



# Iron Mountain (Australia)

Modern Slavery Statement

FY2024



## Contents

<b>Acknowledgment of Country</b> .....	2
<b>A Message from our Vice President and General Manager, Australia and New Zealand</b> .....	2
<b>Introduction</b> .....	3
<b>Reporting Entities</b> .....	3
<b>Organisational Structure, Operations and Supply Chain</b> .....	5
<b>Structure</b> .....	5
<b>Our Values</b> .....	7
<b>Australian Operations</b> .....	9
<b>Supply Chain</b> .....	10
<b>Modern Slavery Risk Assessment and Management in our Operations and Supply Chain</b> .....	12
<b>Modern Slavery Risk Assessment Tools: Internal Compliance</b> .....	12
<b>Modern Slavery Risk Assessment Tools: Partnerships</b> .....	15
<b>Risk of Modern Slavery appearing in Iron Mountain’s Supply Chain</b> .....	16
<b>Culture &amp; Engagement</b> .....	18
<b>Effectiveness of Actions Undertaken to Assess Modern Slavery Risks</b> .....	22
<b>Consultation with other Iron Mountain entities</b> .....	24
<b>Other relevant information</b> .....	25
<b>Board Approval</b> .....	25
<b>Appendix 1: Modern Slavery Act (“MSA”) Reporting Compliance Requirements</b> .....	26

## Acknowledgment of Country

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Iron Mountain acknowledges the Traditional Owners of the many Countries throughout Australia and their connection to the land and sea on which we live and work. We pay our respects to their Elders past and present and extend that respect to the Torres Strait Islander people.

## A Message from our Vice President and General Manager, Australia and New Zealand

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I am pleased to present Iron Mountain's FY2024 Modern Slavery Statement.

As a global organisation, Iron Mountain prides itself on being committed to ethical conduct and the protection of human rights. As a large multi-national organisation, we appreciate the challenges presented by modern slavery and our role in recognising and minimising the risks of modern slavery in our business operations and supply chain.

Guided by the UN Guiding Principles on Business and Human Rights and underpinned by our Corporate Sustainability Report and Code of Ethics and Business Conduct, a global trend for transparency in human rights, we continue to strengthen our own practices, to raise awareness and improve oversight across our business operations and supply chains.

Garry Valenzisi



## Introduction

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Iron Mountain has a zero tolerance approach to all forms of modern slavery.

Our commitment to supporting and respecting human rights is an important commitment for Iron Mountain and one we do not take lightly. We expect our business partners and suppliers to support our commitment.

With a focus on developing and implementing procedures, processes and strategies to mitigate exposure to modern slavery and human rights abuses appearing in its business, operations and supply chain, Iron Mountain continues its commitment to eradicating modern slavery and to the global improvement of human rights

Pursuant to the *Modern Slavery Act 2018* (Cth) (the “**Act**”), all entities with an annual consolidated revenue threshold over \$100,000,000 and which are either an Australian entity or a foreign entity carrying on business in Australia within the reporting period<sup>i</sup>, must comply with the Act and publish a Modern Slavery Statement (“**Statement**”).

This Statement is published pursuant to section 14 of the Act.

## Reporting Entities

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In August 2024, Iron Mountain acquired *APCD Pty Ltd*, an Australian IT asset disposition and hardware asset management provider. This acquisition marked a significant milestone for Iron Mountain’s expansion of asset lifecycle management services in the region. Whilst APCD is not a reporting entity for purposes of section 5 of the Act, as an Iron Mountain company, it has been included in this Statement.

This Statement is a joint statement issued by Iron Mountain Australia Group Pty Ltd (ABN 25 004 270 991) (“**IMAG**”) on behalf of itself and its related entities: Iron Mountain Australia Group Services Pty Ltd (ABN 19 079 495 346) (“**IMAGS**”) and APCD Pty Ltd (ABN 69 101 231 332) (“**APCD**”) (collectively “**Iron Mountain**”, “**IM**”, “**we**”, “**us**”, “**our**”).

IMAG and IMAGS are reporting entities within the meaning of section 5 of the Act.

This Statement captures the 7 mandatory criteria for reporting<sup>ii</sup> and describes the potential for risks of modern slavery<sup>iii</sup> appearing in Iron Mountain’s business, operations and supply chains and the steps we undertook to address such risks during the period 1 January 2024 to 31 December 2024 (“**FY24**” or “**Reporting Period**”).

IMAG and IMAGS are incorporated in Victoria, Australia and share a registered address at:

- 37 Logistics Drive, Truganina VIC 3029.

APCD is registered in New South Wales, with its registered address at:

- 16 Harbord Street, Granville NSW 2142.

IMAG, IMAGS and APCD share vice presidents, directors, codes, policies, processes and procedures.

## Organisational Structure, Operations and Supply Chain

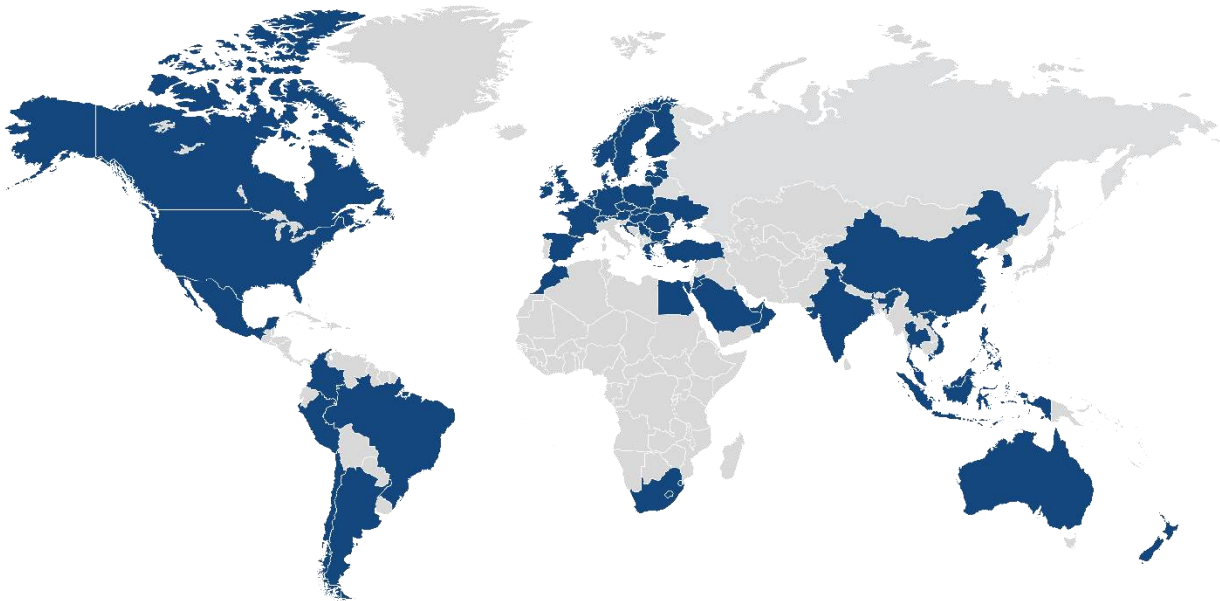
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### Structure

#### Who we are: corporate overview

Building the framework necessary to bridge gaps between physical and electronic media and extracting value along an assets lifecycle whilst preserving institution knowledge and enhancing efficiency, security and access, is the essence of Iron Mountain's business.

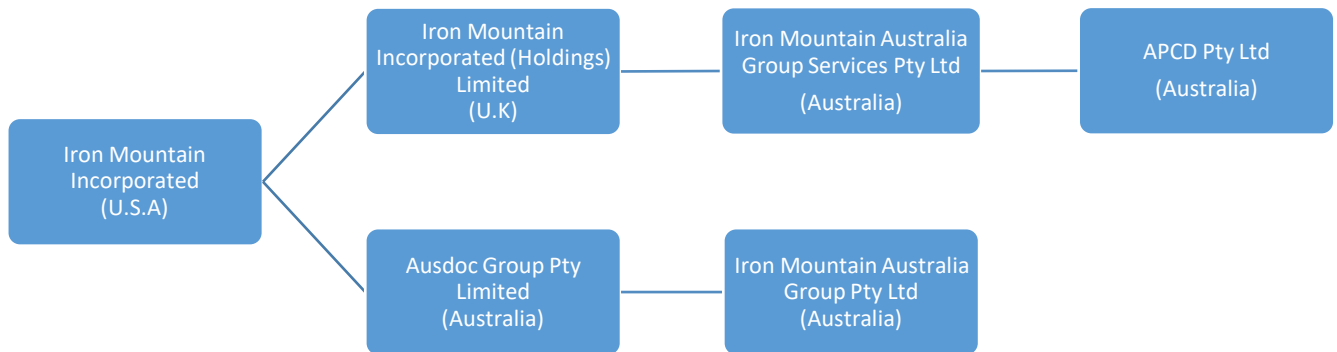
Since its humble beginnings in 1936, the Iron Mountain group has become a global leader in innovative storage, data centre infrastructure, record management services and asset lifecycle management and the trusted partner for over 225,000 customers, spanning 61 countries across 6 continents, including 90% of the Fortune 1000 companies.



Iron Mountain's corporate parent is *Iron Mountain Inc.*, an entity listed on the New York Stock Exchange and headquartered in Portsmouth, New Hampshire, USA.

We have been operating in Australia for over 25 years.

## Organisational Hierarchy



## Senior Management

- **Iron Mountain**
  - Gregory Lever  
*Senior Vice President & General Manager, Asia Pacific*
  - Garry Valenzisi  
*Vice President & General Manager, Australia & New Zealand  
Asia Pacific – Global Industries & Strategic Verticals  
Director/ Company Secretary*
  - Mathew Spratling  
*Senior Director, Sales, Australia & New Zealand*
  - Matthew Goldsack  
*Managing Director, BFSI & Country Manager ANZ  
Global Industries & Strategic Verticals*
- **APCD**
  - Gregory Lever  
*Director*
  - Garry Valenzisi  
*Director / Company Secretary*
  - Stuart Dahlenburg  
*Director*

## Our Values

Our values are central to who we are as a company and as individuals. They represent the ideals that we hold most important and are premised most importantly on:

- ❖ acting ethically, transparently, honestly, safely, securely and with integrity;
- ❖ to take responsibility for our successes, including those of our employees (our “**Mountaineers**”), customers and partners; and
- ❖ to promote the inclusion of, and teamwork with, our Mountaineers in our business operations.



With our values guiding our day to day behaviours, interactions and relationships, we continue cementing our global reputation as an ethical, trustworthy and legally compliant organisation.

By committing to these values and respecting human rights, we promise to:

- be respectful when treating others;
- uphold and protect human rights in our operations;
- provide safe, secure legal working conditions;
- only work with people that want to work with us;
- to be fair, honest and transparent in our day to day actions;
- embrace diversity; and
- monitor our suppliers for compliance with this commitment.



Iron Mountain’s commitment to its values and mitigating potential for, or removing modern slavery risks appearing in its operations or supply chain is underpinned by:

- ❖ our Code of Ethics and Business Conduct (“**Code of Conduct**”).  
Applying to all of our Mountaineers, our Code of Conduct:
  - requires that everyone is protected and treated with respect and dignity;
  - prohibits workplace violence and discrimination;
  - values inclusion and diversity;
  - provides for risk management and the importance of a safe and secure workplace;
  - holds people accountable for their actions;
  - to respect human rights and prevent modern slavery; and
  - immediately raise concerns if human rights violations are witnessed or suspected.
- ❖ our Supplier Code of Conduct (“**Supplier Code**”):
  - identifies the principles, standards and practices expected from Iron Mountain’s suppliers including modern slavery, workplace behaviour and conduct and ethical sourcing;

- Suppliers are expected to abide by the spirit of the Supplier Code and applicable laws
  - Suppliers receive the Supplier Code during onboarding, renewal and due diligence processes; and
  - for Australian suppliers, an annexure to the Supplier Code specific to modern slavery is applicable and is provided to the supplier with the Supplier Code, during onboarding or renewal processes or as part of any due diligence processes.
- ❖ our Global and local policies and statements, including our:
- Third Party Risk Management Policy
  - Global Human Rights Policy
  - Background Investigation Policy
  - Equal Employment Opportunity Policy
  - Fair Work Information Statement
  - Fair Work Casual Employee Information Statement
  - Flexible Workplace Model Policy
  - General Grievance Policy
  - Anti-Bribery and Anti-Corruption
  - International Sanctions and Trade Policy
  - Information Security Policies and Standards
  - Workplace Violence Prevention Policy
  - Occupational Health and Safety Policy
  - Policy against Anti-Discrimination, Harassment and Bullying
  - Procurement Policy
  - Whistleblowing processes
- ❖ stringent Australian workplace laws, including:
- the *Fair Work Act 2009* (Cth) (including National Employment Standards); and
  - the *Fair Work Regulations 2009* (Cth)
- ❖ registered Enterprise Agreements
- ❖ Modern Awards
- ❖ State and Territory Work Health and Safety laws
- including the model WHS Act: *Work Health and Safety Act 2011* (Cth)
- ❖ Various National, State and Territory, anti-discrimination laws;
- ❖ Employment contractual arrangements; and
- ❖ the United Nations' Guiding Principles on Business and Human Rights.

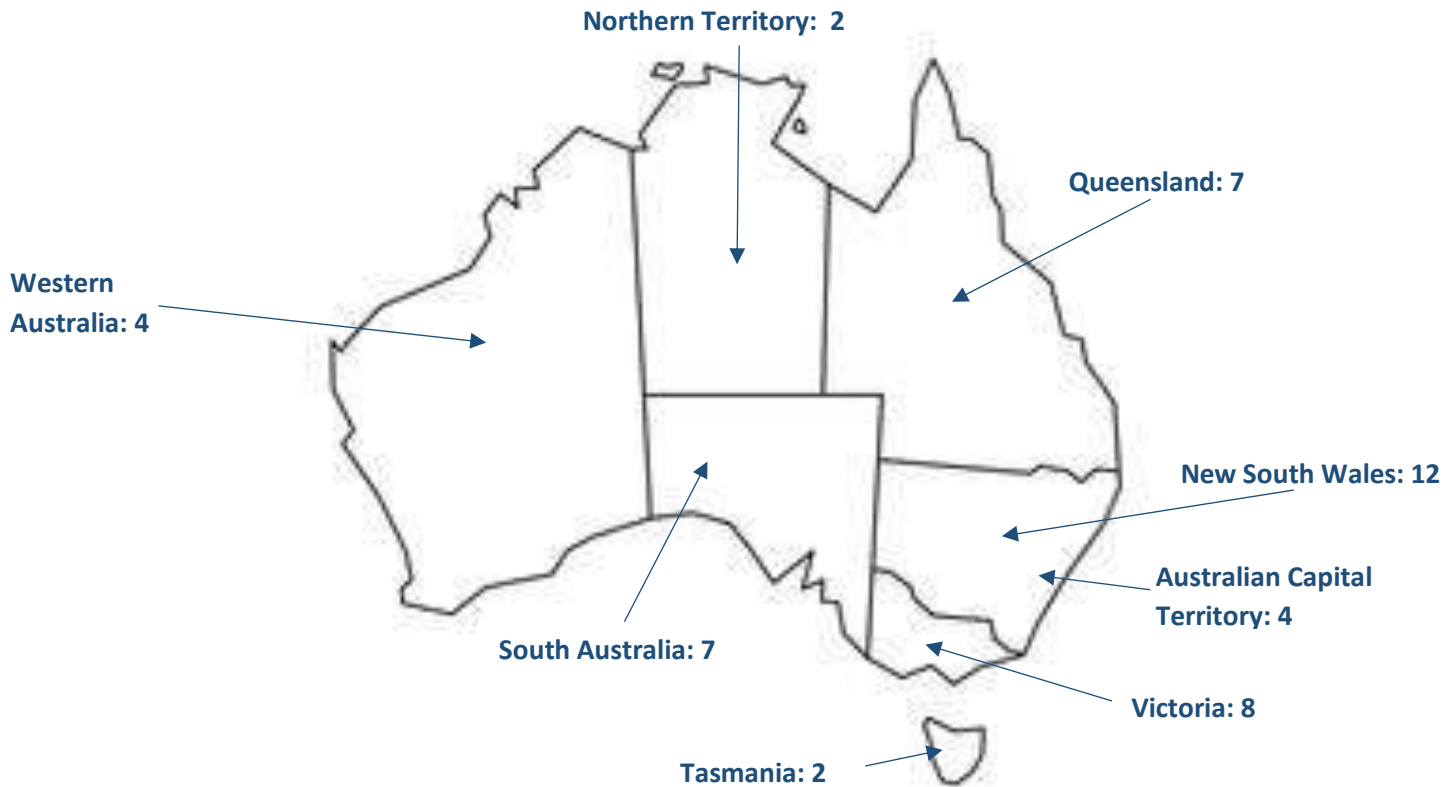
## Australian Operations

Iron Mountain offers a comprehensive and diverse range of information and asset management service solutions, including secure storage, destruction (document and IT asset), restoration, cloud and digital protection solutions for a customer base spanning a multitude of industries ranging from a single, residential person to multi-national corporations.

Our service solutions incorporate equipment, goods and the information and asset management service solutions.

We do not manufacture the equipment or goods used or sold in conjunction with our services.

We currently have 46 facilities and business operations located throughout Australia



For more information about Iron Mountain and the service solutions we provide, please refer to our website at: [www.ironmountain.com/en-au](http://www.ironmountain.com/en-au).

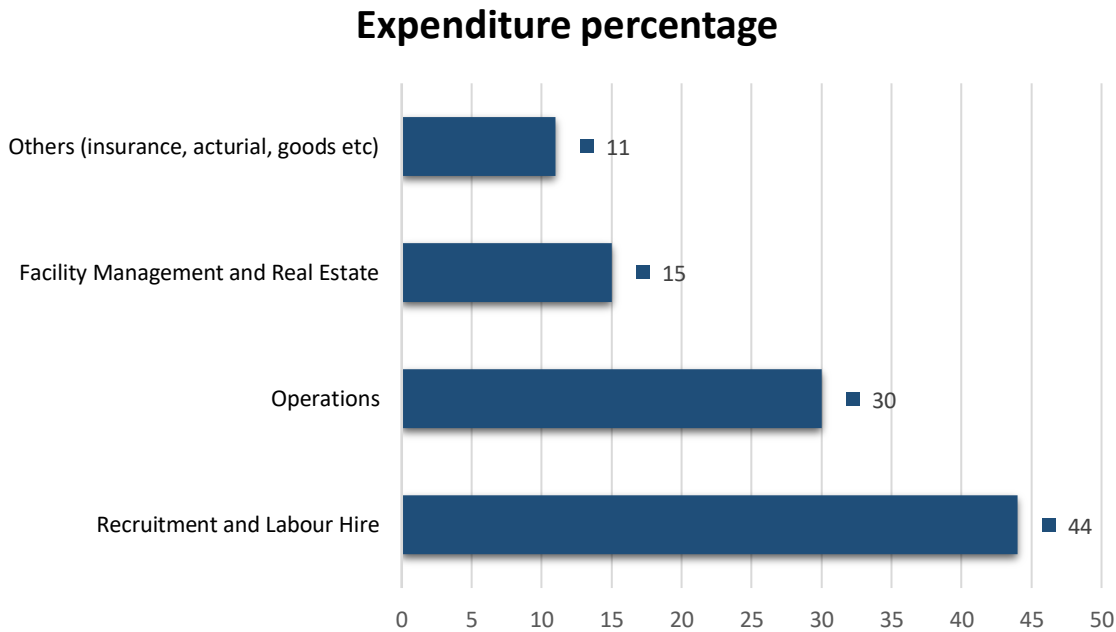
## Supply Chain

Iron Mountain’s global procurement team oversees management of supply chain.

Our Australian operation’s direct supply chain comprises approximately 404 suppliers with the majority of our tier 1 suppliers based in Australia.

Other material suppliers are located in the United Kingdom, the USA, and New Zealand.

The following table identifies our main suppliers and those with whom the majority of our expenditure is incurred:



## Supplier Selection

Any Iron Mountain supplier, regardless of its location or which Iron Mountain group company it services, must undergo a stringent due diligence onboarding processes which is managed by our third party risk management and procurement teams in collaboration with our legal teams.

As part of this process, consideration is given to a supplier’s:

- geographic location;
- commitment to working with Iron Mountain (including compliance with our Supplier Code of Conduct (“**Supplier Code**”), our policies and procedures;
- legislative compliance (including to applicable modern slavery and human rights laws);

- their general approach to preventing human rights abuses and modern slavery in their operations;
- supply chain management; and
- their overall commitment to social responsibility and compliance.

All suppliers must complete modern slavery questionnaires and any due diligence requests. They are also vetted against our internal third party risk management policy and standard. Suppliers are allocated a risk rating depending on the outcome of our due diligence processes with suppliers operating in industries that are more prone to, or which present a higher risk for modern slavery or human rights abuses, allocated a higher risk rating and are managed accordingly.

Iron Mountain does not necessarily consider the cheapest supplier as the most appropriate one to work with Iron Mountain as we also consider potential for high risk of practices appearing in their workforce and business. These suppliers and their practices are not necessarily aligned with Iron Mountains' values and may pose a risk to the protection of human rights.

To become an Iron Mountain supplier and to ensure supplier commitments are aligned with Iron Mountain's expectations, suppliers must also demonstrate commitments that compliment Iron Mountains'. All suppliers must agree to comply with Iron Mountain's Supplier Code and the Act before Iron Mountain will issue any purchase or work orders to those entities. We will reject any supplier that is unable or unwilling to make those commitments or whose responses to our due diligence and onboarding processes, are inadequate or incomplete.

Processes and tools utilised in our due diligence onboarding processes, include:



## Supply Agreements

Suppliers must execute a formal, written contract prior to commencing any services for Iron Mountain. Whilst suppliers are managed by Iron Mountain's procurement team following the third party risk management due diligence process, all contracts are reviewed by Iron Mountain's legal team to ensure they align with our internal policies and guidelines. Execution of these contracts is undertaken in compliance with Iron Mountain's internal authorised signatory policy and transaction reporting requirements.

## Modern Slavery Risk Assessment and Management in our Operations and Supply Chain

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### Modern Slavery Risk Assessment Tools: Internal Compliance

#### Iron Mountain's Internal Compliance Team Framework

Our internal compliance framework is based on our internal codes, policies and compliance structure and comprises the following:

- ❖ Shareholders
- ❖ Global and local Board of Directors  
*(involved in drafting, overseeing and approving our codes, policies and compliance structure)*
- ❖ Global and local Directors and Executive Management
- ❖ Global Sustainability  
*(together with our global privacy and compliance teams and local management, reviews our Modern Slavery Statement and recommends it for Board approval)*
- ❖ Global Privacy and Compliance
- ❖ Third Party Risk Management Team
- ❖ Internal stakeholder teams:
  - legal;
  - security and risk;
  - procurement;
  - human resources;
  - payroll
  - commercial

## United Nations Global Compact<sup>iv</sup> (“UNGC”)

The United Nations’ 10 principles (“**Principles**”) provide global guidelines for businesses to integrate policies and procedures into their operations that respect human rights, labour, the environment and anti-corruption. The Australian government implemented those Principles<sup>v</sup>.

The Principles operate on a three-pillar framework<sup>vi</sup>:

### 1. Protect

*State duty to protect human rights contraventions, including within business operations and implement effective remediation measures and policies.*

### 2. Respect

*businesses / corporations respecting human rights and avoid engaging in actions which infringe upon those rights.*

### 3. Remedy

*providing access to or taking remedial action for victims of human rights violations.*

Iron Mountain is a signatory to the UNGC and aligned with its Principles. With this alignment we recognise the continuum of involvement set out in the Principles, that explains how businesses can cause, contribute or become directly linked to human rights / modern slavery violations in their day to day business operations and supply chain.

CAUSE	CONTRIBUTION	DIRECTLY LINKED
<p>Companies may directly <b>cause</b> instances of modern slavery through their own activities Examples:</p> <ul style="list-style-type: none"> <li>• employing minors;</li> <li>• underpaying employees</li> </ul>	<p>Companies may <b>contribute</b> to modern slavery instances via activities involving a third party Examples:</p> <ul style="list-style-type: none"> <li>• outsourced services with underpaid staff</li> </ul>	<p>Companies are <b>directly linked</b> to instances of modern slavery if those instances are linked to its business operations, services or goods Example:</p> <ul style="list-style-type: none"> <li>• components used in goods sourced from third parties with employees that are or may be, subject to:                             <ul style="list-style-type: none"> <li>- forced labour</li> <li>- servitude</li> <li>- underage</li> <li>- underpaid</li> <li>- excess working hours</li> <li>- confiscation of personal documents (passports / identity documents)</li> </ul> </li> </ul>

Iron Mountain supports the Principles by creating and operating in a business environment that meets or exceeds those principles and a commitment to pursue short and long term strategies, policies and procedures which support those principles.

## Sustainability Group and Sustainability Report

Iron Mountain is committed to transparent reporting on sustainability efforts in accordance with the guidelines of the Global Reporting Initiative<sup>vii</sup>. We support our Mountaineers through a diverse and culturally inclusive workplace.

An important element of Iron Mountain's supply chain, is its sustainability team which actively collaborates with our customers to ensure sustainable behaviours are accessible and achievable.

Iron Mountain's Sustainability Report outlines our commitments and progress against key measures of success for our efforts in the community, our environment, and for our people and is available at: <https://www.ironmountain.com/about-us/sustainability>.

## Third Party Risk Management Team

Our Third Party Risk Management Team oversees the management of our supply chain. This includes flagging and responding to any potential supplier risks in our business operations and supply chain

The team continues to focus on identifying, assessing, mitigating and removing potential modern slavery risks from our operations and supply chain.

This group comprises representatives of the following key internal stakeholders:

- Globally: Executive Management of Iron Mountain Incorporated
- Global Legal Department
- Global Safety, Risk and Security Department
- Enterprise Risk Committee
- Global Procurement Department
- Global Human Resources Department
- Global Ethics and Compliance Department
- Australia: Vice President and General Manager, ANZ

## Modern Slavery Risk Assessment Tools: Partnerships

### United Nations Global Compact (“UNGC”)

As a signatory to the UNGC<sup>viii</sup>, Iron Mountain continues its’ alignment with the values and Principles of the UNGC.

### Sedex

Iron Mountain is a member of the Supplier Ethical Data Exchange organisation (“Sedex”). This global not-for-profit organisation is committed to assisting its members with improving the ethical performance of their supply chains and utilises an audit process that enables those members to understand the labour, health and safety, environmental performance and ethics within their supply chains. The audit process aims to protect employees and workers from unsafe conditions, discrimination, forced labour and low pay.

### Cm3

Iron Mountain subscribes to Cm3, an online contractor safety management and pre-qualification platform onto which suppliers, including Iron Mountain, upload information relevant to that supplier. Information collated includes ethical sourcing practices, modern slavery and human rights compliance, insurances, certifications and policies.

### Avetta

This global contractor risk management platform is used by businesses to manage their supply chains. We subscribe to this platform which is also used by our customers and partners to verify Iron Mountain’s own practices and compliance in risk management.

### Supply Nation

Australia’s leading not-for-profit organisation in supplier diversity aiming to promote and grow, Aboriginal and Torres Strait Islander businesses through supplier diversity.

### *Focus Areas during the FY2024 reporting period*

- the nature and location of services we perform;
- our Mountaineers, their functions and ongoing training;
- recruitment and due diligence processes;
- third party risk management (supplier assessments and onboarding processes);
- identifying potential modern slavery risks in our operations or supply chains; and
- monitoring our internal policies, codes, and processes to ensure they are current, reflective of our values and global standards and effective

## **Risk of Modern Slavery appearing in Iron Mountain's Supply Chain**

The Global Slavery Index<sup>ix</sup> (the "Index") published by Walk Free in 2023, identified that more than 50 million people still live in modern slavery with 12 million of those being children and 28 million subjected to forced labour. Whilst the Index identified parts of the Asia Pacific as regions with the highest prevalence of modern slavery, Australia was identified as having the second, strongest governmental response to modern slavery after the United Kingdom.

Iron Mountain believes the business sector risks posing the highest risks of modern slavery within its own supply chain are:

- maintenance and cleaning services for our various offices and facilities;
- suppliers sourcing services, products and components from overseas countries;
- supplier partnerships with overseas based entities; and
- overseas based suppliers.

The demand for low skilled, migrant and cheap labour exacerbates these risks.

Iron Mountain endeavours to engage Australian based suppliers and partners for our operations. Given Australia's strong legislative framework and general compliance stance to the protection of human rights, and our own stringent due diligence processes and supply chain management procedures, we consider the potential for modern slavery or human rights abuses appearing in our supply chain, as low.

We recognise there is no guarantee that instances of modern slavery appearing in our supply chain, regardless what mechanisms we implement to combat this. However, we remain vigilant and are committed to monitoring, investigating and taking appropriate action to manage, combat and prevent these risks arising in our supply chain.

## **Supplier Management in our Operations and Supply Chain**

We are compliant with laws and standards that are applicable to our business and operations and expect that our partners are equally compliant. Our contracts and purchase orders also require compliance with applicable laws and standards. Iron Mountain's supplier terms and conditions require compliance with our Supplier Code, the Act and to flow down such compliance through their own operations and supply chains.

If an Iron Mountain supplier or partner were to contravene our Supplier Code, the Act or our policies, we will work with them to remedy identified issues whilst retaining the right to terminate the relationship where appropriate.

Iron Mountain actively manages its relationships with its suppliers to ensure they act in accordance with best practices, the spirit of the Supplier Code and applicable laws.

## Links

- IM's Code of Ethics and Business Conduct can be found at:  
<https://www.ironmountain.com/utility/legal/code-of-ethics>
- IM's Supplier Code of Conduct can be found at:  
<https://www.ironmountain.com/utility/legal/supplier-code-of-conduct>
- IM's Corporate Sustainability Report can be found at:  
<https://www.ironmountain.com/en-au/about-us/sustainability#report>
- United Nations Global Compact – Participants  
<https://unglobalcompact.org/what-is-gc/participants/91841-Iron-Mountain>





# Culture & Engagement

## Culture & Engagement

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### Community Support

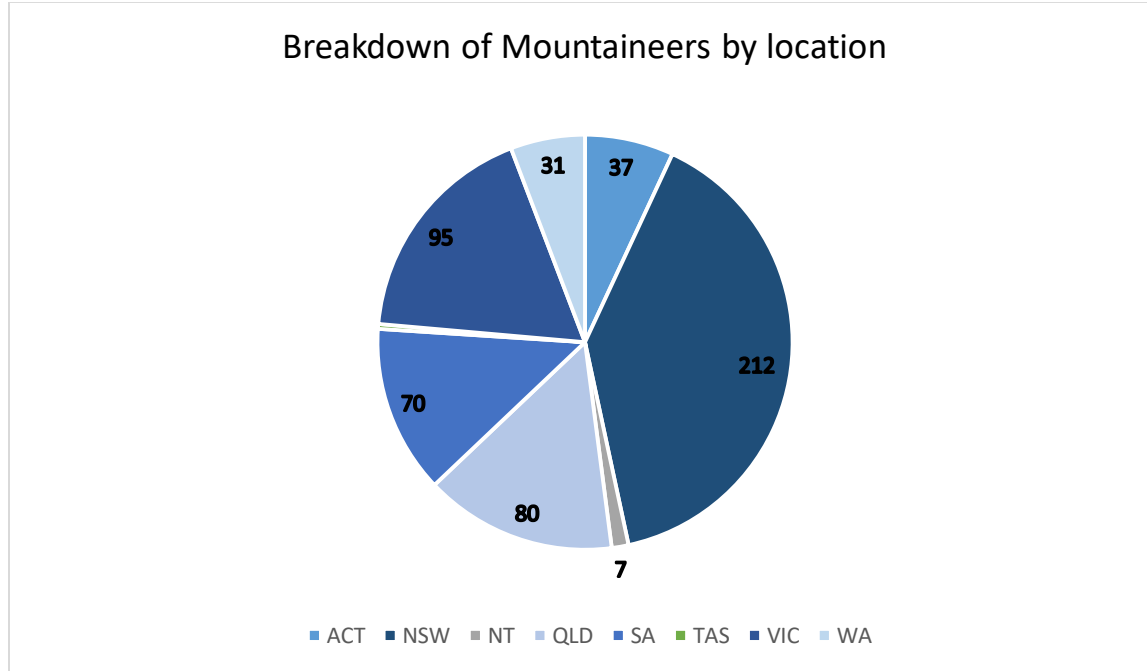
At Iron Mountain, our impact extends beyond the walls of our facilities. We contribute positively to the communities in which we operate by leveraging the unique capabilities of our business. We go beyond philanthropy to conduct business in a way that ensures a prosperous future for communities.

Iron Mountain’s robust network of 28,850 employees and 1,350 facilities is actively engaged in our global community. We offer volunteerism, financial grant awards and in-kind service to nonprofits and non-governmental organizations to help make our neighborhoods a better place to work and live. Our philanthropic efforts come to life through two programs: the Living Legacy Initiative, which provides financial grants and in-kind services, and Moving Mountains, our employee volunteer program.



## Employee overview

We employ over 28,850 Mountaineers globally, with 534 of those Mountaineers, based in Australia, servicing almost 13,000 customers across a diverse range of industries.



## Everyone has a voice at Iron Mountain

### *Speak up culture and whistleblowing*

Employees, partners and suppliers are encouraged to speak up or report (anonymously if preferred), raise concerns or whistle blow on potentially illegal practices without fear of retribution, retaliation or victimisation.

Concerns may be raised through Iron Mountain’s Ethics Line which is independently monitored and available 24 hours a day, 365 days a year. Iron Mountain receives reports of concerns generated through its’ Ethics Line for review, investigation and, if appropriate, action.

### *“IM Listening” surveys*

We encourage all our Mountaineers to participate in our global, annual, and online employee survey known as “IM Listening”. This survey provides a platform for our Mountaineers to share their experiences of working at Iron Mountain and to offer feedback on how we can collectively enhance the employee experience. Iron Mountain leadership utilizes the feedback gathered to inform our priorities for a successful future, address unmet needs, and strengthen our work, culture, and company.

The 2024 survey results for Australia and New Zealand were very positive in the following areas, showing an increase compared to 2023 and reflecting the views of the majority, with over 80% submission rates year over year (81% in both 2024 and 2023, and 82% in 2022):

- being proud (a +6 point increase) and committed (a +9 point increase) to working for Iron Mountain
- feeling able to be themselves at work (a +3 point increase) and feeling a sense of belonging (a +10 point increase)
- having access to sufficient resources (a +2 point increase)
- feeling valued and respected at Iron Mountain (a +6 point increase)
- being comfortable voicing their ideas and opinions (a +3 point increase)

## **Mountaineer assistance and wellbeing**

Iron Mountain prides itself on making resources available to its Mountaineers to assist them in their day to day lives, whether from an emotional, physical or financial standpoint.

Resources include:

### **1. Resources for Living (“RfL”)**

*Prioritizing preventive care and resilience for physical and mental health are key priorities that align with our culture of well-being and excellence. In addition to plans supporting employees’ physical well-being, we offer benefits and resources that help employees and their families prioritize mental health.*

*“Resources for Living” is a confidential employee assistance program that supports all Iron Mountain employees and their household members—24 hours a day, 7 days a week—at no cost.*

### **2. John Jamison Education Fund**

*A fund created to support Mountaineer children to pursue goals in higher education.*

### **3. Wellbeing Skill Building and PsychHub**

*In addition to internal surveys and the RfL, Mountaineers can also access our Wellbeing Skill Building program and PsychHub, the world’s largest mental health education platform.*

### **4. IM Wellness Program**

*A confidential free program available 24/7, assisting Mountaineers to take advantage of the Iron Mountain wellbeing resources available to them, including lifestyle coaching, Employee Assistance Programs and mindfulness.*

## 5. Employee Engagement Council

*In addition to the resources offered to all Mountaineers, Australian Mountaineers also have at their disposal, the Employee Engagement Council. This council is made up of representatives from our various internal departments.*

*An important part of the council's remit is to ensure that our Mountaineers and their families feel "included" and part of the greater Iron Mountain family. The council creates regular fun activities for our Mountaineers, their family and friends to participate in.*

*All Mountaineers are encouraged to reach out to council members to discuss or raise any ideas or concerns they may have concerning Iron Mountain's business and operations. Ideas or concerns raised with the council are escalated to Iron Mountain's senior leadership where appropriate.*

### Awards and Recognition

In 2024, Iron Mountain was honoured to receive a number of Awards, including:

- named a Top Performer in Employee Wellness by JUST Capital
- recognised by Comparably for having one of the "Best HR Teams" and "Best Global Culture" in 2024;
- named a Best Place to Work in 2024 by Built In; and
- scoring 100 on the 2024 Disability Equality Index.

## Recruitment and workforce training

Iron Mountain is compliant with applicable work, labour, and work health and safety laws. We utilise comprehensive recruitment processes which include pre-employment checks on potential employees, a right to work in Australia, ensuring minimum age, and payment requirements are complied with.

We also use the services of employees from entities within the Iron Mountain Group. Comparable pre-employment checks as those we undertake in Australia are utilised within the Iron Mountain Group.

Our workforce is supplemented through labour hire and recruitment agencies. We ensure comprehensive contractual arrangements are in place with those agencies that incorporate requirements for pre-employment checks and compliance our Supplier Code and modern slavery obligations.

We are confident these processes significantly reduce potential for modern slavery risks to exist within our workforce.

All Mountaineers must:

- attest to compliance with Iron Mountain's Code of Conduct on hire; and
- complete mandatory annual training and awareness programs developed in association with independent experts. These programs are presented via an online platform with

participation levels monitored and recorded. Our modern slavery training module provides Mountaineers with guidance on identifying and reporting on the existence of human trafficking and modern slavery.

Iron Mountain is proud of its Mountaineers and strives to give them the best tools and opportunities to support their general wellbeing and career development.

Mountaineers are encouraged to take advantage of all the resources Iron Mountain makes available to them.

## Effectiveness of Actions Undertaken to Assess Modern Slavery Risks

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### Reporting

Iron Mountain maintains its commitment to assessing and investigating any risks of modern slavery and human rights abuses that may appear in its operations and supply chain. Our processes, procedures are premised on an understanding of the types of situations or circumstances posing the most risk. Our policies and procedures are managed and regularly reviewed and updated by our shareholders, executive and senior management, both at a local and global level.

Iron Mountain's Ethics Line, Code of Conduct and Supplier Code in conjunction with our General Grievance Handling Policy (ANZ) and Equal Employment Opportunity Policy (ANZ) policies enable our Mountaineers, partners and suppliers to raise concerns or issues.

During the current reporting period, no reported incidences of modern slavery breaches, human rights abuses, breaches of our Supplier Code or the Act in its business operations or supply chain, were received by Iron Mountain.

## The Future

Iron Mountain is committed to applying our core values, processes and policies across our operations and supply chain in an endeavour to continue efforts to combat modern slavery and human rights abuses.

We hope to achieve this by:

<b>Task</b>	<b>Objectives</b>
<i>Policy and Code Review</i>	<ul style="list-style-type: none"> <li>- To continually monitoring our policies, standards, and codes to ensure they are current, compliant, and relevant</li> <li>- Co continually review and/or establish processes and procedures to review, assess and mitigate potential for human rights abuses and instances of modern slavery to appear in our supply chain or business operations.</li> <li>- To ongoing review and monitoring of our Global Human Rights Policy to ensure it remains relevant to and compliant with evolving modern slavery and protection of human rights laws.</li> </ul>
<i>Contractual Review</i>	<ul style="list-style-type: none"> <li>- To continually monitor and audit our suppliers to ensure compliance with our Supplier Code, the Act and a general commitment to eradicating modern slavery and human rights abuses.</li> <li>- To ensuring modern slavery and protection of human rights provisions are captured in all supplier agreements and to update existing or legacy contracts where required.</li> </ul>
<i>Training</i>	<ul style="list-style-type: none"> <li>- To conduct manual, regular training of employees to allow them to recognise the potential for, and to raise awareness of modern slavery and human rights abuses.</li> <li>- To investigate and promptly address any concerns raised through our Ethics Line.</li> </ul>
<i>Supplier Risk Management</i>	<ul style="list-style-type: none"> <li>- To establish, maintain and review minimum standards for onboarding suppliers.</li> <li>- To continually monitoring industry standards against relevant suppliers.</li> <li>- To continual monitoring to ensure adherence to Iron Mountain’s policies.</li> <li>- To managing communication of risks to internal business relationship owners.</li> <li>- To audit our suppliers to ensure compliance with contractual obligations, including compliance with modern slavery legislation and Iron Mountain’s Supplier Code.</li> <li>- To manage relationships with suppliers to mitigate potential for modern slavery or human rights issues to appear in the relationship.</li> </ul>

Whilst we are confident that the mechanisms we have in place to monitor our business operations and supply chain for risks of modern slavery or human rights abuses, will enable us to quickly identify and address such risks, we remain committed to the ongoing monitoring of relevant legislation and capture any amendments to the legislation in our policies and to appropriately and continually, manage our supply chain.

For further information about how Iron Mountain is building a better and more sustainable future, please refer to our Sustainability Report.

## Consultation with other Iron Mountain entities

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In preparing this Statement, Iron Mountain consulted with:

- its parent company, *Iron Mountain Inc.*;
- APCD;
- Iron Mountain's Global Sustainability corporate team; and
- Iron Mountain United Kingdom.

Such consultation included:

- identifying supplier industries and potential risk areas;
- supplier management;
- policies and processes available (currency and monitoring);
- incident reporting (if any, why and how).

### Global reporting

Iron Mountain entities publishing similar statements are:

- Iron Mountain (UK) PLC – publish a *Slavery and Human Trafficking Transparency Statement* under the United Kingdom's *Modern Slavery Act 2015*; and
- Iron Mountain Norge A/S – publish a *Norway Transparency Act Statement* under the *Norwegian Transparency Act*

## Other relevant information

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Iron Mountain acknowledges its obligations in respect to and the importance of, identifying, addressing and mitigating instances of modern slavery risks that may appear in its business operations, supply chain and to globally respect human rights.

We enhance this commitment through our policies and processes and the expectation that our Mountaineers and partners are aligned with this commitment.

In compiling this Statement, Iron Mountain considered the 7 key Modern Slavery Act Reporting Compliance Requirements (see Appendix 1).


## Board Approval

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This Statement was approved by Iron Mountain's board of directors on 3<sup>rd</sup> June 2025.

Signed by

DocuSigned by:  
  
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**GARRY VALENZISI**

Vice President and General Manager, Australia and New Zealand  
Asia Pacific – Global Industries & Strategic Verticals  
Director / Company Secretary  
Iron Mountain Australia Group Pty Ltd (ABN 25 004 270 991)  
Iron Mountain Australia Group Services Pty Ltd (ABN 19 079 495 346)  
APCD Pty Ltd (ABN 69 101 231 332)

## Appendix 1: Modern Slavery Act (“MSA”) Reporting Compliance Requirements

Compliance Requirement	Criteria and MSA Reporting	MSA Section	Relevant Statement Section(s)	Page No(s).
1. Identify the Reporting Entity		s16(1)(a)	<ul style="list-style-type: none"> <li>➤ Reporting Entities</li> <li>➤ Organisational Structure</li> </ul>	3, 4, and 6.
2. Describe the reporting entity’s structure, operations and supply chains		s16(1)(b)	<ul style="list-style-type: none"> <li>➤ Organisational Structure</li> <li>➤ Operational Structure</li> <li>➤ Australian Operations</li> <li>➤ Supply Chain</li> </ul>	5, 6, 9 and 10
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls		s16(1)(c)	<ul style="list-style-type: none"> <li>➤ Supply Chain</li> <li>➤ Supplier Selection</li> <li>➤ Supply Agreements</li> </ul>	10, 11 and 12
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks including due diligence and remediation processes		s16(1)(d)	<ul style="list-style-type: none"> <li>➤ Supplier Selection and Agreements</li> <li>➤ Modern Slavery Risk Assessment Tools: Internal Compliance</li> <li>➤ Modern Slavery Risk Assessment Tools: Partnerships</li> <li>➤ Risk of Modern Slavery appearing in Iron Mountain’s Supply Chain</li> <li>➤ Supplier Management in our Operations and Supply Chain</li> <li>➤ Recruitment and Workforce Training</li> </ul>	10, 11, 12, 14, 15, 16, 17, 21 and 22
5. Describe how the reporting entity assesses the effectiveness of these actions		s16(1)(e)	<ul style="list-style-type: none"> <li>➤ Supplier Management in our Operations and Supply Chain</li> <li>➤ Modern Slavery Assessment Tools: Internal Compliance</li> <li>➤ Modern Slavery Assessment Tools: Partnerships</li> <li>➤ Focus Areas during the FY24 period</li> <li>➤ Effectiveness of Actions Undertaken to Assess Modern Slavery Risks</li> </ul>	12, 15, 16, 22
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)		s16(1)(f) (i) and (ii)	<ul style="list-style-type: none"> <li>➤ Consultation with other IM entities</li> </ul>	24
7. Provide any other relevant information		s16(1)(g)	<ul style="list-style-type: none"> <li>➤ This Statement</li> <li>➤ The Future</li> </ul>	23, and 24

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<sup>i</sup> Statements are due within six months after the end of the reporting entity's financial year end.

<sup>ii</sup> s16 *Modern Slavery Act* 2018 (Cth)

<sup>iii</sup> Broadly defined, "*modern slavery*" means exploiting persons for commercial or personal gain by engaging in practices including: human trafficking; slavery and associated practices; servitude; forced and child labour.

<sup>iv</sup> <https://unglobalcompact.org/>; <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>v</sup> Australian Human Rights Commission: [www.humanrights.gov.au/our-work/business-and-human-rights/about-business-and-human-rights](http://www.humanrights.gov.au/our-work/business-and-human-rights/about-business-and-human-rights)

<sup>vi</sup> Guiding Principles on Business and Human Rights: United Nations Human Rights – Office of the High Communication 2011 publication.

<sup>vii</sup> <https://www.globalreporting.org/>

<sup>viii</sup> <https://www.unglobalcompact.org/what-is-gc>

<sup>ix</sup> <https://cdn.walkfree.org/content/uploads/2023/05/17114737/Global-Slavery-Index-2023.pdf>

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