



## **Slavery and Human Trafficking Transparency Statement for Iron Mountain (UK) PLC and its affiliates operating in the UK (collectively “IM”) for the Financial Year 2019**

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

### **IM Overview**

IM is part of the Iron Mountain group, the world’s largest provider of records and information management services. The Iron Mountain group operates in over 50 countries and employs over 24,000 people, approximately 1,700 of which are based in the United Kingdom. More information about our business is available from our website: [www.ironmountain.co.uk](http://www.ironmountain.co.uk).

Our business and core values are premised on compliance and acting with integrity therefore we take adherence to laws, including the Act, seriously and we are fully supportive of initiatives aimed at the eradication of both slavery and human trafficking across the globe. Further, we are committed to providing equal opportunities for all as described within our ethics code which underpins all aspects of our organisation.

We do not use or accept forced, bonded or involuntary labour or child labour and we only work with people who choose to work freely. Further, we do not confiscate personal documents of any of our employees nor do we force them to make any form of payment to secure their employment.

Following the introduction of the Act, IM created and has maintained a cross-functional working group (including members of our legal, procurement, compliance and ethics teams) to assess and respond to its requirements with the intention of identifying and removing any possible existence of slavery and human trafficking within IM and within our supply chain. The ongoing analysis and efforts led by this group has led us to conclude that neither IM, nor our supply chain, are particularly susceptible to these risks but nonetheless, as outlined in this document, we have taken a number of steps to achieve our aim alongside compliance with the Act.

### **Analysis of the Risks of Slavery and Human Trafficking within IM’s own Operations**

We have undertaken a risk assessment of the likelihood of slavery and human trafficking existing within our own organisation and conclude the likelihood to be very low. This finding was based upon analysis of: the nature of work performed by our personnel; the locations of our facilities and personnel; our recruitment and vetting processes; and the lack of any indication of the existence of slavery or human trafficking.

We are confident that the extensive pre-employment screening checks we undertake in relation to our own employees (including verifying their right to work) and paying above the government living wage across the UK go a long way to limit the possibility of slavery and human trafficking existing. Further, where we use employees of Iron Mountain group companies to provide services to, or for, IM we are confident that the pre-employment screening checks undertaken by our group companies are sufficient to minimise the possibility of slavery and human trafficking. However, we do use employment agencies to help manage fluctuations in our staffing requirements and we are aware that we have less control over personnel provided through these channels. Consequently, in addition to having contractual requirements in place with the agencies we use to comply with applicable laws (which would include the Act), we ask them to confirm their compliance with the Act. We are also inserting specific obligations relating to the Act into our agreements when they come up for renewal (or if we enter into agreements with new agents) on an ongoing basis, to help ensure their compliance with the Act.

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

Whilst the Iron Mountain group operates in over 50 countries, IM's supply chain is relatively small compared to that of other companies of similar size and scale with the majority of IM's suppliers being based in the UK. Further, as our business is primarily focused on the delivery of services, we are not exposed to many of the risks involved in the manufacturing sector to the same extent as many companies of our size.

Similar to the assessment that we undertook in relation to our own business, we have assessed the risks of slavery and human trafficking existing within our supply chain and consider this to be relatively low. However, there are areas within our supply chain which we have identified as being more susceptible to slavery and human trafficking than others (including outsourced cleaning services and the manufacturing of uniforms) so it is our understanding and expectation that the steps detailed below will act to reduce this risk.

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

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

- *Contractual Requirements*: we have incorporated express obligations for our suppliers to comply with the requirements of the Act, and to flow these down to their own suppliers, within our standard terms and conditions. We also retain the right to audit our suppliers against their compliance with the Act.
- *Supplier Code of Conduct*: IM's supplier code of conduct, which has been in place for a number of years and against which suppliers can be audited, requires all of our suppliers to act in both an ethically and legally compliant manner (<http://www.ironmountain.com/Company/Global-Procurement/Prospective-Supplier-Information/Guidelines-for-Suppliers.aspx>), including with respect to their employees and staff.

- *Supplier selection:* In selecting suppliers/partners IM focuses on their overall ability to work with IM (including their commitment to CSR and compliance) and not just on price alone. In doing so we do not always choose to work with the cheapest suppliers who arguably may be more likely to use forced labour or behave contrary to the Act. In addition, we request information from potential suppliers on their approach to the Act and any areas of specific risk.
- *Relationships with Suppliers:* IM actively manages relationships with our key suppliers who, through either contractual requirements or dealings with IM, should be aware of our expectations regarding compliance with the Act. Further, should we believe a supplier to be responsible for a breach of the Act, susceptible to breaching the Act, or not acting in accordance with its principles, we would look to work with them to rectify the situation whilst reserving our right to take more formal action, including terminating the relationship, if necessary.
- *Compliance Helpline:* IM runs an anonymous helpline that enables employees (and suppliers) to whistleblow on illegal practices without the risk of victimisation thereby creating an environment in which any non-compliant practices may be brought to the attention of IM.
- *Training:* IM has instructed third party experts to provide training to our procurement team on the Act and how to spot and report indicators of the existence of slavery and human trafficking. On identification of any indicator, our staff are trained to promptly report and escalate the issue to senior personnel. Such training shall be repeated on a periodic basis. We are also investigating ways in which we train a wider audience on the issue to enhance our ability to identify and deal with risks.
- *Speak-up culture:* IM works hard to create an open culture in which all employees are actively encouraged to speak openly, through various channels, about any concerns or suspicions they may have.
- *Recruitment:* IM undertakes strict pre-employment screening on all employees, which includes verification of an individual's right to work within the UK. This significantly reduces the likelihood of us directly using forced labour.
- *Third Party Reviews:* We are reviewing the merits of engaging specialist third party consultants to undertake a thorough review of our supply chain, using various software tools, to validate our findings and make recommendations about further steps we could take to support the objectives of the Act.
- *National and International Learning:* We regularly monitor Home Office Guidance to understand developments in best practice. Further, as legislation similar to the Act is being introduced across the globe, we are looking to identify additional measures that we could take or best practices that we could adopt, to reduce the risk of us inadvertently breaching the Act.

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

*C. Marshall.*

**Charlotte Marshall**

**Director**