



10 August, 2017

Period covered

From: 1 January 2016 To: 31 December 2016

Statement of support by the President & Chief Executive Officer

To our stakeholders:

I am pleased to confirm Iron Mountain's support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption. Iron Mountain became a signatory to the United Nations Global Compact in August, 2016.

In this annual Communication on Progress, we describe our actions to integrate the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders through our website and our annual Corporate Responsibility Report.

Yours sincerely,

William L. Meaney, President & Chief Executive Officer

Issue Area	Global Compact Principle	Implementation and measurement	Relevant GRI indicator [link to GRI index]
Human rights	<p>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights</p> <p>Principle 2: Businesses should make sure that they are not complicit in human rights abuses</p>	<p>Code of ethics [http://s1.q4cdn.com/415773695/files/doc_downloads/Governance-Docs/Code-of-ethics-and-business-conduct.pdf]; 2016 Corporate Responsibility Report [http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx]; Goals and targets, presented in CR Report [http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx]</p>	<p>G4-10; G4-11; G4-LA2; G4-LA6; G4-LA9; G4-LA13; G4-SO1 G4-10; G4-SO1</p>
Labor	<p>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining</p>	<p>Code of ethics [http://s1.q4cdn.com/415773695/files/doc_downloads/Governance-Docs/Code-of-ethics-and-business-conduct.pdf]</p>	<p>G4-11; G4-LA8</p>

	Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labor	of-ethics-and-business-conduct.pdf]; 2016 Corporate Responsibility Report	G4-LA2; G4-LA13
	Principle 5: Businesses should uphold the effective abolition of child labor	[http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx] ; Goals and targets, presented in CR Report	G4-10
	Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation	[http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx]	G4-10; G4-34; G4-56; G4-LA1; G4-LA2; G4-LA3; G4-LA9; G4-10; G4-LA11; G4-LA12; G4-LA13
Environmental	Principle 7: Businesses should support a precautionary approach to environmental challenges	Code of ethics [http://s1.q4cdn.com/415773695/files/doc_downloads/Governance-Docs/Code-of-ethics-and-business-conduct.pdf] ; CDP response (available at www.cdp.net); 2016 Corporate Responsibility Report	G4-EC2; G4-EN3; G4-EN15; G4-EN16; G4-EN17; G4-EN18; G4-EN19; G4-EN20; G4-EN27; G4-EN30
	Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility	[http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx]	G4-EN2; G4-EN3; G4-EN5; G4-EN15; G4-EN16; G4-EN17; G4-EN18; G4-EN19; G4-EN20; G4-EN22; G4-EN23; G4-EN27; G4-EN30



	<p>Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies</p>	<p>Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx]; Goals and targets, presented in CR Report [http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx]</p>	<p>G4-EN19; G4-EN27; G4-SO1</p>
<p>Anti-Corruption</p>	<p>Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery</p>	<p>Code of ethics [http://s1.q4cdn.com/415773695/files/doc_downloads/Governance-Docs/Code-of-ethics-and-business-conduct.pdf]; 2016 Corporate Responsibility Report [http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx]]; Goals and targets, presented in CR Report [http://www.ironmountain.com/About-</p>	<p>G4-S6; G4-SO3; G4-SO4; G4-SO5; G4-PR8</p>

2016
CORPORATE
RESPONSIBILITY
REPORT

TRUST



IRON MOUNTAIN

2016 CORPORATE RESPONSIBILITY REPORT
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CEO STATEMENT

IRON MOUNTAIN GOES ABOVE AND
BEYOND TO SECURE WHAT MATTERS
TODAY, FOR TOMORROW.

Thank you for your interest in Iron Mountain's corporate responsibility program and the progress we've made thus far against our commitments.

You should know upfront that we approach corporate responsibility through a central belief that we can address pervasive environmental and social issues by leveraging our global scale and through our daily work as the trusted guardians of our customers' most important assets.

Last year marked a historic year for our 66-year-old company as we acquired fellow global storage and information management provider, Recall Holdings. The addition of the Recall team, along with their service-delivery operations and solution capabilities, give Iron Mountain further capacity to serve our customers as well as act as an agent for environmental and social change.

As you'll read in this report, the size of the Recall business and the fact that they too reported on CR goals led us to combine the 2015 results of both companies, creating a new baseline for measuring the combined 2016 performance of both companies.

This report is just our fourth. And whilst we've made steady progress over the last few years, namely in what we've learned along the way, we recognize there's room to set higher goals and to make greater CR contributions.

With this caveat, I'm pleased to share that we achieved several noteworthy milestones in 2016, including becoming a signatory to the UN Global Compact, being listed for the second year on the Dow Jones Sustainability Index and becoming one of the top buyers of renewable energy amongst Fortune 500 companies.

In addition to these highlights, here's a summary of our performance against 2016 CR goals:

SOCIAL

- **Employee Safety:** We lowered safety-incident rates below 2015 levels, achieving a lost time injury rate of 1.1 and a total recordable incident rate of 2.3—marking the fourth straight year of improvement.
- **Inclusion and Diversity:** We achieved equal pay (within 10%) for all managerial levels across the UK, Western Europe and North America except for the pay of female individual contributors in North America. Their pay was on average 11% below the average of their male counterparts. We've included this data in the report, something we've done for three straight years, both for transparency and to support broader gender pay equity.
- **Community:** Our employees volunteered more than 50,000 of recordable hours in their communities—an admirable achievement despite falling short of our goal of 60,000 hours.

ENVIRONMENT

- **Renewable energy:** We achieved our goal of increasing our usage of renewable electricity in North America from wind, from less than 1% to 2.5%. New renewable energy contracts have made Iron Mountain one of the top 25 green power buyers among the largest 500 U.S. companies by revenue according to the EPA Green Power Partnership. And based on our current operational footprint, wind and solar will provide about 50% of our electricity needs in 2018.
- **Climate impacts:** With the addition of Recall—a global provider one quarter of our previous size—we missed our goals for lowering greenhouse gas (GHG) emissions and maintaining electricity usage, with GHG emissions increasing 0.7% and energy usage increasing 3.3% against the restated 2015 baselines. However, on a like-for-like basis, our energy usage at “same locations” was lower year-over-year due to a \$2.5 million investment in LED lighting retrofits, and these improvements were only offset by growth in our data center business and acquisitions in our art storage business.

With this report we’re also announcing our next step on our CR journey. Early in 2017, we engaged with key stakeholders including customers, investors and the NGO community to identify and better understand the key Environmental, Social and Governance (ESG) issues where we face the biggest opportunities and the biggest risks.

We then worked with leaders across the business to study these areas and develop companywide vision statements along with measures of success. This process sets new focus and new potential for our work to create value for all our stakeholders through ESG achievements.

I look forward to sharing our progress, and until then, we appreciate your feedback and comments.



William Meaney, President & CEO



The acquisition of Recall in 2016 presented a significant challenge for merging data systems and representing a consistent year-over-year comparison. Because Recall was such a large organization (about 25% of Iron Mountain's size worldwide) and they had their own public reporting, we decided to combine the reported 2015 results of the two companies and create a new 2015 baseline. These figures and this report represent the results of the combined global operation in 2016 compared to the combined 2015 performance.

		2016 GOAL	2016 RESULTS	Notes
1	Climate Impacts	Reduce GHG emissions by 1% from 2015.	Not Achieved: Global GHG emissions increased post-Recall integration by 0.7%.	While our direct emissions (scope 1 and 2) were reduced by about 2%, we added a large amount of scope 3 emissions by including the impacts of third-party transportation providers in former Recall territories, mostly in Latin America.
2	Energy	Hold total facility energy use flat vs. 2015.	Not Achieved: Reported Global facilities energy use increased by 3.3 % against restated 2015 baseline.	"Same locations" energy use was lower yr/yr benefiting from investments of about \$2.5M in energy efficiency including LED lighting retrofits; however, these improvements were offset by other increases. Notably the addition of new business including Crozier fine arts and the growth of our data center business.
3	Renewable Energy	Increase use of renewable electricity in North America from >1% to more than 2.5%.	Achieved: 2.6% of North American electricity from wind.	Use of renewable energy (wind and solar) increased from less than 1% in 2015 to 3.1% in North America and 2.6% of global electricity use. Realizing that our most energy intensive activity, the data center business, is growing at a fast rate, we have contracted for wind and solar energy supplies beginning in 2017 to provide 100% of the data center load going forward.
4	Employee Safety	Maintain worldwide safety results from 2015 of LTIR 1.3 & TRIR 2.4.	Achieved: We are reporting a worldwide LTIR of 1.1 and TRIR of 2.3 for 2016.	We are currently working on the deployment of our first-ever global safety framework. This framework will ensure consistency in safety standards, reporting and implementation.
5	Employee Volunteerism	Achieve 60,000 hours of volunteerism.	Not Achieved: 50,000 hours of employee volunteerism were reported.	Our employees are passionate about giving back to their communities through volunteerism. Through our Moving Mountains program employees in North America receive 16 hours of paid time off to volunteer.
6	Gender Pay Gap	Maintain or increase gender pay equity within +/- 10% at all organizational levels in North America and the UK.	Not Achieved: We achieved this goal for all roles in both the UK and Western Europe. However, in North America at one reporting level (Individual Contributor - Exempt) the avg female pay was 11% below their avg male counterparts.	We conduct regular pay equity evaluations to explore any instances where we do not meet our pay equity goals. The outcomes of that analysis help us to understand the reason that there may be gaps in pay equity.



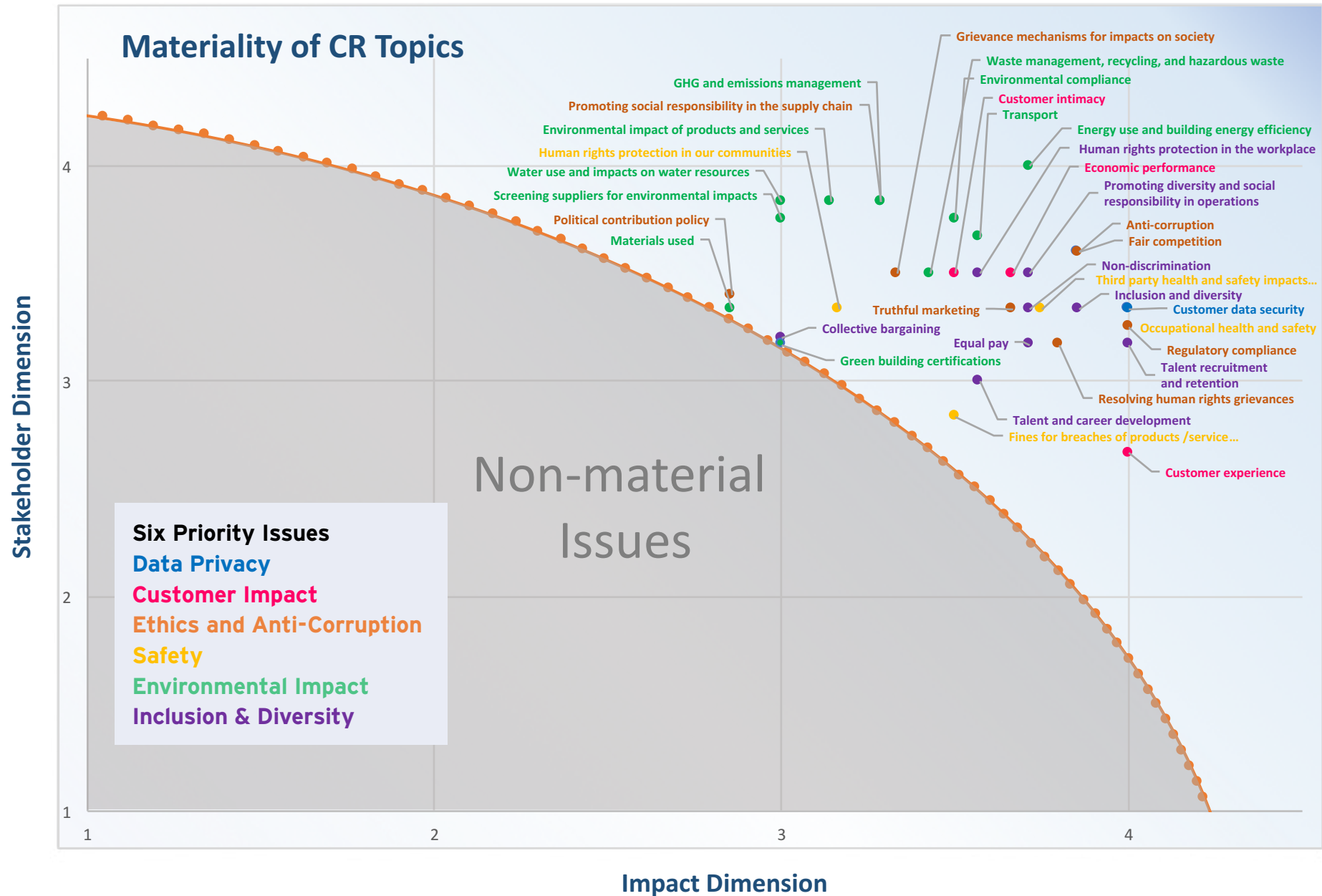
OUR COMMITMENT

WE BELIEVE IN BEING A RESPONSIBLE
CORPORATE CITIZEN AND REINFORCING
OUR VALUES THROUGH ACTION.

IRON MOUNTAIN'S VALUES DEFINE OUR CHARACTER AND EARN US THE TRUST OF OUR CUSTOMERS, PARTNERS AND SHAREHOLDERS. WE ARE COMMITTED TO PUTTING THESE VALUES INTO ACTION EVERY DAY—BY ACTING AS A POSITIVE FORCE FOR CHANGE IN OUR COMMUNITIES, PROTECTING OUR PLANET AND HELPING OUR EMPLOYEES ACHIEVE THEIR FULL POTENTIAL.

MATERIALITY OF CR TOPICS FOR 2016

In 2016, we prioritized the issues that were most relevant to our business and stakeholders by incorporating feedback from senior managers and representatives of key stakeholder groups, including customers, employees, investors, peers, community and other groups. We identified and determined those topics most critical to our business and applied the principles and guidelines of the Global Reporting Initiative (GRI), United Nations Global Compact (UNGC) and Sustainable Development Goals (SDGs).



OUR COMMITMENT

OUR VISION FOR THE FUTURE

As part of our materiality assessment process we formed focus groups for the top six areas of focus. Each focus group consisted of two members of our Senior Executive Team and other functional leaders with subject matter expertise. Each group was tasked with developing an aspirational statement and associated measures of success.

We are excited to share the results of those focus groups and our first comprehensive list of long-term vision statements and key measures of success for each of our six focus areas. Throughout 2017 our teams will be working on developing specific metrics, annual targets and long-term goals that align with these visions.



SAFETY



ENVIRONMENTAL IMPACT



DATA PRIVACY



ETHICS & ANTI-CORRUPTION



CUSTOMER IMPACT



INCLUSION AND DIVERSITY

OUR COMMITMENT

IRON MOUNTAIN ENVIRONMENTAL, SOCIAL AND GOVERNANCE ASPIRATIONS



SAFETY

We have an uncompromising approach to Safety, which is one of our core Values. We protect ourselves and each other from harm, and secure our customers' assets as if they were our own. Safety is our first consideration in everything we do, and ultimately becomes the foundation of how we do business.

- We will demonstrate a “zero incident” safety culture across Iron Mountain's global footprint through our actions, commitment, accountability and improvements toward safety throughout all levels in the organization.



ENVIRONMENTAL IMPACT

We are committed to reducing our impact on the environment while driving value to our customers, investors and the communities in which we operate. We strive to improve our environmental performance and initiate innovative projects and activities that reduce cost, build resiliency and further reduce our impacts on the environment.

- Using a science-based goal-setting methodology, we will develop a goal for reducing our climate footprint.
- We will be identified as a sustainability thought leader and innovator in our industry.



DATA PRIVACY

As the global leader in information management we are uniquely positioned to set industry standards for safeguarding information and data privacy. We aspire to be an innovator in the development of new methodologies that safeguard data privacy while continuing our commitment to meeting evolving regulatory, customer and legal obligations.

- We will provide leadership in influencing and practicing industry standards for data privacy.
- We will develop educational resources for our employees and customers to help them understand and implement best practices to ensure data privacy.
- We will develop new methodologies to help customers analyze risks within their current programs and processes.

OUR COMMITMENT

IRON MOUNTAIN ENVIRONMENTAL, SOCIAL AND GOVERNANCE ASPIRATIONS



ETHICS & ANTI-CORRUPTION

We are committed to being recognized for our uncompromising ethical standards and to helping set best practices for our industry. We believe that doing business with integrity is the only way to do business. It is inherent in our Company Code of Ethics.

- We will insert our voice to promote ethical business practices.
- We will receive third-party recognition for our ethical business practices.



CUSTOMER IMPACT

We will accelerate growth and create incremental value for customers, investors and other stakeholders by delivering products and services that help address environmental, social and governance challenges faced by our customers.

- We will incorporate environmental, social and corporate governance (ESG) dimensions in our customer and stakeholder feedback process to help identify emerging needs.
- We will deploy a process to identify and mitigate ESG risks in new products and businesses.
- We will define and create a plan to grow revenue from ESG advantaged products and services.



INCLUSION AND DIVERSITY

We will accelerate our global Inclusion and Diversity strategy to ensure we have the best talent to deliver our business objectives; enable an innovative, high-performance culture and deliver superior performance to our customers and shareholders.

- We will ensure all processes, from talent management to customer interaction and supplier selection, are inclusive, equitable and accessible.
- We will seek opportunities to engage with external stakeholders that share our values and interests.



OUR PROMISE

OUR PROMISE TO SAFEGUARD OUR CUSTOMERS' INFORMATION AND ASSETS IS THE FOUNDATION OF IRON MOUNTAIN'S TRUSTED REPUTATION.

CUSTOMERS

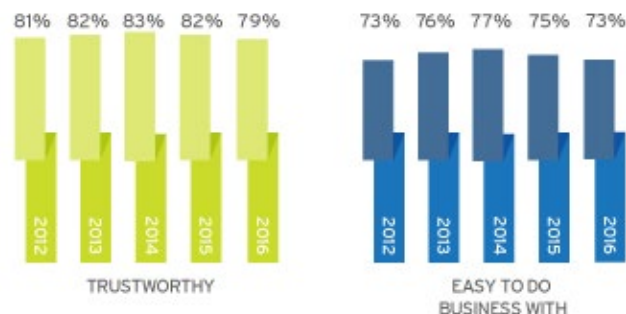
Our customers entrust us to protect, preserve and manage critical business assets, cultural treasures and historical assets. We help customers optimize and make better use of their information and meet compliance requirements. We serve customers of all sizes across many sectors, including healthcare, government, legal, financial and entertainment. Regardless of the type of asset we are storing, our commitment is the same: to protect and preserve the material as if it were our own, ensuring its value for the future, and so earning our customers' trust and confidence every day.

We measure that trust through relationship surveys that look at many aspects of our relationship as well as "moment in time" transactional surveys triggered by specific customer interactions. In the fall of 2016 we completed a relationship survey, one that we typically complete twice per year, but based on the activity early in the year to integrate the Recall business, we elected to forgo the spring survey in 2016. We reached out to 60,000 customers and received responses from 12,000 of them. The overall percentage of customers that see

Iron Mountain as trustworthy or easy to do business with fell slightly. When we look at the data, approximately 12% of the responses came from newly acquired Recall customers. When those responses are removed, the scores are in line with previous year's results. It is not unusual for an acquisition such as this to cause a downward shift in loyalty scores.

In addition to customer loyalty scores and feedback, we conduct Net Promoter surveys that give us a net promoter score (NPS). NPS has been measured in North America for several years, and we began rolling it out to the UK in 2015. Our score in mid-2016 was 31 when including Recall customers and 36 without.

PERCENTAGE* OF CUSTOMERS WHO AGREE THAT IRON MOUNTAIN IS:



*Values for North America

OUR PROMISE

CUSTOMER DATA PRIVACY

Our chain of custody protocols and procedures ensures information is protected from the moment we receive it until it's returned or securely destroyed. By securely managing each stage from receipt to destruction, we help customers lower storage costs, comply with regulations, recover from disaster and use their information better for business advantage.

Our Information Security team ensures we adhere to all regulatory requirements. We have received SysTrust certification in North America, following rigorous audits of our policies, systems and technologies by Ernst & Young. Also in North America, Visa and the payment card industry have included us on the list of "compliant service providers", and our secure shredding is "AAA" certified by the National Association for Information Destruction.





OUR PEOPLE

WE WOULDN'T BE IRON MOUNTAIN
WITHOUT OUR MOUNTAINEERS.

OUR PEOPLE

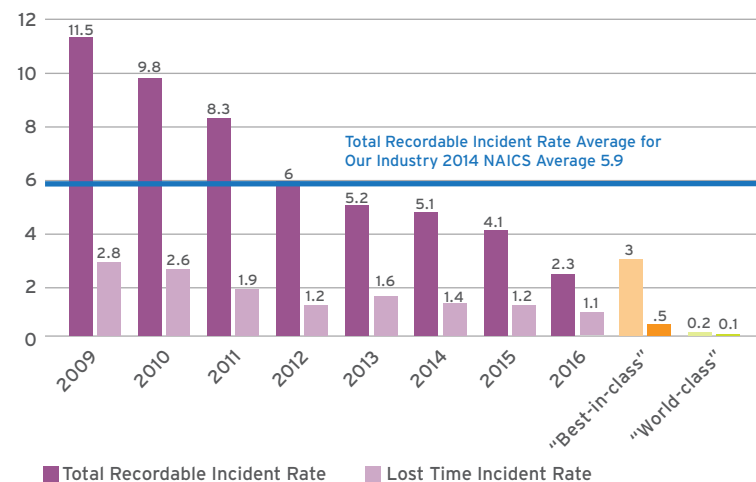
GRI MATERIAL ASPECT
OCCUPATIONAL HEALTH AND SAFETY
LA6

SHAPING OUR SAFETY CULTURE

At Iron Mountain, we hold true to our value of owning safety and security. We protect ourselves and each other from harm, and secure our customers' assets as if they were our own. We have a legal and ethical responsibility and commitment to ensure we provide a safe, secure and healthy work environment for our employees, contractors and those we come in contact with in our work environment. Safety is our first consideration in everything we do, and ultimately becomes the foundation of how we do business.

While the evolution of our safety culture begins with leadership, management practices alone are not sufficient to achieve excellence. Making safety a living value requires an engaged workforce at every level. To that end, we are on a relentless pursuit of excellence as it relates to safety. During 2016 we refined and began deployment of a global safety maturity model. The road map for deployment of that model and to reach the most mature stage will take seven to eight years to achieve globally. This is a continuous improvement model and ultimately we believe it will position us to be able to certify Iron Mountain against 18001, globally and maintain certification.

NORTH AMERICA SAFETY PERFORMANCE FOR 2016



LOST TIME AND TOTAL RECORDABLE INCIDENT RATES

REGION	ASIA PACIFIC	EASTERN EUROPE	LATIN AMERICA	NORTH AMERICA	WESTERN EUROPE	WORLDWIDE
LTIR	0.1	0.6	2.0	1.3	1.8	1.1
TRIR	0.3	0.8	2.0	4.1	2.2	2.3

INCLUSION AND DIVERSITY

While inclusion has always been an extension of our Core Values and embedded within our Code of Ethics, we have now explicitly called out the importance of inclusion and defined inclusive behaviors for all employees around the world to demonstrate in everything we do.

This starts at the top. Our CEO, William L. Meaney, holds his Senior Executive Team accountable to pursuing inclusion goals and behaviors. His leaders are actively involved in promoting an inclusive culture and communicating the value of diversity. Many are Executive Sponsors for one of our global Employee Resource Groups, which drive the business through recruitment and retention, development and mentoring, customer and community engagement, and inclusive culture building.

In 2016, Iron Mountain was proud to join the Boston Women's Workforce Council and sign their compact to end pay inequality. Also in 2016, in the U.S. we joined multiple state business coalitions advocating LGBT equality. We were proud to be recognized by OUTstanding and The Financial Times for having a Top 50 LGBT executive ally.

Iron Mountain has publicly committed to achieving diversity goals to increase the representation of women and minorities in leadership roles by 2020. We have strategies across the talent life cycle to achieve these goals. As of January 2017, women accounted for 24% of our leadership (Director and above, North America), a year

on year increase from 22%. Minorities accounted for 9% (U.S.), flat from previous year, attributed to changes in our workforce after multiple acquisitions.

In 2017, we continue to build a more inclusive culture by expanding unconscious bias training, growing our Employee Resource Groups and embedding more accountability across the organization. More than ever, we see inclusion at the very heart of who we are, reflected in our thinking, our actions and the way we interact with each other, our customers and in the communities where we live and work.



TURNOVER OF PERMANENT EMPLOYEES

UNITED STATES	UNDER 30 YEARS OLD		30 - 50 YEARS OLD		OVER 50 YEARS OLD	
	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Beginning of Year Headcount (January 1, 2016)	655	268	3,633	1,245	1,457	559
Employees leaving in 2016	254	89	752	260	294	140
Employees joining in 2016	391	163	1,159	363	372	127
End of Year Headcount (December 31, 2016)	665	281	3,995	1,335	1,713	619

CANADA	UNDER 30 YEARS OLD		30 - 50 YEARS OLD		OVER 50 YEARS OLD	
	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Beginning of Year Headcount (January 1, 2016)	82	18	517	161	219	77
Employees leaving in 2016*	21	12	107	29	52	8
Employees joining in 2016*	57	24	183	59	74	8
End of Year Headcount (December 31, 2016)	102	27	576	184	274	87

*one person not gender specified

UNITED KINGDOM	UNDER 30 YEARS OLD		30 - 50 YEARS OLD		OVER 50 YEARS OLD	
	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
Beginning of Year Headcount (January 1, 2016)	156	94	664	232	285	83
Employees leaving in 2016	46	26	114	55	49	13
Employees joining in 2016	88	41	166	55	62	19
End of Year Headcount (December 31, 2016)	170	87	713	255	332	92

EQUAL REMUNERATION

Iron Mountain has a merit-based compensation philosophy that ensures gender equality in pay. Similar to last year, our North American and UK businesses continued to monitor pay by gender among job groups to identify discrepancies. The United States Department of Labor has found our process compliant and thus gender neutral. In Canada we operate a similar process to conform to the Pay Equity requirement.

FEMALE TO MALE AVERAGE COMPENSATION RATIOS

(BASE SALARY)	UNITED STATES	CANADA	UNITED KINGDOM
Senior Vice President	109%	n/a	*
Vice President	96%	*	*
Director	96%	108%	109%
Managers	99%	97%	100%
Supervisor	100%	100%	100%
Individual Contributor–Exempt	89%	96%	99%
Individual Contributor–Non-Exempt	99%	99%	n/a*

* Too few to report and maintain confidentiality

A photograph of several white wind turbines standing on a hill covered in autumn-colored trees. The sky is blue with some clouds. The image is partially covered by large, semi-transparent geometric shapes in shades of teal and dark blue on the left side.

OUR PLANET

WE FIND INNOVATIVE WAYS TO REDUCE OUR ENVIRONMENTAL IMPACTS AND SUPPORT OUR CUSTOMERS DOING THE SAME THROUGH OUR OFFERINGS.

ENERGY STRATEGY

In 2016, Iron Mountain continued the evolution of its Energy Program that shifts energy to drive real business value. The four cornerstones of the energy strategy are a focus on reducing consumption, shifting when power is used, procuring energy at the most favorable near-and-long term rates and progressing toward 100% renewable energy.

In 2016, to reduce consumption, \$3M in capital was deployed on a new round of energy efficiency upgrades. The primary focus continues to be retrofitting fluorescent lighting to LED and adding effective lighting controls where possible. Electricity consumption has reduced by 40% or more at each Records Storage site in North America that has been upgraded. Iron Mountain's Data Center business also made headlines for a commitment to energy efficiency as it joined the U.S. Department of Energy (DOE) Better Buildings Initiative as a Challenge Partner. In doing so, we became the first FISMA High-compliant data center operator to commit at this level, pledging to reduce data center energy intensity by 20% over a 10-year period.

Iron Mountain is among the leading users of renewable energy in the U.S. We increased our renewable energy use in 2016, with the total amount of on-site solar installed at Iron Mountain U.S. facilities doubled. This included the completion of a nearly 2MW array adjacent to our campus in Freehold, NJ, in the U.S. That solar

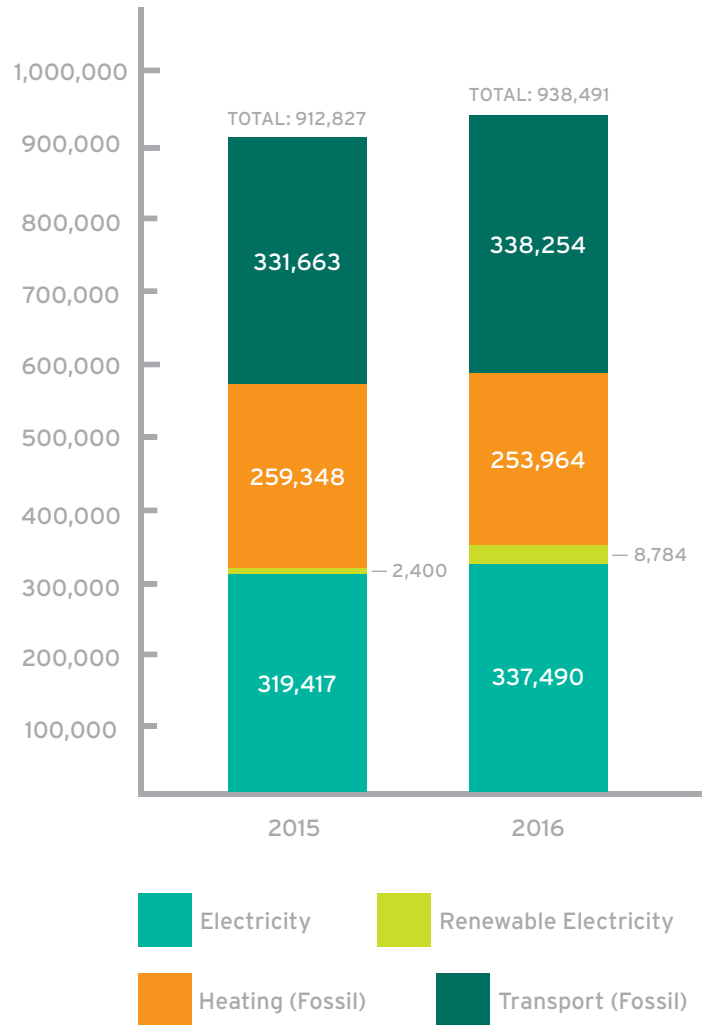
system will produce enough renewable energy annually to offset 60% of the campus's usage, with that expected to increase as other energy efficiency projects come online. We also have solar systems in Sacramento and four in California scheduled for installation in the U.S. in 2017. All Iron Mountain solar systems in the U.S. are certified Green Power, which contributes to reducing our reported greenhouse gas emissions.

We made significant progress toward expanding use of renewable energy with the wind farm in Ringer Hill, PA, in the U.S. coming online and producing enough green power to meet 100% of the data center needs and over 30% of total U.S. consumption.

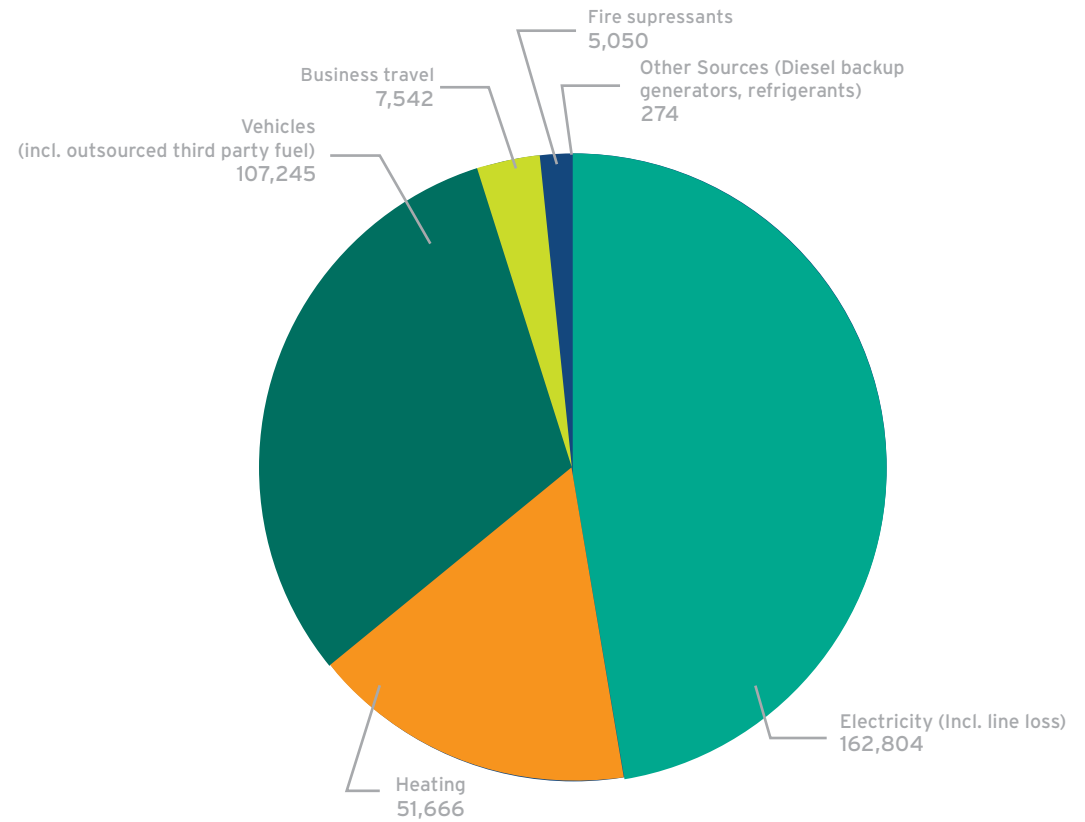
This has secured Iron Mountain as one of the top 25 buyers of renewable energy among the Fortune 1000 and a top-70 energy buyer in the Environmental Protection Agency (EPA) Green Power Partnership. A second agreement for a new wind farm in Texas was signed in 2016 and will come online in mid 2017. Once online, collectively these agreements will reduce Iron Mountain's reportable GHG emission from electricity by over 60%.

Also in the U.S., we made a small-scale renewable purchase of 1MW of around the clock green power. This integrates green power into existing power purchases.

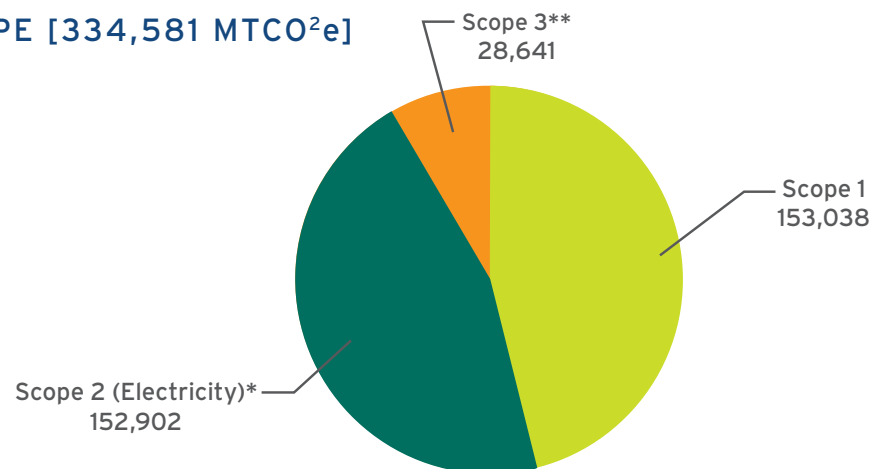
ENERGY CONSUMPTION [MWH]



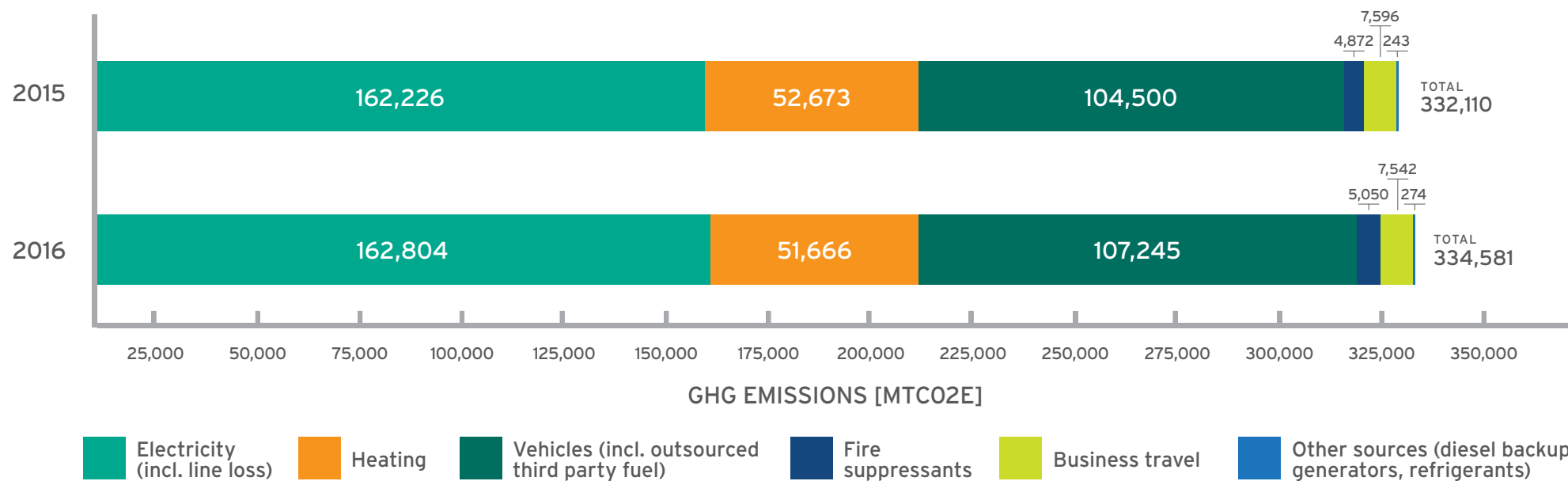
2016 GHG EMISSIONS BY SOURCE [334,851 MTCO₂e]



2016 GHG EMISSIONS BY SCOPE [334,581 MTCO₂e]



GHG EMISSIONS BY SOURCE



* 2016: calculated using the "market-based" approach taking into account the 8,784 MWh of electricity from renewables (backed by RECs). The "location-based" emissions amount to 157,172 tCO₂e

** 2016: includes ca. 12,000 tCO₂e from 4,169,230 liters of "outsourced/3rd party fuel"



OUR COMMUNITIES

WE PRESERVE OUR SHARED CULTURAL TREASURES AND
COLLECTIVE MEMORIES FOR GENERATIONS TO COME.

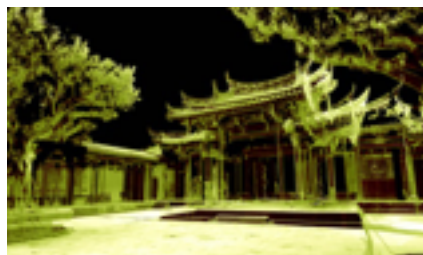
LIVING LEGACY INITIATIVE

The Living Legacy Initiative is Iron Mountain's commitment to preserve and make accessible cultural and historical information, world artifacts and treasures. This philanthropic focus area comes from two beliefs: to protect and share our world heritage; and to offer our six decades of experience acting as the trusted guardian of our customers' assets. Living Legacy grants provide nonprofit agencies, museums and other non-government organizations with cash contributions, in-kind services and customized solutions. Grant partners are developed and voted on by the program manager and Living Legacy Committee. Grant partners are established on a rolling, annual basis. In 2016, Iron Mountain worked with nine carefully selected partners that included digitizing global cultural heritage sites, preserving both veteran and non-veteran stories from World War II, storing archaeological artifacts and sponsoring a Title IX women's sports exhibit.

CYARK: TAIWAN

Iron Mountain partnered with CyArk to digitize Taiwan's Lukang Longshan Temple, an 18th-century Buddhist temple, becoming the first Living Legacy project in Asia. CyArk is an international nonprofit organization that uses laser scanning to create an online, 3D library of the world's cultural heritage sites before they are lost or destroyed. The temple is especially vulnerable, as it sits atop a tectonically active region called the "Ring of Fire," home for 90 percent of all the world's earthquakes.

For the first time, CyArk integrated virtual reality (VR) technology capabilities so that the temple can be "toured" as if really there. "Visitors" have the opportunity to come face-to-face with its architectural beauty. Iron Mountain provides funding, in-kind data storage and protection services for all of CyArk's sites.



BOSTON PUBLIC LIBRARY: BOSTON, MA

Iron Mountain also celebrated the 400th anniversary of William Shakespeare's death with the Boston Public Library in 2016. The Bard's legacy was displayed in the Exhibit, "Shakespeare Unauthorized." Nearly 60,000 people visited the free exhibit for a rare opportunity to experience Shakespeare and view up close rare editions, including the First Four Folios and other early and uncommon resource materials.



SUPPORTING OUR COMMUNITIES THROUGH VOLUNTEERISM

The Moving Mountains program encourages, rewards and reports on our employees' volunteerism. To support employees in engaging with organizations and missions they are passionate about, we offer 16 hours of paid time off to eligible employees in the United States and Canada for community service. In 2016, employees chose causes they cared most about and logged more than 50,000 hours of volunteer service.

DETROIT'S CONSISTENT HELPING HANDS

In 2016 the North Central region of the United States tracked more volunteer hours on average per employee than any other area. In particular, the employees in Detroit consistently volunteered more than any other team. They supported veteran groups, walked on behalf of the Arthritis Foundation and breast cancer research, collected for Toys for Tots, assisted a women's domestic violence shelter and rolled up their sleeves at a food bank. For example, two times a month, 10 employees each day would visit the local Detroit Gleaners Community Food Bank. There they would sort and package fresh produce on a conveyor line into boxes and packaging. At each visit, the Detroit employees would assemble 350-500 boxes of food that would be sent from the warehouse to other food banks, schools, churches and pantries for distribution. In total, they volunteered 720 hours and packaged more than 10,000 boxes of fresh food for local residents.

"Our Detroit team recognizes that at any time someone we know, or even one of us, will need help. We not only like working together as a team to participate in volunteer activities, but we also enjoy making a difference in our local community where we each call home."

Kim Leonard, Operation Supervisor





GLOBAL REPORTING INITIATIVE INDEX

STANDARD DISCLOSURES



GLOBAL REPORTING INITIATIVE G4 GENERAL STANDARD DISCLOSURES

G4-1

CEO Statement on the relevance of sustainability

[CEO Statement on pages 4-5](#)

G4-2

Key impacts, risks and opportunities

[Material CR topics are listed on page 9;](#)

[Aspirations outlined on pages 11-12](#)

G4-3

Name of the organization

Iron Mountain Incorporated

G4-4

Brands, products and/or services

<http://www.ironmountain.com/Services.aspx>

G4-5

Headquarters location

Boston, Massachusetts, United States

G4-6

Countries with business operations

Iron Mountain has more than 1,350 facilities in over 45 countries.

A full list is available at

<http://www.ironmountain.com/Service-Locations.aspx>.

G4-7

Ownership and legal form

Iron Mountain Incorporated is listed on the New York Stock Exchange (NYSE: IRM) and the Australian Stock Exchange (INM).

G4-8

Markets served

Iron Mountain is a global business dedicated to storing, protecting and managing information and assets. Organizations across the globe trust us to store and protect information and assets. Thousands of local enterprises work with us, as does more than 94% of the Fortune 1000. We help over 220,000 customers to protect everything from critical business information to geological samples, works of fine art to original recordings of treasured artists.

G4-9

Scale of the reporting organization

Iron Mountain has more than 1,350 facilities and over 25,000 employees located in over 45 countries. We serve over 220,000 customers globally. As of December 31, 2016, we conducted operations through 1,146 leased facilities and 297 owned facilities. Our facilities are divided among our reportable operating segments as follows: North American Records and Information Management Business (668), North American Data Management Business (69), Western European Business (218), Other International Business (473) and Corporate and Other Business (15). These facilities contain a total of 86.2 million square feet of space.

G4-10

Employees by employment type, employment contract and region

Iron Mountain has more than 25,000* employees worldwide. Broken down by region as:

Asia Pacific - 1988

Europe - 5,656

Latin America - 7,320

North America - 9,858

South Africa and Middle East - 416

*Includes all employees on a permanent or flexible contract of employment with Iron Mountain

1. North American data includes the United States and Canada.
2. Mexico is included with Latin America.
3. Employees in Germany were calculated as FTEs.

G4-11

Employees covered by collective bargaining agreements

6.79% of our workforce in North America was covered by union representation in 2016. We do not currently collect representation data outside North America.

G4-12

Description of the organization's supply chain

Iron Mountain's value chain includes the communities where we operate and where our employees' families and prospective employees live; our suppliers of services, energy and vehicle fuel, and materials; our customers including government agencies; and regulatory bodies.

G4-13**Significant changes regarding size, structure or ownership**

On 2 May 2016, Iron Mountain completed the acquisition of Recall Holdings Limited. At the time of acquisition, Recall had 80,000 customer accounts in 25 countries, a global footprint of more than 300 dedicated facilities and over 5,000 employees.

G4-14**Precautionary approach**

The Precautionary Principle is considered in the evaluation of our key corporate responsibility (CR) issues and opportunities and determined which CR topics were most critical to address. We also involve an external expert and incorporate feedback from our most senior managers and representatives of key stakeholder groups in this process.

G4-15**External Charters, principles or other Initiatives****Internal standards:**

Code of Ethics

www.ironmountain.com/code

External standards:

Signatory to UN Global Compact
UK Modern Slavery Act

http://www.ironmountain.co.uk/~/_media/Files/Iron%20Mountain/Company/About%20Us/IM_UK_Modern_Slavery_Compliance_Statement.pdf?la=en-GB

G4-16**Membership in associations and organizations**

Please see page 19 in our 2015 CR Report.

<http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx>

G4-17**Reporting boundaries in the consolidated financial statements**

Please see page 85 in our 2016 Annual Financial Report and Stockholder Letter for more details.

http://sl.q4cdn.com/415773695/files/doc_financials/2016/Final-10KWrap.pdf

G4-18**Process for defining report content**

In order to prioritize the CR issues that are most relevant for our business and stakeholders, we applied the principles and guidelines of the Global Reporting Initiative (GRI) with the help of an external expert in Q4 2016. By incorporating feedback from our most senior managers and representatives of key stakeholder groups, we identified key issues and determined which CR topics were most critical to address. We also pinpointed related opportunities in order to manage corresponding challenges in a precautionary manner.

G4-19**Material aspects**

[Material CR Topics are listed on page 9;](#)
Material GRI aspects are as listed in this Index.

G4-20**Reporting boundaries of material aspects within the organization**

Material aspects apply to Iron Mountain operations in all countries; however, data may not be available at a global level where operations are still being integrated into the data collection process (particularly in the case of Recall operations acquired during 2016). This is specified where relevant. Material aspect boundaries (listed in this GRI Content Index) within the organization are for all of Iron Mountain's operations, its stockholders and its employees, as they can influence cost and brand reputation and thus business success.

G4-21**Reporting boundaries of material aspects outside the organization**

Material aspect boundaries outside the company are specifically relevant to different parts of our value chain. This value chain includes the communities where we operate and where our employees' families and prospective employees live; our suppliers of services, energy and vehicle fuel, and materials; our customers including government agencies; and regulatory bodies. Our economic performance is relevant for all participants in our value chain. Environmental topics are relevant for communities that are exposed to environmental impacts; for suppliers of materials, energy and fuels; and in the case of environmental impacts of products and services for our customers. Within labor topics, health and safety is also relevant for the family members of our employees, and diversity and equal remuneration tends to be of particular interest to government sector customers. The local community topic is particularly relevant to the communities concerned but also to our customers. For all customers, anti-corruption, fair competition, customer satisfaction and customer privacy are relevant, and regulators place high value in legal compliance.

G4-22**Effects of restatements of information**

Information on the whole has not been restated; however, [energy and emissions data reported on pages 23 and 24](#) for 2015 has been restated to include data from Recall operations prior to acquisition, where noted. This increases energy consumption and emissions for the 2015 from previous data reported in the 2015 CR Report.

G4-23**Report significant changes from previous reporting periods in the Scope and Aspect Boundaries.**

[This information is located on p. 6.](#)

G4-24**Relevant stakeholder groups**

See page 18 in our 2015 CR Report for more details.
<http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx>

G4-25**Basis for selection of stakeholders**

In Q4 2016, Iron Mountain, with the help of an external expert, refreshed our initial materiality assessment. The selected stakeholders represent key target groups of our CR Report, including customers, investors, peers and nonprofit organizations. These dialogues have provided recommended next steps to further advance our CR efforts and are used as a tool for continuous improvement.

G4-26**Approaches to stakeholder engagement**

We engage with our stakeholders regularly, using channels that are most convenient to them. See page 18 in our 2015 CR Report for more details.
<http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx>

In Q1 2017 our stakeholders were asked to review Iron Mountain's previous CR Report and provide feedback on specific elements, including the materiality process, goal setting, performance indicators and customer engagement. The selected stakeholders represent key target groups of our CR

Report, including customers, investors, peers and nonprofit organizations. These dialogues have provided recommended next steps to further advance our CR efforts and are used as a tool for continuous improvement.

G4-27**Topics raised by stakeholders and how these are addressed by the organization**

Please see page 18 in our 2015 CR Report <http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx>

G4-28**Reporting period**

1 January - 31 December 2016

G4-29

Date of most recent previous report
August 2016

G4-30**Reporting cycles**

Annual

G4-31

Contact point for questions regarding the report or its contents

Kevin Hagen, Director, Corporate Responsibility
kevin.hagen@ironmountain.com

G4-32

Reporting option chosen

This is our fourth CR report against the internationally established sustainability reporting guidelines of the Global Reporting Initiative (GRI) and our third report prepared according to the GRI G4 core option of the guidelines.

G4-33

External assurance for the report

At this time, Iron Mountain has decided to not seek external assurance for the report. Iron Mountain will investigate this for future years.

G4-34

Governance structure, committees under the Board of Directors

Available online at
<http://investors.ironmountain.com/company/for-investors/corporate-governance/governance-documents/default.aspx>

G4-56

General principles and codes of conduct

Available online at
<http://investors.ironmountain.com/company/for-investors/corporate-governance/governance-documents/default.aspx>

GLOBAL REPORTING
INITIATIVE G4 SPECIFIC
STANDARD DISCLOSURESECONOMIC
DISCLOSURES**G4-DMA****Disclosures on Management Approach
Economic Performance**

The economic success of our business determines Iron Mountain's ability to create value for all our stakeholders, particularly stockholders, employees and our local communities. Ultimate oversight of Iron Mountain's financial performance and control of the company, including strategy and risk management, is the responsibility of the Board of Directors. Strategic financial and non-financial goals for the company are reassessed in quarterly review processes and our annual strategic planning.

G4-EC1**Economic value generated and distributed**

Beginning on numbered page 46 in our annual report found here:

http://s1.q4cdn.com/415773695/files/doc_financials/2016/Final-10KWrap.pdf

Iron Mountain's robust network and infrastructure of 25,000 employees and 1,000 facilities are actively engaged with our global community. We offer volunteerism, financial grant awards and in-kind service to nonprofits and non-government organizations to help make our neighborhoods a better place to work and live. In 2016 we donated \$545,000 to various nonprofits and provided \$49,298 of in-kind services. We invite you to read more about our work here: <http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/Our-Communities.aspx>

G4-EC2**Financial implications of climate change**

Each year, Iron Mountain responds to the CDP climate change survey, where we disclose the implications of both risks and opportunities presented by climate change, including financial implications where relevant. Our response is accessible online at www.cdp.net.

ENVIRONMENTAL
DISCLOSURES**G4-DMA****Overall Environmental Disclosures
on Management Approach**

Iron Mountain strives to responsibly limit our impact on the environment. Our service offering includes solutions that support our customers in reducing their own environmental impacts, and we regularly assess these offerings to ensure they are meeting our customers' needs.

The Senior Vice President for Corporate Responsibility, who reports to the Executive Vice President, Chief People Officer (a member of our Senior Leadership Team led by the CEO), has operational responsibility for environmental management. Our [Code of Ethics and Business Conduct](#) includes our views on protecting the environment and building sustainability (page 47). Our Chief Compliance Officer is responsible for monitoring compliance with the Code and provides a quarterly dashboard and an annual report on compliance to the Iron Mountain Board's Audit Committee. The Chief Compliance Officer attends all committee meetings to uphold an ongoing dialogue that includes addressing any possible changes in compliance responsibilities,

policies or procedures that might be needed. Environmental policies are implemented at individual sites to ensure compliance with local environmental regulations.

Current efforts to measure and reduce environmental impacts at site and regional levels are regularly assessed through data collection and analysis. Additionally, some metrics such as energy use and utility spend are reviewed monthly at the SVP level. Following the integration of Recall, we are implementing a global environmental data collection system, with improved measuring and monitoring of impact, with the ability for live review. In 2017, we are defining new environmental goals.

**Disclosures on Management
Approach Materials**

The Senior Vice President of Procurement is responsible for overseeing corporate-wide purchasing, and we have engaged primary and secondary vendors to source more environmentally responsible materials.

**Disclosures on Management Approach
Effluents and Waste**

Our shred-all policy results in 100 percent recycling rate of paper in the United States and Canada.

**Disclosures on Management
Approach Energy**

Reducing our energy consumption is a key focus. In North America, a third-party expert aggregates our utility usage. We are rolling this process out globally, starting in 2017 with Iron Mountain operations (including legacy Recall sites) in the United Kingdom, Ireland, Australia and Brazil. Rollout will then continue globally.

**Disclosures on Management
Approach Emissions**

Emissions resulting from energy use, direct releases of GHG emissions and business travel are closely tracked.

**Disclosures on Management
Approach Transport**

Our telematics technology helps monitor fuel efficiency and identify opportunities for improving fleet operations, which is overseen by country managers at the local level and a fleet manager at the corporate level. Iron Mountain reports energy and greenhouse gas impacts via the CDP climate change survey which lists the governance, strategy, risks, opportunities, projects and initiatives to reduce energy and emissions, and targets in regard to our response to climate change in detail. Our response is accessible online at www.cdp.net.

G4-EN2**Proportion of materials used to provide major products and services that are recycled input materials**

A significant source of the materials we purchase is the corrugated cardboard boxes used to store our customers' records. Given this significant volume, we carefully select the boxes we purchase to minimize environmental impacts. The boxes we purchase in North America are made with approximately 65 percent recycled material, and roughly 71 percent in Europe. These are purchased from preferred suppliers with chain-of-custody certification who follow environmentally responsible practices. These boxes are recycled once they reach the end of their storage life.

G4-EN3**Energy consumption**

Global energy use increased 2.8%. Energy use within facilities increase by 7.6%. Use of Renewable Energy (wind and solar) increased from less than 1% in 2015 to 2.5% of North American electricity demand.

[Data reported on page 23.](#)

G4-EN5**Energy intensity**

Total facilities energy Intensity = $600,237,00 / 85,766,745 = 6.99$ Kwhrs/sqft

G4-EN6**Energy saved**

The total reductions attributed to \$2.5M in capital investments in energy efficiency projects such as LED lighting retrofits was 5,706 MWh. We have also joined the U.S. Department of Energy Better Building Challenge, made a commitment to increase the efficiency of data center operations and publicly report the results.

G4-EN15**Direct greenhouse gas emissions (Scope 1)**

[Data reported on page 24.](#)

Scope 1 emission were reduced yr/yr by 5.7%

G4-EN16**Energy-related indirect greenhouse gas emissions (Scope 2)**

[Data reported on page 24.](#)

Emissions from electricity increased by 0.2% yr/yr

G4-EN17**Other indirect greenhouse gas emissions (Scope 3)**

[Data reported on page 24.](#)

While direct emissions (scope 1 and 2) were reduced by about 2%, we added a large amount of scope 3 emissions by including the impacts of third-party transportation providers in former Recall territories, mostly in Latin America.

G4-EN18**Greenhouse gas emissions intensity**

Greenhouse gas intensity is 334,581 Tons CO₂e / 85,766,745 Sqft = 0.0039 Tons/Sqft

G4-EN19**Initiatives to reduce greenhouse gas emissions**

[Data reported on page 24.](#)

In addition to investments in energy efficiency we have completed 15 and 20 year contracts to source up to 160,000 MWhrs/yr of electricity from new wind and solar resources beginning in 2017. These purchases would place IRM in the top 25 green power buyers among Fortune 500 companies according to the EPA Green Power Partner List.

G4-EN20**Ozone-depleting substances**

One source of our GHG emissions and our largest source of ozone depleting substances is the inadvertent release of Halon and/or FM200 gas from the fire suppression systems in our facilities. We carefully monitor these systems to prevent inadvertent releases; however, through human error or mechanical failure unintended releases are possible.

We have identified an alternative to Halon and FM200 which has no GHG or ozone impact and meets all of our performance, safety and system requirements; however, it is substantially more costly. In 2016 we continued to have success with pilot test installations. Based on these results, we have banned Halon for all new systems, and we are evaluating system conversion on a site-by-site basis, particularly when building changes or capital projects require system upgrades.

In 2016 we successfully engaged with the American Carbon Registry (ACR) to include Halon 1301 in the latest revision of the official protocol on emission reduction measurement and monitoring methodology for destruction of ozone depleting substances and high-GWP foam. If this revision is adopted by the California Air Resources Board, it will make it

possible to destroy Halon gas and sell the resulting carbon credits under the California cap and trade climate program. If this became possible, we would have a new possible avenue for responsibly destroying Halon and using the proceeds to make site conversion financially viable. While promising, there is substantial headwind expected in the process of adoption. We will stay engaged in 2017.

G4-EN22**Total water discharge**

Iron Mountain does not currently track water discharge, as any water removed from site is generally done so by municipal water and sewerage systems. Since Iron Mountain predominantly operates in commercial or industrial areas, this minimizes the impacts of water consumption and discharge.

G4-EN23**Waste**

1,742,250 tons of waste was reported globally in 2016.

G4-EN26**Water bodies affected by water discharges**

Iron Mountain predominantly operates in commercial or industrial areas, which are designed for such use. This minimizes the impact of water discharge due to the provision municipal water and sewerage systems. Iron Mountain is not aware of any important water bodies impacted by the discharge of water used onsite in 2016.

G4-EN27**Mitigation of environmental impacts of products and services****A RESPONSIBLE CHOICE**

Iron Mountain is committed to being a responsible partner to our customers. To this end, we continuously seek innovative ways to help minimize the environmental impacts of our service offerings. One example is our Secure IT Asset Disposition (SITAD) service in the United States, which provides a safe and responsible way for our customers to dispose of or recycle their electronic waste.

In 2016, we helped our customers to responsibly dispose of 9,445 tons of electronics and backup tapes and 767 tons of X-ray film. We also offer secure destruction of paper documents and used boxes through our shredding service. This offering in the United States

provides a safe and environmentally conscious solution for our customers looking to dispose of documents. We offer onsite and offsite shredding services on a one-time or reoccurring basis to tailor each solution to the customer's needs. One hundred percent of paper shredded through this service is recycled, and customers using this service are given reports that outline the environmental benefits attributed to their document disposal. In 2016 557,296.5 tons of cardboard and paper were recycled through this service.

G4-EN30**Environmental impact of transport**

[Data reported on page 24.](#)

Fleet operations around the world is a major focus for reductions in fuel use, cost and environmental impacts. In 2016 we increased the size of our fleet with the Recall acquisition; however, Legacy Iron Mountain fleet operations improved gas mileage slightly yr/yr. In 2017 we will actively test alternative fuel vehicles including electric vehicles. We are also partnering with the Environmental Defense Fund to dedicate a Climate Corps Fellow to analyze our best fleet alternative vehicle options.

SOCIAL - LABOR
PRACTICES AND DECENT
WORK (LA) INDICATORS**G4-DMA****Disclosures on Management**

Approach Labor Practices and Decent Work Performance (including Occupational Health and Safety, Training and Education and Diversity and Equal Opportunity) Ensuring we have a healthy, well-trained and ethical workforce is essential for our business performance. It supports the well-being and professional fulfillment of our people, and allows us to provide quality service to our customers. Our Code of Ethics and Business Conduct guides the behavior and culture of our workforce, allowing us to put our values into action every day. Our Chief Compliance Officer is responsible for monitoring compliance with the Code and provides a quarterly dashboard and an annual report on compliance to the Iron Mountain Board's Audit Committee. The Chief Compliance Officer attends all committee meetings to uphold an ongoing dialogue that includes addressing any possible changes in compliance responsibilities, policies or procedures that might be needed. Our various Human Resources functions lead these efforts and

impact global business performance across the company, which requires these functions to report to Global Talent Management at Iron Mountain. We closely monitor employees' participation in our benefit plan to ensure we are offering benefits that provide the greatest value. International employee benefits plans are managed at the country level, and overseen by the Director of Benefits Strategy (U.S. and Canada) and the Reward Director (International). Meeting our commitment to operate safely and responsibly is overseen by the Senior Vice President, Chief Security Officer. Our Global Health and Safety Policy defines the basic requirements of our health and safety management system and serves as the foundation of our safety endeavors. Chelsea Foxwell, VP Global Talent Management and Organizational Development, oversees our enterprise-wide end-to-end talent process, including learning and development. Gene Baker, our VP of Total Rewards, oversees enterprise-wide job grading, compensation, incentive and benefits design. Ty Ondatje, Senior Vice President and Chief Diversity Officer is responsible for policies and programs for diversity and equal opportunity and reports to our Senior Leadership Team led by the CEO. www.ironmountain.com/code

G4-LA1**Employee fluctuation**

[Employee turnover data reported on page 19.](#)

G4-LA2**Access to benefits**

Benefit plans are managed at the country level, are overseen by our VP of Total Rewards and may vary by employment type. Part-time employees may be eligible for many of the same benefits offered to full-time employees.

G4-LA3**Return and retention after parental leave**

In the reporting year, 184 male and 77 female employees went on parental leave in North America, and 182 male and 71 female employees returned from leave in that year.

G4-LA6**Accidents, occupational illness and lost time**

Iron Mountain relies upon Total Recordable Incident Rate (TRIR) and Lost Time Incident Rate (LTIR) as its key safety performance indicators. These metrics were established for our North America business several years ago, and in 2015 we began reporting the same figures at the enterprise level. [Safety data and information reported on page 17.](#)

G4-LA9**Employee education and development****TRAINING DATA**

REGION	CANADA	UNITED STATES
TOTAL HOURS	8,969	57,690
AVERAGE HOURS PER EMPLOYEE	7.18	6.70
AVERAGE HOURS PER MALE EMPLOYEE	7.51	7.50
AVERAGE HOURS PER FEMALE EMPLOYEE	6.11	4.42
AVERAGE HOURS PER PEOPLE LEADERS	3.76	3.75
AVERAGE HOURS PER NON-PEOPLE LEADERS	7.24	6.85

G4-LA10**Programs for skills management and lifelong learning**

Iron Mountain continues to build a true learning culture with award-winning training and development programs. For the fourth year in a row, we have been ranked among the Top 125 Learning Organizations by Training

Magazine—placing No. 41 this year, up from previous ranks of No. 42, 58 and 92. The honor was achieved through the collaborative efforts of our learning teams, including innovative programs that support our frontline employees, sales, customer service, and global leadership.

G4-LA12**Diversity in governance bodies and workforce**

Information on the Board of Directors is available on our website at <http://investors.ironmountain.com/company/for-investors/corporate-governance/governance-documents/default.aspx>.

G4-LA13**Equal remuneration of men and women**

[Pay data outlined on page 20.](#)

**SOCIAL - SOCIETY
(SO) INDICATORS**

Behaving as a responsible corporate citizen is important to Iron Mountain's reputation. We are committed to helping local communities meet their needs as a way of ensuring mutual success. Iron Mountain's Community Engagement manager leads this responsibility. Our compliance with ethical business requirements protects all participants in the marketplace, and prevents financial risks for our company and our stockholders. Our Code of Ethics and Business Conduct is an essential foundation for this principle. Our Chief Compliance officer is responsible for monitoring compliance with the Code and provides a quarterly dashboard and an annual report on compliance to the Iron Mountain Board's Audit Committee. The Chief Compliance officer attends all committee meetings to uphold an ongoing dialogue that includes addressing any possible changes in compliance responsibilities, policies or procedures that might be needed. We have worked with community members and outside consultants to develop an assessment of needs that we can uniquely address. The result is a strategic philanthropic focus for our

cash grants and service-in-kind support for nonprofit partnerships that help to protect, preserve and ensure access for cultural and historic records and artifacts. Our Living Legacy Initiative is detailed in Corporate Giving guidelines and policy and, we report on impacts and results.

<http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/Our-Communities.aspx>

G4-SO1**Impact on the community**

In 2016 we donated \$545,000 to various nonprofits and provided \$49,298 of in-kind services. Our employees in North America volunteered over 50,000 hours in 2016. <http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/Our-Communities.aspx>

G4-S03**Assessment of corruption risks**

In addition to strict provisions preventing corrupt behavior in our Code, we assess corruption risks by country.

This assessment is based on discussions of the Anti-bribery/Anti-corruption Steering Committee and on insights from Transparency International's Corruption Perceptions Index. These assessments consider: (a) whether we've acquired assets in the country in question, (b) whether there has been a significant change in local management, (c) which proportion of our local business portfolio consists of government contracts and (d) on internal audit findings.

G4-S04**Training on anti-corruption**

Our Chief Compliance Officer and his team travel to all countries determined by the process mentioned above to provide in-person training for the local Sales, Marketing, Procurement, Legal, Finance and leadership teams. We are not aware of any cases of violation of Anti-bribery/Anti-corruption laws at Iron Mountain globally in 2016.

G4-S05**Actions taken in response to incidents of corruption**

We are not aware of any cases of violation of Anti-bribery/Anti-corruption laws at Iron Mountain globally in 2016.

G4-S07**Anti-competitive behavior**

Iron Mountain believes that a free and competitive marketplace offers us the best opportunity to succeed. By delivering value and providing best-in-class service, we outperform the competition and build long-term trust with our customers. We recognize that even the appearance of unfairness or deception in our competitive practices can directly impact our chances of success. Our Code of Ethics and Business Conduct also demands that we be aware of and respect fair competition and antitrust requirements worldwide. This includes legal requirements as well as our company policies and procedures. Employees who may come into contact with competitors or competitively sensitive information are required to complete annual Antitrust and Fair Competition training, and to certify to company policies. We are not aware of any cases of violation of antitrust and not fair competition laws at Iron Mountain globally in 2016.

http://s1.q4cdn.com/415773695/files/doc_downloads/LEG-2350_Political_Contribution_Policy_Final_CompassInternal.pdf

G4-S08**Regulatory non-compliance**

We are committed to demonstrating responsible behavior in the communities where we operate, and in 2016 there were no significant fines or non-monetary sanctions for non-compliance with laws and regulations that are not disclosed in this report. In respect to public policy, Iron Mountain does not make political contributions from corporate funds or resources. All company donations and charitable contributions worldwide are controlled through a compliance policy, ensuring that these gifts are free of conflicts of interest and aligned with national and local laws.

SOCIAL - PRODUCT RESPONSIBILITY (PR) INDICATORS

Ensuring a positive customer experience is essential for both our customers and the growth of our business.

Comprehensive customer surveys allow us to keep the pulse of the marketplace. Our chief marketing officer in North America is responsible for our Customer Experience program in that region. We are aligning international efforts more closely with it, starting with Western Europe. Our management approach to the customer experience is continuously reviewed for any needed changes based on the feedback received from our customers. Data security and privacy are at the core of our business and addressed in our Code of Ethics and Business Conduct and essential parts of our compliance programs. We also support the development industry standards on data security. We work closely with customers represented in our Customer Advisory Board to anticipate and meet future needs in the market. See page 32 in our 2015 report. <http://www.ironmountain.com/About-Us/Corporate-Social-Responsibility/News-and-Noteworthy/Corporate-Social-Responsibility-Reports.aspx>

G4-PR5

Customer satisfaction

[Data presented on page 14.](#)

G4-PR8

Complaints regarding customer privacy and data protection

To support our culture of continuous improvement, we capture “near-miss” indicators relating to the handling of customer materials. These incidents are reported via our Incident Reporting Center (IRC) and are triaged, investigated and escalated by an experienced team of security professionals. The IRC allows the team to efficiently track incidents, identify trends and develop processes and procedures to prevent recurring incidents. On the rare occasion when compromised data security does occur, the incident is typically brought to the customer’s attention by our own internal quality controls. In 2016, there were no significant complaints from regulatory bodies or other outside parties on data protection and privacy issues.

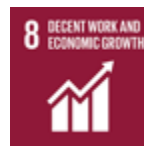
UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

The following Sustainable Development Goals (SDGs) were supported by Iron Mountain activities and operations during 2016.



Achieve gender equality and empower all women and girls

See G4-LA9; G4-10; G4-LA11; G4-LA12; G4-10; G4-34; G4-56; G4-LA1; G4-LA2; G4-LA3; G4-LA11; G4-LA12; G4-LA13



Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

G4-LA6; G4-10; G4-11; G4-LA2; G4-LA9; G4-LA13; G4-EN6; G4-EN19; G4-EN27; G4-SO1



Make cities and human settlements inclusive, safe, resilient and sustainable

See G4-EN23; G4-EN27; G4-EN30; G4-LA6



Ensure healthy lives and promote well-being for all at all ages

See G4-EC1; G4-EN15; G4-EN16; G4-EN17; G4-EN18; G4-EN19; G4-EN20; G4-EN30; G4-LA2; G4-SO1; G4-LA6



Ensure availability and sustainable management of water and sanitation for all

See G4-EN22; G4-EN26



Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation

See G4-EN6; G4-EN19; G4-EN27; G4-SO1



Ensure sustainable consumption and production patterns

See G4-EN2; G4-EN23; G4-EN27; G4-EN30



Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

See G4-LA9; G4-10; G4-LA11; G4-LA12



Ensure access to affordable, reliable, sustainable and modern energy for all

See G4-EN3; G4-EN5; G4-EN6



Reduce inequality within and among countries

See G4-10; G4-LA1; G4-LA3; G4-LA9; G4-LA11; G4-LA12



Take urgent action to combat climate change and its impacts

See G4-EN15; G4-EN16; G4-EN17; G4-EN18; G4-EN19; G4-EN20; G4-EN30

UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS



Conserve and sustainably use the oceans, seas and marine resources for sustainable development

See G4-EN6; G4-EN7; G4-EN19; G4-EN22; G4-EN24; G4-EN26; G4-EN27; G4-SO1; G4-SO2



Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

See G4-27; G4-56; G4-57; G4-58; EN DMA; G4-EN27; G4-SO3; G4-SO4; G4-SO5; G4-SO7; G4-SO8; G4-PR8



Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss

See G4-EN1; G4-EN2; G4-EN6; G4-EN7; G4-EN19; G4-EN23; G4-EN24; G4-EN25; G4-EN27; G4-EN28; G4-SO1; G4-SO2



Strengthen the means of implementation and revitalize the global partnership for sustainable development

See G4-56; G4-57; G4-58; G4-SO3; G4-SO4; G4-SO5; G4-SO8



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