



IRON
MOUNTAIN®

IRON MOUNTAIN SUPPLIER CODE OF CONDUCT

CONTENTS

- /03 INTRODUCTION
- /04 IRON MOUNTAIN'S VALUES
- /04 COMMITMENT TO ETHICS AND COMPLIANCE
- /05 PRIVACY AND DATA PROTECTION
- /05 ETHICAL WORKPLACE PRACTICES AND ANTI-SLAVERY
- /06 HEALTH, SAFETY, AND SECURITY
- /06 ANTI-DISCRIMINATION, RESPECT FOR DIVERSITY,
AND EQUAL EMPLOYMENT OPPORTUNITY
- /07 ENVIRONMENT AND SUSTAINABILITY
- /07 ANTI-BRIBERY AND ANTI-CORRUPTION
- /08 GIFTS AND ENTERTAINMENT
- /08 PROVIDING SERVICES TO THE GOVERNMENT
- /09 CONFLICTS OF INTEREST
- /09 INTERNATIONAL SANCTIONS AND TRADE REGULATIONS
- /09 INSIDER TRADING
- /10 ANTITRUST AND FAIR COMPETITION
- /10 USE OF SUBCONTRACTORS
- /10 BRAND AND REPUTATION
- /11 ASSESSING COMPLIANCE AND REPORTING VIOLATIONS
- /11 NO RETALIATION
- /11 NO CREATION OF THIRD PARTY RIGHTS

INTRODUCTION

Trust. It's hard to earn, and easily broken. For seven decades now, our Values and how we live them are why customers, suppliers, and shareholders trust us. Our Values consistently drive our behavior and represent the ideals we hold most important.

Iron Mountain strongly values its supplier relationships, and as a trusted Iron Mountain service provider, you play a key role in allowing us to live up to our Values and our promises: to our customers, our employees, our shareholders, and the communities where we live and work.

Iron Mountain's Supplier Code of Conduct (which supplements our Code of Ethics and Business Conduct) sets forth the principles, standards, and practices required for doing business with us. We expect you to abide by the letter and spirit of the Code, and to use it as a resource to help provide service that's ethical and legally compliant. Be aware that violation of the Code can be considered a violation of your agreement with Iron Mountain - which could result in termination of our business relationship.

If a situation arises during the course of our business relationship that might impact your ability to provide us with service that's consistent with our Values or the Code, please contact your Iron Mountain representative or our Legal Department's Privacy and Compliance team at compliance@ironmountain.com.

IRON MOUNTAIN'S 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 team, 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.

COMMITMENT TO ETHICS AND COMPLIANCE

Iron Mountain operates in strict compliance with applicable laws, rules, and regulations - regardless of the type of service we're providing, or where it's being delivered. To help ensure compliance, we maintain a robust ethics and compliance program, the cornerstone of which is our [Code of Ethics and Business Conduct](#). The Code gives us direction on ethical and compliant behavior, and provides resources to obtain further assistance or report violations. As a condition of employment, all employees must certify to the Code, and to other company policies.

As a trusted service provider, we require that you also operate in strict compliance with the law, and in a manner that's consistent with our Values and Code of Ethics and Business Conduct. To that end, depending on the nature of the service you're providing (and your contractual terms), you may be required to participate in compliance trainings, certify to certain Iron Mountain policies, or comply with various statutes and regulations.

Before beginning your service with Iron Mountain, please familiarize yourself with our Code of Ethics and Business Conduct, which can be found at the following address: www.ironmountain.com/code.

PRIVACY AND DATA PROTECTION

For seventy years, Iron Mountain has been earning (and keeping) our customers' trust by securely protecting information and other assets. Iron Mountain maintains privacy, security, and data protection controls that meet or exceed our legal, contractual, and other binding obligations (such as subscribed-to industry standards or certifications).

When you handle information or assets on our behalf - whether it's our employees' or our customers' - we require that you keep it safe, confidential, and use it only for authorized purposes. This means applying levels of protection that never fall below the legal, contractual, or other binding obligations that apply to you.

As part of this commitment, you may be required to maintain (and demonstrate) effective physical, technical, and administrative controls over the privacy and security of the data or other assets you're handling. Depending upon the services you are providing and the nature of the information or assets you are handling on our behalf, you may also be required to undergo Iron Mountain's Third Party Risk Assessment or Vendor Privacy Assessment, which will help determine if additional safeguards are appropriate.

ETHICAL WORKPLACE PRACTICES AND ANTI-SLAVERY

Iron Mountain is committed to applying the principles of its Values and Code of Ethics and Business Conduct in the workplace. As such, we work to continually improve our employees' working conditions, and to meet all legal requirements concerning labor and organizing rights, wages and deductions, and working hours (including voluntary overtime). As an Iron Mountain supplier, we expect you to share in this commitment and to respect any and all such rights.

Regardless of the type or location of service provided, Iron Mountain's suppliers must adhere to all applicable legal and other binding obligations concerning employment practices and workplace conditions. Suppliers must 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.

We require that you - and anyone providing you with goods or services - comply with all applicable regulatory requirements relating to anti-slavery and human trafficking (such as the U.K. Modern Slavery Act). We also require that you implement appropriate controls and procedures within your company and within your supply chain to prevent modern slavery, and that you take no action which would cause Iron Mountain to be out of compliance with its own requirements.

HEALTH, SAFETY, AND SECURITY

Iron Mountain is deeply committed to the health, safety, and security of its employees. Indeed, **Own Safety and Security** is one of our company's Values. Because suppliers often work directly alongside Iron Mountain employees (or our customers), you are expected to take all appropriate measures to verify your employees' backgrounds and qualifications. Such measures may include confirming competencies and skills, checking criminal histories, assessing driving records, performing health status checks, or verifying work eligibility.

When providing services at an Iron Mountain facility, certain additional rules may apply, such as performing a job hazard analysis before beginning work or executing tasks, displaying identification badges, submitting to temperature checks, or wearing personal protective equipment. You may also be required to sign in and out of facilities or to remain with an Iron Mountain escort. In all instances, though, suppliers must refrain from any form of conduct that's considered dangerous, threatening, or harassing, and must perform service in a manner that's compliant with applicable health and safety laws and regulations. Iron Mountain also encourages suppliers to establish clear disciplinary procedures that are uniformly applied across its workforce.

ANTI-DISCRIMINATION, PROMOTING DIVERSITY, AND EQUAL EMPLOYMENT OPPORTUNITY

Iron Mountain believes that our strong commitment to inclusion and diversity makes us a better, stronger company. It contributes directly to our ability to meet the wide-ranging needs of our customers, and to succeed in the marketplace. To help achieve this, we make employment decisions based strictly on an individual's capacity to perform the job - and not on factors such as race, religion, ethnicity, age, gender, sexual orientation, disability, or other characteristics that are unrelated to an individual's skills or qualifications.

Iron Mountain requires that its suppliers undertake similar commitments: to always act in compliance with anti-discrimination laws, and to take concrete steps towards advancing the goals of promoting inclusion and diversity and eliminating discrimination in the workplace. As an embodiment of our dedication to these principles, Iron Mountain will consider the diversity of a supplier's workforce as a positive factor during the selection process.

ENVIRONMENT AND SUSTAINABILITY

Iron Mountain is committed to conducting business in a sustainable and environmentally responsible manner. Because we operate a large fleet of vehicles and have extensive real estate holdings - including data centers - we realize that our business decisions and internal practices can have a direct effect on our communities and the environment. As such, we operate in full compliance with applicable environmental laws, and work continuously towards increasing the sustainability of our operations. Iron Mountain will only work with suppliers that operate in compliance with applicable environmental laws, and we prefer to select suppliers that share our commitment to the business practices we outline in our [Corporate Social Responsibility report](#).

ANTI-BRIBERY AND ANTI-CORRUPTION

As a company which operates in many different countries around the world, Iron Mountain is committed to complying with the letter and spirit of applicable anti-bribery and anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. These laws generally prohibit providing, offering to provide, or authorizing others to provide anything of value to government officials or private parties for the purpose of improperly obtaining business, securing an advantage, or influencing a decision.

We take this commitment very seriously—and require the same level of commitment from our suppliers. Iron Mountain suppliers must strictly comply with all aspects of these (and related) laws - including those concerning financial reporting, bookkeeping, records retention, and the submission of accurate invoices and expense reports.

Iron Mountain wins business based on the merit of its products and services—not through bribes, kickbacks, improper gifts and entertainment, or facilitation payments. While this holds true in general, extra obligations may apply when interacting with government officials, government-run businesses, or the individuals associated with them.

GIFTS AND ENTERTAINMENT

Iron Mountain will never extend preferential treatment to suppliers because of their offer of gifts, entertainment, or other items of value. Suppliers may not offer gifts to Iron Mountain in an attempt to influence our business decisions, or to gain advantage over other suppliers. Even when gifts are permissible under law and policy, suppliers must still exercise discretion and good judgment, since even “routine” business courtesies have the potential to cause embarrassing situations or create risk for those involved.

Suppliers should familiarize themselves with Iron Mountain’s Gifts, Hospitality and Charitable Contributions Policy, and not offer or accept gifts that violate it.

PROVIDING SERVICES TO THE GOVERNMENT

Governments around the world trust Iron Mountain to protect their vital information and irreplaceable assets. While we act with the highest degree of integrity with all of our customers, service to the government often comes with additional obligations - which as our trusted supplier, may be passed along to you.

When providing services on behalf of Iron Mountain to federal, state, or local governments, you may be subject to specific requirements related to wages, hours, working conditions, pricing, gifting, lobbying, conflicts of interest, or the proper handling of information. There may also be unique operational requirements, or restrictions on which individuals are qualified (or permitted) to provide service.

It’s your responsibility to understand and adhere to the compliance commitments involved in servicing the government - whether they apply to you directly by law, or through your contract with Iron Mountain.

CONFLICTS OF INTEREST

When a friendship, family relationship, financial interest, or other similar circumstance interferes with (or has the potential to interfere with) your ability to make honest and fair business decisions, or to provide goods or services to Iron Mountain, a conflict of interest may exist. Suppliers are required to raise any such concerns (or potential concerns) to Iron Mountain before the business relationship is formed, or at any time thereafter, should a new conflict arise.

INTERNATIONAL SANCTIONS AND TRADE REGULATIONS

We operate in many countries that impose controls on the import and export of sensitive equipment and data (such as computer hardware and encryption technology). There are also global restrictions on doing business with certain designated groups, individuals, or countries. Strictly complying with international sanctions and trade regulations is critical to preserving our ability to conduct business internationally, and is an important way we live our Value to **Own Safety and Security**. For that reason, we are unable to work with suppliers who appear on government sanctions lists. If you are aware that you appear on any such list, please bring this to the attention of your Iron Mountain representative before providing us with goods or services. While these important regulatory restrictions apply to you - and we expect you to understand and abide by them - they also apply to your suppliers, and we require that you pass them along as appropriate.

INSIDER TRADING

Iron Mountain is a publicly traded company with a variety of legal obligations to its shareholders and government regulators. As a supplier, you may be entrusted with information that has not yet been (or may never be) disclosed to the public. This information could affect our stock price, or the valuation of other companies. Our ethical standards (and the law) strictly forbid you from acting on such information. This applies not only to you and your employees directly, but to family, friends, or others who might be in a position to make investment decisions based on the information. If you have access to such information, you're expected to keep it confidential, and to handle it with the utmost care and discretion.

ANTITRUST AND FAIR COMPETITION

Iron Mountain is committed to competing fairly in the marketplace, and to complying with all applicable laws concerning antitrust and fair competition. We actively avoid situations that could even have the appearance of impropriety or deception.

When providing service to Iron Mountain, we require that you too abide by these legal and ethical standards - and specifically avoid collecting or sharing competitively sensitive information such as customer lists or pricing and discount information.

USE OF SUBCONTRACTORS

Iron Mountain appreciates that in today's business environment, suppliers may have reason to subcontract certain aspects of their service delivery. To become an Iron Mountain supplier, you must pass through a competitive procurement process, which will include rigorous due diligence of your business. So before you delegate duties to subcontractors, you're expected (and may be required by law or contract) to perform similar levels of due diligence on them, and to flow-down all appropriate legal and contractual obligations (including nondisclosure and confidentiality terms, or provisions required when providing services to the government). You are then responsible for monitoring and enforcing the compliance of your subcontractors with the obligations you pass along.

Also be sure to review your contract to see if you're required to provide Iron Mountain with notice, or to obtain our consent before subcontracting.

BRAND AND REPUTATION

As an Iron Mountain supplier, your actions and business practices can directly impact one of our most valued assets: our reputation. This is especially true when you deal directly on our behalf with our customers or the public. For that reason, you should always conduct yourself in a responsible and ethical manner, that's consistent with our Values and Code of Ethics and Business Conduct.

Unless you're expressly authorized to do so, you may not make public reference to our business relationship, or make statements (in any medium) representing Iron Mountain. All press (including social media) inquiries should be referred to your Iron Mountain representative.

ASSESSING COMPLIANCE AND REPORTING VIOLATIONS

As an Iron Mountain supplier, it's your obligation to comply with the provisions of this Code, and pursuant to the audit terms which may be in your agreement, Iron Mountain reserves the right to verify compliance. To help provide assurances, we may ask you to answer questions regarding provisions of this Code and to provide documents or attestations supporting your compliance.

It's also your obligation to promptly report suspected or actual violations of this Code, the law, or other aspects of your business with Iron Mountain. All reports are taken seriously, and are thoroughly investigated. Any information you provide will be handled with discretion, and will be kept as confidential as possible.

You are encouraged to report violations to your Iron Mountain representative. When this is not possible or appropriate, please contact the Global Privacy and Compliance team at compliance@ironmountain.com, or Iron Mountain's Ethics Line. The Ethics Line is operated by an independent company, and (where permitted by law) you can choose to remain completely anonymous. To make a report online, or to access the list of international Ethics Line telephone numbers, please visit www.IMEthicsLine.com. Failure to report violations may result in the termination of our business relationship.

NO RETALIATION

Iron Mountain has a strict no-retaliation policy with regard to the good-faith reporting of legal or ethical violations. Any employee or manager who retaliates, attempts to retaliate, or encourages others to retaliate, against an employee or supplier who has reported a violation will face serious disciplinary action, up to and including termination. Iron Mountain will seek to end its business relationship with you as a supplier if we discover that you've engaged in retaliation against one of your employees in response to their reporting of a violation.

NO CREATION OF THIRD PARTY RIGHTS

Iron Mountain's Supplier Code of Conduct does not create new or additional rights on the part of third parties (or their beneficiaries). This includes a right of the supplier's employees to cause Iron Mountain to enforce any provisions of this Code.

This Code supplements, but does not supersede, the rights and obligations established under contract between Iron Mountain and the supplier.



800.899.IRON | IRONMOUNTAIN.COM

ABOUT IRON MOUNTAIN

Iron Mountain Incorporated (NYSE: IRM), founded in 1951, is the global leader for storage and information management services. Trusted by more than 220,000 organizations around the world, and with a real estate network of more than 85 million square feet across more than 1,400 facilities in over 50 countries, Iron Mountain stores and protects billions of information assets, including critical business information, highly sensitive data, and cultural and historical artifacts. Providing solutions that include secure storage, information management, digital transformation, secure destruction, as well as data centers, art storage and logistics, and cloud services, Iron Mountain helps organizations to lower cost and risk, comply with regulations, recover from disaster, and enable a more digital way of working. Visit www.ironmountain.com for more information.

© 2021 Iron Mountain Incorporated. All rights reserved. Iron Mountain and the design of the mountain are registered trademarks of Iron Mountain Incorporated in the U.S. and other countries. All other trademarks and registered trademarks are the property of their respective owners.