

Political Contribution Policy

Approve	Jason Lomax, VP, Global Privacy & Compliance	Recommend	Jeffrey Perkins, Government Affairs Specialist
Concur	Garry Watzke, SVP, Global Government Affairs		
Effective Date	01-August-2014		

1.0 Purpose and Scope

Iron Mountain (the “Company”) recognizes that it may be permitted by law under certain circumstances to contribute corporate funds or resources to political candidates, political parties or organizations.

The purpose of this policy is to ensure compliance with the numerous jurisdictional regulations governing corporate political contributions as well as potential unforeseen harm to Iron Mountain’s reputation and brand.

This policy applies to all employees of Iron Mountain, its related legal entities, and controlled joint ventures in all geographies, business lines and functions. The United States, state and local so-called “pay-to-play” policy applies only to members of the Board of Directors, officers and those employees involved in contracting with state or local governments (“State and Local Team Members”).

2.0 Policy Statement

2.1 Global Controls

- 2.1.1 Iron Mountain will comply with all legal and regulatory requirements in its political activities and interactions with public officials.
- 2.1.2 Iron Mountain and employees with access to corporate funds will not make political contributions in any form or amount from corporate funds or resources. This prohibition covers indirect assistance such as the use of facilities or personnel for a fundraising event; the purchase of tickets for receptions, testimonials, or dinners; advertisement in journals or payment for service.
- 2.1.3 Foreign nationals are prohibited from making any contributions or expenditures in connection with any election in the United States (Note: Green card holders are not considered foreign nationals).

2.2 US Controls (Pay to Play)

- 2.2.1 Iron Mountain will only support candidates for political office through the Iron Mountain Employees Political Action Committee (IMPAC) which supports candidates for the United States Congress who, regardless of party affiliation: (1) have expressed support for issues important to Iron Mountain or whose positions align with those of Iron Mountain; or (2) have expertise or jurisdiction

over issues affecting Iron Mountain or have seniority on committees or are within the leadership of Congress and have the ability to have an impact upon such issues; or (3) represent key states where Iron Mountain has significant operations and interests; and have a likelihood of winning in the primary and general election.

- 2.2.1.1 IMPAC must only be funded through voluntary employee contributions. Participation in IMPAC is strictly voluntary and has no effect on one's employment with Iron Mountain.
- 2.2.1.2 Contributions made by IMPAC must, as required by law, be reported in filings with the Federal Elections Commission and are publicly available.
- 2.2.2 Iron Mountain and employees must not use corporate funds to make independent political expenditures, including electioneering communications, notwithstanding the Supreme Court's decision in Citizens United that corporations may make such expenditures.
- 2.2.3 Employees' personal contributions to national political campaigns and to IMPAC are not subject to any pre-approval process.
- 2.2.4 Directors, Officers and State and Local Team Members must comply with U.S. state and local personal political contribution laws.
- 2.2.5 Directors, Officers and State and Local Team Members must inform the Executive Vice President, General Counsel or Vice President, Privacy and Compliance of the intention to make a political contribution to a U.S. state or local candidate prior to making a contribution and provide the following information:
 - 2.2.5.1 State or locality contribution will be made
 - 2.2.5.2 Name of the candidate to be contributed to
 - 2.2.5.3 Office sought by candidate
 - 2.2.5.4 Amount of contribution
 - 2.2.5.5 When the contribution is to be made

3.0 Responsibilities

- 3.1 Iron Mountain Employees
 - 3.1.1 Be aware of, understand and comply with all policies, procedures and written instructions appropriate to your workplace
 - 3.1.2 Immediately report all known or suspected use of corporate funds being made to political contributions or independent political expenditures.
- 3.2 Senior Vice President, Government Affairs
 - 3.2.1 Document all Company political activity related to political contributions or independent expenditures.
 - 3.2.2 Make documents related to Company political activity available to Vice President, Privacy and Compliance periodically or upon request.
- 3.3 Vice President, Privacy and Compliance
 - 3.3.1 Approve all policy exceptions (including the right to delegate such authority).

- 3.3.2 Monitor changes in international, United States federal, state and municipal laws and regulations on political contributions.
 - 3.3.3 Maintain a current list of states and localities with “pay-to-play” rules and make it available upon request.
 - 3.3.4 Maintain current list of Company Officers and State and Local Team Members.
 - 3.3.5 Send communications to Company Officers and State and Local Team Members informing them of this policy and the procedure for having personal political contributions evaluated for compliance with state and local political contributions laws.
 - 3.3.6 Receive, record and evaluate Company Officers and State and Local Team Member’s proposed personal political contributions.
 - 3.3.7 Advise Company Officers and State and Local Team of the permissibility of their proposed personal political contributions and the consequences to the company.
 - 3.3.8 Collect annual certifications of compliance from Company Board of Directors, Officers and State and Local Team Members.
 - 3.3.9 Periodically monitor the Company’s compliance with this policy.
- 3.4 Executive Vice President, General Counsel
- 3.4.1 Provide resources to comply with international, U.S. federal, state and local political contribution laws and regulations.
 - 3.4.2 Send communications to Company Board of Directors informing them of this policy and the procedure for having personal political contributions evaluated for compliance with state and local political contributions laws.
 - 3.4.3 Receive, record and evaluate Company Board of Directors’ proposed personal political contributions.
 - 3.4.4 Advise Company Board of Directors of the permissibility of their proposed personal political contributions and the consequences to the company.
- 3.5 Directors, Officers and State and Local Team Members
- 3.5.1 Be aware of, understand and comply with the political contribution policy and related procedures.
 - 3.5.2 Be aware of the list of U.S. states and localities with “pay-to-play” rules or consult the Vice President, Privacy and Compliance for the information.
 - 3.5.3 Consider the advice and guidance of the Executive Vice President, General Counsel and Vice President, Privacy and Compliance of the consequences of making a political contribution in a “pay-to-play” state prior to making the contribution.

4.0 Definitions

- 4.1 Political Contributions - Political contributions include cash or in-kind donations and activities including campaigning, or anything of value in support of political candidates, political parties or organizations. Examples include political fundraising events; providing goods, services, equipment or facilities; paying employees during working hours to work at a political function or paying for campaign expenses.

- 4.2 Pay-to-Play Laws - Certain state and local laws that restrict political contributions by companies, such as Iron Mountain, that do business with state and local governments and personal political contributions by their officers, directors, and certain employees involved in the contracting process. In some jurisdictions, restrictions on political contributions also apply to the spouses and dependent children of covered officers, directors and employees. Contact the VP, Global Privacy and Compliance to learn more about which states and municipalities have pay-to-play laws.
- 4.3 State and Local Team Members - Employees involved in contracting with U.S. state or local governments.
- 4.4 Independent Expenditures - An independent expenditure is expenditure for a communication “expressly advocating the election or defeat of a clearly identified candidate that is not made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, a candidate’s authorized committee, or their agents, or a political party or its agents.

5.0 Relevant Control Standards

- 5.1 National, state and Local Political Contribution and Procurement Laws globally
- 5.2 U.S. Federal Election Campaign Act

6.0 Frequency of Amendments

This policy will be updated as needed to support changes in law, operating conditions and company values. At a minimum, this policy will be reviewed and approved every 3 years for applicability, appropriateness, and effectiveness.

7.0 Implementation

- 7.1 This policy will come into effect with the issuance of email communication from the VP Privacy & Compliance and EVP, General Counsel to the Company Board of Directors, Officers and State and Local Team Members.
- 7.2 The Legal Department will provide training to key functional teams following initial policy communication and any future changes to the policy.
- 7.3 Monitoring: The Privacy & Compliance team will administer an annual certification process for Directors, Officers and State and Local Team Members to verify compliance with “pay-to-play” laws.
- 7.4 All exceptions to this policy, unless otherwise noted, must be pre-approved by the VP, Privacy & Compliance using the Policy Exception Request Form in Compass.

8.0 Related Policies and Controls

Code of Ethics & Business Conduct
Global Anti-corruption & Anti-bribery Policy
Global Compliance & Ethics Policy

9.0 Change History

Date	Version	Description
23-02-11	1.0	New

01-08-14	2.0	Revised
	3.0	
	4.0	
	5.0	
	6.0	