IRON MOUNTAIN 2022

SUSTAINABILITY REPORT

IRON
MOUNTAIN®

This report represents our commitment to enhance stakeholder awareness of our sustainability priorities and describes how our performance is contributing to long-term value creation and a sustainable, responsible and customer-centric business model.

LETTER FROM OUR PRESIDENT AND CEO

As I reflect on the last year, our responsibility to take care of each other and our planet has never been more important.

Over the past year, we saw devastating events like the war in Ukraine, the continued loss of so many loved ones from the effects of COVID across the globe, Hurricane Ian in the United States, Typhoon Megi in the Philippines, Tropical Cyclone Freddy in Southern Africa and Mozambique, floods in India and Brazil, and more recently, earthquakes in Turkey and Syria.

As business leaders, we have a responsibility to support our people and communities no matter how dynamic or difficult the times are.

There are many tangible ways that we can act responsibly, including building resilient operations that march towards net zero carbon dioxide impact by 2040, our continued building of a truly diverse, global and inclusive workforce, and conducting ourselves with the very best governance standards.

We take our purpose to "protect and elevate the power of our customers' work" to heart, and seek to do all we can to embed this in the way we create sustainable solutions and services for our customers. Over the past year, I'm proud that we've made meaningful progress in our sustainability efforts, not only for our company but in support of our communities and helping our customers achieve their sustainability goals.

EXPANDING OUR CAPABILITIES TO SUPPORT OUR CUSTOMERS

In 2022, we completed the acquisition of ITRenew, as part of our growth strategy for our Asset Lifecycle Management (ALM) business. Through ALM we're able to provide hyperscale and corporate information technology (IT) infrastructure managers with secure services and solutions for decommissioning, data erasure, processing, and recycling or remarketing of hardware and components to the very highest information security and environmental standards.

To help our customers measure and communicate their progress towards their sustainability commitments, we have also developed an Environmental Benefits Report for ALM services helping them quantify the progress made in diverting electronic waste from landfills and reducing their greenhouse gas emissions.

SECURING A SUSTAINABLE FUTURE

We continue to increase the procurement of renewable electricity, reaching 1 million MWh in 2022, an increase of 13%. Our fleet electrification program and energy efficiency projects are delivering strong results. In 2021 we made our intent to reach net zero emissions by 2040 clear by joining the Climate Pledge. This year, we'll submit an updated goal to the Science-Based Targets initiative (SBTi) in alignment with their Business Ambition for 1.5°C requirements.

DELIVERING ON OUR COMMITMENTS

In this report, you'll see that we have successfully achieved seven of the ambitious sustainability goals we set in 2021. These achievements include increasing the coverage of our gender pay parity reporting to incorporate all global operations, expanding the coverage of our waste reporting, and publishing a Global Human Rights policy.

Whilst there's much more to be done, I'm very proud of what we've accomplished so far, and I invite you to learn more about our efforts in this report. As we go forward we'll continue to be transparent about our progress keeping our core values as our foundation for all that we do.

Yours sincerely,

William L. Meaney
President and CEO, Iron Mountain

ABOUT IRON MOUNTAIN

OUR PURPOSE

TO PROTECT AND ELEVATE THE POWER OF OUR CUSTOMERS' WORK.

WHO WE ARE

For more than 70 years, Iron Mountain Incorporated (NYSE: IRM) has been your strategic partner to care for your valuable assets. A global leader in storage and information management services, and trusted by more than 225,000 organizations around the world, including 95% of the Fortune 1000, we protect, unlock, and extend the value of your information and assets – whatever they are, wherever they are, however they're stored.

We provide the framework necessary to bridge the gap between physical and digital and extract value along the lifecycle of your information, enabling organizational resilience. And all this with a commitment to sustainability at our core.

OUR VALUES

ACT WITH INTEGRITY	We are open and honest and live our values every day.
OWN SAFETY AND SECURITY	We protect ourselves and each other from harm, and secure our customers' assets as if they were our own.
BUILD CUSTOMER VALUE	We constantly look for ways to better serve our customers and improve their business.
TAKE OWNERSHIP	We take personal responsibility for the success of our teams, our customers, and our company.
PROMOTE INCLUSION AND TEAMWORK	We look for and value each other's unique ideas and perspectives to get better results.

AWARDS AND RECOGNITION

Listed on the 2022 FTSE4Good Index

RE100 Key Collaborator Award

Scored a 90% on the Disability Equality Index

Forbes' America's Best Large Employers List 2022

Mogul's Top Pioneers in Diversity and Inclusion 2022

LEADERSHIP SPOTLIGHT

EDWARD GREENE

Edward Greene named among the Most Influential Black Executives in Corporate America by *Savoy* Magazine

KEY FACTS AND FIGURES

60
COUNTRIES

225,000
CUSTOMERS

6
CONTINENTS

1951
FOUNDED

1,400
FACILITIES

26,000
EMPLOYEES

$5.1B
US FISCAL 2022 REVENUE

95%
OF THE FORTUNE 1000

97M
SQ. FT. OF REAL ESTATE

OUR APPROACH TO SUSTAINABILITY

> **SUSTAINABILITY:** "A sustainable future ensures we stay within the limits of the planet and provides a strong quality of life for generations to come."
>
> - **World Wildlife Fund**

SECURING A SUSTAINABLE FUTURE

We believe a sustainable future is only possible through collaboration. When we make commitments together – with our customers, suppliers, and the communities where we operate – we can not only multiply our efforts, but can also make sustainable behaviors more accessible and achievable.

We're securing a sustainable future by partnering with our customers, enabling them to make better decisions about how they manage their most valuable information and assets. We're supporting our employees with a culture of diversity and inclusion, and it is through their efforts that we deliver on our promises to our customers and to our communities. And we're elevating the quality of life in those communities where we operate through our commitments to environmental and social sustainability.

At Iron Mountain, we're using our influence and expertise to drive innovations that will not only protect and elevate the power of our customers' work but will also make a lasting, positive impact on people, the planet and performance. We regularly evaluate which sustainability topics are most material to our business. Our 2022 materiality assessment used the double-materiality approach. During this process, we asked stakeholders to consider environmental, social and governance (ESG) topics from both an internal and an external perspective. The results allow us to identify which topics have the most impact on Iron Mountain as a business and where Iron Mountain has an impact on society. See the results on page 49.

OUR FOUR SUSTAINABILITY PILLARS

SAFEGUARDING CUSTOMER TRUST	To be our customers' most trusted partner for unlocking business value.
PROTECTING OUR PLANET	To take responsibility for a sustainable future by unlocking opportunities in our operations and beyond.
EMPOWERING OUR PEOPLE	To have past, current and future employees view their experiences at Iron Mountain as an accomplishment and a source of pride.
STRENGTHENING OUR COMMUNITIES	To catalyze positive change in the communities in which we operate.

SUSTAINABILITY GOALS

TRACKING OUR PROGRESS

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

We recognize that achieving the goals we set requires continual focus, collaboration and innovation. The sustainability team is responsible for meeting with functional and business unit leaders to monitor progress toward our commitments. This collaboration allows teams to track the effectiveness of our programs aimed at improving our sustainability performance. In addition to a twice-a-year executive leadership meeting to review progress on goals and ensure action plans are adjusted as needed to achieve our goals, the sustainability team also produces a quarterly dashboard for the executive leadership team to keep them apprised of progress throughout the year.

WATCH

In 2022 we sat down with Iron Mountain executives to understand how our goals keep us on track for our journey to net zero and how we can be responsive to the needs of the communities where we live and work.

To safeguard customer trust, protect our planet, empower our people and strengthen our communities we intend that:

GOAL	STATUS	LOCATION
By 2022, we will develop or adopt a brand trust indicator metric and report our baseline.	Complete	Page 11
By 2023, we will complete a climate scenario analysis.	Complete	Page 16
By 2023, we will increase our reporting coverage of waste and recycling data to at least 90% of our global operations.	Complete	Page 16
By 2023, we will expand gender pay parity reporting to cover all global operations.	Complete	Page 25
By 2022, we will create or adopt a process to measure the community impact of our business decisions.	Complete	Page 33
By 2025, through our Living Legacy Initiative, we will launch 50 new educational resources that unlock the value of the past, help shape the future, and strengthen our communities.	Complete	Page 33
By 2023, we will adopt and implement a global human rights policy.	Complete	Page 11
Iron Mountain will achieve net-zero emissions by 2040, 10 years ahead of the Paris Climate Accord.	In Progress	Page 17
By 2040, we will use 100% clean electricity 100% of the time in our data centers. To accelerate decarbonization of the grid, we are going beyond our RE100 commitment of 100% renewable electricity. We will use the Google methodology for matching site- by-site electricity use with local clean power generation every hour of every day to achieve 24/7 clean power.	In Progress	Page 19
We commit to transitioning 100% of company cars and 50% of vans to EVs by 2030. As an initial step, we commit to converting 10% of our worldwide fleet to EVs by 2025.	In Progress	Page 23

GOAL	STATUS	LOCATION
By 2040, we will drive circular economy innovation by working toward zero waste in our operations and collaborating with others to create closed-loop products and services.	In Progress	Page 22
We will relentlessly strive to be a world-class employer in every region in which we operate.	In Progress	Page 24
By 2025, we will tighten our threshold for gender pay parity from +/-10% to achieve +/- 5% across all organizational levels in the U.S., Canada, and the UK.	In Progress	Page 47
By 2025, women will represent 40% of global leadership.	In Progress	Page 29
By 2025, people who identify as BIPOC will represent 30% of U.S. leadership.	In Progress	Page 29
By 2030, as part of our commitment as a signatory to the EU Climate Neutral Data Centre Pact, all Iron Mountain data centers worldwide will be climate neutral.	In Progress	Page 19
We will maintain a 100% renewable electricity supply for our global data center business and achieve 90% renewable electricity corporate-wide by 2025 – 15 years ahead of our RE100 commitment.	In Progress	Page 19
By 2040, our business decisions will have a net positive impact on our communities.	In Progress	Page 33
By 2025, Iron Mountain employees will contribute a total of 100,000 hours of volunteer time to our communities through our Moving Mountains program.	In Progress	Page 35
By 2025, all new construction multi-tenant data center facilities will be certified to the BREEAM Green Building Standard.	In Progress	Page 21
We will go beyond our current science-based target (25% reduction of absolute GHG emissions from our 2016 baseline) and by 2025 will achieve a reduction of 25% of GHG emissions from Scope 1 and 2 energy sources from our 2019 baseline.	In Progress	Page 17

Q+A WITH GLOBAL HEAD OF COMMUNICATIONS AND SUSTAINABILITY, RANDEEP SOMEL

INTRODUCTION

In 2022, Iron Mountain welcomed Randeep Somel to lead our global communications and sustainability efforts. As the former lead for funds focused on ESG and positive impact investing, Randeep comes to Iron Mountain with extensive experience in sustainability.

Q **What are you most excited about as you step into your new role at Iron Mountain?**

A I have joined a talented team and a company with an excellent culture. These are important ingredients for a long-term successful organization. This is a forward-looking company that is focused on continuously providing new and improved solutions for their customers. The size and scale of our operations – our customers include 95% of the Fortune 1000 companies – highlights the positive and lasting difference we can make. Before joining Iron Mountain, I spent nearly two decades as a sustainability and impact-focused investor. This gave me the opportunity to look across geographies, industries and market capitalizations at companies that were leaders in their fields. It is now a privilege to join a company like Iron Mountain, a leader in its field, and to be a part of the wonderful journey we are on.

Q **How do you think your role as both the Global Head of Sustainability and Communications can help Iron Mountain accelerate its progress in sustainability and meet its growth ambitions?**

A The trust that we have built up with over 225,000 customers across 60 countries is important to our future. We are part of major global secular trends: the growth of data and the growth of electronic waste, to highlight two. Iron Mountain has moved with both customer needs and technology to increase our offerings in areas such as colocation data centers and asset lifecycle management. These business units address a growing business need for our customers, while also providing an opportunity for them to reach their own sustainability goals.

It now falls on us as communicators to ensure that all of our stakeholders are aware of the future direction of Iron Mountain. For our customers, it's how we have developed services and processes to equip them for the changing landscape ahead, and for our colleagues and future talent, it's the positive long-term direction for all Mountaineers. For the communities where we currently operate, and where we look to operate in the future, it's by demonstrating the responsible social partner that we are and can be.

Q **What do you think are the strengths of Iron Mountain's sustainability work?**

A An organization can only offer sustainable services once it has a plan to improve the sustainability of its own operations. Iron Mountain has done tremendous work in reducing our absolute greenhouse gas emissions, while simultaneously expanding the size and scope of our operations. We continue improving our standards across many environmental, social and governance areas. The services we offer have a strong basis in helping our customers with their own sustainability goals: from data centers powered by renewable energy and the remarketing and recycling of our customers' IT equipment to the sustainable transportation of fine art. For this to come together, we need clear and independent methods to verify and communicate our sustainability work. Iron Mountain has a track record for reporting through adherence to reporting standards from GRI, TCFD, CDP and SBTi. The key from here is to continue to improve and be prepared for all new disclosures on the horizon, such as the EU's Corporate Sustainability Reporting Directive (CSRD) and, in the U.S., the SEC's climate-related disclosures.

Q **What are Iron Mountain's customers looking for today as it relates to sustainability?**

A Customers are looking for credible partners. They want partners who understand their business needs and their sustainability priorities. As the regulatory and disclosure landscape continues to evolve, we need to integrate our operations more with our customers to ensure we deliver on all of their priorities. At Iron Mountain we will continue to evolve our existing product range and develop new products and solutions that will help customers improve their operations and achieve their sustainability aspirations.

Q **Why are sustainability commitments important for organizations like Iron Mountain?**

A Sustainability commitments direct the entire organization towards shared goals. Commitments can energize an organization – an organization of over 26,000 people in our case. Commitments impact teams across the business, from the finance team who are responsible for allocating capital to frontline colleagues who use new equipment and technology while servicing our customers. Our employees know that not only are they working to make our organization more efficient, but also that they help provide a net positive impact for our customers and society. Sustainability commitments provide all stakeholders with clear communication on a company's direction. While they tend to be longer term, we use intermediate points to ensure we remain on the right path.

SAFEGUARDING CUSTOMER TRUST

DELIVERING ON OUR COMMITMENTS

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

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

HUMAN RIGHTS POLICY

Iron Mountain understands the importance of protecting, upholding and advancing respect for human rights. In 2021, we made a public commitment to publish a Human Rights Policy by 2023. A Human Rights Policy is a statement that underlines Iron Mountain's dedication to upholding fair business practices and ensuring that all individuals have the right to be treated with dignity and respect. We are pleased to share that we have now formally approved and published an enterprise-wide policy available on our sustainability webpage.

Our Human Rights Policy builds upon the strong foundation laid by our existing policies, such as the Code of Ethics and Business Conduct and the Policy Against Discrimination, Harassment, and Bullying. We worked with teams from across the business and enlisted the help of an external consultant to create a policy that aligns with international standards.

BRAND TRUST METRIC

We set a goal that we intend to develop or adopt a brand trust indicator metric and report our baseline in order to understand our customers' perception of our brand and to evaluate the effectiveness of our initiatives.

External reporting frameworks and rating agencies can play an important role in benchmarking, measuring progress, and identifying opportunities for an organization. The Iron Mountain Sustainability team has identified a collection of internationally recognized frameworks that can be used to monitor our progress on sustainability issues that are material to our business and that could impact brand trust.

We have implemented an internal annual review process during which we analyze our performance metrics as they relate to the selected frameworks and identify areas that may require further focus. We established a baseline using the 2021 annual ratings and seek to continuously improve on these metrics.

CUSTOMER CONNECTION

AWARD WINNING INNOVATION

We believe that collaboration with customers can drive innovation. We're excited to announce that we were awarded the 2022 Best Data & Technology Solution innovation award for our Asset Lifecycle Management (ALM) solution at the CBRE Global Workplace Solutions Leadership Conference in Dallas, TX. For their annual Global Supplier Partner Innovation Challenge, we presented our ALM solution, sharing a business case and customer case study. We are honored to have received the award from CBRE, a leader in commercial real estate services and investment.

SUSTAINABLE PRODUCTS AND SERVICES

We recognize the important role we play in our customers' value chain. Several years ago, we recognized an opportunity to leverage our sustainable business practices to add value to our product offerings.

Last year, we introduced a methodology we use to determine if an offering has the attributes necessary to be considered a sustainable solution. It was important to us that the criteria be underpinned by a rigorous methodology that meets the expectation of all stakeholders. This methodology, developed in collaboration with a Fellow from MIT's Sustainability Lab and reviewed by external business leaders and subject matter experts, evaluates offerings using the following criteria:

1. **Solves Customer ESG Needs:** The product resolves a significant, relevant and clearly defined ESG challenge for the customer.

2. **Comprehensive Evaluation:** The product claims are supported by transparent analysis across the product lifecycle.

3. **External Endorsement:** The ESG claims are the subject of endorsement or collaboration with a credible external organization.

4. **Responsibly Marketed:** The product marketing accurately represents ESG claims and any risks.

In 2022, we further developed and tested this methodology, applying it to over a dozen existing products and services. We also built the process into our innovation lifecycle. What we found was that this work has to go beyond our product and innovation teams – it requires us to build internal knowledge with marketing, communications, sales, and other functions across the business.

"At Iron Mountain we accelerate the value of our customers' data by accelerating innovation. We are energized by a spirit of inclusion and compassion to solve emerging and complex new challenges as the world shifts to increasingly more data-driven and virtual environments."

– Mithu Bhargava, EVP Digital Solutions

Q+A WITH HEAD OF GLOBAL PRIVACY, JULIA BONDER-LE BERRE

INTRODUCTION

Data privacy has long been a material topic for Iron Mountain, and it has become particularly important with the expansion of digital services. Our stakeholders understand the importance of privacy and data protection – whether it pertains to compliance with applicable laws or assurances that data stored with Iron Mountain is safe and secure and that its processing is in line with relevant regulations and industry best practices. Iron Mountain's Head of Global Privacy, Julia Bonder-Le Berre, provided her thoughts on the topic.

Q   **What is Iron Mountain's approach to data privacy?**

A   Iron Mountain is a global organization, and our approach to privacy and data protection is also global. While we have an established Global Privacy Program, we continuously put efforts into maturing our overall privacy and data protection posture to meet evolving regulatory requirements and industry best practices. As a service provider whose core business is to safely and securely manage customers' records, and enable our customers' transformation by digitizing and unlocking the potential of their data, we understand the responsibility that comes with global data privacy requirements. While technology and regulations evolve, privacy compliance and data security have become main risk areas for many of our customers. To remain a trusted business partner and a custodian of their valuable data assets, our approach to privacy needs to evolve to meet the expectations of our customers.

Q   **What are some of the key areas of data privacy you and your team are monitoring?**

A   Today, organizations are expected not only to comply with privacy and data protection laws, but to actively demonstrate how they comply. As part of that, our customers are running more rigorous checks and require us to provide evidence of our privacy practices. To that end, our efforts are focused on enhancing processes that are foundational for our global privacy compliance, including that we are reinforcing a culture of privacy among our employees. In addition, our efforts are focused on privacy by design to ensure that privacy and security are embedded in our products and services. As an example, we are currently assessing global data residency requirements of our customers to ensure they are considered as we plan consolidation of our IT infrastructure. This approach will help us increase data security, enable savings and grow our digital business portfolio with confidence.

Q   **How does the global digital transformation impact data privacy?**

A   Historically, our data privacy profile was limited given that our core business focused on storing records on paper and tapes and managing their life cycle until safe disposal. With the global digital transformation, our business opportunities are changing and our focus is shifting to digital services. In particular, we are growing our scanning services and data analytics services. That move from non-digital to digital changes our data privacy risk profile. Our response is to step up our privacy compliance posture and use of privacy enhancing techniques to ensure that we remain a trusted business partner to our customers worldwide.

Q   **One of Iron Mountain's Sustainability Pillars is Trust. How do you think of data privacy as it relates to Trust?**

A   The trust of our customers is critical to our business and determines our relationship with them. At all times, our customers expect that we handle their data in a responsible and secure manner and that our services assist them with their privacy compliance requirements. Transparency is at the core of every trusted relationship. And this is why we are making continuous efforts to communicate to our customers the breadth of our data processing services. Trust is a key driver in advancing our sustainability efforts, and something we think about each day as we serve our customers. Our privacy compliance and data protection practices are key to maintaining that trust.

ASSET LIFECYCLE MANAGEMENT

ACQUIRING ITRENEW

At Iron Mountain, we are committed to being our customers' most trusted partner and continually seek to expand our portfolio of products and services to help our customers meet their environmental goals.

In 2022, we acquired ITRenew, a leading provider of sustainable asset disposition, recycling and remarketing solutions. Its comprehensive portfolio of best-in-class decommissioning and data security services has now been fully integrated into our Asset Lifecycle Management (ALM) business unit.

The ALM business unit provides our customers with an end-to-end platform approach and an extensive portfolio of solutions for their IT Asset Lifecycle Management needs. From secure and efficient IT asset decommissioning with a transparent, traceable chain of custody and comprehensive audit-ready data erasure, to multiple primary and secondary paths for retired hardware remarketing for higher value recovery and lower total cost of ownership. Our reportable, environmentally responsible services and our circular approach to reclaim, remarketing and recycle help reduce carbon and electronic waste (e-waste) in compliance with required laws and regulations.

Our ALM solutions can also help our customers reach their own environmental goals. According to the Global e-Waste Monitor 2020 report, the world generates in excess of 50 million metric tons of e-waste annually, of which just over 17% is recorded as having been recycled. If current trends continue, the annual figure is projected to grow to close to 75 million metric tons by 2030.

We provide our customers with secure IT asset disposition services that help them contribute to the circular economy by decreasing the amount of e-waste going to landfills, recapturing value from retired electronics, protecting their information by securely erasing sensitive data and reducing greenhouse gas emissions.

IRON MOUNTAIN PROCESSED OVER 2,200 METRIC TONS OF E-WASTE IN 2022 ON BEHALF OF OUR CUSTOMERS.

THIS IS EQUIVALENT TO THE WEIGHT OF 320 ELEPHANTS!
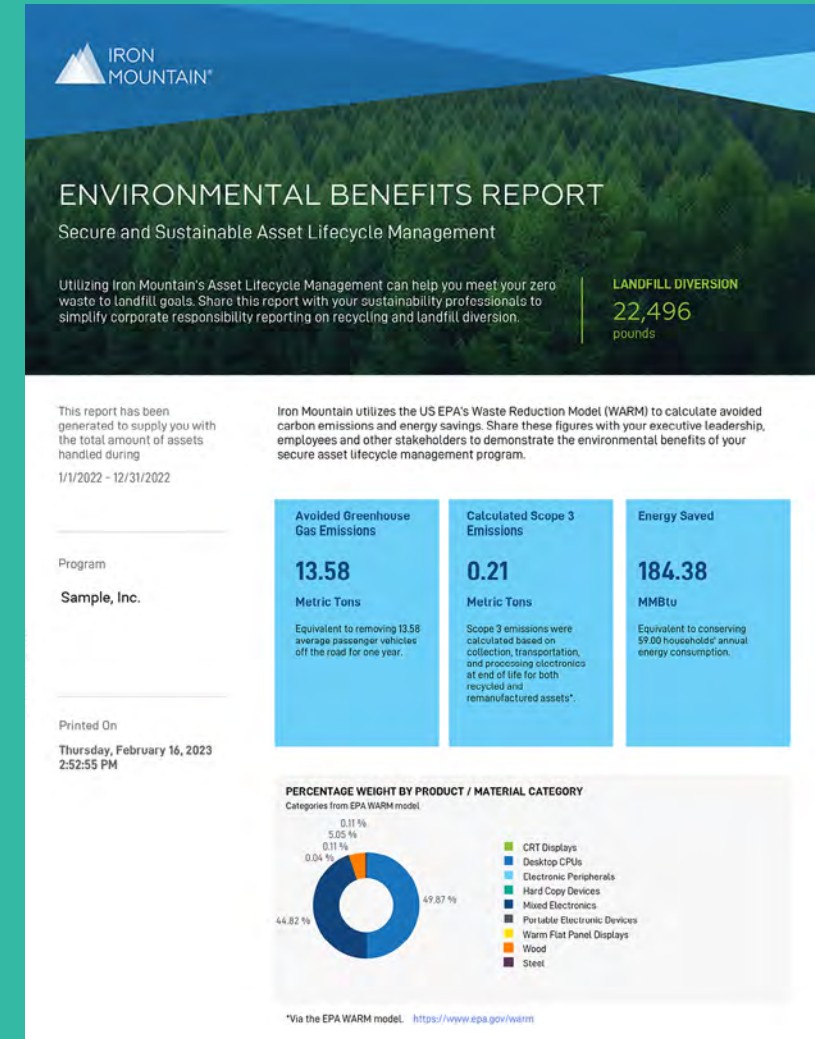
ENVIRONMENTAL BENEFITS REPORT

Data is essential for managing an effective sustainability strategy and can help our customers measure and communicate their progress toward sustainability goals. We created an Environmental Benefits Report for the ALM division in order to provide actionable data and appropriate documentation about the benefits of appropriately managing end-of-life IT assets with Iron Mountain. The report data and accompanying visuals summarize measurements such as weight diverted from landfills, carbon emissions avoided, calculated Scope 3 emissions, energy saved, and percentage of materials remarketed versus recycled. Based in part on the U.S. Environmental Protection Agency's Waste Reduction Model (WARM), the report supports sustainability reporting and decision making with auditable, activity-level data.

PROTECTING OUR PLANET

DELIVERING ON OUR COMMITMENTS

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

CLIMATE SCENARIO ANALYSIS

Iron Mountain recognizes the importance of a climate scenario analysis to inform our strategy. In 2021, we announced that we would complete a climate scenario analysis by 2023. Our risk management process has included consideration of the impacts from climate change and reinforced the value of a formal climate scenario analysis.

To complete the analysis, we partnered with BSR, a global nonprofit that works with its network of over 300 member companies to build a just and sustainable world, to explore the strategic implications under three climate-related scenarios for 2050. BSR used three climate scenarios developed by the Network for Greening the Financial System to facilitate discussions and workshops with subject matter experts and leaders from across the business to better understand Iron Mountain's risks and opportunities related to climate change. The analysis culminated in an executive-level strategic implications workshop that identified opportunities to enhance Iron Mountain's resilience and refine our strategy around hotspots common across the three scenarios.

The analysis will inform the next steps in advancing our efforts to mitigate climate-related risks and realize climate-related opportunities. Our Sustainability team will continue to meet with business unit and functional leaders to discuss implementation of the recommendations from the analysis and further embed climate resilience into our strategy. You can read more about our climate scenario analysis and the results of the process in our Task Force for Climate-Related Financial Disclosures (TCFD) report available on our sustainability webpage.

WASTE DATA VISIBILITY

We believe that data enables progress. That's why we set the following goal in 2021: we will increase our reporting coverage of waste and recycling data to at least 90% of our global operations by 2023. We achieved this goal using a combination of utility waste vendor provided data, gap analysis and estimations to achieve 100% reporting coverage. Our complete waste footprint is available in our Sustainability Performance Summary on page 40.

CUSTOMER CONNECTION

OPPORTUNITY STREAMS

Waste diversion and circular economy are key components of many of our customer's environmental ambitions. We help customers identify materials in their operations that could be inputs for other products and processes, instead of sending them directly to the landfill. This includes helping our customers recycle their waste back into their own supply chains utilizing both mechanical and molecular recycling. We are re-envisioning "waste streams" as "opportunity streams." You can read more about this process here.

GREENHOUSE GAS EMISSIONS

OUR JOURNEY TO NET ZERO

We have set ambitious goals and have made industry-leading commitments to reduce our greenhouse gas emissions. In 2019, The Science Based Targets Initiative (SBTi) approved our first science-based target ("SBT"), covering all scopes of emissions. We became signatories of the Climate Pledge in 2021 with a commitment to reach net-zero emissions by 2040. In 2022, we submitted our letter of commitment to the SBTi Business Ambition for 1.5°C campaign. As part of this process, we intend to update our short-term SBT to align with 1.5°C climate science and submit a net-zero target for SBTi validation in 2023.

We are using a measured approach to expand the reach of our emissions reductions initiatives and identify opportunities to decarbonize our operations. Our path to net zero focuses on reducing energy use, electrifying our systems and vehicles, installing renewable energy systems, and procuring green power. Our approach has delivered meaningful reductions to our emissions. To date we have reduced Scope 1 and 2 emissions by 32% compared to our 2016 baseline.

IDENTIFYING NET-ZERO BUILDINGS

With a global real estate portfolio of over 1,400 facilities in more than 60 countries, we recognize that there is an opportunity to reduce energy use and implement onsite renewable energy solutions at our facilities. In 2022, we worked with an Environmental Defense Fund (EDF) Fellow to develop a methodology and criteria to identify locations that have the potential to reach net-zero energy. The project team led by the EDF Fellow compiled energy demand and generation data for our facilities and developed a methodology for assessing progress towards net-zero energy status. Based on the analysis, the team made standardized recommendations for energy efficiency and renewable energy generation measures. We seek to build, maintain, and operate every building in the Iron Mountain portfolio in ways that support our net zero ambitions.

Iron Mountain has reduced Scope 1 and 2 greenhouse gas (GHG) emissions by 32% compared to our 2016 baseline, while more than tripling electricity consumption and growing revenue by more than 40%.

REPORTING ON OUR VALUE CHAIN

We have a track record for continuous improvement as it relates to our data collection and reporting processes, renewable energy procurement, and managing our direct emissions. We recognize that it is also important to leverage our scale and expertise to advance our Scope 3 emissions reporting and to help our suppliers set emissions reduction targets that are aligned with our commitment to net zero by 2040.

In 2022 we took the initial steps to improve our understanding of emissions that occur in our value chain. Our work has been informed by the GHG Protocol Scope 3 guidance and leverages tools such as the U.S. Environmental Protection Agency's Waste Reduction Model. The additional sources of Scope 3 emissions in this report are indicative of our commitment to transparency and our belief that data is a key enabler of progress. This data, along with vendor-engagement activity that began in 2023 will lead to future reporting advancements and opportunities for collaboration.

1 Determine relevant scope 3 categories

2 Estimate GHG emissions

3 Improve and expand emissions estimate over time

Source: www.epa.gov/climateleadership/scope-3-inventory-guidance

RENEWABLE ENERGY

RENEWABLE ENERGY PROCUREMENT STRATEGY

Iron Mountain has built strong renewable energy capabilities as evidenced by our designation as a top 30 purchaser of green power in the U.S. We are on our way to being 100% powered by renewable electricity by 2040 as part of our RE100 commitment, the global initiative for businesses to commit to 100% renewable electricity. Our global operations were 85% powered by renewable energy, and we procure the equivalent of 100% of the electricity used in our data centers with renewable energy. Our portfolio of renewable energy solutions includes onsite generation, green retail energy supply, and virtual power purchase agreements for wind and solar power. We work closely with our utility data aggregation and advisory services partner to evaluate the utility-level green power landscape, including green tariffs and other utility-specific programs. We also seek to expand onsite solar and are currently investigating opportunities in our Asian, European and Latin American operations. As of 2022, there were 47 facilities with onsite solar arrays in our global real estate portfolio, representing a cumulative system size of more than 18.5 MW.

24/7 CARBON-FREE ENERGY SOLUTION

In 2021, we set a 2040 goal to be using 100% clean electricity 100% of the time in our data centers. We made significant strides towards that goal in 2022. We worked to improve the ability to track the hourly needs at over 100 of our facilities in the United States and announced a series of electricity procurement transactions that will provide carbon-free energy 24 hours a day, 7 days a week to many facilities across the portfolio. The 24/7 carbon-free energy concept describes a situation where a facility has all of its hourly forecasted energy needs met all of the time, as opposed to matching energy load on an annual basis like many conventional renewable energy solutions do.

ELECTRICITY CONSUMPTION (MWH) AND RENEWABLE ENERGY USE (%) OVER TIME

Legend: Total Electricity Consumption — Total Renewable Electricity Consumption — Percent Renewable
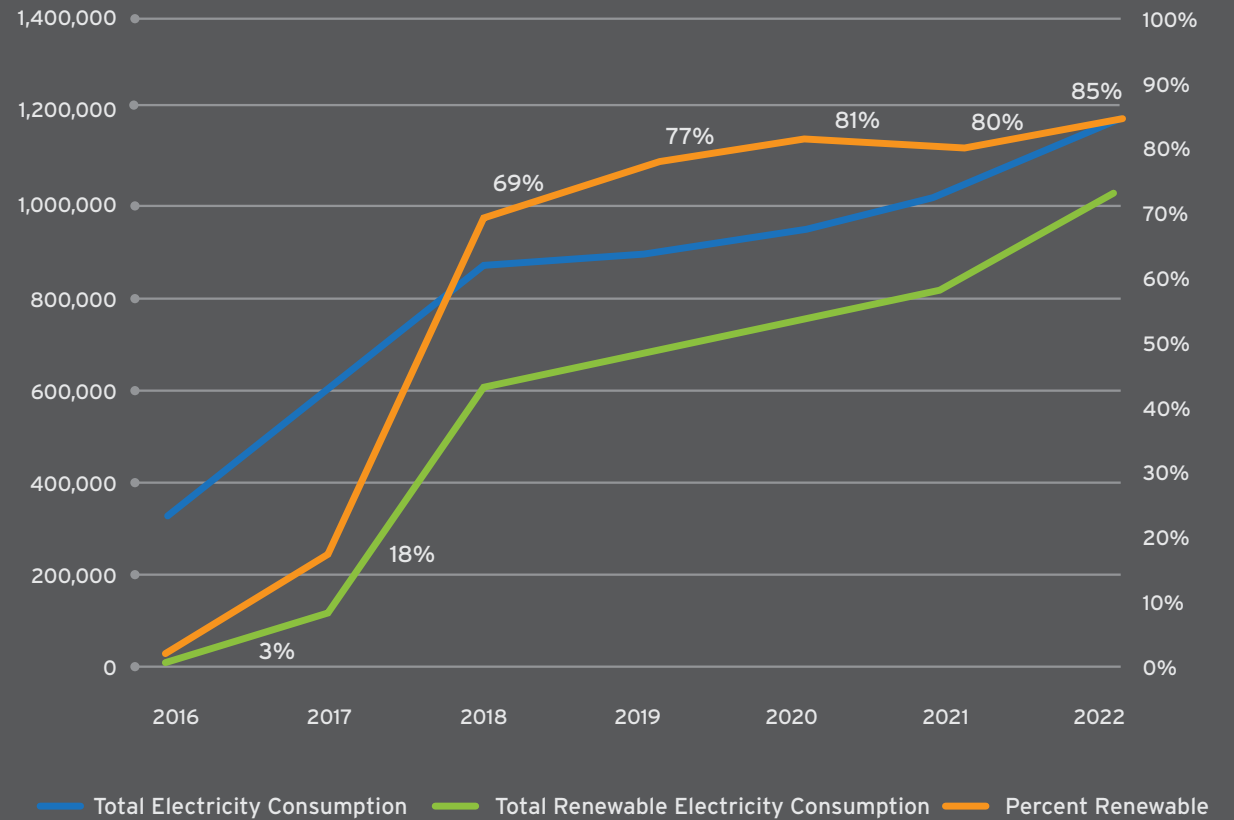
"Businesses today are increasingly focused on decarbonizing across their full value chain. As a critical component of our customers' supply chain, we are able to demonstrate our ability to help them achieve their carbon reduction goals through transactions like these. This supports our 24/7 carbon-free energy goal of meeting our electricity needs with locally produced clean energy, every hour of each day, helping our organization reach its target of net-zero GHG emissions."

— Chris Pennington, Director of Energy and Sustainability at Iron Mountain Data Centers

RE100 LEADERSHIP AWARDS

Iron Mountain proudly accepted the RE100 Leadership Award for the Key Collaborator category during Climate Week in New York City in 2022. The RE100 Leadership Awards recognize RE100 members who are "transforming the renewable electricity sector." The awards are managed annually by the Climate Group, an international nonprofit dedicated to addressing climate change. The Key Collaborator category focuses on organizations that collaborate with other industry peers and suppliers while demonstrating a dedication to transparency in data disclosure. Our nomination focused both on our efforts to achieve 24/7 carbon-free energy for our global operations by 2040 and on the partners we have worked with to reach these ambitions. We worked with RPD Energy to investigate enhanced retail service solutions and with Cleartrace to capture real-time data on both electricity use and greenhouse gas emissions through their hourly carbon accounting and energy traceability platform. This program will allow us insight into the renewable energy that is generated and the amount of energy consumed on the path to 24/7 matched usage.

Deborah Marson, Executive Vice President, General Counsel and Secretary, accepted the RE100 Leadership Award on behalf of Iron Mountain during Climate Week in New York City.

BOYERS: MULTIPLE RENEWABLE SYSTEMS

As an example of our renewable energy strategy in action, the Iron Mountain Data Center site in Boyers, Pennsylvania, is deploying multiple onsite renewable solutions. The site, situated in a former limestone mine with a natural reservoir, is a location well suited for a data center due to consistent low temperatures and water availability. The U.S. Department of Energy's Better Buildings Challenge as part of the Better Buildings Initiative recently recognized the site's advanced geothermal cooling mechanism, initially implemented in 2013. The data center portion of the Boyers site is the country's first underground facility to receive an Energy Star certification.

The Boyers site also recently signed an agreement for an onsite solar power system as part of a Power Purchase Agreement. The installation will represent Iron Mountain's largest onsite system and is estimated to cover up to 25% of the annual power load.

Iron Mountain Data Centers stepped up to DOE's Better Buildings Challenge in 2016.

WATCH Better Buildings Virtual Site Visit: Iron Mountain Data Centers.

GREEN BUILDINGS

FIRST-EVER BREEAM DESIGN-CERTIFIED DATA CENTER IN NORTH AMERICA

As a company with a large real estate footprint, we recognize that we can reduce a building's lifelong environmental footprint through innovative design and construction. In 2021, we set a goal that by 2025 we intend for all new construction multi-tenant data center facilities to be certified to the BREEAM Green Building Standard. We demonstrated our commitment to green building in 2022 when we announced that our AZP-2 data center in Phoenix, Arizona. It became the first data center in North America to receive a BREEAM Excellent New Construction Standard certification.

Key components of the design include:

- Energy use modeling and simulations
- Low-impact building material selection
- Water efficiency measures that reduce water use by 50%

As we continue on our growth trajectory, it is critical that we integrate green building and design into our physical locations in order to meet our sustainability ambitions. Iron Mountain's Sustainability team and global real estate teams intend to assess additional green building certification opportunities across the portfolio in 2023.

ENERGY EFFICIENCY PROJECTS

We have made significant strides to increase our energy efficiency. Historically, our programs have included a variety of solutions, including LED retrofits, installation of programmable thermostats and HVAC optimization programs. In 2022, we installed programmable thermostats at 11 sites and retrofitted 12 sites with over 8,600 LED fixtures globally. Our site consolidation strategy, active in select markets, allows us to reduce energy consumption through consolidation and increase efficiency through program implementation in newly consolidated locations. Looking ahead, we intend to conduct virtual energy audits and site surveys to identify opportunities in addition to our ongoing HVAC optimization and LED retrofit programs. We intend to collect further information about historic site-level energy-efficiency efforts as part of our refreshed science-based target and report on these findings in subsequent reporting cycles.

To improve power use effectiveness (PUE) at our data centers, we developed a comprehensive method focused on energy demand analysis, precise modeling and strategic project selection. We launched the program at our Denver data center in 2021 when we completed the initial analysis. In 2022, we upgraded the chiller plant and computer room air-handling units at the Denver data center and expanded the program to the Scottsdale data center where we completed an initial opportunity assessment.

With the BREEAM design certification of our Phoenix, AZ (AZP-2) data center, we hope to demonstrate the steps facility owners can take to ensure that their data centers are both efficient and resilient.

SUSTAINABLE RESOURCE USE

REDUCING RESOURCE USE: WASTE, WATER AND REFRIGERANTS

Reducing resource use and waste is a key component of our zero waste to landfill and circular economy ambitions and supports our efforts to be responsible environmental stewards.

REDUCING WASTE:

- Our Zero Waste Program Team, established in 2021, worked with a third-party waste advisory firm to collect data for locations where visibility is currently limited in order to better understand the type and amount of waste being generated. The team also implemented a zero waste pilot program at 15 sites. Under the pilot, the facilities added additional recycling streams to reduce the amount of waste sent to landfills, and employees were educated on proper waste diversion.

MANAGING WATER USAGE:

- Our irrigation control program, launched in 2021 at 41 of our facilities, resulted in over 11.3 million gallons of water saved in 2022. We will continue to explore additional water reduction activities in 2023.

- At our data center facilities we are developing solutions to upgrade our older facilities to reduce water consumption and be more aligned with our new construction facilities that use very little water for cooling.

REPORTING ON REFRIGERANTS:

- We expanded our refrigerant management pilot program which was initially launched in eight sites in 2021. The program's objectives are to calculate refrigerants under management and quantify their associated climate impact, develop a plan to remove potent refrigerants and establish a refrigerant management strategy moving forward. Demonstrating our commitment to transparent reporting of our greenhouse gas footprint, our 2022 greenhouse gas inventory includes estimated emissions associated with refrigerants for the first time due to the early successes of this pilot.

History of Halon Destruction and Iron Mountain's Innovative Solution

Halon fire suppression systems were noted for their safety and effectiveness when first deployed in the 1960s. However, it was later discovered that the halon types commonly used in fire suppression are more than 7,000 times as potent as carbon dioxide when leaked into the atmosphere. New production was banned in 1994, but many installations, including at some Iron Mountain storage facilities, were allowed to keep their existing halon systems.

Knowing that the systems present a risk both to our business and the environment, Iron Mountain set out five years ago to find a sustainable solution for halon disposal. There were few options at the time. We leveraged our partnership with carbon credit project developer Tradewater and clean agent fire protection system provider Wesco to develop an innovative, environmentally responsible end-of-life solution.

The responsible destruction of halon results in carbon credits acting as an incentive for businesses to responsibly dispose of their halon stores. In 2022, Wesco and Iron Mountain partnered to deliver more than 5,000 pounds of decommissioned and contaminated halon gas to Tradewater for a pilot destruction project to put the new end-of-life solution to work. Microsoft purchased the resulting carbon offsets to meet its voluntary carbon credit commitments.

FLEET ELECTRIFICATION

Transportation is a material issue for Iron Mountain. Vehicles are vital to our operations, and vehicle emissions represent approximately 46% of our Scope 1 greenhouse gas emissions. Fleet electrification is an essential component of our emissions reduction strategy and allows us to reduce exposure to fossil fuel prices and local emissions regulations. The Iron Mountain truck is a visible image that can be seen on roadways across the globe and represents an opportunity to drive the message about our net-zero commitment to our communities.

To date, our efforts to electrify our fleet have focused on building a solid foundation. We have convened a cross-functional team of subject matter experts, secured support from executive sponsors, and established a senior-level electric vehicle (EV) integration steering committee. We have tested our program elements, completed viability assessments, and begun to implement launch plans for both EVs and an EV charging infrastructure – with the help of our main charging partner, Enel X Way. We have also joined EV100, a global initiative for companies who are working to transition their fleets to EVs. We have committed to transition 10% of our total fleet to electric by 2025 and electrify 100% of our cars and 50% of our vans by 2030. These efforts have resulted in a total of 91 EVs in service or on order in 13 countries to date, including 37 EVs added in 2022.

> "Achieving our sustainability goals is a team sport. We work closely with a cross-functional internal team as well as with external partners. They all have an important role in ensuring the success of our fleet electrification program."
>
> - Yulia Roman, Program Manager overseeing Iron Mountain's fleet electrification initiatives

We took time in 2022 to celebrate these achievements. We held launch events in the UK, Brazil and Mexico in an effort to energize our employees and inform our customers about supporting their sustainability goals through our EV ambitions. We will continue to evaluate leases and contracts for vehicles in our fleet to identify additional regions across the globe where we can expand our electric fleet. Looking forward, we intend to add EVs in 13 additional countries and will continue to explore the transition of our truck fleet.

EMPOWERING OUR PEOPLE

DELIVERING ON OUR COMMITMENTS

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

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

GENDER PAY PARITY

In 2019 we set a goal to expand gender pay parity reporting to cover all global operations by 2023. We are proud to announce that this year's report includes pay parity reporting on all global operations that are covered by our internal human resources database. See the performance table titled Female to Male Average Compensation Ratios pages 47-48 for this reporting.

"Addressing the gender pay parity gap is an issue for employers across all industries. This is one reason Iron Mountain has embedded structural inclusion into our processes and policies, including increasingly transparent reporting. To that end, we're investing in HR technology for better real-time analysis and insights. Aligned with our broader equity strategy, an improved platform will help us better identify opportunities to close pay gaps where they exist, including gender."

- Michael Forbes, Senior Director, Compensation

CUSTOMER CONNECTION

2022 Education series and InfoGoTo resources.

Each year Iron Mountain hosts a webinar series where thought leaders shed light on solutions to challenges that our customers might face. The 2022 Education Series included a session focused on ways to incorporate sustainability thinking into decision-making. Subject matter experts from Iron Mountain discussed the functions that are critical to achieving sustainability goals and how internal collaboration can drive sustainability initiatives forward. You can view our Education Series webinars here. We also continued to offer resources to customers on our InfoGoTo platform. Headlines from our blog posts in 2022 included:

- ESG Expectations Have Accelerated. But How And Why?
- Breaking Down Organizational Silos To Meet Sustainability Goals: Everyone Has A Role To Play
- How ESG Thrived Through The Pandemic And What We Learned From It
- Get A Head Start On ESG Reporting
- For True Sustainability, Your Supply Chain Matters
- Everyone Plays a Role sustainability series

CULTURE AND EMPLOYEE ENGAGEMENT

In 2021 we announced that Iron Mountain created a new dedicated Culture and Engagement (C&E) team. The C&E team is charged with forming partnerships across the enterprise to discover opportunities to enrich our culture and showcase how our employees are living our values every day. The C&E team collaborates with Talent Acquisition, Talent Development, and Total Rewards teams, Global Communications, PR, Diversity, Equity, and Inclusion, Innovation, Global Safety and Security, Global Privacy and Compliance and others to build and sustain a culture of recognition, continuous learning, wellbeing, innovation, diversity, equity, inclusion and belonging.

Along with our company values, Iron Mountain strives to be a culture of voice, wherein every employee experiences the safety, confidence and trust they need to contribute to their fullest potential, including giving and receiving feedback fairly and frequently. We believe that employee engagement is the Mountaineer's measure of commitment to the company's purpose and goals, and an indicator of employees' mental and emotional connection to their work.

In 2022, the C&E team, along with a mix of cross-function colleagues, worked together to update the Employee Engagement Survey, called IM Listening. The goal of the survey is to explore the employee experience and facilitate an environment wherein employees are able to provide valuable and connected feedback to managers. Efforts included an enhanced survey design and a methodology linked to employee experience, business priorities and external benchmarks. As part of the survey process, we also implemented a better-constructed approach for action planning, called IM Listening in Action, which calls on all people leaders to shape meaningful activities based on the survey results. The survey and action planning process allows us to gather deeper insights and promote drivers of engagement and retention.

The C&E team has now built a Global Culture Network of more than 2,000 Mountaineers. Members of the Culture Network are crucial collaborators who provide diverse insight and perspective to the C&E team while inspiring fellow Mountaineers. We also scaled our successful global recognition program, Values in Practice (VIP), to include a new VIP Leadership Award. As part of the new program, 561 Mountaineers recognized their direct managers who they felt demonstrated company values in a way that inspires others. The 2022 VIP Awards saw 350 Mountaineers recognize their colleagues as outstanding Iron Mountain value ambassadors at all levels.

WATCH

See in our Culture Video and Engagement Video, launched in 2022, what Mountaineers from around the world had to say about what it means to work at Iron Mountain.

2022 Employee Engagement Survey Results
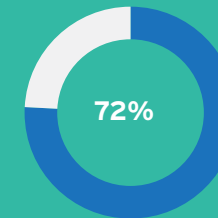
72% ENGAGEMENT INDEX SCORE

82% OVERALL PARTICIPATION RATE

ENGAGING EMPLOYEES IN SUSTAINABILITY

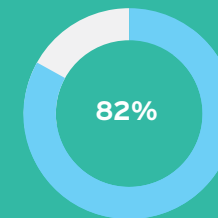## EMBRACING EMPLOYEE INTEREST IN SUSTAINABILITY

Employees are at the heart of our sustainability strategy. We believe that when our employees engage with sustainability issues, we are better able to meet our sustainability goals and can more effectively recognize and understand our customers' sustainability needs. We launched a sustainability survey in 2022, where we learned that 80% of Mountaineers want to understand more about how to incorporate sustainability and contribute to our company's sustainability goals in their everyday work. To support our employees in this endeavor, in 2022 we launched the Positive Impact Newsletter, an internal publication. This newsletter keeps our employees up to date on Iron Mountain's sustainability programs and provides resources to help them learn more about sustainability topics affecting our employees, customers and communities. Additionally, we publish the "Everyone Plays a Role" employee sustainability stories on our external website and amplify through social media channels.

GREEN LIGHT INNOVATION CAPTURE PROJECT

In an effort to catalyze innovation and tap into our employees' creativity, the innovation team launched the Green Light Innovation Capture Project. When the United States Patent and Trademark Office® (USPTO) announced it will fast-track the next 1,000 patent applications that reduce greenhouse gas emissions, we saw an opportunity to invite Mountaineers from across the globe to share sustainability ideas. There were 43 submissions from Mountaineers in 12 countries. After a formal review process, the final two winning ideas were filed with the USPTO.

"Thanks to numerous pep talks from my manager, I submitted ideas for the Green Light Innovation Capture Project. I was ecstatic to have one of my pitches selected, especially considering how many smart submissions there were. This will be the first patent application of my career, and hopefully one of many! I'm proud to work at a company that prioritizes sustainability and invests in innovation."

- Lucy Yan, one of the winners of the Green Light Innovation Capture Project
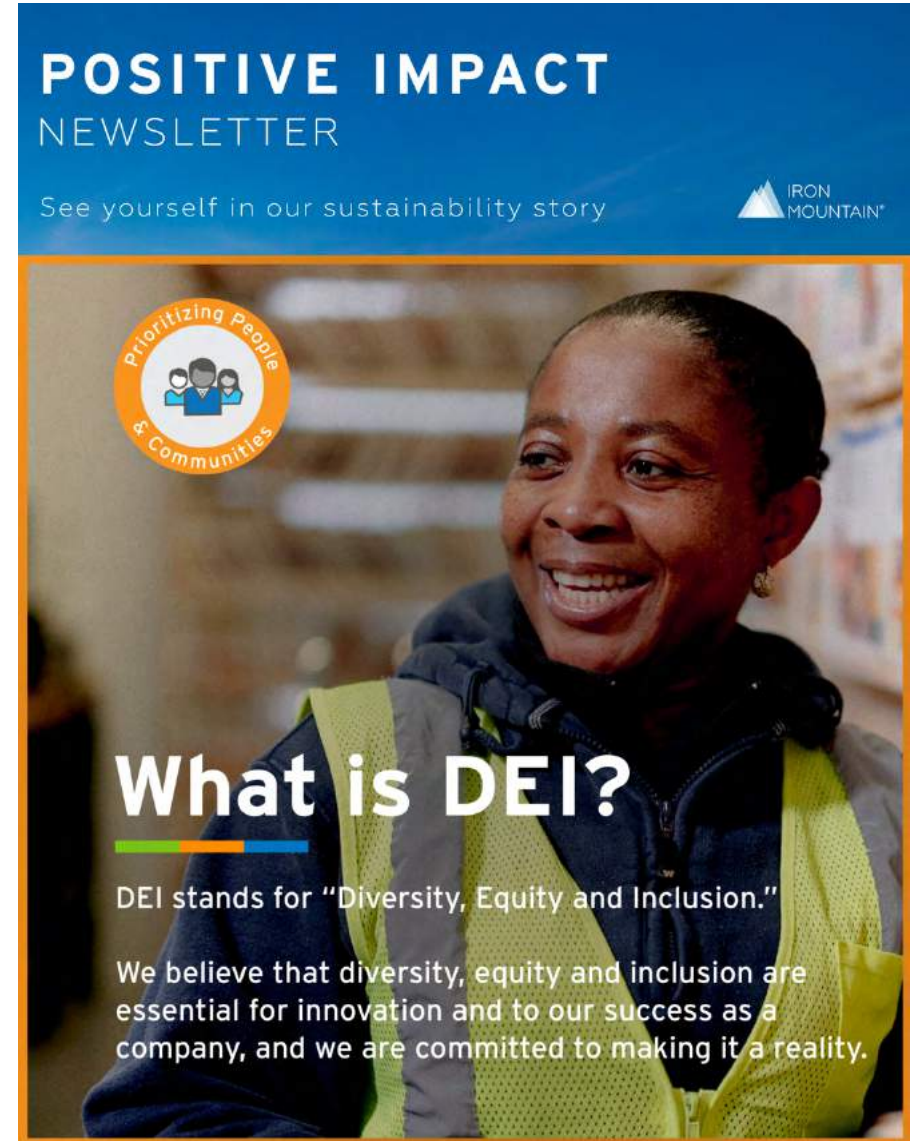
TRAINING AND DEVELOPMENT

We believe that a focus on curiosity and continuous learning not only supports innovation and allows us to provide better solutions for our customers, but it also helps our employees achieve their career ambitions and reach their potential. We offer our employees a variety of training and development opportunities that augments and supports our robust on-the-job skills-based training programs. We launched our global Management Development Program (MDP) in 2021 and nearly doubled the program's reach in 2022. The 12-week program guides people managers through learning modules focused on key leadership concepts and allows participants to network with peers in their cohort. As of Q4 2022, 30% of MDP alumni received a promotion or role expansion, a testament to the program's early success. Also in its second year, the Supervisor Development Program (SDP) continued to bring frontline supervisors through a comprehensive learning framework.

The Leadership Essentials Initiative, a program launched in 2022, saw over 2,300 employees activate virtual LinkedIn Learning licenses. As part of the program, licenses were offered to all Mountaineers with titles from supervisor to senior vice president, and courses span a wide variety of topics including leadership, effective communication, project management, skills-based tools, sustainability, and others. To encourage participation and facilitate collaborative learning, the Training and Development team launched the following programs as part of the Leadership Essentials Initiative:

• Formal discussion groups, known as Course Clubs, that explore a variety of courses in greater depth

• Career Pathfinder with tools to create a career roadmap

• Quarterly and Year-End Peak Learner recognition for top participants

We intend to expand the program's reach approximately 60% in 2023 to include coordinator to senior vice president roles. The program will also provide targeted and tailored communications to ensure that every participant is aware of the training and career development tools available to them.

2022 LEARNING AND DEVELOPMENT PROGRAMS	AUDIENCE	NUMBER OF PARTICIPANTS 2022	HOURS OF CONTENT CONSUMED 2022
Management Development Program (MDP)	People Managers	246	3,444
Supervisor Development Program (SDP)	Frontline Supervisors	33	297
Leadership Essentials Initiative	Supervisor to Senior Vice President	2,363 Licenses Activated	3,059
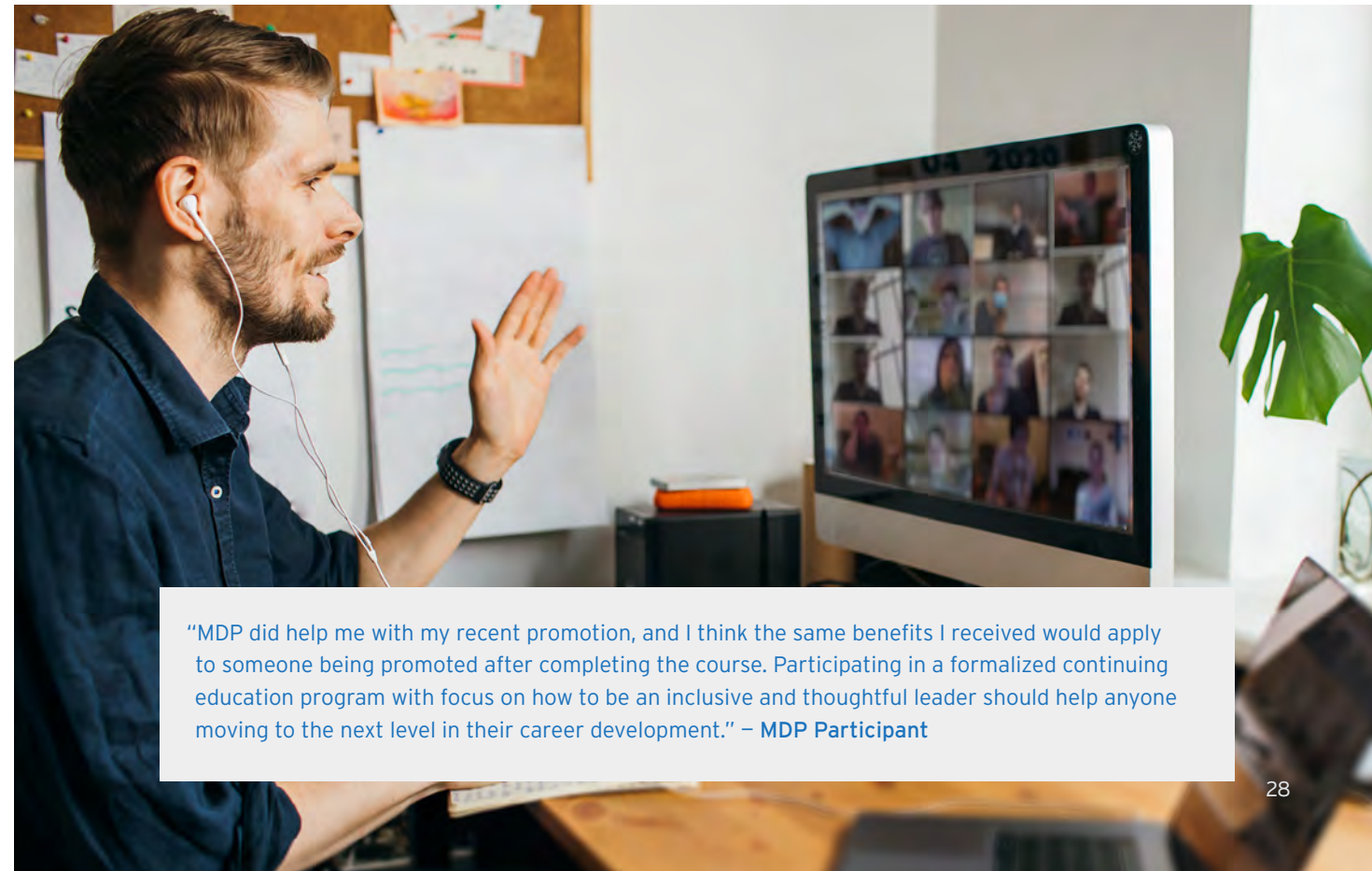
"MDP did help me with my recent promotion, and I think the same benefits I received would apply to someone being promoted after completing the course. Participating in a formalized continuing education program with focus on how to be an inclusive and thoughtful leader should help anyone moving to the next level in their career development." – **MDP Participant**

DIVERSITY, EQUITY, AND INCLUSION

Iron Mountain is creating a culture where the words we say are matched by a universal sense of belonging – where all employees feel that their contributions are valued, their voices are heard, and they have the opportunity to achieve their goals and meet the needs of our customers. We recognize that a culture of belonging is critical for an organization to thrive. We seek to ensure that our organization reflects our customers and the communities in which we live. We strive to attract, develop, retain and empower high-quality individuals with diverse perspectives. We believe this approach leads to better business decisions and is a catalyst for innovation and growth.

To enable this cultural transformation, we have employed a framework that is focused on aligning our strategy with our business priorities; measuring and tracking our progress; auditing our systems, policies and processes to ensure our structures facilitate inclusiveness; retaining our most valued assets – our employees; and ensuring accountability at all levels. These efforts have resulted in Iron Mountain's recognition as a 2022 Top Pioneer in Diversity and Inclusion by Mogul, an HR tech and executive recruiting firm. This award sought to identify companies that have affected positive change in their organizations through prioritizing and advancing diversity and inclusion.

As a global company operating in 60 countries, it is critical that we have a global strategy that is locally relevant. In order to understand "locally relevant," our DEI team visited with our employees, customers, vendors and local charitable foundations in numerous countries to understand their lived experiences. Our goal is not to export a U.S.-centric solution around the globe, but to understand the challenges and opportunities in each country we serve. The information and stories gathered on the tour will be used to inform our ongoing global strategy.

Our Global Chief Diversity, Equity and Inclusion Officer works closely with our executive team, human resources, Sustainability, the DEI Councils and our employee resource groups (ERGs), all of whom support the strategy in a variety of capacities. The **Global DEI Council** is made up of the executive team and is chaired by the CEO. The Council supports the DEI strategy and initiatives, monitors the progress of DEI initiatives and the enterprise goals, ensures accountability based upon identified measures and goals, and communicates DEI progress to stakeholders. In 2021, we set the following ambitious goals: By 2025, we intend that women will represent 40% of global leadership, and individuals from underrepresented groups will represent 30% of U.S. leadership. As of 2022, women represented 31% of global leadership, and individuals from underrepresented groups represented 24% of U.S. leadership. The Global DEI Council is responsible for providing the resources to help us reach our goals to attract and retain a high-performing and diverse team, but also acts fervently to retain our talent.

2022 DIVERSITY IN LEADERSHIP* ROLES

*Director and above

Legend: BIPOC (US Only) · Women (Globally) · Women in Leadership Goal · BIPOC in Leadership Goal
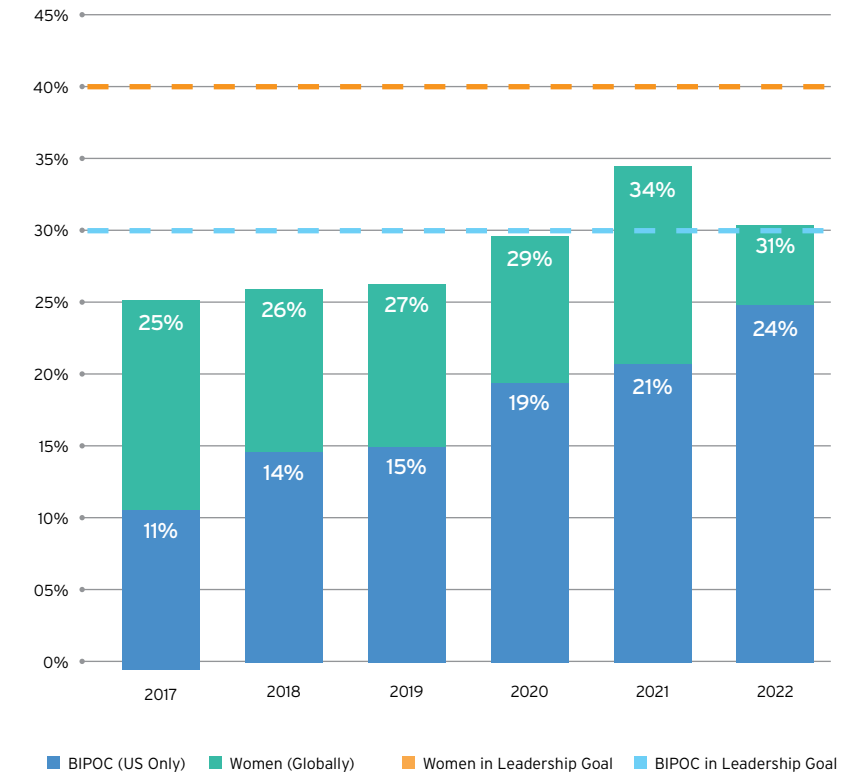
EMPLOYEE RESOURCE GROUPS

Our volunteer-based **employee resource groups** represent cultural and marginalized groups and provide an opportunity for members and their allies to create a safe, inclusive environment. Mountaineers from around the globe participate in our ERGs, working together to offer educational content and other programming to all employees. Selected highlights from our ERGs in 2022 include:

- A three-part Innovations Series led by the **BlackColleagues@IM, NAAsians@IM, Veterans@IM**, and the Innovation team highlighted ongoing innovation initiatives at Iron Mountain and informed participants how they can contribute to the innovation of Iron Mountain products and services for the future.

- A four-part education and discussion forum was hosted by the **Capable@IM ERG** as part of National Disability Employment Awareness Month (NDEAM). The forum culminated with a panel moderated by Deborah Marson, Iron Mountain's General Counsel and Co-Executive Sponsor for the Capable ERG. Edward Greene, Chief Human Resource Officer, and Charlene Jackson, Global Chief Diversity, Equity and Inclusion Officer, were featured panelists.

- The **LGBTQ+ and Ally@IM ERG** hosted a number of events to celebrate Pride Month in June. Topics and resources included LGBTQ+ benefits in the areas of transgender healthcare and family creation available for Iron Mountain employees in the U.S., the work done by nonprofit partner CyArk to help document and preserve an LGBTQ+ historical landmark, and a guest speaker who discussed their insights and experiences on how to empower the LGBTQ+ community.

- The **Women@IM ERG** hosted a Professional Speaker Series that provided tools and resources to participants in the areas of financial literacy and professional development.

- The **Veterans@IM ERG** supported the annual Wreaths Across America campaign and helped coordinate wreath-laying ceremonies to honor the veterans of the United States Armed Forces.

ENABLING EMPLOYEE SUCCESS

FLEXIBLE WORKFORCE

Our workforce has adopted new tools and learned new techniques to effectively and efficiently operate in the new, and often virtual, work environment. The move to a collaborative and productive hybrid work environment enables many of our employees to thrive in their roles. In 2021, we laid the groundwork for a flexible workforce model by evaluating how our employees work and what they need to be successful. In 2022, we launched our formal Global Flexible Workplace Model which provides an opportunity for employees to work remotely or in a hybrid model when the type of arrangement and role profile allows. You can read more about our flexible workforce model in our Flexible Workplace Statement available on our sustainability webpage.

DRIVER SAFETY

Our value of owning safety and security applies to all facets of our business including the safety of our employees on the road. Transportation is an integral component of our operations, and driver safety is a key component of our health and safety efforts. Our robust peer-to-peer training and safety observation programs provide the tools and techniques drivers need to be successful, and our telematics programs allow us to collect data on vehicle maintenance requirements and vehicle use to ensure our drivers are operating vehicles that are safe.

GREENROAD WORLD CUP

We've also continued to build on our successful driver safety programs through a 13-year partnership with GreenRoad, a fleet safety software company that offers a safe-driver coaching and gamification platform. The Iron Mountain Transportation Team expanded our driver safety engagement program, the GreenRoad World Cup, to 32 countries in 2022. The program tracks safe behaviors on the road using data captured from the platform. The data also captures fuel usage information and shows a direct correlation between safer driving techniques and behaviors and fuel efficiencies through direct practices like reduced idling. Best scoring drivers are rewarded with prizes, and the friendly cross-country competition allows participants to compete on behalf of their teams. The Transportation Team looks forward to expanding this program in 2023.

Lucky Isemimen was recognized for the third year in a row as having the best score as part of the GreenRoad World Cup program. Lucky's supervisor had this to say about this stellar Mountaineer:

"It is an absolute pleasure for me to manage such a hardworking, positive, customer-focused and safety-driven employee. For Lucky to be recognized for the third consecutive year is a prime example of his focus, dedication and consistency to be the best every day."

STRENGTHENING OUR COMMUNITIES

DELIVERING ON OUR COMMITMENTS

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

MEASURING COMMUNITY IMPACT

We set a goal in 2021 that we intend that our business decisions will have a net positive impact on our communities by 2040. To quantify our impact, we set an interim goal to create or adopt a process to measure the community impact of our business decisions by 2022. In our 2021 Sustainability Report, we announced the achievement of this goal with the creation of our Community Impact Framework that uses a combination of Global Reporting Initiative (GRI) standards and metrics sourced from IRIS+ Catalog of Metrics.

LAUNCHING EDUCATIONAL RESOURCES

We also set a goal that we intend to launch 50 new educational resources through our Living Legacy Initiative by 2025. We are proud to announce that we achieved this goal three years early. More information can be found in the section titled Corporate Philanthropy: Living Legacy on of this report.

CUSTOMER CONNECTION

Digitization to Better Serve the Community

The Ada Jenkins Center, a nonprofit organization focused on helping people reach economic stability through community outreach efforts, recently discontinued its medical care offerings when a local clinic began accepting their patients. The organization needed to store and easily access the medical files from their former patients in case the patients requested files for their ongoing care. The local Iron Mountain team mobilized digitizing and indexing over 122,500 items in total. The center now has additional free space in their building and a secure and streamlined way to share patient files. Read more about this customer collaboration here.

CORPORATE PHILANTHROPY

LIVING LEGACY

We have proven ourselves to be a leader in the protection of our customers' most vital assets and information, and as a result, we have a unique ability to leverage our strengths through our corporate philanthropic efforts. The Living Legacy initiative is Iron Mountain's charitable commitment to preserving cultural and historical information and artifacts and making them globally accessible to the public through digitization and education. Our grant program combines financial contributions, in-kind services, and customized solutions to nonprofit agencies, museums, and other nongovernmental organizations in an effort to advance their missions. We select partners who align with our mission, vision and values and who can benefit from our unique expertise. You can read more about our incredible partner organizations here.

In 2022, we partnered with organizations focused on history and cultural heritage preservation within communities whose stories are not typically shared in the mainstream media. We maintained our commitment to delivering educational resources to the public to share our collective history and lessons of the past to help shape a more positive future. Those resources include lesson plans, guided virtual tours, online databases, traveling exhibits, and more. Two of the partners who have been part of this work are:

- Lincoln Presidential Foundation – Warning Signs: Lincoln's Response to Rising Threats to Freedom, Justice, and Democracy explores crucial evidence, historical context, and different perspectives about an extremely polarized moment in U.S. history and what it reveals about maintaining a healthy democracy today.

- CyArk – The Sue-meg State Park digital documentation and virtual tour amplifies Indigenous history and an ongoing connection to the land and provides opportunities for diverse audiences to engage with the site.

Please visit our website to read about all of the partners who have helped us build a compelling collection we call the Journey to Equal Rights.

WATCH

SKIP LOWRY: California State Parks Interpreter and Yurok Tribal Citizen Sue-meg State Park, California

In **2021**, we set a goal to launch **50** new educational resources to strengthen our communities. We are proud to share that we have met that goal three years early, having already launched **59** resources by the end of **2022**.

We launched

59

educational resources in 2022

VOLUNTEERISM

Our Moving Mountains volunteer program encourages our employees to contribute to positive change in their communities by providing full-time employees sixteen hours and part-time employees eight hours of annual paid time off to volunteer. Employees select a community or civic organization that is close to their hearts and then detail their efforts on our Moving Mountains portal. The portal allows employees to easily track volunteer hours, find new volunteer opportunities, recruit volunteers and share stories with their fellow Mountaineers.

In 2022, we focused on growing our base of volunteers in all global operations by implementing initiatives to increase the program's visibility. We highlighted Moving Mountains in our internal communications platforms during the month of May to raise awareness about the program. Our Dollars for Doers challenge recognized three Mountaineers who logged the most volunteer hours and awarded funds to the charitable organizations of their choice. The winner logged a total of 377 hours with youth charities in their area – over a four-month period!

By the Numbers:

Over 900 Mountaineers in 26 different countries volunteered their time to over 500 unique community or civic organizations including environmental efforts, animal care groups, elementary schools, board leadership service, and youth sports teams, to name just a few. Mountaineers also came together as teams to participate in a variety of volunteer events. Examples include:

- Organized a blood donation drive with 37 donors and a total of 23 productive units of blood collected
- Adopted a highway where the volunteer group walked a total of 4 miles and collected 10 large bags of garbage
- Hosted an annual campaign to collect and gift over 1,500 toys to children

MOVING **MOUNTAINS**

In 2021 we set a goal that employees would volunteer 100,000 hours by 2025. Mountaineers contributed 28,613 hours in 2022 for a cumulative total of 39,090 hours

Mountaineers in Romania created an Iron Mountain Blood Network with the aim of getting Mountaineers together regularly to donate blood. It's been especially important for refugees from the war in Ukraine who arrive in Romania and need medical help.

SUPPLIER DIVERSITY

Iron Mountain's Supplier Diversity program established over 20 years ago promotes the presence and growth of diverse suppliers in our supply chain. We recognize that minority, women, LGBTQ+, disability, and veteran-owned companies, as well as small businesses, contribute significantly to the overall economic strength of our communities and can drive better business outcomes through innovation, efficiency and collaboration. The use of diverse suppliers and local small businesses also helps make our products and services more accessible and allows us to deliver the highest quality services at the best price.

We continued to drive towards our supplier diversity goals: By 2023, we intend to increase our diverse-supplier spend with minority, women, veteran, disability and LGBTQ+ owned businesses by 16% from our 2020 baseline. We are proud to report that we achieved a 36% increase from 2021 to 2022. We also track our spend with small businesses. Our small business spend combined with our diverse-supplier spend exceeded $275M in 2022, which was an increase of 23% compared to the previous year.

Iron Mountain South Africa was rated as Level 1 in Broad-Based Black Economic Empowerment (BBBEE) in 2022. BBBEE is an effort to address historical imbalances in the country by facilitating the participation of Black people in the mainstream economy. Our efforts in these areas over the previous two years have resulted in the elevation to Level 1, the highest rating level for the program.

To ensure we are up to date with the latest developments in a complex and ever-evolving field and to ensure that we have visibility into innovative companies, we continued our supplier diversity outreach efforts in 2022. The procurement team engaged with over 100 diverse suppliers at the Women's Business Enterprise National Council (WBENC) National Conference. As part of the conference, Iron Mountain sponsored an event with customers and current and potential suppliers at the historical Paschal's Restaurant in Atlanta, Georgia. We also continued to support our suppliers in their journey to obtain various certifications through education, information sharing and outreach efforts.

SUPPLY CHAIN ENGAGEMENT

Iron Mountain believes that a shared dedication to responsible business is essential for an effective relationship with our suppliers. The Iron Mountain Supplier Code of Conduct, which supplements our Code of Ethics and Business Conduct, outlines the principles, standards and practices required for doing business with us and requires compliance with laws governing employment, environmental practices, anti-corruption, anti-discrimination, and other similar issues. Our internal procurement policy outlines our procurement team's responsibility to assist Iron Mountain in achieving our supplier diversity and sustainability goals.

We first launched our formal sustainability supply chain risk assessment in 2021, and we continued to build on these efforts in 2022. Our supply chain analysis evaluates our critical suppliers, as well as 50 of our top suppliers by spend, in six key sustainability topics: human rights, codes of conduct and ethics, transparency and targets, carbon emission, environmental policies and supplier diversity. We added a new lens to our assessment in 2022 where we evaluated high-risk commodities within our supply chain, and we circulated a pilot version of our new supplier survey to gain greater visibility into the sustainability practices of many of our top suppliers. Our supply chain sustainability program will continue to engage suppliers in sustainability topics and intends to survey suppliers who did not meet performance thresholds in our initial supply chain sustainability analysis.

In 2022, we started a new program to recognize suppliers who are exceptional partners. Our Supplier of the Year Awards recognize elite suppliers who enable us to better service our customers and the communities where we conduct business. The three topics for the categories include supplier diversity, facilitation of strong partnership, and performance in innovation. Iron Mountain values our supplier relationships and aims to recognize outstanding suppliers who enable Iron Mountain to be a strong player in the marketplace and who share in the Company's vision.

SUSTAINABILITY PERFORMANCE

PERFORMANCE TABLES

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

◎ **Third Party Assured**

GREENHOUSE GAS EMISSIONS					
GREENHOUSE GAS EMISSIONS (METRIC TONS OF CO2e)	**2018**	**2019**	**2020**	**2021**	**2022****
Scope 1	149,865	143,159	125,318	132,299	162,084
Scope 2 market-based	83,368	77,312	62,095	75,801	63,308
Scope 2 location-based	400,045	370,167	208,150	213,000	209,112
Total Scope 1 and Scope 2 emissions, Market Based	233,233	220,471	187,413	208,100	225,391
GHG Intensity Scope 1 and 2 (mtCO2e/sq ft)	0.0026	0.0024	0.0020	0.0022	0.0023
Scope 3*	26,167	38,689	23,657	20,526	121,681
Total absolute emissions	259,400	259,160	211,071	228,626	347,072
Certified Offsets				1,000	30,000

Greenhouse gas (GHG) emissions data is as of 12/31/2022. The time frame for data is 1/1/2018 to 12/31/2022. The data boundary for scope 1 and 2 GHG emissions data includes all Iron Mountain operations and includes a gap analysis and estimation process to cover all operations. See the Iron Mountain annual CDP response for additional information on our GHG emissions sources and calculation methodology.

*The 2022 data boundary for scope 3 GHG emissions was expanded from previous years and now includes additional sources of emissions and covers all operations for scope 3 categories 3, 5, 6, 8, and 13.

** In 2022 we integrated GHG emissions data associated with acquisitions, such as ITRenew and InfoFort. Our Scope 1 GHG emissions also reflect approximately 33,000 MTCO2e from non-recurring events where fire suppression systems were activated.

PERFORMANCE TABLES

◎ Third Party Assured

ENERGY

ENERGY CONSUMPTION (MWh)	2018	2019	2020	2021	2022
Total energy consumption	1,481,040	1,533,552	1,486,012	1,593,667	1,754,610
Total electricity consumption from operations	880,654	883,974	935,791	1,037,686	1,174,613
Total renewable electricity consumption	607,749	683,919	758,595	830,702	1,001,511
Percentage electricity consumption from renewable sources	69%	77%	81%	80%	85%
Energy intensity* (MWh/sq ft)	0.016	0.017	0.016	0.017	0.018

Energy data is as of 12/31/2022. The time frame for data is 1/1/2018 to 12/31/2022. The data boundary is all Iron Mountain operations and includes a gap analysis and estimation process to cover all operations. In 2022 we integrated energy consumption data associated with acquisitions, such as ITRenew and InfoFort.

*Energy intensity is calculated using total energy consumption and total facility area.

WASTE MANAGEMENT

WASTE CATEGORY (METRIC TONS)	2018	2019	2020	2021	2022	
					Waste from our direct operations	Waste processed on behalf of customers
Total	8,241	9,399	8,986	10,484	12,509	437,948
Landfill	6,936	7,073	6,103	7,030	8,193	0
Recycling	657	1,359	2,501	3,091	3,947	426,510
Recovery (energy from waste)	648	967	382	364	368	11,438
Diversion Rate	8%	14%	28%	29%	32%	Not calculated
Data Coverage	62%	67%	66%	65%	100%	Not calculated

Waste data is as of 12/31/2022. The time frame for data is 1/1/2018 to 12/31/2022. The data boundary for 2022 is all operations and includes waste disposed on behalf of our customers and includes gap analysis and estimation process to cover all operations. In 2022 we integrated waste data associated with acquisitions such as ITRenew and InfoFort. An intensity factor (kg/sqft) was created using vendor-provided data representing 73% of the global footprint as a percentage of square footage. Intensity factors were applied to the remainder of the global portfolio. Waste data for 2018, 2019, 2020 and 2021 represents approximately 62%, 67%, 66%, and 65% respectively, of waste produced as part of our operations as a percentage of our total global square footage. Waste data for the years 2018 – 2021 does not include waste disposed of on behalf of our customers or the aforementioned estimation process.

PERFORMANCE TABLES

◎ Third Party Assured

WATER					
WATER CONSUMPTION (CUBIC METERS)	**2018**	**2019**	**2020**	**2021**	**2022**
Water consumption	794,378	924,515	1,007,077	1,105,168	1,298,175
Water intensity (m^3/sq ft)*	0.020	0.022	0.025	0.025	0.029

Water data is as of 12/31/2022. The time frame for data is 1/1/2018 to 12/31/2022. In 2022 we integrated water data associated with acquisitions such as ITRenew and InfoFort. Water data for 2018, 2019, 2020, 2021, and 2022 represents approximately 44%, 45%, 43%, 46%, and 48% respectively, of our total global square footage.

*Water intensity is calculated using total water consumption and total facility area.

FACILITY AREA					
FACILITY AREA (SQUARE FEET)	**2018**	**2019**	**2020**	**2021**	**2022**
Total square footage	89,876,628	91,380,966	92,739,141	94,629,122	96,771,153

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

PERFORMANCE TABLES

◎ Third Party Assured

WORKFORCE - GENDER								
WORKFORCE BREAKDOWN BY GENDER	**TOTAL**		**FEMALES**		**MALES**		**NOT DECLARED**	
EMPLOYMENT CONTRACT	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**
Permanent	22,379	24,653	8,639	9,679	13,740	14,973	0	1
Temporary	644	644						
EMPLOYMENT TYPE	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**
Full-Time	21,717	24,006	8,264	9,266	13,453	14,739	0	1
Part-Time	662	647	375	413	287	234	0	0
WORKFORCE BY REGION	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**
North America	9,841	10,803	3,085	3,676	6,756	7,127	0	0
Latin America	4,927	5,022	2,474	2,511	2,453	2,511	0	0
Asia Pacific	2,427	2,795	856	1,044	1,571	1,751	0	0
Europe, Middle East and Africa (EMEA)	5,184	6,033	2,224	2,448	2,960	3,584	0	1
EMPLOYMENT BY CATEGORY	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**
VP and above	137	142	29	37	108	105	0	0
Director	486	563	180	183	306	380	0	0
Supervisor/Manager	2,264	4,419	733	1,555	1,531	2,864	0	0
Individual Contributor	19,492	19,529	7,697	7,904	11,795	11,624	0	1
BOARD OF DIRECTORS	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**
Board of Directors	11	11	4	4	7	7	0	0

Workforce data is as of 12/31/2022. Data boundary is all active employees in our internal human resources database. This represents 24,653 of approximately 26,000 employees, or approximately 95% of the global Iron Mountain workforce. One employee did not disclose gender as of 12/31/2022. Global job architecture changes made in 2022 in our internal human resources database contributed to a year over year change in the number of employees in some categories.

PERFORMANCE TABLES

WORKFORCE - GENDER

PERCENTAGE OF FEMALE EMPLOYEES	2021	2022
Company-wide	38.6%	39.3%
North America	31.3%	34.0%
Latin America	50.2%	50.0%
Asia Pacific	35.3%	37.4%
Europe, Middle East and Africa (EMEA)	42.9%	40.6%

Third Party Assured

Workforce data is as of 12/31/2022. Data boundary is all active employees in our internal human resources database. This represents 24,653 of approximately 26,000 employees, or approximately 95% of the global Iron Mountain workforce.

WORKFORCE - AGE

AGE COMPOSITION OF EMPLOYEES	UNDER 30 YEARS OLD		30-50 YEARS OLD		OVER 50 YEARS OLD	
EMPLOYEE CATEGORY	2021	2022	2021	2022	2021	2022
VP and above	0%	0%	47.4%	46.5%	52.6%	53.5%
Director	0%	0%	59.1%	51.9%	40.9%	47.8%
Supervisor/Manager	3.0%	3.8%	71.2%	67.0%	25.8%	29.2%
Individual Contributor	22.1%	23.8%	56.6%	52.8%	21.3%	23.4%
BOARD OF DIRECTORS	2021	2022	2021	2022	2021	2022
Board of Directors	0%	0%	0%	0%	100%	100%

Workforce data is as of 12/31/2022. Data boundary is all active employees in our internal human resources database. This represents 24,653 of approximately 26,000 employees, or approximately 95% of the global Iron Mountain workforce. Global job architecture changes made in 2022 in our internal human resources database contributed to a year over year change in the number of employees in some categories.

PERFORMANCE TABLES

◎ Third Party Assured

WORKFORCE - ETHNIC COMPOSITION

ETHNIC COMPOSITION OF US EMPLOYEES	TOTAL		VP AND ABOVE		DIRECTOR		SUPERVISOR/MANAGER		INDIVIDUAL CONTRIBUTOR	
	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022
American Indian or Alaskan Native	0.5%	0.3%	0.0%	0.0%	0.3%	0.3%	0.4%	0.2%	0.5%	0.4%
Asian	4.7%	5.7%	5.9%	10.9%	12.6%	15.0%	5.9%	8.1%	4.2%	4.6%
Black or African American	25.0%	25.8%	7.8%	9.9%	3.6%	2.6%	14.0%	10.4%	27.6%	31.0%
Hispanic/Latino	19.9%	18.6%	0.0%	1.0%	5.8%	5.8%	14.2%	10.2%	21.5%	21.6%
Native Hawaiian or Other Pacific Islander	0.5%	0.5%	0.0%	0.0%	0.0%	0.0%	0.2%	0.5%	0.6%	0.5%
Two or More Races	1.9%	1.8%	1.0%	1.0%	0.6%	0.6%	1.7%	1.4%	1.9%	2.0%
White	45.7%	45.3%	83.3%	76.2%	76.4%	74.6%	62.3%	67.5%	41.6%	37.8%
Decline to state/not specified	2.0%	1.9%	2.0%	1.0%	0.6%	1.2%	1.3%	1.8%	2.1%	2.0%
SPECIAL POPULATIONS	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**
Veteran	5.0%	4.9%	8.8%	6.9%	7.1%	5.5%	5.7%	5.2%	4.8%	4.7%
Disability	3.5%	5.1%	4.9%	3.0%	3.2%	4.6%	3.2%	4.4%	3.6%	5.3%

Workforce data is as of 12/31/2022. Data boundary is all active US employees in our internal human resources database. Global job architecture changes made in 2022 in our internal human resources database contributed to a year over year change in the number of employees in some categories.

PERFORMANCE TABLES

◎ Third Party Assured

◎ NEW EMPLOYEES

NEW EMPLOYEE HIRES	2021	2022
Total	6,736	9,529
NEW HIRES BY REGION	**2021**	**2022**
North America	3,479	4,878
Latin America	1,914	2,281
Asia Pacific	563	1,024
Europe, Middle East and Africa (EMEA)	780	1,346
NEW HIRES BY GENDER	**2021**	**2022**
Female	3,067	4,600
Male	3,666	4,928
Not Declared	3	1
NEW HIRES BY AGE GROUP	**2021**	**2022**
Under 30 years old	3,065	4,065
30-50 years old	2,962	4,369
Over 50 years old	706	1,089
Not declared	3	6

Workforce data is as of 12/31/2022. Data boundary is all active employees in our internal human resources database. This represents 24,653 of approximately 26,000 employees, or approximately 95% of the global Iron Mountain workforce.

◎ EMPLOYEE TURNOVER

EMPLOYEE TURN-OVER AND RATE	TOTAL EMPLOYEES		TURNOVER		TURNOVER RATE	
	2021	2022	2021	2022	2021	2022
Voluntary			4,338	5,360	19.4%	21.7%
Involuntary			2,431	2,404	10.9%	9.8%
Total	22,379	24,653	6,769	7,764	30.2%	31.5%
TURNOVER BY REGION	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**
North America	9,841	10,803	3,528	3,870	35.9%	35.8%
Latin America	4,927	5,022	1,718	2,170	34.9%	43.2%
Asia Pacific	2,427	2,795	504	639	20.8%	22.9%
Europe, Middle East and Africa (EMEA)	5,184	6,033	1,019	1,085	19.7%	18.0%
TURNOVER BY GENDER	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**
Female	8,639	9,679	2,743	3,587	31.8%	37.1%
Male	13,740	14,973	4,023	4,177	29.3%	27.9%
TURNOVER BY AGE GROUP	**2021**	**2022**	**2021**	**2022**	**2021**	**2022**
Under 30 years old	4,376	4,826	2,393	3,020	54.7%	62.6%
30-50 years old	12,997	13,630	3,296	3,761	25.4%	27.6%
Over 50 years old	5,007	6,197	1,075	979	21.5%	15.8%
Did not declare age				4		NA

Workforce data is as of 12/31/2022. Data boundary is all active employees in our internal human resources database. This represents 24,653 of approximately 26,000 employees, or approximately 95% of the global Iron Mountain workforce.

PERFORMANCE TABLES

◎ **Third Party Assured**

US MATERNITY AND PATERNITY LEAVE

2022 US MATERNITY AND PATERNITY LEAVE	TOTAL	FEMALE	MALE
Employees on maternity or paternity leave at some time during 2022	254	82	172

2021 US MATERNITY AND PATERNITY LEAVE	TOTAL	FEMALE	MALE
Employees on maternity or paternity leave at some time during 2020	214	73	141
2021 employees who returned to work after maternity or paternity leave ended	214	73	141
Total number of employees who returned from maternity or paternity leave during 2020 and are still employed 12 months after their return	214	73	140
2021 Retention Rate	100%	100%	99.3%

Workforce data is as of 12/31/2022. Data boundary is all active employees.

◎ VOLUNTEERISM

VOLUNTEERISM	2021	2022
Employee Volunteer Hours	10,477	28,613

Workforce data is as of 12/31/2022. Data includes self reported volunteer hours via internal volunteerism tracking mechanisms or via time-off requests for volunteering

◎ HEALTH AND SAFETY

TOTAL RECORDABLE INCIDENT RATE (TRIR)	2021	2022
Asia	0.1	0.1
Australia and New Zealand	0.2	0.8
Europe, Middle East and Africa	0.1	0.5
Latin America	0.1	0.9
North America	2.2	2.5
Worldwide	1.1	1.1

LOST TIME INCIDENT RATE (LTIR)	2021	2022
Asia	0.1	0.1
Australia and New Zealand	0.2	0.8
Europe, Middle East and Africa	0.6	0.5
Latin America	0.8	0.9
North America	1.1	1.2
Worldwide	0.7	0.7

Workforce data is as of 12/31/2022. Data boundary is all active employees.

PERFORMANCE TABLES

2022 FEMALE TO MALE AVERAGE COMPENSATION RATIOS – TOP TEN COUNTRIES BY EMPLOYEE HEADCOUNT										
MANAGEMENT LEVEL	UNITED STATES OF AMERICA	CANADA	UNITED KINGDOM	INDIA(1)	BRAZIL	COLOMBIA	FRANCE	MEXICO	POLAND	ROMANIA
SVP	97.6%	*	*	*	*	*	*	*	*	*
VP	101.1%	*	*	*	*	*	*	*	*	*
Director	102.0%	79.3%	91.9%	*	89.6%	*	*	*	*	*
Manager	100.8%	109.2%	89.4%	108.9%	101.7%	119.8%	110.1%	*	109.4%	92.8%
Supervisor	88.6%	94.4%	87.7%	108.8%	92.2%	118.7%	111.7%	78.0%	88.1%	134.4%
Individual Contributor (Professional)	87.7%	81.8%	83.0%	73.9%	74.0%	75.0%	88.2%	79.4%	107.3%	92.8%
Individual Contributor (Support)	81.7%	85.5%	89.7%	86.0%	92.1%	94.1%	100.7%	97.0%	90.8%	97.8%

(1) Total Guaranteed Pay (TGP): Due to local pay practices, TGP was used in place of base salary in local currency

* Too few to report and maintain confidentiality Professional: non-managerial roles whose work supports strategic objectives through the application of specific conceptual knowledge of theories, practices, and procedures. In the US, these would be categorized as exempt from overtime provisions of local labor regulations. Support: non-managerial roles whose work is through the completion of tasks and skills-based contributions that are administrative, clerical, or manual in nature. In the US, these roles would be eligible for overtime as outlined in local labor regulations. Workforce data is as of 12/31/2022. Data boundary is all active employees in our internal human resources database. This represents 24,653 of approximately 26,000 employees, or approximately 95% of the global Iron Mountain workforce.

PERFORMANCE TABLES

FEMALE TO MALE AVERAGE COMPENSATION RATIOS
WEIGHTED AVERAGES BY REGION (EXCLUDING THE TOP TEN COUNTRIES IN THE PREVIOUS TABLES)

MANAGEMENT LEVEL	LATAM WEIGHTED AVERAGE RATIO	MENAT WEIGHTED AVERAGE RATIO	APAC WEIGHTED AVERAGE RATIO	ESA WEIGHTED AVERAGE RATIO
SVP	*	*	*	*
VP	*	*	*	*
Director	*	*	119.3%	114.5%
Manager	95.9%	79.7%	104.9%	88.6%
Supervisor	108.7%	124.8%	107.2%	93.3%
Individual Contributor (Professional)	85.0%	101.3%	87.4%	90.5%
Individual Contributor (Support)	100.4%	115.9%	99.5%	93.1%

(1)Total Guaranteed Pay (TGP): Due to local pay practices, TGP was used in place of base salary in local currency

*Too few to report and maintain confidentiality

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

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

Workforce data is as of 12/31/2022. Data boundary is all active employees in our internal human resources database. This represents 24,653 of approximately 26,000 employees, or approximately 95% of the global Iron Mountain workforce.

TRAINING AND DEVELOPMENT

TRAINING AND DEVELOPMENT HOURS	2022
Training Hours	6,714
Hours of training per employee	0.3

Training hours as of 12/28/2022. The time frame for this data is 1/31/2022-12/28/2022. Initial program launch date is 1/31/2022. Data capture date of 12/28/2022 to accommodate end of year business processes. Data boundary is all hours captured through LinkedIn Learning system.

CHARITABLE CONTRIBUTIONS

CHARITABLE CONTRIBUTIONS CATEGORY	2018	2019	2020	2021	2022
Living Legacy	$545,000	$545,000	$655,000	$545,000	$544,500

Charitable contributions data is as of 12/31/2022. Data includes grants awarded under the Living Legacy program. Additional charitable contributions not captured in this table. We intend to expand reporting of charitable contributions in 2024.

UNION REPRESENTATION

UNION	2021	2022
Percent of employees covered by union representation	7.0%	6.2%

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

SUPPLY CHAIN ($M)

SUPPLIER DESIGNATION	2018	2019	2020	2021	2022
Diverse-supplier spend	$38.1	$41.3	$60.0	$72.4	$98.0
Small-business spend	$154.9	$151.5	$151.3	$153.0	$178.4

Supplier data as of 12/31/2022. The time frame for this data is January 1, 2022 to December 31, 2022. Data boundary is all suppliers.

MATERIALITY ASSESSMENT AND STAKEHOLDER ENGAGEMENT

MATERIALITY ASSESSMENT AND STAKEHOLDER ENGAGEMENT

DEFINING AND ASSESSING MATERIAL TOPICS

A materiality assessment and stakeholder engagement process helps us understand our stakeholders' needs by identifying topics that are relevant to the success of our company and areas where we make an impact on society. We use data from the process to refine our sustainability strategy and determine how we can make business decisions that positively impact our communities. We revisit this process every two to three years to account for changes to the business, regulations, society and climate. We refreshed our materiality assessment and stakeholder engagement process in 2022 using guidance from the Global Reporting Initiative (GRI) 3: Material Topics 2021 standard in order to consider a double-materiality perspective. GRI's publication *The double-materiality concept; Application and issues* asks organizations to not only look internally at how sustainability topics impact their performance or value, but also to look externally at how the organization affects the environment and society.

Simply put, we wanted to understand sustainability topics that affect our business while simultaneously understanding how our business decisions impact society and the environment. We used the following factors recommended by GRI to determine our material topics and complete our materiality assessment:

- An inventory of our organizational values, policies, strategies, management systems, goals and targets
- An assessment of our core competencies and their contributions to the United Nations Sustainable Development Goals (SDGs)
- A review of topics and future challenges for our sector, as identified by competitors, industry groups and internationally recognized sustainability standards boards and reporting frameworks
- A review of laws, regulations, international agreements and voluntary agreements of strategic significance to our organization
- A comprehensive survey of the interest and expectations of stakeholders

The materiality results overview below fulfills the requirements for GRI disclosures 3-1-a, 3-1-b, 3-2-a, and 3-2-b:

- How we identified positive and negative impacts, both actual and potential, on the economy, environment and people, including impacts on their human rights, across their activities and business relationships
- How we prioritized the impacts for reporting based on their significance
- The stakeholders and experts whose views have informed the process of determining our material topics
- A list of material topics
- Changes to the list of material topics compared to the previous reporting period

STAKEHOLDER ENGAGEMENT

The stakeholder engagement component of our materiality assessment included perspectives from our employees, customers, suppliers, nonprofit partners and investors. Our collection methods included surveys and interviews as well as research of publicly available materials produced by our stakeholders. Participants were asked to evaluate potential topic areas, provide feedback on the relative importance of topic areas based on their relationship with Iron Mountain, and consider how Iron Mountain affects our stakeholders, society and the environment.

MATERIALITY ASSESSMENT METHODOLOGY	
GRI RECOMMENDED FACTORS	**SOURCES**
Inventory of our organizational values, policies, strategies, management systems, goals and targets	• Iron Mountain purpose statement, values (page 5) • Business overview (2022 10K page 1) • Business strategy (2022 10K page 1) • Iron Mountain products and services overview (Iron Mountain webpage) • Iron Mountain sustainability pillars (page 6) • Iron Mountain sustainability goals (page 8)
An assessment of our core competencies and their contributions to the United Nations Sustainable Development Goals (SDGs)	GRI 101 Foundation 2016 defines reasonably estimable economic, environmental and/or social impacts as "the effect an organization has on the economy, the environment, and/or society, which in turn can indicate its contribution (positive or negative) to sustainable development." The impact areas are considered for their alignment with the United Nations Sustainable Development Goals (SDGs) to effectively communicate Iron Mountain's "contribution to sustainable development." See Appendix B: Sustainable Development Goals (page 73)
A review of topics and future challenges for our sector, as identified by competitors, industry groups and internationally recognized sustainability standards boards and reporting frameworks	• Sustainability Accounting Standards Board (SASB) Real Estate Services Industry standards • Sustainability Accounting Standards Board (SASB) Air Freight and Logistics Industry standards • National Association of Real Estate Investment Trusts (NAREIT) Practical Reference for ESG Implementation and Reporting • Association for Information and Image Management (AIIM) 2021 State of the Intelligent Information Management Industry • Peer and competitor sustainability reports
A review of laws, regulations, international agreements, and voluntary agreements of strategic significance to our organization	• Iron Mountain 2022 Form 10-K Item 1A Risk Factors • Iron Mountain 2022 CDP Response • Iron Mountain 2021 Corporate Responsibility Report
A comprehensive survey of the interest and expectations of stakeholders	Surveys and interviews as well as research of publicly available materials produced by our stakeholders. See summary on page 52.

STAKEHOLDER ENGAGEMENT METHODS	
STAKEHOLDER GROUP ENGAGED	ONGOING METHODS FOR DIALOGUE
Employees	• Employee engagement surveys • Performance evaluations, including end-of-year discussions and periodic career conversations • Feedback via frontline managers in daily pre-shift meetings and monthly team meetings • Roundtable discussions held with employees • Multiple one-way and two-way communication channels and internal social platforms • Surveys as part of materiality assessment; sample consisted of 80 employees including executive leadership, business unit and operational leadership, sustainability subject matter experts, and frontline workers
Customers	• Regular customer feedback collected via Customer Advisory Board (CAB), customer experience surveys, and Service Experience follow-up calls from the Customer Advocacy Center • Regular customer-initiated requests for information or annual audits • Education series • Association event attendance as sponsor/presenter • Surveys of customers as part of materiality assessment identified by the Customer Experience team
Suppliers	• Association event attendance as sponsor/presenter • Request for proposal, requests for information, and contract initiation and execution • Regular business reviews • Surveys of suppliers as part of materiality assessment as identified by Global Procurement
Nonprofit Partners	• Feedback from partner organizations and grant recipients • Discussion with prospective grant recipients • Volunteer events and activities • Surveys and interviews of nonprofit partners as part of materiality assessment as identified by the Manager, Community Engagement
Investors	• Annual shareholder meeting • Quarterly earnings teleconferences and webcasts • Industry- and broker-sponsored conferences, facility tours and non-deal roadshows • Requests for information

MATERIALITY ASSESSMENT AND STAKEHOLDER ENGAGEMENT

HIGH IMPACT ON IRON MOUNTAIN

- Enterprise risk management
- Innovative products
- Customer support and satisfaction
- Talent attraction
- Delivering on sustainability commitments
- ☆ Facilities security and emergency response

IMPACT ON ENVIRONMENT AND SOCIETY

HIGH IMPACT ON ENVIRONMENT AND SOCIETY

- Corporate philanthropy
- Employee volunteerism
- Waste management and circular economy
- Water consumption
- ☆ Supply chain sustainability

IMPACT ON IRON MOUNTAIN

KEY SUSTAINABILITY TOPIC AREAS

- Data privacy and protection
- Compliance and business ethics
- Greenhouse gas emissions
- Energy use
- Diversity, equity and inclusion
- Employee health, safety, wellbeing and wages
- ☆ Human rights
- ☆ Resilient operations

☆ Indicates new topic area

Note: We have combined some of our previously reported topic areas for greater clarity when reporting on topics in this year's GRI Report. We will continue to monitor all topics identified as part of the materiality assessment.

GLOBAL REPORTING INITIATIVE (GRI) 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 GRI 1: Foundation 2021.

Statement of use: Iron Mountain has reported the information cited in this GRI content index for the period January 1, 2022–December 31, 2022, with reference to the GRI Standards.

GRI 1 used: GRI 1: Foundation 2021

DISCLOSURE AND REQUIREMENT		LOCATION OR DESCRIPTION
GRI 2: GENERAL DISCLOSURES 2021		
2-1 Organizational details	All	2022 Form 10-K
2-2 Entities included in the organization's sustainability reporting	2-2-a	2022 Form 10-K
	2-2-b	There are no differences between the entities included in our sustainability reporting and the entities listed in our audited consolidated financial statements filed on public record.
	2-2-c	We do not make adjustments to information for minority interests in our sustainability report. Our sustainability reporting includes all entities under operational control during the reporting period.
2-3 Reporting period, frequency and contact point	2-3-a	Sustainability reporting period: January 1, 2022–December 31, 2022 Reporting frequency: annually
	2-3-b	Financial reporting period: January 1, 2022–December 31, 2022
	2-3-c	Sustainability report publication date: Q2 2023
	2-3-d	Contact point: Jennifer Grimaudo, Jennifer.Grimaudo@IronMountain.com
2-4 Restatements of information	2-4-a	Our previous reporting did not include biofuel emissions sources from portions of our operations. The following 2021 metrics have been adjusted in our reporting: • Scope 1 GHG emissions • Total Scope 1 and Scope 2 GHG emissions, Market Based • GHG Intensity Scope 1 and 2 (mtCO2e/sq ft) • Total absolute emissions • Total energy consumption

DISCLOSURE AND REQUIREMENT		LOCATION OR DESCRIPTION
GRI 2: GENERAL DISCLOSURES 2021		
2-5 External assurance	All	Statement of Assurance, pages 74
2-6 Activities, value chain and other business relationships	All	2022 Form 10-K There are no significant changes in the organization's sectors, value chain and other business relationships compared to the previous reporting period.
2-7 Employees	All	Performance Tables, pages 38 There were no significant fluctuations in the number of employees during the reporting period and between reporting periods.
2-8 Workers who are not employees	All	Iron Mountain's work is not performed by a substantial number of independent contractors or supervised workers.
2-9 Governance structure and composition	All	2022 Proxy Statement (link)
2-10 Nomination and selection of the highest governance body	All	2022 Proxy Statement (link)
12-11 Chair of the highest governance body	All	2022 Proxy Statement (link)
2-12 Role of the highest governance body in overseeing the management of impacts	2-12-a	See GRI 3: Material Topics on pages 67-69
	2-12-a	Materiality and Stakeholder Assessment, pages 49
	2-12-a	See GRI 3: Material Topics on pages 67-69

DISCLOSURE AND REQUIREMENT		LOCATION OR DESCRIPTION
GRI 2: GENERAL DISCLOSURES 2021		
2-13 Delegation of responsibility for managing impacts	All	See GRI 3: Material Topics on pages 67-69
2-14 Role of the highest governance body in sustainability reporting	All	The highest governance body that reviews and approves the reported information and material topics is the Executive Vice President, General Counsel and Secretary. The Board of Directors does not currently approve the reported information in this report.
2-15 Conflicts of interest	All	Code of Ethics and Business Conduct
2-16 Communication of critical concerns	All	Code of Ethics and Business Conduct
2-17 Collective knowledge of the highest governance body	All	See GRI 3: Material Topics on pages 67-69
2-18 Evaluation of the performance of the highest governance body	All	2022 Proxy Statement (link)
2-19 Remuneration policies	All	2022 Proxy Statement (link)
2-20 Process to determine remuneration	All	2022 Proxy Statement (link)

DISCLOSURE AND REQUIREMENT		LOCATION OR DESCRIPTION
GRI 2: GENERAL DISCLOSURES 2021		
2-21 Annual total compensation ratio	All	2022 Proxy Statement (link)
2-22 Statement on sustainable development strategy	All	Iron Mountain Communication on Progress 2022 to the United Nations Global Compact
2-23 Policy commitments	2-23-a	Code of Ethics and Business Conduct
	2-23-b	Human Rights Policy
	2-23-c	
	2-23-d	
	2-23-e	
	2-23-f	
2-24 Embedding policy commitments	All	Code of Ethics and Business Conduct Human Rights Policy Supplier Code of Conduct
2-25 Processes to remediate negative impacts	All	Code of Ethics and Business Conduct Human Rights Policy Supplier Code of Conduct

DISCLOSURE AND REQUIREMENT		LOCATION OR DESCRIPTION
GRI 2: GENERAL DISCLOSURES 2021		
2-26 Mechanisms for seeking advice and raising concerns	All	Code of Ethics and Business Conduct Human Rights Policy Supplier Code of Conduct Iron Mountain Ethics Line Employees can report any incident of fraud, waste, abuse, corruption, human rights, or other related concerns to our Ethics Line at www.imethicsline.com or by calling 1-866-668-3837. There were 152 cases reported through the Ethics Line in 2022. In any instance where a substantiated violation was identified, appropriate action was taken.
2-27 Compliance with laws and regulations	All	There were no significant instances of non-compliance with laws and regulations during the reporting period.
2-28 Membership associations	All	Aerospace Industries Association (AIA), American Health Information Management Association (AHIMA), ARMA International (ARMA), Armed Forces Communications and Electronics Association (AFCEA), Association for Information and Image Management (AIIM), Association of Corporate Counsel (ACC), BSR, Business-Government Relations Council, Circular Electronics Partnership, Clean Energy Buyers Association (CEBA), Data Center Coalition (DCC), Disability:IN, Healthcare Information and Management Systems Society (HIMSS), Healthcare Plastics Recycling Council, Information Technology Industry Council (ITI), Information Governance Initiative, International Legal Technology Association (ILTA), The International Secure Information Governance & Management Association (i-SIGMA), National Association of Real Estate Investments Trusts (NAREIT), National LGBT Chamber of Commerce, National Minority Supplier Development Council, Northern Virginia Technology Council, Supply Nation Australia, Sustainable Brands Corporate members, The New England Council, World Business Council for Sustainable Development (WBCSD), Women's Business Enterprise National Council
2-29 Approach to stakeholder engagement	All	Materiality and Stakeholder Assessment, pages 49
2-30 Collective bargaining agreements	All	Performance Tables, pages 38
GRI 3: MATERIAL TOPICS 2021		
3-1 Process to determine material topics	All	Materiality and Stakeholder Assessment, pages 49
3-2 List of material topics	All	Materiality and Stakeholder Assessment, pages 49 Iron Mountain completed a materiality assessment in 2022 using a double-materiality assessment process.
3-3 Management of material topics	All	See GRI Disclosures on Management of Material Topics, pages 67-69

GRI 201: ECONOMIC PERFORMANCE 2016

201-1 Direct economic value generated and distributed	All	2022 10-K
201-2 Financial implications and other risks and opportunities due to climate change	All	Iron Mountain CDP Response
201-3 Defined benefit plan obligations and other retirement plans	201-3-e	Iron Mountain Benefits Page

GRI 205: ANTI-CORRUPTION 2016

	205-2-a	All governance body members have access to our organization's anti-corruption policies and procedures through our policy center and our Code of Ethics and Business Conduct.
	205-2-b	All employees have access to our organization's anti-corruption policies and procedures through our policy center and our Code of Ethics and Business Conduct.
205-2 Communication and training about anti-corruption policies and procedures	205-2-c	All business partners have access to our organization's anti-corruption policies and procedures through our Code of Ethics and Business Conduct and our Supplier Code of Conduct.
	205-2-e	Our annual Code of Ethics training, which is mandatory for all employees around the globe, is part of a global compliance training strategy. In addition to the Code of Ethics training, employees are required to complete assigned compliance training programs in accordance with our Compliance Training Strategy based on their role and legal requirements. 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.
205-3 Confirmed incidents of corruption and actions taken	All	We are not aware of any new cases alleging a violation of anti-bribery/anti-corruption laws at Iron Mountain globally in 2022. We are not aware of any new cases alleging a violation of our code of conduct in 2022 by a supplier.

GRI 206: ANTI-COMPETITIVE BEHAVIOR 2016

206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	All	We are not aware of any new cases alleging a violation of antitrust and fair competition laws initiated during 2022.

GRI 301: MATERIALS 2016

301-2 Recycled input materials used	301-2-a	Iron Mountain's primary business activities include information management, storage and destruction. Physical input materials for Iron Mountain's products and services, including recycled input materials, are limited. 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 Iron Mountain EcoBox is made from at least 65% recycled materials and 35% sustainably managed forests. The boxes are certified by the Forest Stewardship Council (FSC), a group that works to ensure forests are properly and responsibly maintained to meet economic needs, conserve biodiversity and preserve species, while also taking into account land rights and the rights of Indigenous communities and workers. These boxes are recycled once they reach the end of their storage life. Iron Mountain purchased approximately 15 million boxes that met the FSC certification requirements in 2022. The EcoBox was available in France, Germany, Poland, Romania, Serbia, South Africa, the United Kingdom, Australia, New Zealand, the United States, Canada, Mexico, Argentina, Brazil, Slovakia, the Czech Republic, Ireland and Spain in 2022.

GRI 302: ENERGY 2016

302-1 Energy consumption within the organization	All	Performance Tables, page 38 Iron Mountain CDP Response Iron Mountain TCFD Report
302-3 Energy intensity	All	Performance Tables, page 38 Iron Mountain CDP Response Iron Mountain TCFD Report
302-4 Reduction of energy consumption	All	Iron Mountain CDP Response

GRI 303: WATER AND EFFLUENTS 2018

303-1 Interactions with water as a shared resource	All	This information will be available as part of Iron Mountain's 2023 public CDP Water response. We intend that this response will be made available on our sustainability webpage after its publication in 2023.
303-5 Water consumption	All	Performance Tables, page 38

GRI 305: EMISSIONS 2016

305-1 Direct (Scope 1) GHG emissions	All	Performance Tables, page 38 Iron Mountain CDP Response Iron Mountain TCFD Report
305-2 Energy indirect (Scope 2) GHG emissions	All	Performance Tables, page 38 Iron Mountain CDP Response Iron Mountain TCFD Report
305-3 Other indirect (Scope 3) GHG emissions	All	Performance Tables, page 38 Iron Mountain CDP Response Iron Mountain TCFD Report
305-4 GHG emissions intensity	All	Performance Tables, page 38 Iron Mountain CDP Response Iron Mountain TCFD Report
305-5 Reduction of GHG emissions	All	Performance Tables, page 38 Iron Mountain CDP Response Iron Mountain TCFD Report
305-6 Emissions of ozone-depleting substances (ODS)	All	Performance Tables, page 38 Iron Mountain CDP Response 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.

GRI 306: WASTE 2020

306-1 Waste generation and significant waste-related impacts	All	**Iron Mountain TCFD Report** In addition to our own waste stream, Iron Mountain is committed to being a responsible partner to our customers. To this end, we continuously seek innovative ways to help minimize the environmental impacts of our service offerings. One example is our Secure IT Asset Disposition (SITAD) service in the United States, which provides a safe and responsible way for our customers to dispose of or recycle their electronic waste. As an E-stewards Enterprise, when customers choose Iron Mountain for the disposal of their electronic waste, they are assured that all of our processors meet stringent environmental and social standards. We also offer secure destruction of paper documents and used boxes through our shredding service. This offering provides a safe and environmentally conscious solution for our customers looking to dispose of documents. We offer on-site and off-site shredding services on a one-time or recurring basis to tailor each solution to the customer's needs. One hundred percent of paper shredded through this service is recycled, and customers using this service are given reports that outline the environmental benefits attributed to their document disposal. In 2022, we helped our customers to responsibly dispose of: • 2,227 tons of e-waste • 12,931 tons of backup tapes and miscellaneous media • 2,477 tons of X-ray film • 827 tons of plastic pharmacy bottles • 464,065 tons of cardboard and paper
306-2 Management of significant waste-related impacts	All	Iron Mountain CDP Response Iron Mountain TCFD Report
306-3 Waste generated	All	Performance Tables, page 38
306-4 Waste diverted from disposal	All	Performance Tables, page 38
306-5 Waste directed to disposal	All	Performance Tables, page 38

GRI 401: EMPLOYMENT 2016

401-1 New employee hires and employee turnover	All	Performance Tables, page 38
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	All	Performance Tables, page 38 Iron Mountain Benefits Page Full-time employees regularly scheduled to work 30 or more hours per week are eligible for benefits. Part-time employees regularly scheduled to work between 20 and 30 hours per week are eligible for certain benefits, including healthcare, commuter, EAP, wellness and legal benefits.
401-3 Parental leave	All	Performance Tables, page 38 Iron Mountain Benefits Page Iron Mountain's parental and maternity benefits vary by country in order to ensure compliance with local laws and regulations. In the United States, our parental leave policy provides up to eight weeks of fully paid leave to birth and nonbirth parents. A disability benefit is available to employees following the birth, adoption or fostering of a child. This benefit provides 100% of pay for up to eight weeks. New parents are offered a variety of resources, including backup dependent care, Employee Assistance Program, and a Dependent Care Flexible Spending Account.

GRI 403: OCCUPATIONAL HEALTH AND SAFETY 2018

403-1 Occupational health and safety management system	403-1-a	Iron Mountain OHS Policy Statement Iron Mountain has implemented an occupational health and safety management system in alignment with the standards developed in the creation of ISO 45001.
	403-1-b	Iron Mountain OHS Policy Statement Iron Mountain's occupational health and safety policy applies to all employees, customers, visitors or other parties of wholly owned entities and majority-owned joint ventures who perform services for or on behalf of Iron Mountain regardless of the capacity in which they do so in geographies, business lines and functions in which we operate.

403-2 Hazard identification, risk assessment, and incident investigation	All	Iron Mountain OHS Policy Statement
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	All	Iron Mountain OHS Policy Statement
403-8 Workers covered by an occupational health and safety management system	All	Iron Mountain OHS Policy Statement Iron Mountain's occupational health and safety policy applies to all employees, customers, visitors or other parties of wholly owned entities and majority-owned joint ventures who perform services for or on behalf of Iron Mountain regardless of the capacity in which they do so in geographies, business lines and functions in which we operate.
403-9 Work-related injuries	All	Performance Tables, page 38
403-10 Work-related ill health	All	Performance Tables, page 38
GRI 404: TRAINING AND EDUCATION 2016		
404-1 Average hours of training per year per employee	All	Performance Tables, page 38
404-2 Programs for upgrading employee skills and transition assistance programs	404-2-a	Employee Training and Development, Page 28

GRI 405: DIVERSITY AND EQUAL OPPORTUNITY 2016

405-1 Diversity of governance bodies and employees	All	Performance Tables, page 38
405-2 Ratio of basic salary and remuneration of women to men	All	Performance Tables, page 38

GRI 413: LOCAL COMMUNITIES 2016

413-1 Operations with local community engagement, impact assessments, and development programs	413-1-a-iv	Performance Tables, page 38 Living Legacy Initiative, page 34 List of Partners and other organizations funded in 2022: CyArk, Lincoln Presidential Library Foundation, People's Palace Projects, Me & Korea, Girls Inc. of Atlanta, Pauli Murray Center of History and Social Justice, Smithsonian Museum of the American Latino, Military Women's Memorial, Tulalip Foundation

GRI 418: CUSTOMER PRIVACY 2016

418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	All	There were no significant complaints from regulatory bodies on data protection and privacy issues in 2022.

GRI 3: MATERIAL TOPICS 2021	
3-3 MANAGEMENT OF MATERIAL TOPICS	
All Sections – Ethics and Compliance	Our Code of Ethics and Business Conduct sets forth our policies and standards on a variety of topics, such as safety and security, inclusion and diversity, harassment and discrimination, conflicts of interest, bribery and corruption, environment and sustainability, and human rights and privacy considerations, among others. We also offer an opportunity for anyone to report incidents of fraud, waste, abuse, corruption, or any other ethical or human rights concerns to our Ethics Line. An independent company operates the Ethics Line, and individuals who report concerns can choose to remain anonymous (where law permits). Our robust compliance training program is a critical way we ensure that we meet our customers' expectations, abide by all regulatory requirements, and adhere to all internal and external policies. Employees are required to complete regulatory training annually. Courses are assigned based on a variety of factors, including role, access to information, policy, regulations and law. Our process encourages participation and accountability to ensure that employees complete their annual compliance training requirements. Our Compliance Training Curriculum is dynamic and tailored to ensure we maintain our certifications, meet our commitments to our customers, and deliver value to all stakeholders (including our employees) by reducing mistakes and unnecessary expenses.
All Sections - Risk Management	Our stakeholders place significant trust in us to manage their valuable information and assets and deliver services with as little interruption as possible. To do this, we must effectively identify, assess and manage risk. Our Risk Management team has developed a comprehensive, global framework for reducing risks based on four dimensions: degree of impact, likelihood of occurrence, control effectiveness, and risk tolerance. As part of our enterprise risk management (ERM) process, we undertake an annual risk assessment to identify and quantify these risks along these dimensions. The Risk Management team regularly engages with business unit and operational leads around these risks through the ERM Steering Committee, and with executive leadership through the Enterprise Risk Committee (ERC). The Board of Directors Risk and Safety Committee is responsible for reviewing the Company's establishment and operation of the ERM program. This comprehensive process ensures that risks are identified, carefully prioritized, appropriately resourced, and effectively managed.
GRI 201: Economic Performance 2016	The economic success of our business determines Iron Mountain's ability to create value for all of our stakeholders, including shareholders, employees, partners and the communities in which we work. The topics described here are material to our shareholders and our employees. Iron Mountain's strategy, financial performance and risk management are the responsibility of the executive leadership team under the oversight of the Board of Directors. Annual targets are established across all aspects of financial performance, and performance against those targets is monitored throughout the year. Ultimate oversight of strategic financial and nonfinancial goals for the company are reassessed in quarterly review processes, annual performance reviews, and as part of our annual strategic planning with senior management and the Board of Directors. When deviations from projections and goals are anticipated, a variety of remedial actions are considered, including cost-saving measures, enhanced revenue generation, and other measures as deemed appropriate.
GRI 205: Anti-corruption 2016	Our Code of Ethics and Business Conduct demands that we respect and comply with anti-corruption requirements worldwide. This includes legal requirements, as well as our company policies and procedures.
GRI 206: Anti-competitive Behavior 2016	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.

GRI 301: Materials 2016 GRI 302: Energy 2016 GRI 303: Water and Effluents 2018 GRI 305: Emissions 2016 GRI 306: Waste 2020	Additional information about our management of environmental topics can be found in the Iron Mountain Environmental Policy and the Iron Mountain Task Force for Climate-Related Financial Disclosures (TCFD) Report. Iron Mountain strives to responsibly limit our impact on the environment. Our service offerings include solutions that support our customers in reducing their own environmental impacts, and we regularly assess these offerings to ensure they are meeting our customers' needs. The topics described here are relevant to our employees, customers, partners and, indirectly, to our shareholders. The Risk and Safety Committee of the Board of Directors considers climate risks as part of the corporate risk evaluation process and receives quarterly reports on climate risk. The Vice President, Head of Global Communications and Sustainability, who reports to the Executive Vice President, General Counsel and Secretary (a member of our Executive Leadership Team led by the CEO), has responsibility for our environmental sustainability strategy. The Senior Vice President, Global Real Estate, who reports to the Executive Vice President, Chief Operating Officer (a member of our Executive Leadership Team led by the CEO), is responsible for environmental programs, projects, initiatives and operational efficiency efforts in our facilities, with the exception of data center facilities where these environmental programs are managed by Vice President, Global Risk, Sustainability and Government Programs for Iron Mountain Data Centers. Our Global Environmental Policy outlines our commitments, processes and responsibilities to and for environmental management. Our Code of Ethics and Business Conduct includes our views on protecting the environment and building sustainability. The Senior Vice President of Global Procurement is responsible for overseeing corporate-wide purchasing, and we have engaged primary and secondary vendors to source more environmentally responsible materials. Current efforts to measure and reduce environmental impacts at sites and regional levels are regularly assessed through data collection and analysis. Emissions resulting from energy use, direct releases of GHG emissions and business travel are closely tracked. Additionally, some metrics, such as energy use and utility spend, are reviewed monthly at the VP level. We have implemented a global environmental data collection system with improved measuring and monitoring of impact, with the ability for real-time data review.
GRI 402: Labor/Management Relations 2016 GRI 407: Freedom of Association and Collective Bargaining 2016 GRI 408: Child Labor 2016 GRI 409: Forced or Compulsory Labor 2016	Information about Iron Mountain's management of human rights topics can be found in the Iron Mountain Human Rights Policy. 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. Our Code of Ethics and Business Conduct guides the behavior and culture of our workforce, allowing us to put our values into action every day. Our Chief Compliance Officer is responsible for monitoring compliance with the Code. He presents to the full Board on an annual basis and attends each regularly scheduled Audit Committee meeting to uphold an ongoing dialogue that includes addressing evolving risks and, when necessary, enhancing our standards, controls, training and monitoring mechanisms. The Chief Compliance Officer reports to the EVP, General Counsel and Secretary.
GRI 401: Employment 2016	Our Senior Vice President of Total Rewards oversees enterprise-wide compensation and benefits with a team of internationally based compensation and benefit professionals. Our Vice President, Global Talent Acquisition, oversees enterprise-wide talent acquisition with a team of internationally based talent acquisition and recruiting professionals.
GRI 403: Occupational Health and Safety 2018	Meeting our commitment to operate safely and responsibly is overseen by the EVP, Chief Risk Officer. Our Global Health and Safety Policy defines the basic requirements of our health and safety management system and serves as the foundation of our safety endeavors. The Risk and Safety Committee, based on reports provided by the Company's management, monitors the adequacy of material fire, health, safety, security, business continuity, chain of custody, cybersecurity and information security, and risk management strategies and systems for the reporting of accidents, incidents and risks, and material investigations and remedial actions.
GRI 404: Training and Education 2016	The VP, Global Talent Management, reports to the Chief Human Resources Officer and oversees a team including the Senior Program Manager, Global Talent Solutions, who implement our enterprise-wide learning and development framework.

GLOBAL REPORTING INITIATIVE (GRI) INDEX

GRI 405: Diversity and Equal Opportunity 2016	The Chief Diversity, Equity and Inclusion Officer is responsible for the policies for diversity and equal opportunity and reports to our Chief Human Resources Officer. Inclusion, diversity and preventing harassment and discrimination are addressed in our Code of Ethics and Business Conduct.
GRI 413: Local Communities 2016	Iron Mountain's robust network and infrastructure of approximately 26,000 employees and approximately 1,400 facilities are actively engaged with our global community. We offer volunteerism, financial grant awards and in-kind service to nonprofits and nongovernmental organizations to strengthen our communities. Iron Mountain's Director of Corporate Responsibility leads our philanthropic initiatives, and our volunteerism programs are led by Iron Mountain's Events, Volunteerism and Operations Specialist and are regularly assessed for their effectiveness. Our materiality assessment included a community engagement component, including survey distribution and interviews with select nonprofit partners.
GRI 415: Public Policy 2016	With 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 Proxy Statement, corporate funds are not used in support of or opposition to political candidates, political parties, political committees, and other political entities organized and operating for political candidates. In addition, corporate funds are not used for "electioneering" communications. The Company administers IMPAC (Iron Mountain Incorporated Employees Political Action Committee), which is a nonpartisan political action committee which is a federally registered corporate employee political action committee. IMPAC allows eligible employees to pool their resources to support candidates at the federal, state and local level who understand the and support 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 is supervised by a board of directors composed of senior managers from different areas of the Company and the Board of Directors Nominating and Governance Committee. Iron Mountain scored in the top tier of the 2022 CPA-Zicklin Index of Corporate Political Disclosure and Accountability.
GRI 418: Customer Privacy 2016	Data security and privacy are at the core of our business and are addressed in our Code of Ethics and Business Conduct. They are also essential parts of our compliance programs. We work closely with customers represented in our Customer Advisory Board and Executive Exchange Program to anticipate and meet future needs in the market. We are continually developing innovative new methodologies for strengthening privacy across all information types, while also meeting evolving regulatory, customer and legal obligations. And, as our customers face ever-growing volumes of information, from business records to their customer and employee personal data, we remain committed to ensuring our suite of services can help them protect their data, comply with regulations, and quickly respond to any kind of breach or cyberattack, while minimizing the impact to their brand reputation and business processes. In 2022, we continued to assist clients with creating retention policies that are compliant with the California Consumer Privacy Act (CCPA) and GDPR, identify classes of records that are likely to contain personal data, and apply stricter retention rules to such classes based on regulatory requirements. We also hosted digital forums where experts helped customers navigate the costs and risks of managing physical and digital information, comply with changing industry regulations, and gain greater control, access and visibility over their information. 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.

APPENDIX A: TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES SUMMARY

TCFD | TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

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

GOVERNANCE	STRATEGY	RISK MANAGEMENT	METRICS
The Board of Directors Risk and Safety Committee is responsible for reviewing the Company's establishment and operation of the Enterprise Risk Management (ERM) program. The Board's Nominating and Governance Committee receives periodic reports of sustainability strategy and initiatives from the Sustainability team. The Vice President, Head of Global Communications and Sustainability has a global role and reports to the Executive Vice President, General Counsel and Secretary, who reports directly to the CEO. Through this structure he leads processes and a team that monitors climate-related issues most material to Iron Mountain. When opportunities or risks are identified, the management of the associated action plans is either owned by the Vice President, Head of Global Communications and Sustainability directly or by the functional owner in the organization where it is most relevant.	We continuously monitor conditions related to climate change and adapt our strategies accordingly. Our products and services strategy has been influenced by climate-related risks and opportunities through both the development of new products and services and the identification of enhancements for current products and services to help customers solve their own climate-related challenges. Climate-related risks and opportunities have influenced our financial planning when considering the effects that severe weather events may have on revenues and capital expenditures. Our operations strategy has been influenced by climate-related risks and opportunities and we monitor customer demand as well as the security risks and physical risks that climate change poses to our facilities and operations	Iron Mountain's process to identify, assess, and respond to climate related risks and opportunities that pose a substantive financial or strategic impact includes a risk identification and assessment methodology that focuses on a set of risk rating criteria to calculate overall risk scores, and various risk management techniques relating to climate-related risks and opportunities. The Risk Management team regularly engages with business unit and operational leads around these risks through the ERM Steering Committee, and with executive leadership through the Enterprise Risk Committee. New to our process was the implementation of a climate scenario analysis. Moving forward, climate scenario analysis will be integrated into our process for identifying and assessing climate-related risks.	We set ambitious public goals and are transparent in our reporting in order to hold ourselves accountable for the impact of our operations and to focus on how we can create positive change in the communities in which we do business. Our goals encourage us to collaborate across disciplines to innovate, become more inclusive, and grow our business sustainably. We focus on what is most material and most impactful. We create our goals carefully with input from our stakeholder engagement process, function-specific subject matter experts, and executive leadership. Our sustainability team regularly meets with goal owners to determine goal progress, set benchmarks, and understand the actions we are taking. This information is documented in an internal dashboard which is shared with executive leadership quarterly.

The Iron Mountain TCFD Report can be found on our sustainability webpage.

APPENDIX B: SUSTAINABLE DEVELOPMENT GOALS

During 2022, all Iron Mountain activities and operations supported the following United Nations Sustainable Development Goals (SDGs). As a signatory to the United Nations Global Compact, Iron Mountain is committed to pursuing their policies, strategies, and procedures, as well as to creating a culture of integrity that supports all 10 principles of the United Nations Global Compact, as well as the SDGs.

IRON MOUNTAIN MATERIAL TOPIC	SDG	SDG TARGETS AND INDICATORS
Compliance and business ethics	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	16.B 16.5
Data privacy and protection	16 PEACE, JUSTICE AND STRONG INSTITUTIONS	16.10
Diversity, equity and inclusion	5 GENDER EQUALITY	5.1 5.5
	10 REDUCED INEQUALITIES	10.2 10.4
Employee health, safety, wellbeing and wages	1 NO POVERTY	1.1
	3 GOOD HEALTH AND WELL-BEING	3.6 3.8
Energy use	7 AFFORDABLE AND CLEAN ENERGY	7.1 7.2

IRON MOUNTAIN MATERIAL TOPIC	SDG	SDG TARGETS AND INDICATORS
Greenhouse gas emissions	13 CLIMATE ACTION	13.2
Human Rights	5 GENDER EQUALITY	5.2
	8 DECENT WORK AND ECONOMIC GROWTH	8.7 8.8
	10 REDUCED INEQUALITIES	10.3
Resilient operations	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE	9.1 9.4
	13 CLIMATE ACTION	13.1

SUSTAINABLE DEVELOPMENT GOALS

APPENDIX C: EXTERNAL ASSURANCE STATEMENT

DNV

Independent Assurance Report

DNV Business Assurance USA, Inc. (DNV) has been commissioned by the management of Iron Mountain, Incorporated (Iron Mountain) to carry out an independent limited level assurance engagement of Selected Information for calendar year 2022 as presented in the company's Sustainability Report (the "Report"). The assurance was carried out March through April 2023.

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

Selected Information

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

Data verified for the period January 1, 2022-December 31, 2022:

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

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

Our competence, independence, and quality control

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

1: Green Power includes wind , solar, and hydro generations.

DNV

Scope and approach

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

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

Environmental and social indicators have been evaluated in reference to: Global Reporting Initiative's GRI Standards 2021;

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

- World Business Council for Sustainable Development (WBCSD) / World Resources institute (WRI) Greenhouse Gas Protocol, Corporate Accounting Standard REVISED EDITION

- WBCSD/WRI Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Scope 3)

DNV used a risk-based approach throughout the assurance engagement, concentrating on the areas that we believe are most material for both Iron Mountain and its stakeholders. DNV applied a materiality threshold of five percent for the GHG emissions (Scope 1 and 2) and Energy. The boundary of our work includes global operations for all Selected Information in scope except for Ethnic Composition of Employees and Special Populations which includes US operations only.

We understand that financial data, including financial data that feeds into the calculation of Selected Performance Indicators are subject to a separate independent audit process. DNV has relied on this information as accurate for the purposes of our scope of work. This includes but is not limited to any statements relating to sales, revenue, salaries, charitable contribution.

Selected Information

Greenhouse Gas Emissions

- 2022 Scope 1 Emissions   162,084 MtCO$_2$e
- 2022 Scope 2 Emissions (Location-Based)   209,112 MtCO$_2$e
- 2022 Scope 2 Emissions (Market-Based)   63,308 MtCO$_2$e
- 2022 Scope 3 Emissions (Location-Based, unless noted otherwise)
  - Category 3 - Fuel- and energy-related activities   101,843 MtCO$_2$e
  - Category 5 – Waste generated in operations   2,818 MtCO$_2$e
  - Category 6 - Business travel   17,020 MtCO$_2$e
  - Category 8 - Upstream leased assets   1,098,019 MtCO2e (Location-Based); 0 MtCO$_2$e (Market-Based)
  - Category 13 - Downstream leased assets   5,142 MtCO2e (Location-Based); 0 MtCO$_2$e (Market-Based)

Energy

- 2022 Total Green Power   1,001,511 MWh
- 2022 Total Energy Consumption   1,754,610 MWh

Responsibilities of Iron Mountain and DNV

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

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

Level of Assurance

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

DNV

Water Consumption

- 2022 Total Water Consumption[2]   1,298,175 m³

Waste

- 2022 Total Waste Generated[3]   12,509 metric tonnes

Workforce Data

- 2022 Female Employees (Percent)   39.3%
- 2022 Ethnic Composition - US only (Percent)
  - American Indian or Alaska Native   0.3%
  - Asian   5.7%
  - Black or African American   25.8%
  - Hispanic or Latino   18.6%
  - Native Hawaiian or Other Pacific Islander   0.5%
  - Two or More Races   1.8%
  - White   45.3%
  - Decline to state/not specified   1.9%
- 2022 Special Populations – US only (Percent)
  - Veteran   4.9%
  - Disability   5.1%
- 2022 New Employee Hires   9,529
- 2022 Total Employee Turnover and Turnover Rate   7,764 | 31.5%
- 2022 Total Recordable Incident Rate   1.1
- 2022 Lost Time Incident Rate   0.7
- 2022 Total Volunteer Hours   28,613
- 2022 Total Charitable Contributions $ 544,500
- 2022 Total Training Hours   6,714
- 2022 Hours of Training per Employee   0.27

Independence

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

Basis of our conclusion

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

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

2: Water consumption includes facilities for which actual invoices are available. This covers 48% of sites.
3. Total waste generated includes estimated data (for 27% of total square footage) and actual invoices (for 73% of total square footage)

WHEN TRUST MATTERS

![DNV logo]

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

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

In addition to the above, specific to the environmental indicators, the following steps were conducted for the Water and Waste:
- Water:
  - Review of the water consumption methodology;
  - Conduct data checks for the water data collected, transferred and calculated;
  - Perform sample-based assessment of data reported against the source data water consumed;
  - Evaluate whether assumptions and methodology used in cases of data estimation for whole year data are valid.
- Waste
  - Review of the waste segregation methodology and description of waste categorization;
  - Conduct data checks for the waste data collected, transferred and calculated;

This Statement is for the sole use and benefit of the party contracting with DNV Business Assurance USA, Inc. to produce this Statement (the "Client"). Any use of or reliance on this document by any party other than the Client shall be at the sole risk of such party. In no event will DNV or any of its parent or affiliate companies, or their respective directors, officers, shareholders, employees or subcontractors, be liable to any other party regarding any statements, findings, conclusions or other content in this Statement, or for any use of, reliance on, accuracy, or adequacy of this Statement.

For and on behalf of DNV Business Assurance USA, Inc.
Katy, TX
May 01, 2023

![DNV logo]

DNV Business Assurance

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

Assurance Team

Role	Name
Lead Verifier	Natasha D'Silva
Project Manager & Assessor	Yishuang Xu
Lead Verifier (Environment)	Kyle Silon
Technical Reviewer	Shruthi Bachamanda

DNV

Appendix A. Iron Mountain's "Criteria"

The table below has been prepared by Iron Mountain. It is intended to provide readers with a summary of the methodologies used by Iron Mountain to prepare the metrics that are not aligned in the GRI standards:

Selected Information	Definition	Methodology
2022 Total Training Hours	Total hours viewed using the LinkedIn Learning Platform by licensed employees (supervisor levels & above – workday job level P3+) over the period from January 1st to December 28th in 2022.	2022 number of hours viewed obtained from LinkedIn Learning Dashboard (Note: the data coverage period for training data is 1/31-12/28. Initial program launch date is 1/31. Data capture date of 12/28 to accommodate end of year business processes).
2022 Hours of Training per Employee	The amount of hours an Iron Mountain employee spent on training and development materials provided on the LinkedIn Learning Platform over the period from January 1st to December 28th in 2022.	2022 total number of hours viewed obtained from LinkedIn learning Dashboard / Total IRM Population
2022 Total Charitable Contributions	Total charitable contributions paid out by Iron Mountain in 2022, including Living Legacy Giving Budget, Employee Resource Grants, and Community Engagement.	Sum of total amount of budgets approved and paid for Living Legacy Giving Budget, Employee Resource Grants, and Community Engagement in 2022
2022 Total Volunteer Hours	Total hours volunteered by all Iron Mountain full time and part time employees in 2022. Iron Mountain gives all full time employees 16 hours and part time employees 8 hours of annual paid time off to volunteer. This is called "Community Service Time " (CST) in North America, APAC, and LATAM, and "Volunteering Time" in EMEA. Employees are also encouraged to track volunteer hours for eligible volunteer activities that are performed outside of work hours.	2022 total number of volunteer hours obtained from both the Moving Mountains portal and the HR timekeep practices (Community Service Time - CST or Volunteering Time). Duplicated hours from CST and MM portal were detected and subtracted from the total volunteer hours.
2022 Total Waste Generated	Total waste generated in 2022, covering all global activities Iron Mountain conducted in the period of Jan 01st, 2022 to Dec 31st, 2022.	Calculation is based on actual waste data from 73% of properties and the remaining 27% is estimated based on square footage.
2022 Total Water Consumption	Total water consumed in 2022 from 48% total square footage that has actual data.	Calculation includes properties that have actual data (48% of total square footage, no estimation included)

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