IRON MOUNTAIN 2022

TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES (TCFD) REPORT

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OVERVIEW OF TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURES

TCFD was established by the Financial Stability Board to meet the need for effective and standardized climate-related disclosure. In 2017, TCFD released its recommendations with the ultimate goal of increasing the level of transparency around climate-related risks and opportunities and to allow companies to discuss their climate strategy and risk management processes. This report follows the TCFD recommendations.

CORE ELEMENTS OF RECOMMENDED CLIMATE-RELATED FINANCIAL DISCLOSURES

GOVERNANCE

STRATEGY

RISK
MANAGEMENT

METRICS
AND
TARGETS

GOVERNANCE
The organization's governance around climate-related risks and opportunities

STRATEGY
The actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning

RISK MANAGEMENT
The processes used by the organization to identify, assess, and manage climate-related risks

METRICS AND TARGETS
The metrics and targets used to assess and manage relevant climate-related risks and opportunities

Source: Recommendations of the Task Force on Climate-related Financial Disclosures; Final Report; 2017

ABOUT THIS REPORT

As a global leader in innovative storage, data center infrastructure, asset lifecycle management and information management services, our reach stretches across 60 countries. We strive to take responsibility for a sustainable future by unlocking opportunities in our operations and beyond. This can only be achieved if we recognize our contributions to climate change, understand the risks that climate change poses to our business, and pursue opportunities that accompany the transition to a zero-carbon economy.

Our third annual Task Force on Climate-related Disclosures (TCFD) report outlines our approach to addressing our contribution to climate change and the mechanisms we have in place to both reduce our environmental footprint and become a more resilient business.

KEY ACTIONS IN 2022

Governance	Climate Scenario Analysis	Completed our first climate scenario analysis to advance our efforts to mitigate climate-related risks and realize climate-related opportunities.
	Science Based Targets (SBT)	Submitted our letter of commitment to the SBTi Business Ambition for 1.5°C campaign in 2022. As part of this process, we intend to update our short-term SBT to align with 1.5°C climate science and submit a net-zero target for SBTi validation in 2023.
Risk	Climate Scenario Analysis	Completed our first climate scenario analysis to advance our efforts to mitigate climate-related risks and realize climate-related opportunities.
Strategy	Energy Efficiency	Installed programmable thermostats at 11 sites and retrofitted 12 sites with over 8,600 LED fixtures globally.
	24/7 Carbon-Free Energy	Improved the ability to track the hourly needs at over 100 of our facilities in the United States and announced a series of electricity procurement transactions that will provide carbon-free energy 24 hours a day, 7 days a week to many facilities across the portfolio.
	Electric Vehicles	Committed to electrifying 100% of our cars and 50% of our vans by 2030. These efforts have resulted in a total of 91 EVs in service or on order in 13 countries to date, including 37 EVs added in 2022.
Metrics	Greenhouse Gas (GHG) Emissions	Reduced Scope 1 and 2 emissions by 32% since 2016. Conducted a comprehensive Scope 3 review that will inform our reporting.
	Waste	Collected data for locations where visibility is currently limited in order to better understand the type and amount of waste being generated. We have increased waste data visibility to 100%.
	Renewable Energy	Over 85% of our global portfolio is powered by renewable energy, and we procured the equivalent of 100% of the electricity used in our data centers with renewable energy.

OUR CLIMATE CHANGE FOCUS: PROTECTING OUR PLANET

We embrace our responsibility to contribute to a net-zero GHG emissions future for our planet. We seek opportunities to improve environmental performance within our operations. We enable our customers to manage information while meeting their environmental goals. And we partner with our suppliers to unlock opportunities to protect our planet, together.

Our efforts to decarbonize the grid, manage our resource use responsibly, and improve our climate resilience go hand-in-hand with our efforts to report on our progress in a transparent manner. We invite you to view our annual response to CDP and visit our sustainability webpage for more information about Iron Mountain's commitment to environmental sustainability. Resources available on the corporate responsibility webpage include our Global Environmental Policy, our Corporate Sustainability Report in alignment with the Global Reporting Initiative (GRI), and our Carbon Reduction Plan.

GOVERNANCE

BOARD AND MANAGEMENT OVERSIGHT OF CLIMATE-RELATED RISKS AND OPPORTUNITIES

The Board of Directors' Risk and Safety Committee is responsible for reviewing the company's establishment and operation of the Enterprise Risk Management (ERM) program. The Company's Chief Risk Officer (CRO) manages a team which is responsible for the management, governance and assessment of risk across Iron Mountain, including the day-to-day oversight of the ERM program. The company's risk management team regularly engages with business unit and operational leads around these risks through the ERM Steering Committee, and with executive leadership through the Enterprise Risk Committee (ERC). This comprehensive process ensures that risks are prioritized, resourced, and managed. Climate-related risks are embedded in this process. The Vice President, Head of Global Communications and Sustainability is a member of the Enterprise Risk Steering Committee.

The Vice President, Head of Global Communications and Sustainability has a global role and reports to the Executive Vice President, General Counsel and Secretary, who reports directly to the CEO. Through this structure he leads processes and a team that monitors climate-related issues most material to Iron Mountain. When opportunities or risks are identified, the management of the associated action plans is either owned by the Vice President, Head of Global Communications and Sustainability directly or by the functional owner in the organization where it is most relevant. The Vice President, Head of Global Communications and Sustainability manages the Sustainability team.

The sustainability team is responsible for meeting with functional and business unit leaders to monitor progress toward our environmental commitments. This collaboration allows teams to track the effectiveness of programs aimed at improving performance. In addition to twice-yearly executive leadership meetings to review progress on goals and ensure action plans are adjusted as needed to meet the goals, the sustainability team also produces a quarterly dashboard for the executive leadership team to keep them apprised of progress throughout the year. The sustainability team also provides periodic reports to the company's Board of Directors on the company's sustainability strategy and key initiatives.

Climate-related issues are currently integrated into the following management processes:

- Reviewing and guiding strategy
- Setting performance objectives to reduce GHG emissions
- Monitoring and overseeing progress against goals and targets for addressing climate-related issues
- Aligning executive incentive compensation to include greenhouse gas emissions reduction targets

	IDENTIFY	MANAGE	MONITOR
Board of Directors		• Risk and Safety Committee reviews ERM program • Nominating and Governance Committee reviews ESG strategy and objectives	Review overall risk position, risk management processes, and ESG progress
CEO and Executive Leaders	Provide input for annual risk assessment	• Set objectives and approve strategy for risk management • Allocates resources for risk mitigation	Oversee performance against risk objectives
Enterprise Risk Management (ERM)	Conduct annual risk assessment	Enterprise Risk Committee (ERC) oversight of known risks, including the monitoring of action plans and progress reporting	Update Board of Directors and Board level Risk and Safety Committee on all enterprise risks
Sustainability Department	Conduct regular materiality assessment	Recommend sustainability strategy and objectives	• Identify and support sustainability goals implementation, action, and progress reporting • Update the Board of Directors on sustainability strategy and objectives

STRATEGY

CLIMATE SCENARIO ANALYSIS

In 2021, we announced that we would complete a climate scenario analysis by 2023. Completing a climate scenario analysis can inform our strategy and enhance risk management processes. The results of our climate scenario analysis outlined in the following pages are intended to help our stakeholders better understand our climate resilience under different plausible future states of the climate and how we could maximize opportunities and address climate-related risks.

Our risk management process has included consideration of the impacts from climate change and reinforced the value of a formal climate scenario analysis. To complete the analysis, we partnered with BSR, a global nonprofit that works with its network of over 300 member companies to build a just and sustainable world, to explore the strategic implications under three climate-related scenarios for 2050. The analysis will inform the next steps in advancing our strategy to mitigate climate-related risks and realize climate-related opportunities.

The scenario analysis process involved the following steps:

Scenario Development	BSR used three climate scenarios developed by the Network for Greening the Financial System (NGFS). The three scenarios have a 2050 horizon year and are differentiated by three design choices relating to long-term policy, short-term policy, and technology availability. These climate scenarios provide the base narratives for Iron Mountain's climate scenario analysis. BSR extended each of the narratives by adding content about how a range of business-relevant topics might plausibly play out in each of these scenarios. • Current Policies • Delayed Transition • Net Zero 2050 Details about the scenarios, temperature assumptions, and level of physical and transition risks can be found on the NGFS site here.
Identification of Climate-related Risks and Opportunities	Seven group interviews involving subject matter experts and leaders from diverse functions and business units across the organization were conducted to analyze the impact of the three scenarios and identify climate-related risks and opportunities for Iron Mountain. These risks and opportunities are available on pages 12-13.
Strategic Implications	The analysis culminated in an executive-level strategic-implications workshop that identified opportunities to enhance Iron Mountain's resilience and refine our strategy around hotspots common across the three scenarios.
Action Planning	A follow-up session to the workshop was organized with the Sustainability team to identify next steps on the most important issues to improve Iron Mountain's strategic resilience.

STRATEGIC IMPLICATIONS

As part of our 2022 climate scenario analysis, we identified seven themes that were common across all scenarios: supply chain, workforce, reputation, government regulation, transition impacts on existing assets, business innovation, and overall physical impacts to assets. These scenario insights will be reviewed by Iron Mountain leadership and will inform Iron Mountain's prioritization and management of climate risk. We will focus on top priorities as identified by senior leadership during the climate scenario analysis implications discussion: sustainability collaboration and communication, facility resilience, societal and policy considerations, and embedding sustainability into growth. Our Sustainability team will continue to meet with business unit and functional leaders to prioritize and discuss implementation of the recommendations from the analysis and further embed climate resilience into our strategy.

IDENTIFIED RISK	POTENTIAL RISK IMPACT	SCENARIO(S) CONSIDERED	RISK TYPE	TIME HORIZON
Specific risks that climate change poses to our operations and strategic business initiatives	How climate-related risks could impact our future financial position and operations	The scenarios relevant for the identified risk	**Transition:** transition to a lower-carbon economy **Physical:** physical impacts of climate change	**Short term:** 0-5 years **Medium term:** 5-10 years **Long term:** 10-20 years
Increased severity and frequency of extreme weather events	Increased operational and capital costs associated with service disruptions and damage to equipment and facilities; reputational loss associated with damaged trust when securing important assets; insurance costs may increase for facilities in areas potentially impacted by significant climate change. Supply chain disruption limiting resource availability could have an impact on our ability to meet customer needs.	Current Policies Delayed Transition	Physical	Short and medium term
In some regions where we operate living conditions could be negatively impacted by climate change	Restricted growth in certain markets could occur as climate conditions impact presence of employees and customers.	Current Policies Delayed Transition	Physical	Medium and long term
Reputational risk associated with a failure to meet climate-related commitments or regulatory requirements	Reputational loss and financial penalties possible for failure to comply with regulatory requirements, perceived greenwashing or lack of transparency regarding environmental goals and progress.	Delayed Transition Net Zero 2050	Transition	Short, medium and long term
Volatile energy costs	Increase in energy prices and increased operational costs throughout the value chain.	Current Policies Delayed Transition	Transition	Short, medium and long term
Ability to adapt in a rapidly evolving sustainability landscape	Costs to implement strategy adjustments for technology and staffing. Additional investments and collective action by global teams to scale renewable energy and our cleantech portfolio.	Delayed Transition Net Zero 2050	Transition	Short and medium term
Carbon tax	Increased operational costs associated with taxes; increased capital expenditures associated with cleantech adoption.	Delayed Transition	Transition	Medium term

IDENTIFIED OPPORTUNITIES	POTENTIAL OPPORTUNITIES IMPACT	SCENARIO(S) CONSIDERED	OPPORTUNITIES TYPE	TIME HORIZON
Specific opportunities that climate change poses to our operations and strategic business initiatives	How climate-related opportunities could impact our future financial position and operations	The scenarios relevant for the identified opportunity	**Examples:** : efficiency gains, new products and services, access to new markets, more resilient operations	**Short term:** 0-5 years **Medium term:** 5-10 years **Long term:** 10-20 years
Strategic real estate portfolio management	Expand service offerings by repurposing storage facilities for functions that are not at high risk of damage due to severe weather. Mitigate physical impacts of climate change and reduce the likelihood of damage to assets through locating facilities in markets less vulnerable to physical impacts of climate change as well as investments in technology and in resilient infrastructure in the real estate portfolio.	Current Policies Delayed Transition	New products and services Access to new markets More resilient operations Reduced capital expenditures	Short, medium and long term
Supply chain resilience	Reduce reliance on unpredictable supply chains via investment in circular materials. Localize supply chains to reduce transportation emissions and avoid disruptions. Engage with suppliers to mitigate climate risk and decrease scope 3 GHG emissions.	Current Policies Delayed Transition Net Zero 2050	More resilient operations Reduced capital expenditures	Short and medium term
Climate friendly and circular products, services and offerings	Differentiate our brand and attract customers seeking to decarbonize their operations and meet sustainability goals.	Delayed Transition Net Zero 2050	New products and services Access to new markets	Short, medium and long term
Resource efficiency programs	Reduce operating costs through resource use efficiency programs. Increase resilience in regions that experience resource scarcity (i.e., water).	Current Policies Delayed Transition Net Zero 2050	Efficiency gains More resilient operations Reduced operating costs	Short, medium and long term
Transportation optimization and electrification	Optimize transportation routes to increase distribution efficiency. Further electrify the fleet to reduce exposure to fossil fuels and avoid regulations on tailpipe emissions.	Delayed Transition Net Zero 2050	Efficiency gains More resilient operations	Short, medium and long term
Renewable energy use	Increase resilience and decrease costs associated with reduced exposure to fossil fuels. Improve brand reputation through achievement of emissions reductions goals.	Delayed Transition Net Zero 2050	More resilient operations Reduced capital expenditures	Short, medium and long term

# IMPACT OF CLIMATE CHANGE ON BUSINESS, STRATEGY, AND FINANCIAL PLANNING

Our operations strategy has been influenced by climate-related risks and opportunities. Our primary business is to provide secure storage and processing solutions for customer information in all forms. To maintain our position as a leader in information management, we monitor customer demand as well as the security risks and physical risks that climate change poses to our facilities and operations. As the effects of climate change become more tangible, we have adapted our strategy to ensure that these potential risks are mitigated. We are able to design and adapt our facilities to mitigate damage from severe weather events where conditions warrant. As part of our energy and carbon reduction operations strategy, we are investigating and implementing a portfolio of projects that includes various efficiency measures in our facilities, electrification of our global fleet, procurement of green power, and installation of onsite renewable solutions, among others. We also closely monitor energy prices. We have experienced significant fluctuations in energy prices in previous years. As our business grows, our commitment to sourcing 100% renewable electricity will be a key factor in insulating us from the cost volatility and environmental impact of dependence on fossil fuels. By leveraging long-term contracts for renewable energy, we can serve our customers and grow our business, while reducing our carbon footprint at the same time.

Our products and services strategy has been influenced by climate-related risks and opportunities through both the development of new products and services and the identification of enhancements for current products and services to help customers solve their own climate-related challenges. We recognize that demand for our products and services may be impacted as customers are increasingly interested in climate-friendly or climate-neutral products and services. Customers are also seeking additional transparency regarding Iron Mountain's supply chain. This also includes inputs to our products and services. Our supply chain may be impacted by climate-related issues, as we seek to source more environmentally friendly materials to support our customers' requirements and to meet our own climate-related goals. Many of our customers have publicly stated environmental goals. Therefore, by enhancing our products and services and developing new offerings, we can help them meet their environmental goals and differentiate our brand in the marketplace.

Climate-related risks and opportunities have influenced our financial planning when considering the effects that severe weather events may have on revenue and capital expenditures. Some of our key facilities worldwide are vulnerable to severe weather events. An increase in severe weather events could result in customer service disruption, physical damage to one or more key operating facilities and the cartons stored in those facilities, the temporary closure of one or more key operating facilities, or the temporary disruption of information systems. This could result in decreases in revenue due to service disruptions and could increase capital expenditures to repair facilities that may become damaged.

Iron Mountain is a durable and resilient company, and we are committed to effective climate-related risk management, robust infrastructure, resource use and emissions reduction, and renewable energy. We continuously monitor conditions related to climate change and adapt our strategies accordingly.
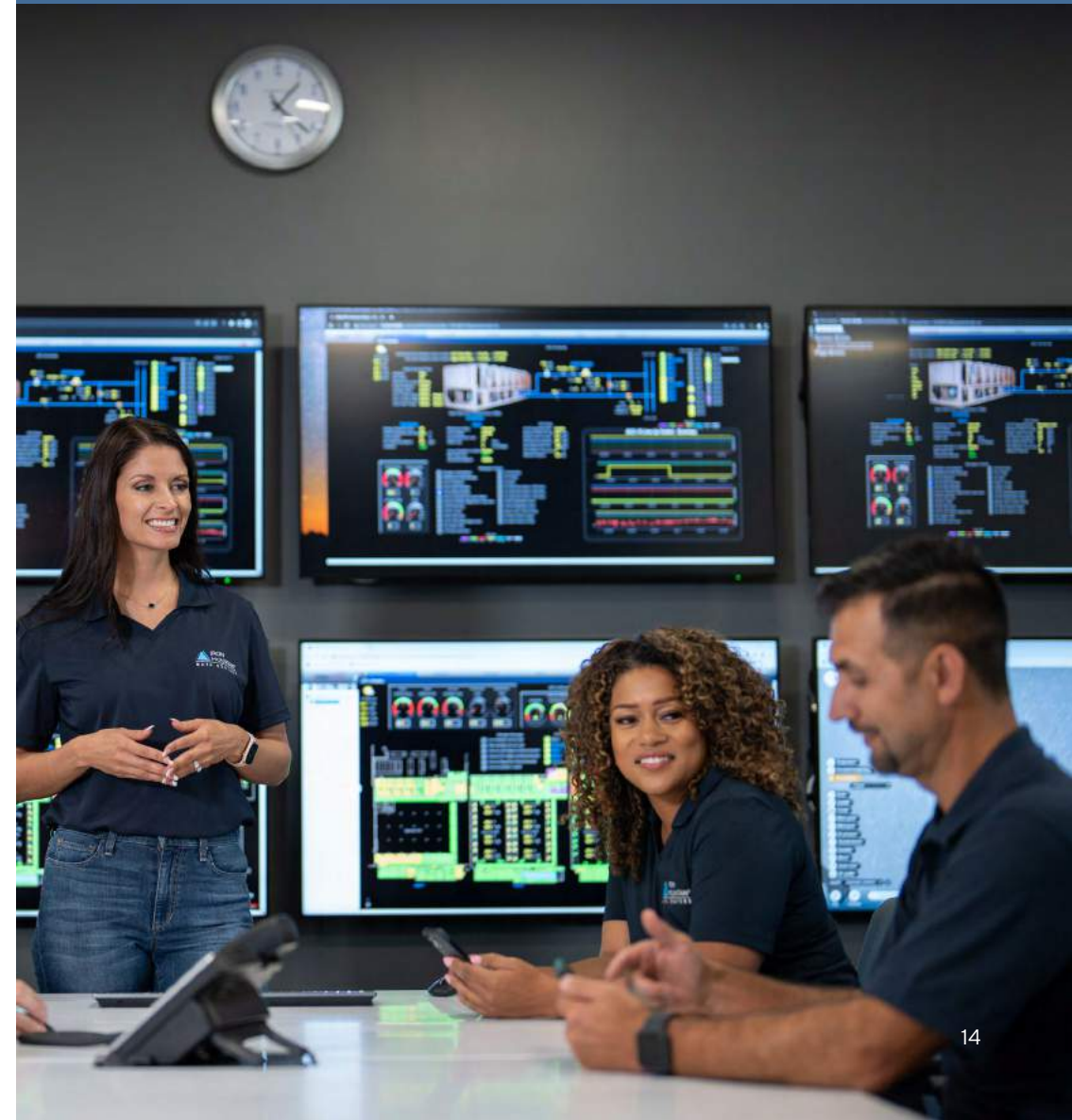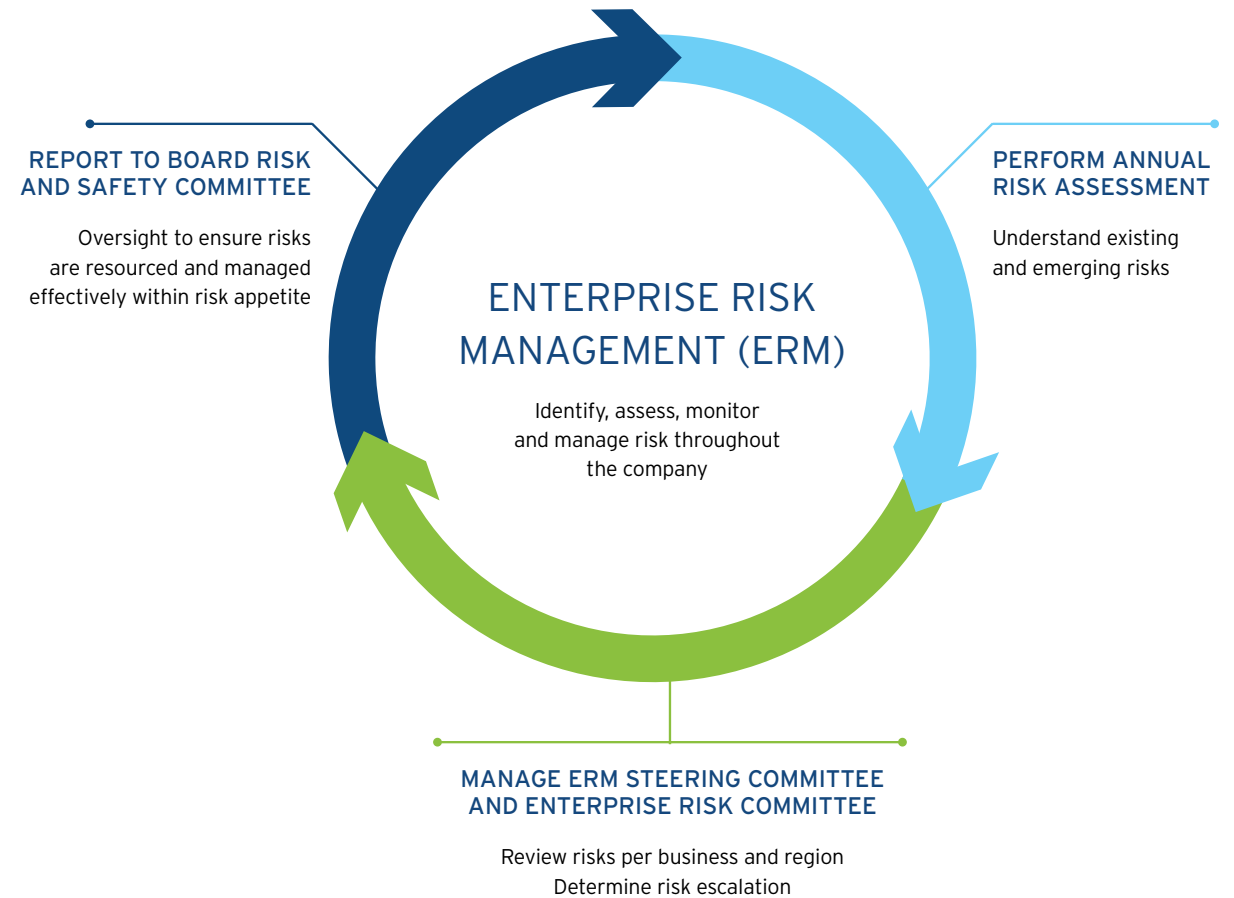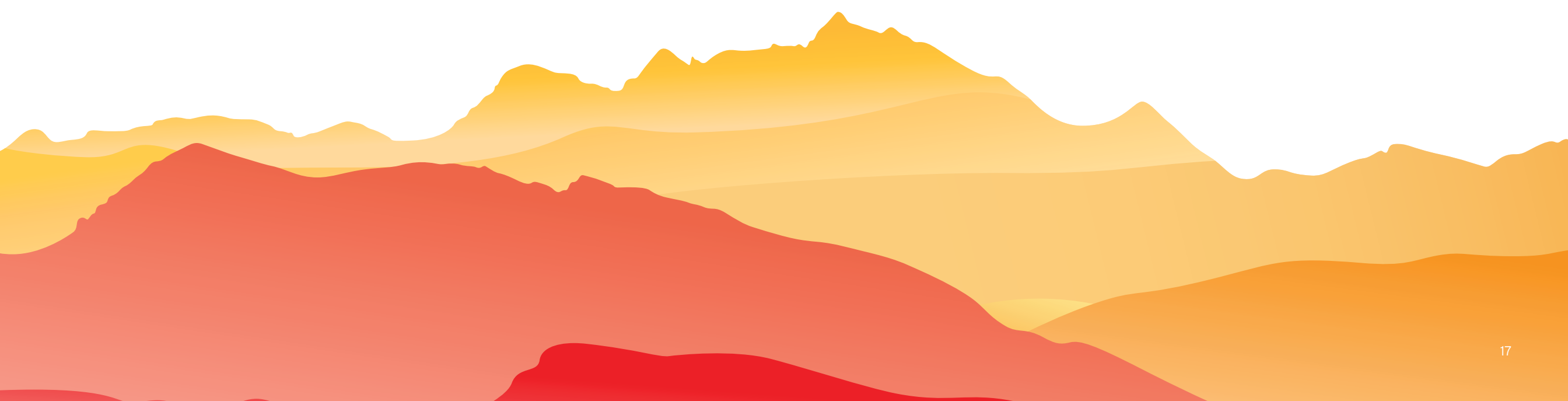
RISK MANAGEMENT

The highest management-level position with direct responsibility for risk is the CRO. The CRO reports internally to the Executive Vice President, Chief Operating Officer. The CRO is responsible for the management, governance and assessment of risk across Iron Mountain. Iron Mountain recognizes the importance of identification and management of risk and has included risk identification and management as part of the responsibility for this management-level position. The CRO has overall responsibility for Iron Mountain's various risk management programs, including the ERM program and the ERC. Management of climate-related risks is assigned to either the Vice President, Head of Global Communications and Sustainability directly or to the functional owner in the organization where it is most relevant.

Iron Mountain's process to identify and assess climate-related risks and opportunities that pose a substantive financial or strategic impact includes a risk identification and assessment methodology that focuses on a set of risk-rating criteria to calculate overall risk scores, as well as various risk management techniques relating to climate-related risks and opportunities. Our risk management team has developed a comprehensive global framework for reducing risks based on four dimensions: degree of impact, likelihood of occurrence, control effectiveness, and risk tolerance. As part of our Enterprise Risk Management program, we undertake an annual risk assessment to identify and quantify these risks along these dimensions using an automated risk-assessment tool. Employees throughout the company provide input during this risk-assessment process, in roles ranging from manager to executive vice president and representing multiple business units and operational lanes. New to our process, in 2022, was the implementation of a climate scenario analysis described on pages 10-13. As part of this analysis, additional risks were identified for potential climate scenarios. Moving forward, the findings will be integrated into our process for identifying and assessing climate-related risks. All geographic regions under operational control and all portions of our value chain are considered in our climate-related risk assessment.

The risk management team regularly engages with business unit and operational leads to address these risks through the ERM Steering Committee and with executive leadership through the Enterprise Risk Committee. At a site level, we have in place risk management processes to ensure our facilities' exposure to extreme weather events that may be exacerbated by climate change, such as storms and floods, is minimized. For strategic risk transfer purposes, we maintain a comprehensive insurance program with counterparties whom we believe to be reputable and adequately capitalized. We also maintain a comprehensive Crisis Management Plan (CMP) that provides an overall management process as well as the underlying foundational structure that enables the appropriate level of senior management oversight in any potential crisis situation.

ENTERPRISE RISK MANAGEMENT (ERM)

Identify, assess, monitor and manage risk throughout the company

PERFORM ANNUAL RISK ASSESSMENT

Understand existing and emerging risks

MANAGE ERM STEERING COMMITTEE AND ENTERPRISE RISK COMMITTEE

Review risks per business and region
Determine risk escalation

REPORT TO BOARD RISK AND SAFETY COMMITTEE

Oversight to ensure risks are resourced and managed effectively within risk appetite

METRICS AND TARGETS

We set ambitious public goals and are transparent in our reporting in order to hold ourselves accountable for the impact of our operations and to focus on how we can create positive change in the communities in which we operate. Our goals encourage us to collaborate across disciplines to innovate, increase inclusiveness, and grow our business sustainably. We focus on what is most material and impactful. We create our goals carefully with input from our stakeholder engagement process, function-specific subject matter experts, and executive leadership.

TARGETS TO MANAGE CLIMATE-RELATED RISKS AND OPPORTUNITIES

Iron Mountain will achieve net-zero emissions by 2040 – 10 years ahead of the Paris Climate Accord.

By 2040, we will use 100% clean electricity 100% of the time in our data centers. To accelerate decarbonization of the grid, we are going beyond our RE100 commitment of 100% renewable electricity. We will use the Google methodology for matching site-by-site electricity use with local clean power generation every hour of every day to achieve 24/7 clean power.

By 2040, we will drive circular economy innovation by working toward zero waste in our operations and collaborating with others to create closed-loop products and services.

By 2030, as part of our commitment as a signatory to the EU Climate Neutral Data Centre Pact, all Iron Mountain data centers worldwide will be climate neutral.

We will maintain the equivalent of 100% renewable electricity for our global data center business and achieve 90% renewable electricity corporate-wide by 2025 – 15 years ahead of our RE100 commitment.

By 2025, all new construction multi-tenant data center facilities will be certified to the BREEAM Green Building Standard.

We will go beyond our current Science Based Target (25% reduction of absolute GHG emissions from our 2016 baseline) and by 2025 will achieve a reduction of 25% of GHG emissions from Scope 1 and 2 sources from our 2019 baseline.

We commit to transitioning 100% of company cars and 50% of vans to EVs by 2030. As an initial step, we commit to converting 10% of our worldwide fleet to EVs by 2025.

By 2023, we will complete a climate scenario analysis. **COMPLETED**

By 2023, we will increase our reporting coverage of waste and recycling data to at least 90% of our global operations. **COMPLETED**

METRICS TO ASSESS CLIMATE-RELATED RISKS AND OPPORTUNITIES

GREENHOUSE GAS EMISSIONS (METRIC TONS OF CO2E)	2018	2019	2020	2021	2022**
Scope 1	149,865	143,159	125,318	132,299	162,084
Scope 2 market-based	83,368	77,312	62,095	75,801	63,308
Scope 2 location-based	400,045	370,167	208,150	213,000	209,112
Total Scope 1 and Scope 2 emissions, Market Based	233,233	220,471	187,413	208,100	225,391
GHG Intensity Scope 1 and 2 (mtCO2e/sq ft)	0.0026	0.0024	0.0020	0.0022	0.0023
Scope 3*	26,167	38,689	23,657	20,526	121,681
Total absolute emissions	259,400	259,160	211,071	228,626	347,072
Certified Offsets				1,000	30,000

Greenhouse gas (GHG) emissions data is as of 12/31/2022. The time frame for data is 1/1/2018 to 12/31/2022. The data boundary for scope 1 and 2 GHG emissions data includes all Iron Mountain operations and includes a gap analysis and estimation process to cover all operations. See the Iron Mountain annual CDP response for additional information on our GHG emissions sources and calculation methodology.

*The 2022 data boundary for scope 3 GHG emissions was expanded from previous years and now includes additional sources of emissions and covers all operations for scope 3 categories 3, 5, 6, 8, and 13.

** In 2022 we integrated GHG emissions data associated with acquisitions, such as ITRenew and InfoFort. Our Scope 1 GHG emissions also reflect approximately 33,000 MTCO2e from non-recurring events where fire suppression systems were activated.

ENERGY

ENERGY CONSUMPTION (MWH)	2018	2019	2020	2021	2022
Total energy consumption	1,481,040	1,533,552	1,486,012	1,593,667	1,754,610
Total electricity consumption from operations	880,654	883,974	935,791	1,037,686	1,174,613
Total renewable energy consumption	607,749	683,919	758,595	830,702	1,001,511
Total electricity consumption from renewable sources (%)	69%	77%	81%	80%	85%
Energy intensity* (MWh/sq ft)	0.016	0.017	0.016	0.017	0.018

Energy data is as of 12/31/2022. The time frame for data is 1/1/2018 - 12/31/2022. The data boundary is all Iron Mountain operations and includes a gap analysis and estimation process to cover all operations. In 2022 we integrated energy consumption data associated with acquisitions, such as ITRenew and InfoFort.

*Energy intensity is calculated using total energy consumption and total facility area.

WASTE MANAGEMENT

WASTE CATEGORY (METRIC TONS)	2018	2019	2020	2021	2022 Waste from our direct operations	2022 Waste processed on behalf of customers
Total	8,241	9,399	8,986	10,484	12,509	437,948
Landfill	6,936	7,073	6,103	7,030	8,193	0
Recycling	657	1,359	2,501	3,091	3,947	426,510
Recovery (energy from waste)	648	967	382	364	368	11,438
Diversion Rate	8%	14%	28%	29%	32%	Not calculated
Data Coverage	62%	67%	66%	65%	100%	Not calculated

Waste data is as of 12/31/2022. The time frame for data is 1/1/2018 to 12/31/2022. The data boundary for 2022 is all operations and includes waste disposed on behalf of our customers and includes gap analysis and estimation process to cover all operations. In 2022 we integrated waste data associated with acquisitions such as ITRenew and InfoFort. An intensity factor (kg/sqft) was created using vendor-provided data representing 73% of the global footprint as a percentage of square footage. Intensity factors were applied to the remainder of the global portfolio. Waste data for 2018, 2019, 2020 and 2021 represents approximately 62%, 67%, 66%, and 65% respectively, of waste produced as part of our operations as a percentage of our total global square footage. Waste data for the years 2018 – 2021 does not include waste disposed of on behalf of our customers or the aforementioned estimation process.

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