQUALITIES	Reduce inequality within and among countries	See 102-8; 401-3; 404-1; 404-3; 405-1
11 SUSTAINABLE CITIES AND COMMUNITIES	Make cities and human settlements inclusive, safe, resilient and sustainable	See 306-2; 302-10; 403-2
12 RESPONSIBLE CONSUMPTION AND PRODUCTION	Ensure sustainable consumption and production patterns	See 301-2; 306-2
13 CLIMATE ACTION	Take urgent action to combat climate change and its impacts	See 305-1; 305-2; 305-3; 305-4; 305-5; 305-6

14 LIFE BELOW WATER	Conserve and sustainably use the oceans, seas and marine resources for sustainable development	See 302-4; 302-5; 305-5; 306-1; 301-24; 413-1; 413-2
15 LIFE ON LAND	Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification and halt and reverse land degradation and halt biodiversity loss	See 301-1; 301-2; 302-4; 302-5; 305-5; 301-23; 301-24; 301-25; 301-28; 413-1; 413-2
16 PEACE, JUSTICE AND STRONG INSTITUTIONS	Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels	See 102-16; 102-17; Environmental DMA; 205-2; 205-3; 206-1; 418-1; 419-1
17 PARTNERSHIPS FOR THE GOALS	Strengthen the means of implementation and revitalize the global partnership for sustainable development	See 102-16; 102-17; 205-1; 205-2; 205-3; 419-1

IRON MOUNTAIN®

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