



Human Rights Policy Statement

Our Human Rights Policy defines the requirements for respecting and upholding human rights. Iron Mountain is committed to protecting, upholding, and advancing respect for human rights throughout its operations and supply chain. This includes promoting equal opportunity, as well as eliminating modern slavery, human trafficking, and harmful or exploitative forms of labor, including child, prison and slave labor. We work diligently to ensure that the rights of everyone, at every level of involvement with the company, within the business, across the supply chain, and in the community at large, are respected at all times. We also recognize that all employees have the right to freedom of association and the right to engage in collective bargaining. The Policy applies to employees and business practices of all Iron Mountain business units, legal entities, controlled joint ventures, affiliates, and partnerships worldwide, as well as Iron Mountain third-party vendors.

This commitment is guided by the principles of the International Bill of Human Rights and the United Nations Guiding Principles on Business and Human Rights.

The following commitments are the individual and collective responsibility of Iron Mountain employees, suppliers, business partners, and associates:

- Respect all international human rights standards, guided by the International Bill of Human Rights and the United Nations Guiding Principles on Business and Human Rights.
- Adhere to the principles of the UN Global Compact, which include human rights, labor, environment, and anti-corruption.
- Commitment to equal employment opportunity and non-discrimination. We make employment decisions based on merit — not on race, color, religion, sex (including pregnancy), national origin, disability, age, sexual orientation, veteran status, genetic information, gender identity, gender expression, or any other factor prohibited by law.
- Provide a safe work environment, free from harassment, sexual harassment, or intimidation, with fair working hours and compensation, and prohibit the use of child, prison, or slave labor.
- Suppliers and business partners must adhere to all applicable legal and other binding obligations concerning employment practices and workplace conditions, take all necessary steps to ensure their workers meet the minimum legal age for employment, and that their service is strictly voluntary – which means that it must not involve acts of slavery or servitude, forced or compulsory labor, or human trafficking. It must also be fairly compensated and carried out under safe and healthy conditions.

- Report any suspected misconduct or violations of this Policy, without fear of retaliation, through the appropriate channels, including the Ethics Line and the Open Door Policy. Anyone can report misconduct confidentially, and where permitted by law, anonymously. For people managers, failure to promptly report or escalate any allegations witnessed or raised with a supervisor or manager may result in disciplinary action.
- Complete all assigned compliance training programs.

Iron Mountain will:

- Conduct annual Code of Ethics training as part of our global compliance training strategy and monitor completion by all employees. Setting forth our policies and standards on a variety of topics, including safety and security, inclusion and belonging, avoiding conflicts of interest, preventing insider trading, anti-harassment and anti-discrimination, anti-bribery and anti-corruption, anti-fraud and anti-money laundering, environment and sustainability, and human rights and privacy considerations, among others.
- Continually monitor the Ethics Line, which is administered by a third party. Assess all reports and investigate alleged major violations of the Iron Mountain Code of Ethics and Business Conduct, including human rights violations, and implement appropriate remedies for violations of this Policy.
- Conduct periodic due diligence both within its organization and throughout its supply chain to assess human rights risks. In operations, this involves analyzing work, training, locations, recruitment, and any indicators of human trafficking or forced labor. In the supply chain, risk assessment considers the services, information or assets that suppliers handle, ensuring that after evaluation, the likelihood of risks related to human rights, working conditions, modern slavery, or forced labor remains very low to none.
- In addition, the Company is committed to responding to information requests about how it addresses potential and actual impacts on human rights and decent working conditions.
- On a biennial basis, or more frequently if needed, review and make recommendations for policy adjustments to ensure continued alignment with regulatory changes and best practices, and obtain approval from the Chief Compliance Officer.