



Occupational Health & Safety Policy Statement

Approved by: Chief Risk Officer and Sr. Director, Global Head of Safety

It is Iron Mountain's policy to conduct its business in a manner that protects the health and safety of employees, others involved in its operations, customers, and the public. Iron Mountain will strive to prevent all accidents, injuries, and occupational illnesses through the active participation of every worker and is committed to continuous efforts to identify and eliminate or manage safety risks associated with its activities.

Our Occupational Health & Safety Policy defines the requirements for an occupational health and safety management system ("OHSMS"). Iron Mountain has developed and implemented a Global Safety Framework to manage safety and support its aspiration to be an incident-free workplace. This Framework is in alignment with the standards developed in the creation of ISO 45001.

The Policy applies to all employees, customers, visitors and 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 all geographies, business lines and functions we operate. Iron Mountain employees and associates will follow all local regulatory requirements or Iron Mountain's global standards, whichever is greater.

The following commitments are the individual and collective responsibility of Iron Mountain employees and associates:

- Be aware of, understand, and comply with all occupational health and safety policies, procedures, and written instructions and successfully complete required health and safety training.
- Operate in a safe and responsible manner that respects the health and safety of Iron Mountain employees, guests and the communities in which we operate.
- Ensure, to the best of our knowledge, that the facilities we operate/occupy meet accessibility requirements and comply with applicable laws and regulations, including parking areas and facility access requirements.
- Review safety performance quarterly with the Executive Team and identify opportunities for improvement.
- Manage safety risks in a manner that protects the brand, reputation and integrity of the business.
- Continuously improve our business processes with respect to health and safety.
- Hold employees accountable to this Policy; failure to do so may result in disciplinary action up to and including termination.

Iron Mountain will:

- Provide a safe working environment for all Iron Mountain employees and associates by operating in a manner that is consistent with applicable laws, regulations, codes and practices in the areas in which we operate.
- Implement and manage an Occupational Health and Safety System that:
 - Consists of written policies, procedures, guidelines and specifications that define the program in detail and ensure safe systems of work
 - Complies with the laws and regulations governing the locations in which we operate
 - Provides a safe workplace, equipment and systems of work
 - Provides guidance to all employees and associates to ensure their safety
 - Communicates and consults with all stakeholders on occupational health and safety issues in the workplace
 - Controls and reduces the incidence of work-related injury and illness
- Establish documentation for the Occupational Health and Safety System that includes, at a minimum:
 - Management's commitment, direction, and review framework process
 - Roles, responsibilities, and authority
 - The process for hazard identification, prioritization, controls and corrective action; incidental investigation, root cause analysis, and recommended corrective action; and performance measurement and monitoring
 - Communication, training, awareness, and methods to establish a participative culture
 - The documentation control process and audit requirements
- Ensure all work locations are covered by an Occupational Health and Safety System tailored to the specific needs, certifications, and legal requirements appropriate to the nature of work, scale, and geography of the location.
- Monitor compliance with the Occupational Health and Safety System, identify instances of noncompliance, and recommend improvements.