



## Summary of Iron Mountain's Background Investigation Requirements for Third-Party Relationships

Security of customer material and employees is essential at Iron Mountain. Our customers trust us with their most sensitive information or assets, which are often fragile media. Based on the type and level of access being sought, a Background Check and Drug Screen may be required.

1. **A Background Investigation is not required** if the Vendor and the Vendor's Consultant(s) have escorted physical access, no logical access to Iron Mountain networks or systems and do not have access to any Iron Mountain or Iron Mountain Customer Data.
2. **A Background Investigation is required** If the Vendor and the Vendor's Consultant(s) have unescorted physical access and/or logical access to Iron Mountain networks or systems and/or access to Iron Mountain or Iron Mountain Customer Data. The background(s) must be refreshed every three years if applicable depending on the length of the SOW.

The following minimum searches must be completed:

- Confirmed authorization to work in the U.S. (eVerify)
- Ten year criminal convictions search\* at three levels: Federal, State and County
- Developed Address search to ensure all jurisdictions the person resided within the ten year period are included in criminal searches
- Government List Searches to include: OFAC SDN List, Office of Inspector General and General Services Administration
- Five Panel Drug Screen confirmed negative
- Sex Offender Registry Search (only if unescorted physical access to Iron Mountain or customer facilities)
- Verify US Person status (if working in an Iron Mountain cleared or ITAR related facility)

\*Note: Iron Mountain complies with the recommendations provided by the EEOC in performing an individualized assessment by a dedicated adjudication review team should derogatory information be identified as part of the Background Investigation. Generally a felony conviction or more than one misdemeanor conviction within 10 years for financial crimes, crimes against property or crimes against persons will disqualify an individual from employment. Given our customers trust us with their most sensitive information, crimes against persons and property (e.g. arson, murder, rape, sexual assault, fraud and identity theft) are scrutinized very closely and rarely accepted.