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Slavery and Human Trafficking Transparency Statement for Iron Mountain (UK) PLC and its affiliates operating in the UK (collectively "IM") for the Financial Year 2025.

This statement is made pursuant to section 54 (Part 6) of the Modern Slavery Act 2015 (the "**Act**") and sets out the steps that IM has taken to address the risk of slavery and human trafficking within its own organisation and within its supply chain.

IM Overview

IM is part of the Iron Mountain group, the world's largest provider of records and information management services. The Iron Mountain group operates in over 50 countries and employs approximately 26,000 people, nearly 1,300 of which are based in the United Kingdom. More information about our business is available from our website: www.ironmountain.co.uk.

Our business is established on core values of trust and integrity and we take compliance with all laws, including the Modern Slavery Act 2015, extremely seriously and are fully committed to and support initiatives that promote the eradication of slavery and human trafficking throughout the world. Furthermore, we strive to ensure equal opportunities for all our workers as described in detail in our Code of Ethics and Business Conduct which provides the bedrock of our organisation. Our Code can be accessed via the following link: www.ironmountain.com/code

We have a zero tolerance attitude towards all forms of slavery and forced labour and only work with people who choose to work freely with us. Under no circumstances do we accept forced, bonded, involuntary or child labour and we do not confiscate personal documents of our employees nor require them to make any form of payment to secure their employment.

When the Act was originally introduced, IM engaged with members of its internal teams and created a cross functional group with representatives from key teams including legal, procurement, ethics and compliance to assess the impact/potential impact of human slavery both within our organisation and within our broader supply chain. Following investigation and analysis, it was determined both at the time and also during regular reassessment, that neither IM nor organisations in our supply chain are at particular risk of nor likely to encounter modern slavery practices within their operations. Nonetheless, we have implemented a number of policies and practices within our organisation to ensure that we remain vigilant to the potential risks of modern slavery and to ensure that human rights are respected both within our own organisation but also in our wider operations and by the people that we work with.

Analysis of the Risks of Slavery and Human Trafficking within IM's own Operations

In assessing of the likelihood of slavery and human trafficking existing within our own organisation, we analysed a number of key factors namely:

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- the nature of work performed by our personnel;
- communications with and training provide to our personnel;
- the locations of our facilities and personnel;
- our recruitment and vetting processes; and
- the lack of any indication of the existence of slavery or human trafficking.

Considering all these factors both individually and collectively, we have concluded the likelihood of any risk of modern slavery to be low.

Our purpose is defined as being our customers most trusted partner for protecting and unlocking the value of what matters most to them in innovative and responsible ways. Given the confidential and sensitive nature of our business, as a matter of course, we conduct extensive pre-employment screening checks before employing any new hires including verifying all employees right to work in the UK. Additionally, Iron Mountain pays all employees above the government living wage in the UK. Collectively, these measures help us to eliminate any risks of modern slavery as we engage not just with potential employees but also with previous employers, character referees and various people who have been involved in a prospective employee's prior career and who are able to verify a candidate's willingness to work for our organisation as a matter of their own free will and for fair market-rate remuneration.

Additionally, other members of the Iron Mountain group of companies utilise comparable pre-employment screening checks and when we work with these affiliated organisations, we are confident that their personnel have all undergone comparable checks into their background and willingness to work for our organisation and that these are sufficient to minimise the risk of slavery and human trafficking.

Aside from our own recruitment processes, we engage with employment agencies and businesses to manage fluctuations in our workforce and additional staffing requirements. We have well established relationships with our trusted recruitment partners and have contractual requirements in place to ensure compliance with all laws (including the elimination of modern slavery and upholding the human rights of all workers).

Analysis of the Risks of Slavery and Human Trafficking within IM's Supply Chain

The Iron Mountain group operates around the world in over 50 countries however our supply chain is relatively small when compared with other organisations of a similar size. Our business model is to grow through acquisition and we primarily supply services via our own in-house expertise. Where we do use suppliers within our UK business, these are few in number and for the most part, located in the UK. As such, we are able to develop close and effective relationships with our suppliers and are not exposed to the risks of modern slavery that exist in other industries, e.g. manufacturing, which by their nature have larger supply chains.

As we have done within our own organisation, we assessed our supply chain (and revisit these assessments periodically) to determine whether there are any risks or modern slavery or human trafficking existing within it. Our determination is that the risk of any abuses is for the most part low however there are a few areas which may be more susceptible to the risks of modern slavery and/or human trafficking; namely outsourced cleaning services and potentially in the manufacturing of our uniforms.

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Steps taken by IM to eradicate the existence of Slavery and Human Trafficking

Following the aforementioned analysis, IM has implemented the following measures:

- *Contractual Requirements*: we have incorporated express obligations for our suppliers to comply with the requirements of the Act, and to flow these down to their own suppliers, within our standard terms and conditions. We also retain the right to audit our suppliers against their compliance with the Act and include questions about the Act in our standard Supplier audit questionnaire.

- *Supplier Code of Conduct*: IM's supplier code of conduct, which has been in place for a number of years and against which suppliers can be audited, requires all of our suppliers to act in both an ethically and legally compliant manner (http://www.ironmountain.com/Company/Global-Procurement/Prospective-Supplier-Information/Guidelines-for-Suppliers.aspx), including with respect to their employees and staff. This code is periodically reviewed to ensure that suppliers are required to act in accordance with best practice and both the letter and spirit of all legislation.

- *Supplier selection*: In selecting suppliers/partners IM focuses on their overall ability to work with IM (including their commitment to CSR and compliance) and not just on price alone. In doing so we do not always choose to work with the cheapest suppliers who arguably may be more likely to use forced labour or behave contrary to the Act. In addition, we request information from potential suppliers on their approach to the Act and any areas of specific risk. Iron Mountain's Third Party Risk Management department's key focus is to identify any risks existing in our supply chain and to monitor legal compliance of all the organisations that we work with. This department works with risk management software which enables us to create a profile of each supplier and map any identified or potential risks so that we can investigate these in more detail and make an informed decision before we work with new or continue to work with existing suppliers. IM also uses EcoVadis to annually assess 100% of our global suppliers across four key risk categories: Environment, Labor & Human Rights, Ethics, and Sustainable Procurement. Any supplier IM identifies as high-risk or strategic through this screening process is asked to complete an additional assessment within the EcoVadis platform. The results from these efforts guide further supplier engagement.

- *Relationships with Suppliers*: IM actively manages relationships with our key suppliers who, through either contractual requirements or dealings with IM, should be aware of our expectations regarding compliance with the Act. Further, should we believe a supplier to be responsible for a breach of the Act, susceptible to breaching the Act, or not acting in accordance with its principles, we would look to work with them to rectify the situation whilst reserving our right to take more formal action, including terminating the relationship, if necessary.

- *Compliance Helpline*: IM runs an anonymous helpline that enables employees (and suppliers) to whistle blow on illegal practices without the risk of victimisation thereby creating an environment in which any non-compliant practices may be brought to the attention of IM.

- *Training*: IM has engaged third party experts to provide training to our procurement team on the Act and how to spot and report indicators of the existence of slavery and human trafficking. On identification of any indicator, our staff are trained to promptly report and escalate the issue to senior personnel. Similar training will be provided by our internal compliance team in the future to wider audience within the business to enhance our ability to identify and deal with risks.

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- *Speak-up culture*: IM works hard to create an open culture in which all employees are actively encouraged to speak openly, through various channels, about any concerns or suspicions they may have. Further IM's values demand that all human rights are respected.

- *Recruitment*: IM undertakes strict pre-employment screening on all employees, which includes verification of an individual's right to work within the UK. This significantly reduces the likelihood of us directly using forced labour.

- *Third Party Reviews*: Whilst we have implemented risk software and have dedicated employees investigating risk in our business and supply chain, we will continue to review the merits of engaging specialist third party consultants to review of our supply chain management, to validate our findings and make recommendations about further steps we could take to support the objectives of the Act.

- *National and International Learning:* We regularly monitor Home Office Guidance to understand developments in best practice. Further, as legislation similar to the Act is being introduced across the globe, we are looking to identify additional measures that we could take or best practices that we could adopt, to reduce the risk of us inadvertently breaching the Act.

We are conscious that the above does not provide IM with absolute certainty that slavery and human trafficking have been eradicated from our organisation and supply chain. Consequently, whilst we consider ourselves low risk, we will continue to review our processes and practices on a regular basis, to ensure that we continue to identify and manage risks in order to establish our ongoing compliance with the Act.

Approved by the board on 10 June 2026

Signed by:
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Nick Ford

Director of Iron Mountain (UK) PLC

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