

Interim report appendices

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APPENDIX A: Shares of supply

Introduction

- A.1 In this Appendix, we present the evidence on shares of supply. This sets out:
- (a) the Parties' submissions on estimated shares of supply for Offshore Infrastructure and Marine, by Persons on Board (**POB**), and our views on them as relevant;
 - (b) our methodology and data sources for the calculation of shares of supply for Offshore Infrastructure and Marine;
 - (c) our estimated shares of supply for Offshore Infrastructure, by revenue, in the:
 - (i) UKCS;
 - (ii) North Sea (excluding the UKCS);¹ and
 - (d) our estimated shares of supply, by revenue, for Marine in the North Sea (including the UKCS).
- A.2 We present shares of supply based on POB (in accordance with the Parties' submissions) and revenue (on the basis of our calculations) both of which could be regarded as appropriate measures when considering the relative positions of providers in the supply of OCS. For Offshore Infrastructure, as these Assets are less mobile (than in the case of Marine), shares of supply based on POB and revenue align closely.
- A.3 However, for Marine Assets, which are typically more mobile, shares of supply based on POB and revenue may vary on the basis of the methodology by which they are calculated. For example, for POB, when shares of supply are calculated at a point in time based on the POB of Marine Assets in a given location, this may not be representative of their typical location and may over- or under-estimate providers' relative positions in the supply of OCS. A benefit of shares of supply by revenue is that revenue can be pro-rated to account for time spent in each geographic area, and therefore we tend to prefer shares of supply calculated on this basis for Marine. However, as set out in Chapter 5, our provisional view is that Marine is a relatively nascent market and we recognise that shares of supply for Marine have limitations which reduce their informative value, given that the Marine Market is growing and market shares reflect the award of a relatively small number

¹ We note that as discussed in Chapter 4, this does not align with our relevant geographic market for the supply of OCS to customers for Offshore Infrastructure Assets.

of existing contracts to date. As such, we assess them alongside other evidence in the round in forming our assessment of the impact of the Merger.

Parties' submissions on shares of supply

- A.4 The Parties submitted that the Phase 1 Decision gives too much weight to shares of supply based on revenues across only a three-year historic period (2022-2024) in the UKCS, which are not an accurate reflection of the Parties' market position, and that market shares are an unreliable indicator of market power in this market.² The Parties also submitted that the [shares of supply] for Marine [in the Phase 1 Decision] miss relevant competitors which results in a significant overstatement of the share of the Parties in a putative UKCS marine market.³
- A.5 The Parties submitted their calculation of estimated shares of supply for Offshore Infrastructure and Marine. Below we briefly set out the Parties' methodology and present their estimates.

Offshore Infrastructure shares of supply

- A.6 The Parties submitted estimated shares of supply for Offshore Infrastructure based on POB using data from Aramark's North Sea database.⁴ We understand the North Sea database is an internal document based on information Aramark receives from clients, tender information, and other market knowledge gathered more generally for each jurisdiction. This is an internal document using information Aramark receives and is based on best estimates.⁵ The Parties used Aramark's estimates of operational POB for Offshore Infrastructure assets to calculate shares of supply.⁶ Table A.1 presents the Parties' estimates.

Table A.1: Parties estimated shares of supply for Offshore Infrastructure based on POB, North Sea and UKCS, May 2025

	(%)	
Caterer	North Sea (including UKCS within the North Sea)	UKCS
Aramark	[30-40]	[40-50]
Entier	[10-20]	[20-30]
ESS	[40-50]	[30-40]
Sodexo	[0-5]	[0-5]
Coor FM	[5-10]	[0-5]
Other	[0-5]	[0-5]

Source: Parties' response to the CMA RFI dated 8 September 2025, question 4.

- A.7 The Parties' estimates show that, in the UKCS, in relation to the supply of OCS for Offshore Infrastructure, the Merger has combined the largest and the third largest

² [Parties' response to the Phase 1 Decision](#), 22 August 2025, paragraph 1.2(a) and (b).

³ [Parties' response to the Phase 1 Decision](#), 22 August 2025, paragraph 3.9.

⁴ Aramark Internal Document, Annex 258 to Parties' response to the CMA's s109 notice dated 29 April 2025, question 5.

⁵ Parties' response to the CMA's s109 notice dated 8 April 2025, question 8.

⁶ Parties' response to the CMA RFI dated 8 September 2025, question 4.

supplier. The Merged Entity has a share of supply of [50-60]%, with ESS being the only other large supplier. The Parties' estimates show that, in the North Sea (including the UKCS), ESS and the Parties are also the largest suppliers, although the Merged Entity has a lower share of [40-50]%.

Marine shares of supply

A.8 The Parties submitted estimated Marine shares of supply based on the Marine Traffic database (as of 29 July 2025 for the UKCS, and as of 1 September 2025 for the Non-UKCS North Sea). The Parties submitted that the Marine Traffic database is a publicly available third-party data source which tracks vessels across the world. The Parties explained that Entier had used the database (which provides some vessels' maximum POB), market knowledge, and [REDACTED]. Where only maximum POB were available, the Parties used an 85% utilisation percentage to calculate operational POB.^{7,8}

A.9 Table A.2 presents the Parties' estimates.

Table A.2: Parties estimated shares of supply for Marine based on POB, North Sea and UKCS, 2025

	(%)	
Caterer	North Sea (including UKCS within the North Sea)	UKCS
Aramark	[5-10]	[5-10]
Entier	[10-20]	[20-30]
OSERV	[30-40]	[30-40]
IFS	[20-30]	[30-40]
Sodexo	[5-10]	[0-5]
Pellegrini	[5-10]	[0-5]
Other	[0-5]	[0-5]

Source: Parties' response to the CMA RFI dated 8 September 2025, question 4.

A.10 Additionally, the Parties submitted share of supply estimates adjusted: (i) to remove all vessels with a maximum POB of less than 20; and (ii) [REDACTED]. The Parties also submitted share of supply estimates including and excluding IFS and OSERV. Table A.3 and Table A.4 below present the Parties' estimates for Marine shares of supply with these adjustments.

A.11 The Parties submitted, with respect to these calculations, that even if, on a conservative basis, IFS and OSERV were excluded entirely from the relevant

⁷ Parties' response to the CMA RFI dated 8 September 2025, question 4. The Parties submitted that a vessel's operational POB is the persons on board that it typically operates at on average. Operational POB is generally below maximum POB, although POBs can and will fluctuate depending on the scope of work and across the lifecycle of the relevant asset.

⁸ Parties' response to the CMA RFI dated 8 September 2025, question 4. For Entier and Aramark vessels, the Parties submitted that the Parties' internal data was used to provide estimates for the operational POB of these vessels. For the remaining marine vessels (whose operational POBs are unknown), an operational POB utilisation percentage of 85% was assumed. The Parties submitted that its marine vessels have a median POB utilisation percentage (ie, the median of the operational POB divided by the median of the maximum POB) of 80%. The Parties submitted that, given that the Parties represent a reasonable proportion of the total marine sector in the North Sea, their median POB utilisation percentage is likely to be representative of the POB utilisation of third-party vessels. The Parties also noted that Entier believes that a POB utilisation of 85% is a reasonable assumption for a marine vessel's operational capacity.

market, the Parties' updated (combined) share of supply would be [30-40]%, and that this is usually below the level which would be considered problematic in merger control.⁹

Table A.3: Parties estimated projected shares of supply for Marine based on 85% operational POB, North Sea with Technip allocated to Conntrak and not including vessels under 20 POB

(%)	
<i>Caterer</i>	<i>Projected share of supply in the North Sea (including UKCS within the North Sea)</i>
Aramark	[5-10]
Entier	[5-10]
Merging Parties	[20-30]
OSERV	[30-40]
IFS	[20-30]
Conntrak	[5-10]
Pellegrini	[5-10]
Sodexo	[5-10]
Foss & Esg	[0-5]

Source: Parties' memo on marine market – updated shares of supply, 6 October 2025.

Table A.4: Parties estimated projected shares of supply for Marine based on 85% operational POB, North Sea excluding OSERV and IFS, with Technip allocated to Conntrak and not including vessels under 20 POB

(%)	
<i>Caterer</i>	<i>Projected share of supply in the North Sea (including UKCS within the North Sea)</i>
Aramark	[10-20]
Entier	[20-30]
Merging Parties	[30-40]
Conntrak	[20-30]
Pellegrini	[10-20]
Sodexo	[10-20]
Foss & Esg	[5-10]

Source: Parties' memo on marine market – updated shares of supply, 6 October 2025.

A.12 With respect to the Parties' calculations of estimated shares of supply, we note that:

- (a) The Parties have calculated estimated shares of supply based on Marine vessels' location as of 29 July 2025 for the UKCS, and as of 1 September 2025 for the North Sea (including the UKCS within the North Sea). While we understand that some Marine customers have assets focussed on the North Sea or UKCS, to the extent that vessels which do not typically spend time in the North Sea or UKCS were present in the North Sea or UKCS at these times, or vice versa, these shares may understate or overstate the positions of various OCS suppliers.¹⁰

⁹ Parties' memo on Marine Market – updated shares of supply 6 October 2025, page 2.

¹⁰ Similarly, the same would apply to UKCS shares of supply.

- (b) We contacted Pellegrini to ascertain further details on its presence in Marine, and it submitted that [REDACTED].¹¹ In addition, we contacted the customers to whom the Parties submitted Pellegrini supplies OCS in the North Sea as part of their data pack. One of these customers told us that Pellegrini does not supply any of its vessels in the North Sea.¹² Taking this into account, our provisional view is that the share estimates overstate Pellegrini's competitive position when competing for Marine customers in the North Sea.
- (c) In addition, some of the shares presented do not align with our product market definition. As outlined in Chapter 4, our provisional view is that self-supply is not part of the relevant product market in Marine, and we have treated IFS and OSERV as facilitating self-supply. Therefore, shares including IFS and OSERV will understate the competitive position of the Parties and other suppliers in the supply of OCS to Marine customers.

Our calculation of shares of supply

Methodology

A.13 In order to calculate shares of supply by revenue for Offshore Infrastructure and Marine, we requested revenue from 2022-2024 split by UK North Sea, UKCS not within the North Sea and rest of the North Sea. We collected data from the Parties and six Offshore Infrastructure and Marine competitors (Sodexo, ESS,¹³ Conntrak, Foss, Francois and Oceanwide).^{14,15} In an industry characterised by bidding, shares of supply are a measure of historical market position as they capture the outcomes of competitive tenders as well as bilateral negotiations and contract extensions. However, given contract awards can mean shares of supply may vary significantly each year, we calculated shares of supply by revenue for each of 2022, 2023 and 2024 and averaged across the three years to account for year-on-year fluctuations.¹⁶

A.14 We calculated the relevant revenues as follows:

¹¹ Third party response to the CMA questionnaire dated 3 October 2025.

¹² Third party response to the CMA RFI dated 1 October 2025.

¹³ Including separately revenues from ESS and 4Service.

¹⁴ As outlined above, we contacted Pellegrini, and additionally we contacted Ligabue as potentially relevant suppliers to include in our shares of supply estimates. Both suppliers submitted that [REDACTED].

¹⁵ We asked customers to provide revenue in 2022-2024 for the supply of OCS, in the following areas: (i) UK North Sea, (ii) UKCS not within the North Sea, and (iii) North Sea excluding the UKCS based on the following geographic definitions. 'UKCS' refers to the UK Continental Shelf including those parts located within the North Sea, as well as the UK Continental Shelf that is outside the North Sea (for example the Irish Sea). 'North Sea' refers to the marginal sea of the Atlantic Ocean that separates the UK from countries such as Norway, Denmark, the Netherlands and other parts of mainland Europe.

¹⁶ The Parties submitted that customer contracts typically last three to five years (Parties' response to the CMA's s109 notice dated 8 April 2025, question 3(b)). Accordingly, we consider looking at shares over a three-year time period to be informative.

- (a) For the Parties' and their competitors' Offshore Infrastructure revenues, we summed the revenues for the North Sea UKCS and the revenues for the UKCS outside the North Sea to calculate total UKCS revenues.
- (b) For the Parties' and their competitors' Marine revenues, we summed the revenues for the North Sea (UKCS and non UKCS) and the revenues for the UKCS outside the North Sea to calculate total revenues from the North Sea and the non-North Sea UKCS.¹⁷

A.15 In particular, in relation to the data provided by the Parties and their competitors:

- (a) Aramark provided Marine revenues pro-rated based on number of days spent in the UKCS and the rest of the North Sea.¹⁸
- (b) Entier provided Marine revenues compiled by summing together the pro-rated daily revenues in each relevant region.¹⁹
- (c) One competitor provided Marine revenues pro-rated by number of months each Marine vessel spent in each nation's waters.²⁰
- (d) One competitor provided Marine revenues pro-rated based on time the Marine vessel spent in each relevant region.²¹
- (e) Two competitors submitted data responses without further clarifications.²²

A.16 In relation to this, to the extent to which there is competition for the supply of OCS for Offshore Infrastructure Assets or Marine Assets in the UKCS or the North Sea which subsequently spend time outside the UKCS or the North Sea, this revenue is excluded from our shares of supply calculations.

¹⁷ Marine revenues in the relevant region are calculated on the basis of the data submitted to us by the Parties and competitors as outlined below.

¹⁸ Parties' response to the CMA RFI dated 5 August 2025, question 9; and Aramark's response to the CMA's s109 notice dated 27 August 2025, question 7.

¹⁹ Parties' response to the CMA RFI dated 5 August 2025, question 5.

²⁰ We then aggregated across the relevant regions to calculate pro-rated revenues for the North Sea and the non-North Sea UKCS. Third party response to the CMA questionnaire dated 27 May 2025.

²¹ Third party response to the CMA questionnaire dated 27 May 2025; Third party response to the CMA's RFI dated 1 September 2025; and Third-party response to the CMA's RFI dated 3 October 2025.

²² Third party response to the CMA questionnaire dated 27 May 2025; and Third-party response to the CMA questionnaire dated 27 May 2025.

Our calculation of shares of supply

Offshore Infrastructure shares of supply

A.17 We present our estimates of shares of supply in the Offshore Infrastructure Market in the UKCS from 2022 to 2024 in Table A.5 below. We note that our estimates are broadly in line with the Parties' estimates set out above in Table A.1.²³

Table A.5: Our estimates of shares of supply (by revenue) in the Offshore Infrastructure Market, 2022-2024

	(%)			
	2022	2023	2024	Average (2022-2024)
Aramark	[30-40]	[30-40]	[30-40]	[30-40]
Entier	[20-30]	[20-30]	[10-20]	[20-30]
Parties	[50-60]	[50-60]	[50-60]	[50-60]
ESS	[20-30]	[30-40]	[30-40]	[30-40]
Sodexo	[10-20]	[0-5]	[0-5]	[5-10]
Francois	[0-5]	[0-5]	[0-5]	[0-5]
Foss	[0-5]	[0-5]	[0-5]	[0-5]
Oceanwide	[0-5]	[0-5]	[0-5]	[0-5]
Total	100	100	100	100

Source: CMA estimates based on revenue data from the Parties and third parties.

A.18 Based on these estimates, the Merger has combined the largest and the third largest supplier. The Merged Entity has an average share of supply of [50-60]% over the three-year period, with ESS being the only other large supplier with an average share of supply of [30-40]%. Sodexo, the fourth largest supplier, experienced a significant decline from [10-20]% in 2022 to [0-5]% in 2024.

A.19 We also present shares of supply for Offshore Infrastructure in the North Sea (excluding the UKCS) in Table A.6 below.

Table A.6: Our estimates of shares of supply (by revenue) for Offshore Infrastructure in the North Sea (excluding the UKCS), 2022-2024

	(%)			
	2022	2023	2024	Average (2022-2024)
Aramark	[10-20]	[20-30]	[30-40]	[20-30]
Entier	[0-5]	[0-5]	[0-5]	[0-5]
Parties	[10-20]	[20-30]	[30-40]	[20-30]
ESS	[30-40]	[30-40]	[30-40]	[30-40]
Sodexo	[40-50]	[30-40]	[20-30]	[30-40]
Oceanwide	[0-5]	[0-5]	[0-5]	[0-5]
Foss	[0-5]	[0-5]	[0-5]	[0-5]
Francois	[0-5]	[0-5]	[0-5]	[0-5]
Total	100	100	100	100

Source: CMA estimates based on revenue data from the Parties and third parties.

²³ We set out our response to the Parties' submissions that shares of supply do not represent the market dynamics in Chapter 6.

A.20 In this geography, the Merged Entity has a smaller average share of supply of [20-30]% over the three-year period, with both ESS and Sodexo holding larger average shares of supply from 2022-2024 than the Merged Entity at [30-40]% and [30-40]%. Entier has a very low average share of supply in this geography [0-5]% relative to its share of supply in Offshore Infrastructure in the UKCS, and this has remained stable from 2022-2024. While Sodexo has experienced a decline in share from 2022-2024 in the wider non-UKCS North Sea, it maintains a higher share in this region relative to the UKCS. All other OCS suppliers have low ([0-5%]) shares of supply.

Marine shares of supply

A.21 We present our estimates of shares of supply in the Marine Market by revenue in the North Sea (including the UKCS)²⁴ from 2022 to 2024 in Table A.7 below.²⁵

A.22 In relation to these shares, we note that:

- (a) Whilst calculation of shares of supply for Marine is inherently difficult due to vessel movement, as outlined above, revenue submissions from OCS suppliers largely account for the movements of Marine vessels. To account for any peaks and troughs caused by temporary movements of vessels, we calculate an average share of supply across three years.
- (b) As set out in Chapter 4, Aramark does not compete for Marine customers that have highly mobile global assets and therefore the Parties do not overlap for such customers. Therefore, to align with the relevant product market, Technip should be excluded from these shares of supply. However, our shares of supply estimates are based on aggregated revenue figures, rather than revenue by individual customers, so we are unable to remove the revenue that is attributed to the Technip contract. We therefore consider that these shares overstate Entier's competitive strength in the Marine Market.²⁶

²⁴ As outlined above, when we refer to the North Sea in this instance, we include revenues from the North Sea and the non-North Sea UKCS.

²⁵ Our calculation of shares of supply are based on historical revenues over a period of three years, therefore may not align with the Parties submissions as these are calculated on the basis of POB and Marine vessels locations based on a set point in time.

²⁶ We note that [REDACTED], therefore regardless we would expect Entier's share of supply in Marine [REDACTED] to fall after this contract reports revenue.

Table A.7: Our estimates of shares of supply (by revenue) in the Marine Market, 2022-2024

	(%)			
	2022	2023	2024	Average (2022-2024)
Aramark	[5-10]	[5-10]	[10-20]	[5-10]
Entier	[30-40]	[30-40]	[40-50]	[30-40]
Parties	[40-50]	[40-50]	[50-60]	[40-50]
Sodexo	[40-50]	[30-40]	[20-30]	[30-40]
Foss	[10-20]	[10-20]	[10-20]	[10-20]
Oceanwide	[0-5]	[0-5]	[0-5]	[0-5]
Francois	[0-5]	[0-5]	[0-5]	[0-5]
Total	100	100	100	100

Source: CMA estimates based on revenue data from the Parties and third parties.

A.23 Table A.7 shows that Entier had the largest share for Marine from 2022-2024, with an average share of [30-40]%.²⁷ The Merged Entity has the largest share of supply for Marine at [40-50]% on average from 2022-2024. Aramark had a smaller share of supply for Marine than for Offshore Infrastructure [5-10]% on average from 2022-2024. Sodexo had the second largest share of supply for Marine, with a share of [30-40]% on average from 2022-2024, with this decreasing from [40-50]% to [20-30]% over the period. Foss had the third largest share of supply (larger for Marine than for Offshore Infrastructure), with an average share of [10-20]% from 2022-2024 which remained relatively stable over the period. Other suppliers had small shares of supply for Marine ([0-5]%) from 2022-2024.

²⁷ This share does not reflect [X]. We would expect Entier's (and the Parties' combined) share of supply in Marine to fall upon earning revenue from this contract.

APPENDIX B: Bidding analysis

Introduction

- B.1 In this Appendix we set out the analysis we have undertaken in relation to Offshore Infrastructure and Marine contracts based on data submitted by the Parties, [X] other OCS suppliers, [X] OCS customers and offshore catering support companies. It sets out for both historic and future tenders:
- (a) The data we received from the Parties, other OCS suppliers, and OCS customers.
 - (b) An overview of the dataset, including the steps we have taken to match tenders submitted by different respondents, and some limitations to our analysis.
 - (c) The key results of our analysis for each of Offshore Infrastructure and Marine tenders.

Historic opportunities

Data submissions

- B.2 During the phase 2 investigation we asked the Parties and OCS suppliers to submit details on every 'opportunity' for which they have engaged with an OCS customer in the UKCS and the North Sea since 2020.²⁸ Similarly, we requested data from OCS customers on their most recent opportunities in relation to OCS in the UKCS.²⁹ In our request, we asked for both tenders and other non-tender

²⁸ Third party response to the CMA RFI dated 15 September 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 10 September 2025; Third party response to the CMA RFI dated 18 September 2025; Third party response to the CMA's RFI dated 15 September 2025; Third party response to the CMA RFI dated 15 September 2025; Third party response to the CMA RFI dated 26 September 2025, Third party response to the CMA's RFI dated 1 September 2025; Third party response to the CMA's RFI dated 2 September 2025, Third party response to the CMA's RFI dated 15 September 2025; Third party response to the CMA's RFI dated 3 October 2025; Third party response to the CMA questionnaire dated 17 September 2025, Third party response to the CMA questionnaire dated 16 September 2025, Third party response to the CMA RFI dated 25 September 2025, Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 22 August 2025, Third party response to the CMA's RFI dated 27 August 2025; Third party response to the CMA's RFI dated 15 September 2025; Third party response to the CMA's RFI dated 15 September 2025.

²⁹ Third party response to the CMA questionnaire dated 22 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 22 August 2025; Third party response to the CMA RFI dated 3 September 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA's RFI dated 3 September 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA RFI dated 21 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 29 August 2025; Third party response to the CMA RFI dated 15 September 2025; Third party response to the CMA RFI dated 3 September 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 3 September 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA RFI dated 11 August 2025;

contract awards to capture all competitive interactions; however, the non-tender contract awards provided to us did not involve competitive interactions and were therefore excluded from our analysis. Non-tender contract awards are discussed further in Chapter 6, paragraphs 6.20 and 6.88.³⁰

- B.3 In some cases, we supplemented the data received with further information gathered during calls with OCS suppliers and customers.³¹

Dataset compilation methodology and process

- B.4 We have compiled a final dataset of all the tender opportunities in the UKCS and North Sea between January 2020 and August 2025 that we are aware of using the sources described in paragraphs B.2 to B.3 by matching the OCS suppliers' data and customers' data.
- B.5 We note that respondents did not always describe tenders in a consistent way.³² As such, we designed a methodology to match and combine the tenders listed by each respondent to account for potential variation when describing the same tenders. We matched two tenders from different sources when the following four matching conditions were met:³³
- (a) the name of the customer was the same or a known variant of the same customer;
 - (b) the dates were within 12 months of each other; and
 - (c) the winner of the tender was the same.³⁴

Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 3 September 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 15 September 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 3 September 2025; Third party response to the CMA questionnaire dated 9 September 2025; Third party response to the CMA RFI dated 16 September 2025; Third party response to the CMA RFI dated 25 September 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 26 August 2025; Third party response to the CMA RFI dated 26 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA RFI dated 26 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA RFI dated 26 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 8 August 2025.

³⁰ As noted in paragraph B.5, descriptions of the same opportunity sometimes varied across respondents, including, in some cases, classification of the type of opportunity. We exercised judgement to resolve these discrepancies based on the information provided, with all such instances classified as tenders.

³¹ Third party call note.

³² For example, the same OCS customer may have been listed under different names, or OCS competitors may list different dates for the same tender dependent on when they were invited to bid.

³³ In cases where the three conditions were not all met, but other information was available that enabled a match to be made, we used this information to match the opportunities.

³⁴ I.e., when considering a match, the two tenders must not list different winners.

- B.6 When resolving inconsistencies between different respondents describing the same tender, we used the following ordering of sources to determine what information to use in our final dataset:
- (a) The customer itself.
 - (b) The winner of the tender.
 - (c) The shortlisted bidders for the tender.
 - (d) The Parties (to the extent not covered in points (a) to (c)).
 - (e) Any other bidders.
- B.7 In the data submitted by Aramark and Entier, there were a total of [30-40] and [20-30] tenders respectively.³⁵ In addition, we identified [80-90] tenders in the data submitted by other OCS suppliers, and [20-30] in the data submitted by OCS customers. We took the following steps to clean and match these datasets into our final dataset:
- (a) We removed all cancelled or ongoing tenders.
 - (b) We excluded tenders from before January 2020.
 - (c) We excluded all tenders for assets outside the UKCS and non-UKCS North Sea including customers that tender all of their global assets together (eg Technip) as Aramark does not compete for such customers. Subsequently, in order to align our analysis with the provisionally defined relevant geographic markets as set out in Chapter 4, we narrowed the dataset to tenders in: (i) the UKCS, including tenders with assets in the UKCS and other parts of the North Sea (and unless otherwise stated, we refer to these for brevity as being ‘in the UKCS’), for Offshore Infrastructure (Tables B.2 to B.6); and (ii) the North Sea, both including and excluding the UKCS,³⁶ for Marine (Tables B.7 to B.10).
 - (d) We excluded all tenders submitted by OCS suppliers where that supplier said it was not invited to bid.³⁷
- B.8 After taking these steps and applying the matching process, our final dataset consists of [40-50] tenders.³⁸ Of these tenders:

³⁵ Aramark internal document, Annex 756 to Aramark’s response to the CMA’s s109 notice dated 24 September 2025; and Entier internal document, Annex 758 to Entier’s response to the CMA’s s109 notice dated 24 September 2025.

³⁶ This includes non-North Sea UKCS.

³⁷ In cases where no other respondent mentioned the tender.

³⁸ Differing interpretation across respondents could lead to minimal number of duplications through missed matches (eg due to unknown variations in customer names). If we have data from the customer, this may result in a tender being included twice and an OCS supplier’s number of bids being higher than set out in this appendix. We consider that the

- (a) Aramark participated in [20-30] tenders, of which [10-20] were for Offshore Infrastructure Assets and [5-10] were for Marine Assets.
- (b) Entier participated in [10-20] tenders, of which [10-20] were for Offshore Infrastructure Assets and [0-5] were for Marine Assets.

B.9 We note that there are certain limitations to the bidding data analysis; however, our provisional view is that these do not significantly impact the results presented above. In particular, as we decided to include all tenders since 2020 in our analysis, in some instances the final dataset includes multiple tenders relating to the same customer. We view this as having a minimal impact, as there are only a few instances where different tenders could relate to the same underlying asset(s).

Results

B.10 We present our analysis of the data below, starting with an overview of the dataset we created, and followed by sections for each of Offshore Infrastructure and Marine tenders.

B.11 The final dataset used for our analysis consisted of [40-50] tenders for the time period 2020 to 2025, of which [40-50] were for Offshore Infrastructure Assets, and [5-10] were for Marine Assets.

General overview

B.12 In our analysis of Offshore Infrastructure and Marine tenders below, we have included the relevant tenders based on the provisionally defined relevant geographic markets. As such, we have included tenders for all Offshore Infrastructure Assets in the UKCS in our analysis, and we have included tenders for all Marine Assets in the UKCS and/or non-UKCS parts of the North Sea.

B.13 Table B.1 sets out the distribution of the assets included in each tender included in our dataset across different geographic regions. The results show that almost all of the tenders for Offshore Infrastructure Assets only included assets in the UKCS ([X]), and only a small minority included assets in both the UKCS and non-UKCS North Sea ([X]).³⁹

B.14 The results for Marine tenders differ somewhat. Half of the tenders in our dataset only included assets in the UKCS ([X]), [X] tender only included assets in the

tables set out therefore show an upper estimate of the strength of the Parties competitors. If we do not have data from the customer, then the supplier's bid may not be matched with Aramark or Entier's bids meaning that Tables B.3, B.4, B.7, and B.8, may underestimate the constraint from other OCS suppliers. However, we consider this limitation is minimal as we are primarily concerned about the impact of the Merger on the Parties' customers (from whom we had a strong response rate).

³⁹ Additionally, 15 tenders for Offshore Infrastructure Assets which only included assets in the non-UKCS North Sea were excluded from the dataset.

non-UKCS North Sea ([X]), and less than half included assets in both the UKCS and non-UKCS North Sea ([X]).

Table B.1: Locations of tenders in the Offshore Infrastructure and Marine Markets

Customer type	Assets exclusively in the UKCS	Assets exclusively in the non-UKCS North Sea	Assets in both the UKCS and non-UKCS North Sea	All tenders
Oil and Gas	[20-30]	n/a	[0-5]	[20-30]
MODU	[5-10]	n/a	[0-5]	[10-20]
Accommodation Barge	[0-5]	n/a	[0-5]	[0-5]
Offshore Infrastructure	[30-40]	n/a	[0-5]	[40-50]
Marine	[0-5]	[0-5]	[0-5]	[5-10]
Total	[40-50]	[0-5]	[5-10]	[40-50]

Source: CMA analysis based on bidding data supplied by the Parties and third parties.

Offshore Infrastructure

B.15 Table B.2 presents the extent to which the Parties and third-party suppliers have competed in tenders in the Offshore Infrastructure Market. Sodexo bid for the most tenders ([20-30]), followed by Aramark ([10-20]), ESS ([10-20]), and Entier ([10-20]). In terms of wins, these four were the only OCS suppliers to win any tenders, with Aramark winning the most ([5-10]). Notably, Sodexo won a far smaller proportion of its bids ([10-20]%) than Aramark ([50-60]%), Entier ([50-60]%), and ESS ([50-60]%).

Table B.2: Tenders in the Offshore Infrastructure Market (2020-2025)

Supplier	No. of bids	No. of times shortlisted	% of bids shortlisted for	No. of tenders won	% of bids won
Sodexo	[20-30]	[10-20]	[60-70]	[0-5]	[10-20]
Aramark	[10-20]	[10-20]	[80-90]	[5-10]	[50-60]
ESS	[10-20]	[10-20]	[80-90]	[5-10]	[50-60]
Entier	[10-20]	[10-20]	[80-90]	[5-10]	[50-60]
Francois	[5-10]	[0-5]	[10-20]	[0-5]	[0-5]
Trinity	[0-5]	[0-5]	[50-60]	[0-5]	[0-5]
OCL	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]

Source: CMA analysis based on bidding data supplied by the Parties and third parties.

+ Percentage columns are calculated based on the total numbers of tenders the supplier bid for.

B.16 Table B.3 presents data on the extent to which Aramark has competed against other OCS suppliers (including Entier) in tenders in the Offshore Infrastructure Market. The results show that whilst Sodexo bid most frequently against Aramark ([10-20]), ESS and Entier were the only OCS suppliers to successfully compete against Aramark ([X] and [X] wins respectively), as Aramark won over half of the tenders it bid for ([50-60]%).

Table B.3: Offshore Infrastructure Market – Aramark bidding analysis (2020-2025)

Supplier	No. of bids	No. of times shortlisted	% of bids shortlisted for	No. of tenders won	% of bids won
Aramark	[10-20]	[10-20]	[80-90]	[5-10]	[50-60]
Sodexo	[10-20]	[5-10]	[50-60]	[0-5]	[0-5]
ESS	[5-10]	[5-10]	[50-60]	[0-5]	[20-30]
Entier	[5-10]	[5-10]	[30-40]	[0-5]	[10-20]
Francois	[5-10]	[0-5]	[5-10]	[0-5]	[0-5]
Trinity	[0-5]	[0-5]	[5-10]	[0-5]	[0-5]
OCL	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]

Source: CMA analysis based on bidding data supplied by the Parties and third parties.

+ Percentage columns are calculated based on the total numbers of tenders Aramark bid for.

B.17 Table B.4 presents data on the extent to which Entier has competed against other OCS suppliers (including Aramark) in tenders in the Offshore Infrastructure Market. The table shows that Aramark bid for over half of the tenders that Entier bid for ([X]), and was shortlisted for all but one of these tenders ([X]). Similarly to Table A.3 whilst Sodexo was the most frequent bidder against Entier ([5-10]), Aramark and ESS were the only OCS suppliers to successfully compete against Entier ([X] wins each).

Table B.4: Offshore Infrastructure Market – Entier bidding analysis (2020-2025)

Supplier	No. of bids	No. of times shortlisted	% of bids shortlisted for	No. of tenders won	% of bids won
Entier	[10-20]	[10-20]	[80-90]	[5-10]	[50-60]
Sodexo	[5-10]	[5-10]	[40-50]	[0-5]	[0-5]
Aramark	[5-10]	[5-10]	[50-60]	[0-5]	[20-30]
ESS	[5-10]	[5-10]	[50-60]	[0-5]	[20-30]
Francois	[5-10]	[0-5]	[5-10]	[0-5]	[0-5]
Trinity	[0-5]	[0-5]	[5-10]	[0-5]	[0-5]

Source: CMA analysis based on bidding data supplied by the Parties and third parties.

+ Percentage columns are calculated based on the total numbers of tenders Entier bid for.

B.18 Table B.5 contains information on every tender in the Offshore Infrastructure Market that Aramark and Entier both bid for since 2020. Together, the Parties won three-quarters [X] of the overlapping bids ([X]), of which the other ranked second on three occasions. ESS won the remaining [X] tenders.

Table B.5: Offshore Infrastructure Market – Parties' overlapping bids (2020-2025)

Customer	Customer type	Date	Aramark Rank	Entier Rank
[X]	O&G	April 2021	3	1
[X]	O&G	August 2021	1	Shortlisted, no rank
[X]	O&G	April 2022	1	2
[X]	O&G	May 2022	2	1
[X]	MODU	April 2023	2	1
[X]	MODU	November 2023	1	4
[X]	O&G	February 2024	Not shortlisted	Shortlisted, no rank
[X]	O&G	July 2024	2	Not shortlisted

Source: CMA analysis based on bidding data supplied by the Parties and third parties.

B.19 Table B.6 presents the distribution of each supplier's bidding activity in tenders in the Offshore Infrastructure Market over time. The results show that Trinity [X] and OCL [X]. Although there is some fluctuation in the number of bids made each year by Sodexo, Aramark, ESS, Entier, and Francois, we do not view these differences as significant enough to draw any further inferences.

Table B.6 Tenders bid for per year in the Offshore Infrastructure Market (2020-2025)

Supplier	2020	2021	2022	2023	2024	2025	Total
Sodexo	[0-5]	[0-5]	[5-10]	[0-5]	[0-5]	[0-5]	[20-30]
Aramark	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[10-20]
ESS	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[10-20]
Entier	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[10-20]
Francois	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[5-10]
Trinity	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
OCL	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]

Source: CMA analysis based on bidding data supplied by the Parties and third parties

+ Our dataset contains no completed tenders for Offshore Infrastructure Assets in the UKCS for 2025.

Note: Some tender processes were spread across multiple calendar years and was only allocated to the latter year. As such, we consider the data to be representative of general trends in bidding over time, rather than activity in a specific year.

Marine

B.20 Table B.7 presents the extent to which the Parties and third-party suppliers have competed in tenders in the Marine Market. As noted in Para B.11, only [5-10] of the [40-50] tenders in our dataset were for Marine Assets and Technip has been excluded from our analysis. Given this relatively small sample size, we have considered this evidence in the round together with all other available evidence. The results show that Aramark bid for [X] of the tenders for Marine Assets in our dataset ([X]), and that Entier and Conntrak were the only OCS suppliers to win multiple tenders ([0-5]).

Table B.7: Tenders in the Marine Market (2020-2025)

Supplier	No. of bids	No. of times shortlisted	% of bids shortlisted for	No. of tenders won	% of bids won
Aramark	[5-10]	[0-5]	[10-20]	[0-5]	[10-20]
Entier	[0-5]	[0-5]	[60-70]	[0-5]	[60-70]
Francois	[0-5]	[0-5]	[60-70]	[0-5]	[30-40]
Conntrak	[0-5]	[0-5]	[60-70]	[0-5]	[60-70]
Sodexo	[0-5]	[0-5]	[50-60]	[0-5]	[50-60]
Foss	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
IFS	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Ligabue	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Pellegrini	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Voyonic	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]

Source: CMA analysis based on bidding data supplied by the Parties and third parties

+ Percentage columns are calculated based on the total numbers of tenders the supplier bid for.

B.21 Table B.8 presents data on the extent to which Aramark has competed against other OCS suppliers (including Entier) in tenders in the Marine Market. The results show that Conntrak and Entier were the most frequent bidders against Aramark ([0-5] each), with five other OCS suppliers competing against Aramark at least once. Aramark only won a small proportion of the tenders it bid for ([10-20%]), whereas Conntrak won multiple bids ([0-5]). [X] OCS suppliers won at least once against Aramark, including Entier.

Table B.8: Marine Market – Aramark bidding analysis (2020-2025)

Supplier	No. of bids	No. of times shortlisted	% of bids shortlisted for	No. of tenders won	% of bids won
Aramark	[5-10]	[0-5]	[10-20]	[0-5]	[10-20]
Conntrak	[0-5]	[0-5]	[30-40]	[0-5]	[30-40]
Entier	[0-5]	[0-5]	[10-20]	[0-5]	[10-20]
Francois	[0-5]	[0-5]	[10-20]	[0-5]	[10-20]
Sodexo	[0-5]	[0-5]	[10-20]	[0-5]	[10-20]
Foss	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
IFS	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Voyonic	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]

Source: CMA analysis based on bidding data supplied by the Parties and third parties

+ Percentage columns are calculated based on the total numbers of tenders Aramark bid for.

B.22 Table B.9 presents data on the extent to which Entier has competed against other OCS suppliers (including Aramark) in tenders in the Marine Market. We note that Aramark bid for over half of these tenders ([30-40]) and was the only OCS supplier to bid against Entier more than once. It was also the only OCS supplier to win a tender against Entier ([0-5]), as Entier won the remaining ([0-5]) tenders.

Table B.9: Marine Market – Entier bidding analysis (2020-2025)

Supplier	No. of bids	No. of times shortlisted	% of bids shortlisted for	No. of tenders won	% of bids won
Entier	[0-5]	[0-5]	[60-70]	[0-5]	[60-70]
Aramark	[0-5]	[0-5]	[30-40]	[0-5]	[30-40]
Francois	[0-5]	[0-5]	[30-40]	[0-5]	[0-5]
Conntrak	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
IFS	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Ligabue	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Pellegrini	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Sodexo	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Voyonic	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]

Source: CMA analysis based on bidding data supplied by the Parties and third parties + Percentage columns are calculated based on the total numbers of tenders Entier bid for.

B.23 Table B.10 contains information on every tender in the Marine Market that Aramark and Entier both bid for since 2020. Together, the Parties overlapped on a small number of tenders ([0-5]), each of which was won by one of the Parties. For one of these tenders, the Parties were ranked first and second.

Table B.10: Marine Market – Parties' overlapping bids (2020-2025)

Customer	Customer type	Date	Aramark Rank	Entier Rank
[X]	Marine	November 2022	1	2
[X]	Marine	February 2023	Not shortlisted	1

Source: CMA analysis based on bidding data supplied by the Parties and third parties

B.24 Table B.11 presents the distribution of each supplier's bidding activity in tenders in the Marine Market over time. We note that Conntrak has not participated in a tender since 2022. Although there is some fluctuation in the number of bids made each year by other OCS suppliers, we do not view these differences as significant enough to draw any further inferences.

Table B.11: Tenders bid for per year in the Marine Market (2020-2025)

Supplier	2020	2021	2022	2023	2024	2025	Total
Aramark	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[5-10]
Conntrak	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Entier	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Francois	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Sodexo	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Foss	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
IFS	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Ligabue	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Pellegrini	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]
Voyonic	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]	[0-5]

Source: CMA analysis based on bidding data supplied by the Parties and third parties

Source: CMA analysis based on bidding data supplied by the Parties and third parties

Note: Some tender processes were spread across multiple calendar years and was only allocated to the latter year. As such, we consider the data to be representative of general trends in bidding over time, rather than activity in a specific year.

Future opportunities

B.25 In order to understand the nature of future opportunities to provide OCS in the UKCS and the North Sea, we have conducted an analysis of the upcoming opportunities which are likely to be available to win through competitive tender. As described in paragraph A.36 below, our provisional view is that competition between the Parties will not be limited to those future opportunities and will likely cover competition for other opportunities not currently known. The results of our analysis are nonetheless a useful piece of evidence to be considered alongside the other evidence set out in this report.

Data submissions

B.26 During the phase 2 investigation, we received data submissions from customers of OCS.⁴⁰ For each customer, we asked:

- (a) whether it had any procurement exercises covering operations in the UKCS or non-UKCS parts of the North Sea planned in the next five years.
- (b) thinking about its next procurement exercise covering operations in the UKCS, to provide the names of all offshore catering services that it would likely invite to bid.
- (c) to provide the name of its current offshore catering services supplier in the UKCS, and if it has operations in the non-UKCS parts of the North Sea which are not covered by its UKCS contract, whether it uses the same or a different supplier.

B.27 We asked OCS suppliers, including each of the Parties, to each list all expected future opportunities to provide OCS in the UKCS and in the North Sea, for which

⁴⁰ Third party responses to phase 2 CMA questionnaire; and Third party responses to CMA RFI.

they anticipated they would bid/participate in the next two years. We also asked these suppliers to list their current OCS customers in the North Sea.^{41,42}

- B.28 In order to distinguish between opportunities from the same customer, we requested additional information from OCS customers and suppliers about these opportunities, including the anticipated date of the opportunity, the number of assets involved, and the geographic location of these assets, as part of the submissions described above.
- B.29 In some cases, we supplemented the data received with further information gathered during calls with OCS suppliers and customers.⁴³

Dataset compilation methodology and process

- B.30 We have compiled a dataset containing all the upcoming opportunities we are aware of from the sources described above.
- B.31 We then took the following steps to clean the dataset:
- (a) We have removed all cases where we understand that the opportunity is not a competitive tender.⁴⁴
 - (b) We have removed all cases where the opportunity is not expected to occur within the next two years (ie before 2028).⁴⁵
 - (c) In the same way as described in paragraph A.7(c) above, and in order to align our analysis with the provisionally defined relevant geographic markets as set out in Chapter 4, we excluded all opportunities outside the UKCS and non-UKCS North Sea, and subsequently narrowed the dataset to opportunities in: (i) the UKCS, for Offshore Infrastructure customers, and (ii) the North Sea, both including and excluding the UKCS, for Marine.
 - (d) We have identified where the same opportunity appears in our data from multiple sources and deduplicated these to create a single entry.
- B.32 As noted in paragraph B.30(d) above, we have sought to identify where multiple sources have referred to the same opportunity, eg where an OCS customer has informed us that it plans to hold a procurement process and provided

⁴¹ Aramark internal document, Annex 298 to Aramark's response to the CMA's s109 notice dated 7 August 2025. Entier internal document, Annex 301 to Entier's response to the CMA's s109 notice dated 7 August 2025. Parties' internal document, Annex 720 to Parties' response to the CMA RFI dated 15 September 2025, Annex 720.

⁴² Third party responses to phase 2 CMA questionnaire.

⁴³ Third party call notes.

⁴⁴ We have excluded opportunities in which we do not have information directly from the customer and where the supplier indicated that the opportunity is not a competitive tender, but instead a bilateral negotiation/direct award or an extension.

⁴⁵ We note additionally that we have also excluded opportunities for which we do not have information regarding the expected date of the opportunity.

corresponding information, and suppliers have told us that they plan to bid for an opportunity from that customer with corresponding information matching that of the customer. In these cases, we have combined this data into a single opportunity.

B.33 Similar to paragraph B.5 above, we note that respondents may have not always described opportunities in a consistent way.⁴⁶ Therefore, where we have received information relating to procurement processes for a given customer, we have only viewed them to be separate opportunities where the listed dates are more than a year apart.⁴⁷

B.34 In general, we have taken the approach that where we have information from a customer directly, this is likely to be the most accurate source of information. We have then supplemented missing information with submissions from OCS suppliers. We additionally note that:

- (a) There were some instances where a customer submitted that it did not plan to hold a procurement process in the next five years, but one or more supplier(s) submitted that it/they plan(s) to bid for an opportunity from this customer in the next two years. We have excluded these instances from our analysis, on the basis that the customer is likely to be best placed to comment on its own future procurement plans.
- (b) We have included opportunities for which we received information from OCS suppliers but do not have information directly from the customer, except where a supplier submitted that it expects to bid/participate in an upcoming opportunity, but the incumbent provider submitted that it does not expect the customer to have a procurement process in the next two years.

Results

B.35 In the figures below, we present our compiled dataset containing upcoming opportunities to supply OCS that are likely to arise in the next two years. We have listed:

- (a) Current supplier: The customer's incumbent provider (ie its current OCS supplier in the UKCS).
- (b) Date: The expected date of the opportunity.

⁴⁶ For example, the same OCS customer may have been listed under different names, or one supplier may list when it expects suppliers to be invited to tender (ie the beginning of the tender process) while the customer or another supplier may list the date the tendered contract is expected to go live (ie the end of the tender process).

⁴⁷ In cases where a party has only provided the date of the opportunity by year, we have treated opportunities to be separate for the purposes of matching where the minimum possible time between the dates is greater than a year. For example, if one party listed the date as June 2026, and another listed the date as 2027, we have treated these to be less than a year apart.

- (c) Customer likely to invite: Where the customer listed suppliers which it would likely invite to bid for its next procurement exercise covering operations in the UKCS.⁴⁸
- (d) Suppliers anticipating to bid: Where suppliers listed the opportunity from this customer as one which it anticipates it will participate/bid.

B.36 Our provisional view is that competition between the Parties will not be limited to these future opportunities and will likely cover competition for other opportunities not currently known.⁴⁹

B.37 We present separately the analysis for Offshore Infrastructure customers, and for Marine customers.

Offshore Infrastructure

Table B.12: Upcoming opportunities in the Offshore Infrastructure Market, 2025-2027

Customer	Current supplier	Date	Customer likely to invite	Suppliers anticipating to bid
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Source: CMA's analysis of data provided by the Parties, OCS suppliers, and customers.

* [REDACTED]. (Third party response to the CMA questionnaire dated 8 August 2025.

† [REDACTED]. (Third party response to the CMA questionnaire dated 8 August 2025.

‡ [REDACTED]. (Third party response to the CMA questionnaire dated 12 August 2025.

¶ [REDACTED]. (Third party response to the CMA questionnaire dated 8 August 2025.

Note: Where we do not have information directly from the customer regarding this opportunity, the 'Customer likely to invite' column is listed as not known.

B.38 We have identified [REDACTED] upcoming opportunities in the Offshore Infrastructure Market in the next two years. These are listed in Table B.12 above.

B.39 We understand that an additional customer, not listed in Table B.12, is currently undertaking a benchmarking exercise with Aramark, ESS, Entier and Conntrak to determine whether it will launch a tender in the next couple of years.⁵⁰

⁴⁸ We note that where we do not have information directly from the customer regarding the opportunity, the 'Customer likely to invite' column is listed as not known.

⁴⁹ It is likely that there are additional customers outside of our dataset for whom we do not have information about their upcoming procurement plans. Similarly, if there are further opportunities for which the suppliers of OCS are not currently planning to bid, these will not be included in the dataset. We note that customers' procurement plans may be subject to change and some of the opportunities in our analysis may not arise in practice, and similarly, customers who were not planning procurement processes may decide to tender for OCS where previously unplanned.

⁵⁰ Third party response to the CMA RFI dated 30 September 2025.

B.40 Of the [X] customers with upcoming opportunities, we have information from [X] customers regarding which suppliers they are likely to invite to bid. Of these customers, in summary:

- (a) All customers expected to invite Aramark and Entier to bid.⁵¹
- (b) All customers expected to invite ESS to bid.⁵²
- (c) Almost all customers expected to invite Sodexo to bid.⁵³
- (d) Over half of customers expected to invite Francois to bid.⁵⁴
- (e) Over half of customers expected to invite Conntrak to bid.⁵⁵
- (f) Less than half of customers expected to invite Foss to bid.⁵⁶
- (g) Two customers expected to invite Trinity to bid.⁵⁷
- (h) No other suppliers were listed by these seven customers as suppliers they expected to invite to bid.

⁵¹ Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 26 September 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 8 August 2025.

⁵² Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 26 September 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 8 August 2025.

⁵³ Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 8 August 2025.

⁵⁴ Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 26 September 2025; Third party response to the CMA questionnaire dated 8 August 2025.

⁵⁵ Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 26 September 2025; Third party response to the CMA questionnaire dated 8 August 2025.

⁵⁶ Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 26 September 2025.

⁵⁷ Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 12 August 2025.

Marine

Table B.13 Upcoming opportunities in the Marine Market, 2025-2027

Customer	Current supplier	Date	Customer likely to invite	Suppliers anticipating to bid
[X]	[X]	[X]	[X]	[X]
[X]	[X]	[X]	[X]	[X]
[X]	[X]	[X]	[X]	[X]
[X]	[X]	[X]	[X]	[X]
[X]	[X]	[X]	[X]	[X]
[X]	[X]	[X]	[X]	[X]

Source: CMA's analysis of data provided by the Parties, OCS suppliers, and customers.

* [X]

‡ [X] (Third party call note) (Third party call note)

Note: Where we do not have information directly from the customer regarding this opportunity, the 'Customer likely to invite' column is listed as not known.

B.41 We have identified six upcoming opportunities in the Marine Market in the next two years.

B.42 Of the [X] customers with upcoming opportunities, we have information from [X] customers regarding which OCS suppliers they are likely to invite to bid. Of these customers, in summary:

- All of these customers expect to invite Aramark;⁵⁸
- Three quarters of these customers expect to invite Francois;⁵⁹
- Two of these customers expect to invite Conntrak;⁶⁰
- Two of these customers expect to invite Sodexo;⁶¹
- Two of these customers expect to invite Ligabue;⁶²
- Two of these customers expect to invite Foss;⁶³ and
- One of these customers expects to invite Entier, Pellegrini, Trinity, Oceanic, Seatec, Wrist and to consider self-supply but it cannot determine the suitability of these suppliers until its next tender exercise.⁶⁴

⁵⁸ Third party response to the CMA questionnaire dated 12 August 2025; Third party call note; Third party response to the CMA questionnaire dated 3 September 2025; Third party call note; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 15 September 2025; Third party response to the CMA questionnaire dated 9 September 2025.

⁵⁹ Third party response to the CMA questionnaire dated 12 August 2025; Third party call note; Third party response to the CMA questionnaire dated 3 September 2025; Third party call note; Third party response to the CMA questionnaire dated 9 September 2025.

⁶⁰ Third party response to the CMA questionnaire dated 12 August 2025; Third party call note; Third party response to the CMA questionnaire dated 3 September 2025; Third party call note.

⁶¹ Third party response to the CMA questionnaire dated 12 August 2025; Third party call note; Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 15 September 2025.

⁶² Third party response to the CMA questionnaire dated 12 August 2025; Third party call note; Third party response to the CMA questionnaire dated 9 September 2025.

⁶³ Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA RFI dated 15 September 2025.

⁶⁴ Third party response to the CMA questionnaire dated 12 August 2025; Third party call note.

APPENDIX C: Third party evidence

Introduction

- C.1 This Appendix sets out the evidence provided to us by customers and competitors during the investigation.
- C.2 After providing a brief overview of our evidence gathering, we present evidence from third parties in this Appendix as follows:
- (a) First, we outline evidence relevant to factors important to the tender/shortlisting process when selecting an OCS supplier, including additional factors with respect to the Marine Market;
 - (b) Second, we consider evidence relevant to closeness of competition between the Parties and competitors;
 - (c) Third, we outline evidence relevant to switching OCS supplier;
 - (d) Fourth, we outline customer views on whether they plan to decommission assets in the UKCS or North Sea;
 - (e) Fifth, we present evidence relevant to barriers to entry and expansion; and
 - (f) Finally, we present customer and competitor views on the Merger.
- C.3 We refer variously to customer and competitor, in relation (as applicable) to Offshore Infrastructure or Marine, to denote the capacity of the entity in question given that its name has been redacted.

Overview of CMA evidence gathering

- C.4 Overall, we sent [X] questionnaires to all the customers of the Parties in the UKCS and North Sea and some third-party customers and received [X] responses.⁶⁵ These were split by [X] Offshore Infrastructure customers (further split by [X] O&G, [X] MODU, [X] accommodation barges) and [X] Marine customers. Two of the Offshore Infrastructure customers we received responses from do not have current assets in the UKCS,⁶⁶ therefore these are excluded below as we summarise customer evidence. Key focus areas of the questionnaires included views on the strength of alternatives, previous and future procurement decisions, switching OCS supplier and views on the Merger. We also included Marine-specific questions sent only to Marine customers. We also held

⁶⁵ We additionally sent questionnaires to some customers of IFS and OSERV which are not summarised in this appendix.

⁶⁶ Third party responses to the CMA questionnaire dated 8 August 2025.

calls with three O&G customers and five Marine customers to further understand factors around their requirements and choice of OCS supplier. Additionally, at phase 1, we received [REDACTED] responses to our questionnaires from customers with assets in the UKCS.

- C.5 We sent out questionnaires (at both phase 1 and phase 2) to competitors of the Parties. With respect to the questionnaires sent out at phase 2, we sent out [REDACTED] questionnaires and received [REDACTED] responses. We also held calls with seven competitors to the Parties and one third-party service provider in the industry to address specific questions relevant to each individual competitor. Additionally, at phase 1, we received responses to our questionnaires from seven competitors and one third-party service provider in the industry.
- C.6 Additionally, we held a call with Strachans as a key supplier to the Parties and their competitors.

Factors important in selection of OCS supplier

Customer evidence

- C.7 We asked Offshore Infrastructure and Marine customers what factors they consider important when choosing their OCS supplier.
- (a) Customers identified several factors as important when choosing an OCS supplier. Over half of customers identified price or cost-effectiveness/commercial considerations as an important factor.⁶⁷ Just over half of customers also identified experience in supplying OCS as an important factor when choosing a supplier,⁶⁸ with most customers indicating that they would not consider procuring OCS in the UKCS from a supplier that did not have experience providing these services.⁶⁹ Other factors frequently identified related to the quality of services/food,⁷⁰ and compliance with health and safety standards.⁷¹
- (b) On a call with the CMA, one customer additionally noted that it would look at what the OCS supplier offered for the bond shop and how that would be managed, how its menus are set up etc. The customer said in its next tender, it planned to look at alternative ways of doing things in order to reduce offshore personnel.⁷²

⁶⁷ Third party responses to the CMA questionnaire dated 27 May 2025.

⁶⁸ Third party responses to the CMA questionnaire dated 27 May 2025.

⁶⁹ Third party responses to the CMA's questionnaire dated 27 May 2025.

⁷⁰ Third party response to the CMA questionnaire dated 27 May 2025.

⁷¹ Third party responses to the CMA questionnaire dated 27 May 2025.

⁷² Third party call note.

- (c) An Offshore Infrastructure customer elaborated that, although OCS is a low-tech provision, the maintenance of a happy, healthy workforce, offshore hygiene and delivery of offshore food and hotel services is very high on its agenda.⁷³

C.8 We asked Offshore Infrastructure and Marine customers in relation to their most recent procurement process in relation to OCS covering operations in the UKCS, to explain what factors determined who they invited to bid or who they bilaterally negotiated with.

- (a) For Offshore Infrastructure customers who tendered for their most recent contract with their OCS supplier, some customers used database searches,⁷⁴ including through FPAL/Achilles,⁷⁵ while other customers narrowed down potential suppliers using criteria.⁷⁶ Some of these criteria included experience in providing OCS in the region of operation,⁷⁷ and membership of COTA.⁷⁸ One customer outlined that in addition to using a database search, it narrowed down against further criteria including capability, current ongoing contract and tender commitments, experience of managing similar sites, staff turnover and labour resources, operation of open book policy and ability to provide both onshore and offshore services.⁷⁹
- (b) For Offshore Infrastructure customers who extended or negotiated, two customers noted good performance of their current supplier,⁸⁰ with one of these customers noting having extended due to a global contract discount.⁸¹ Two other customers mentioned continuity of service as a reason for contract extension.⁸² One customer mentioned that Aramark was considered a proven incumbent, with many of its staff viewed as being akin to its personnel having worked on the offshore assets for many years.⁸³
- (c) Some Marine customers listed similar criteria to Offshore Infrastructure customers, such as that supplier is an incumbent,⁸⁴ health and safety,⁸⁵ experience,⁸⁶ and service quality.⁸⁷ Some Marine customers outlined a broader geographic scope than Offshore Infrastructure customers as part of their selection for suppliers. For example, one customer outlined that they

⁷³ Third party call note.

⁷⁴ Third party responses to the CMA questionnaire dated 8 August 2025

⁷⁵ We understand FPAL/Achilles is database which provides a repository of potential suppliers including those of OCS.

⁷⁶ Third party responses to the CMA questionnaire dated 8 August 2025.

⁷⁷ Third party responses to the CMA questionnaire.

⁷⁸ Third party responses to the CMA questionnaire dated 8 August 2025.

⁷⁹ Third party response to the CMA questionnaire dated 12 August 2025.

⁸⁰ Third party responses to questions the CMA questionnaire.

⁸¹ Third party response to the CMA questionnaire dated 8 August 2025.

⁸² Third party responses to the CMA questionnaire.

⁸³ Third party response to the CMA questionnaire dated 8 August 2025.

⁸⁴ Third party responses to the CMA questionnaire.

⁸⁵ Third party response to the CMA questionnaire dated 12 August 2025.

⁸⁶ Third party responses to the CMA questionnaire.

⁸⁷ Third party responses to the CMA questionnaire.

invited suppliers which were able to service globally,⁸⁸ One customer invited suppliers which had a presence in Northern Europe,⁸⁹ and another customer said that its response to this question was given in general and the selection factors listed are not specific to the UKCS.⁹⁰ One Marine customer noted that price was a key factor it looked at in evaluating the bids and that scale was also an important factor in fixing costs, and in securing consistency of supply and assurance of delivery, its vessels are in port for a short period and it needs fresh, quality food to arrive on time.⁹¹

C.9 We asked customers to explain what factors would result in them considering changing their OCS supplier at the end of the current contract rather than extending the contract with their current supplier.

- (a) The majority of customers which responded to this question across both Offshore Infrastructure customers and Marine customers mentioned financial considerations such as price, increases in costs/rates, commercial considerations⁹² and over half of the customers who responded to this question mentioned quality of food/service/performance.⁹³
- (b) A small minority of Offshore Infrastructure customers mentioned that they would consider switching at the end of the current contract,⁹⁴ and two mentioned that they would consider switching as a result of HSE incidents/safety.⁹⁵
- (c) Additionally, we note the following points were factors for certain Offshore Infrastructure customers:
 - (i) Unionised nature of catering industry means little financial incentive to change.⁹⁶
 - (ii) High crew attrition.⁹⁷
 - (iii) Acquisition of new assets that had a different incumbent contractor or acquisition of new assets that had cessation of production dates beyond our existing assets.⁹⁸

⁸⁸ Third party response to the CMA questionnaire dated 8 August 2025.

⁸⁹ Third party response to the CMA questionnaire dated 12 August 2025.

⁹⁰ Third party response to the CMA questionnaire dated 12 August 2025.

⁹¹ Third party call note.

⁹² Third party responses to the CMA questionnaire.

⁹³ Third party responses to the CMA questionnaire.

⁹⁴ Third party responses to the CMA questionnaire

⁹⁵ Third party responses to the CMA questionnaire.

⁹⁶ Third party response to the CMA questionnaire dated 12 August 2025.

⁹⁷ Third party response to the CMA questionnaire dated 8 August 2025.

⁹⁸ Third party response to the CMA questionnaire dated 8 August 2025.

(iv) Supplier strategy.⁹⁹

(d) Additionally, we also note the following points were factors for certain Marine customers:

(i) Project specific requirements (including Local Content requirements, fiscal constraints).¹⁰⁰

(ii) Following the occurrence of issues with the incumbent catering crew's Marine compliance and certification / local content requirements for a vessel operating in a specific country or region.¹⁰¹

C.10 We also asked customers how important or unimportant a list of factors would be,¹⁰² in determining whether they would consider inviting an OCS supplier to bid or bilaterally negotiate with them. We asked customers to rank these factors on a scale of 1-5, with 1 = not important, 5 = very important, and provide an explanation for their rating.

Senior management staff has prior experience in offshore catering in the UKCS

C.11 Most Offshore Infrastructure customers,¹⁰³ and all Marine customers,¹⁰⁴ who responded to this question considered senior management staff having prior experience in offshore catering in the UKCS important (4/5) or very important (5/5) as to whether they would invite a supplier to bid or bilaterally negotiate with them. Some Offshore Infrastructure customers explained that this is important as there are specific requirements associated with the UKCS,¹⁰⁵ including local regulations. For example, one customer said it is crucial that the supplier understands the UKCS environment,¹⁰⁶ and another customer said that there are unique regulatory, safety, and cultural requirements in the UKCS and prior experience ensures familiarity with standards, reduces onboarding risks and demonstrates credibility.¹⁰⁷ One Marine customer qualified their response with the statement that this is only important for the provision of services in the UKCS,¹⁰⁸ and another customer explained that this is important as the UKCS, and wider North Sea/Northern Europe is its focus.¹⁰⁹

⁹⁹ Third party response to the CMA questionnaire dated 8 August 2025.

¹⁰⁰ Third party response to the CMA questionnaire dated 9 September 2025.

¹⁰¹ Third party response to the CMA questionnaire dated 12 August 2025.

¹⁰² The list of factors we listed were (i) Senior management staff has prior experience in offshore catering in the UKCS; (ii) Senior management staff has prior experience in offshore catering globally; (iii) Supplier's track record in the UKCS; (iv) Supplier's track record in globally; and (v) Supplier has a local presence in the area.

¹⁰³ Third party responses to the CMA questionnaire.

¹⁰⁴ Third party responses to the CMA questionnaire.

¹⁰⁵ Third party responses to the CMA questionnaire.

¹⁰⁶ Third party response to the CMA questionnaire dated 8 August 2025.

¹⁰⁷ Third party response to the CMA questionnaire dated 8 August 2025.

¹⁰⁸ Third party response to the CMA questionnaire dated 9 September 2025.

¹⁰⁹ Third party response to the CMA questionnaire dated 12 August 2025.

- C.12 Similarly, one Marine customer said that an understanding of local regulations, food and ethics,¹¹⁰ was important, and another Marine customer said local expertise¹¹¹ was important.

Senior management staff has prior experience in offshore catering globally

- C.13 Overall, Offshore infrastructure customers considered the global experience of senior management less important than UKCS experience. Just under half of the Offshore Infrastructure customers who responded to this question rated senior management staff has prior experience in offshore catering globally 3/5.¹¹² Less than half of these customers explained that while this is important, it is not as important as UKCS experience.¹¹³
- C.14 Just under half of Offshore Infrastructure customers considered this not important (1/5), or not very important (2/5).¹¹⁴ Two customer explained that they considered this not or not very important as they do not have assets outside the North Sea/UKCS,¹¹⁵ and another customer explained that this is not relevant to its operations.¹¹⁶
- C.15 Two Offshore Infrastructure customers who responded to this question considered this important (4/5),¹¹⁷ and no Offshore Infrastructure customer considered this very important (5/5). Of the two Offshore Infrastructure customers who considered it important, one customer explained that this is valuable in bringing broader best practices and adaptability, though explained that this is not as essential as UKCS experience.¹¹⁸
- C.16 Marine customers overall considered global experience of senior management more important than Offshore Infrastructure customers. Less than half of Marine customers considered this factor important (4/5) or very important (5/5),¹¹⁹ while two Marine customers considered this not important (1/5), or not very important (2/5).¹²⁰

Supplier's track record in the UKCS

- C.17 Almost all Offshore Infrastructure customers who responded to this question considered the supplier's track record in the UKCS as either important (4/5) or

¹¹⁰ Third party response to the CMA questionnaire dated 12 August 2025.

¹¹¹ Third party response to the CMA questionnaire dated 3 September 2025.

¹¹² Third party responses to the CMA questionnaire.

¹¹³ Third party responses to the CMA questionnaire.

¹¹⁴ Third party responses to the CMA questionnaire.

¹¹⁵ Third party responses to the CMA questionnaire.

¹¹⁶ Third party response to the CMA questionnaire dated 12 August 2025.

¹¹⁷ Third party responses to the CMA questionnaire.

¹¹⁸ Third party response to the CMA questionnaire dated 8 August 2025.

¹¹⁹ Third party responses to the CMA questionnaire.

¹²⁰ Third party responses to the CMA questionnaire.

very important (5/5) as to whether they would invite a supplier to bid or bilaterally negotiate with them.¹²¹ Two of these customers explained that this was important, as it provides confidence in a suppliers capability,¹²² with one customer describing this factor as a key differentiator,¹²³ and another customer outlined that this was minimum requirement in their previous tender exercise.¹²⁴ One customer said that as Offshore catering has a direct impact on offshore morale, track record is considered very important.¹²⁵ Two customers considered this 3/5 or below.¹²⁶

- C.18 Similarly, almost all Marine customers which responded to the question considered the supplier's track record in the UKCS as either important (4/5) or very important (4/5) as to whether they would invite a supplier to bid or bilaterally negotiate with them.¹²⁷ Only one customer¹²⁸ considered this not very important (2/5), and subsequently further explained that an OCS supplier's UKCS track record in the customer's selection of OCS supplier was a relevant consideration in its equation, but it is not a 'showstopper'.¹²⁹

Supplier's track record in globally

- C.19 Overall, Offshore infrastructure customers and Marine customers considered the global track record of a supplier less important than the supplier's UKCS track record.
- C.20 A minority of Offshore Infrastructure customers rated this as either important (4/5) or very important (5/5) as to whether they would invite a supplier to bid or bilaterally negotiate with them,¹³⁰ while just under half of customers considered this not important (1/5) or not very important (2/5).¹³¹ Similarly, two Marine customers considered this important (4/5)¹³² and less than half of Marine customers rated this factor 3/5.¹³³

Supplier has a local presence in the area

- C.21 Over half of Offshore infrastructure customers considered a supplier having a local presence in the area as important (4/5) or very important (5/5),¹³⁴ with a small

¹²¹ Third party responses to the CMA questionnaire.

¹²² Third party responses to the CMA questionnaire.

¹²³ Third party response to the CMA questionnaire dated 8 August 2025.

¹²⁴ Third party response to the CMA questionnaire dated 8 August 2025.

¹²⁵ Third party response to the CMA questionnaire.

¹²⁶ Third party responses to the CMA questionnaire.

¹²⁷ Third party responses to the CMA questionnaire. These customers provided similar reasons for their rating as those detailed above with respect to Senior management experience in the UKCS, similarly with one customer detailing that this is only relevant in the UKCS.

¹²⁸ Third party response to the CMA questionnaire dated 3 September 2025.

¹²⁹ Third party call note.

¹³⁰ Third party responses to the CMA questionnaire.

¹³¹ Third party responses to the CMA questionnaire.

¹³² Third party responses to the CMA questionnaire.

¹³³ Third party responses to the CMA questionnaire.

¹³⁴ Third party responses to the CMA questionnaire.

minority of customers considering this not important (1/5), or not very important (2/5).¹³⁵ Some Offshore Infrastructure customers explained that this was important for local supply chain,¹³⁶ and management of relationships.¹³⁷

C.22 Almost all Marine customers considered a supplier having a local presence in the area important (4/5) or very important (5/5).¹³⁸ One Marine customer explained that it would generally look for suppliers with a local presence because such suppliers understand the local content requirements, as well as the health and hygiene rules and other relevant factors with regards to where the vessel will be operating, however it ultimately comes down to price and capability in areas the vessel is planned to operate in.¹³⁹

C.23 One Marine customer considered local presence important but not pivotal,¹⁴⁰ and noted that both UK and European suppliers could potentially service its vessels and that it would consider suppliers without a base in the UK/Aberdeen to supply its vessels based in the UKCS and North Sea.¹⁴¹

Competitor evidence

C.24 When asked what factors competitors thought customers would consider when selecting their OCS supplier, the key factors highlighted by competitors included price,¹⁴² quality,¹⁴³ health and safety.¹⁴⁴

C.25 Two competitors said that having a local presence in the UK is important.¹⁴⁵

(a) One competitor said that those providing services in the UKCS at present were mainly based in Aberdeen with British management teams. Regarding the wider North Sea market (ie Denmark, Norway, and the Netherlands), it noted that tenderers typically prefer suppliers who bid under the same nationality and language or have entities in that country.¹⁴⁶

(b) In relation to expanding in the UKCS region, one competitor said that it was important to have a British team, for the administration to be based in the UK and for decisions to be made in the UK.¹⁴⁷

¹³⁵ Third party responses to the CMA questionnaire.

¹³⁶ Third party responses to the CMA questionnaire.

¹³⁷ Third party responses to the CMA questionnaire.

¹³⁸ Third party responses to the CMA questionnaire.

¹³⁹ Third party call note.

¹⁴⁰ Third party response to the CMA questionnaire dated 12 August 2025.

¹⁴¹ Third party call note.

¹⁴² Third party call note; and Third party call note.

¹⁴³ Third party call note; and Third party call note.

¹⁴⁴ Third party call note; Third party call note; and Third party call note.

¹⁴⁵ Third party call note; and Third party call note.

¹⁴⁶ Third party call note.

¹⁴⁷ Third party call note.

- C.26 Further OCS suppliers highlighted UKCS experience as important, for example:
- (a) One competitor said the decision making on OCS supplier selection in the UKCS market is also heavily weighted on experience in the UKCS.¹⁴⁸
 - (b) One competitor said some customers contact the main suppliers in the UKCS who have offshore experience, credibility and the skillset required.¹⁴⁹
 - (c) One competitor explained that it is important to have a senior management with UKCS-specific experience for expanding in the UKCS region.¹⁵⁰
- C.27 Other factors customers may consider include:
- (a) One competitor outlined criteria used to evaluate tenderers included Revenue size, people management, proof of capability of service, demonstration of systems and process and commercial viability when going to short list. It said that size of the company may also be a consideration for larger customers.¹⁵¹
 - (b) One competitor mentioned diversity and scope of the offer and social value.¹⁵²
- C.28 [✂]¹⁵³
- C.29 The same competitor also said it was beneficial for a supplier to have a global relationship with a customer who is expanding into the UKCS. This may help the supplier win new bids, regardless of its market presence in the UKCS.¹⁵⁴

The tender process

Geographical scope of tenders

- C.30 Competitors generally outlined that tenders for OCS can often take place at the regional level. For example:
- (a) One competitor said that larger O&G customers with a global presence have historically tendered for services on a global basis. However, in the last four to five years, most tenders have been regional - either specific to the North

¹⁴⁸ Third party call note.

¹⁴⁹ Third party call note.

¹⁵⁰ Third party call note.

¹⁵¹ Third party call note.

¹⁵² Third party call note.

¹⁵³ Third party call note.

¹⁵⁴ Third party call note.

Sea or divided into separate regions within the North Sea, for example, UK waters separate from Danish waters.¹⁵⁵

- (b) One competitor said that most customers tender separately for each geographic area in the North Sea.¹⁵⁶
- (c) One competitor explained that [X], [X] and [X] are segmented. For instance, their offices in Aberdeen will only focus on the UK North Sea, but their offices in the [X] will focus just on Europe. However, the competitor clarified that not all OCS suppliers work in this way, as the competitor said the competitor and [X] operate on a more global basis.¹⁵⁷

C.31 Another competitor explained that customers who have global contracts in place with suppliers tend to engage those specific suppliers in regions they are expanding to, instead of tendering for a new supplier.¹⁵⁸

C.32 Further with respect to Marine contracts specifically:

- (a) One third-party service provider in the industry outlined that Marine contracts may be split by geography, type of vessel or vessel purpose.¹⁵⁹ The third-party service provider noted that Marine contracts could potentially be split up so that the UK elements go to a UK supplier, and the remainder goes to other suppliers. The third-party service provider noted that in effect, this is the current situation with [X], where [X] vessels that go into work in Brazil are contracted to a local Brazilian catering company.¹⁶⁰
- (b) One competitor noted that very few global Marine customers have only one supplier, as they would usually have at least two to have geographical coverage, and it would be typical for suppliers to have to bid for new work that arises with existing customers in a different geography.¹⁶¹
- (c) One Marine customer outlined that it had tendered for its current OCS supplier ([X]) globally, due to the complexity of managing multiple contacts.¹⁶²

C.33 One competitor said that the tender and procurement process for Marine customers is the same as other types of customers.¹⁶³

¹⁵⁵ Third party call note.

¹⁵⁶ Third party call note.

¹⁵⁷ Third party call note.

¹⁵⁸ Third party call note.

¹⁵⁹ Third party call note.

¹⁶⁰ Third party call note.

¹⁶¹ Third party call note.

¹⁶² Third party call note.

¹⁶³ Third party call note.

Shortlisting potential bidders

- C.34 We asked some customers to explain the steps they take after having a shortlist of bidders. We asked customers to include to what extent they negotiate with the bidders, whether bidders receive details of competing bids and receive the opportunity to adjust their pricing or any other aspects of their offer before they determine the winner.
- C.35 Customers generally explained that the shortlisting process can include a presentation from the supplier and responding to clarification questions on the bid.¹⁶⁴ Less than half of the customers we asked said that negotiations do take place,¹⁶⁵ and more specifically some customers outlined that they may go back to a bidder if they notice one aspect of the proposal being markedly different than another offer.¹⁶⁶ All customers we asked said that they would not disclose details of competing bids other bidders.¹⁶⁷
- C.36 One competitor said most clients will shortlist down to two to three bidders, and when there are two to three OCS suppliers offering around the same price (due to the fixed union labour cost and only one food distributor), the competition will boil down to buying power and margins offered by these suppliers, therefore pricing is much closer in the UKCS compared to other parts of the world.¹⁶⁸
- C.37 In relation to negotiations between the customers and bidders on price and other commercial offering during the shortlisting process of tenders, one competitor said that such negotiations are not common during the shortlisting process and is more common at the clarification stage. Bidders usually need to go through technical and commercial clarifications with the customer to ensure that there is an understanding on both sides and that the customer is measuring a like-for-like proposal, and such process is more about clarifications rather than negotiations.¹⁶⁹ Another competitor said it always negotiates with its customers on an open-book basis.¹⁷⁰

Contracts

- C.38 One competitor noted that contracts vary in terms of length from one to five years or beyond (with or without options).¹⁷¹ Another competitor said that Marine

¹⁶⁴ Third party follow up responses to the CMA RFIs.

¹⁶⁵ Third party follow up responses to the CMA RFI.

¹⁶⁶ Third party response to the CMA RFI.

¹⁶⁷ Third party follow up responses to the CMA RFIs; and Third party call note.

¹⁶⁸ Third party call note.

¹⁶⁹ Third party call note.

¹⁷⁰ Third party call note.

¹⁷¹ Third party call note.

contracts in particular tend to have a shorter term (for example, three months) than fixed platforms (typically three to five years).¹⁷²

- C.39 In response to a question about visibility of costs and mark-ups, an Offshore Infrastructure customer noted that it had good visibility of where those items were within the commercial bids it received, and its experience was that companies were happy to share this information through questions asked as part of the invitation to tender (ITT).¹⁷³ Another Offshore Infrastructure customer outlined that while the food cost is closed book, COTA rates mean labour markups are visible.¹⁷⁴ A Marine customer said it has some visibility over [X] margins applied in their contracts, as the customer gets a markup on food which is fully visible, whereas all-inclusive day rates for the individuals that are more closed book.¹⁷⁵
- C.40 One competitor said, with respect to margins, there are multiple commercial models (eg cost-plus model – invoice cost of sales + management fee (percentage, fixed value, overheard management fee + profit), but the client may often send out a template for offshore catering providers to populate so the client can have a clear view over the commercial model adopted; and 90% of the time, the client has a lot of visibility over the competitor's margins regardless of the commercial model adopted (eg labour costs etc).¹⁷⁶
- C.41 Another competitor noted that models vary in transparency but generally include labour at a set cost with a mark-up, raw ingredients with a margin, plus an overhead and margin to cover management and profit.¹⁷⁷

Marine

Differences between Marine customers and Offshore Infrastructure customers

- C.42 Competitors generally outlined that servicing Marine customers is different from servicing Offshore Infrastructure customers.¹⁷⁸ For example:
- (a) **Labour:** Several competitors and one third-party service provider in the industry noted that one of the complexities around servicing Marine Assets is labour,¹⁷⁹ with one competitor mentioning that European labour is required for vessels in the North Sea,¹⁸⁰ and another competitor outlining that there

¹⁷² Third party call note.

¹⁷³ Third party call note.

¹⁷⁴ Third party call note.

¹⁷⁵ Third party call note.

¹⁷⁶ Third party call note.

¹⁷⁷ Third party call note.

¹⁷⁸ Third party call note, Third party call note, Third party call note, Third party call note.

¹⁷⁹ Third party call note, Third party call note, Third party call note, Third party call note, Third party call note.

¹⁸⁰ Third party call note.

may be local requirements when Marine vessels change country in terms of crew.¹⁸¹

(i) Further, another competitor noted there is a different process (from TUPE) around Marine labour, where a case-by-case judgement is made as to whether the competitor takes on the labour, or whether the labour remains with the customer. The competitor noted this judgement may depend on the type of labour, the destination, and the type of work to be performed by the vessel.¹⁸²

(b) **Produce/supplies:** Some competitors and one third-party service provider in the industry explained there are complexities around the purchase of produce or supplies.¹⁸³ One third-party service provider in the industry explained that a supplier must understand the local markets, laws and the purchasing in each region, and the consumption of each vessel, to avoid over or under buying,¹⁸⁴ and another competitor said it aimed to obtain food at the lowest cost whilst maintaining the quality while moving locations.¹⁸⁵ One competitor explained that if Marine Assets change countries, the OCS supplier may need to change its suppliers when sourcing produce/supplies. It outlined that some contracts require local food, so the contract's T&Cs stay the same, but as the vessel moves countries, the OCS supplier has to work quite closely with its suppliers to source produce/supplies.¹⁸⁶

C.43 One competitor stated that it required a different mindset to service Marine customers relative to O&G customers,¹⁸⁷ explaining that while there is no difference in the OCS provided to O&G customers compared to those in the Marine and renewables markets in the UKCS, there are different considerations for bidders. The competitor acknowledged these were in relating to compliance with employment law, different union agreements, nationalities and whether the vessel is moving across other countries waters.¹⁸⁸

C.44 Another competitor, which does not service Marine customers, outlined that vessels tend to move cross-border, creating complications from a legal (ie tax) perspective.¹⁸⁹

C.45 With respect to whether there is variation in servicing different types of Marine customers, one third-party service provider in the industry noted that renewables vessels have the same complexity as other Marine Assets around food supply,

¹⁸¹ Third party call note.

¹⁸² Third party call note.

¹⁸³ Third party call note, Third party call note, Third party call note.

¹⁸⁴ Third party call note.

¹⁸⁵ Third party call note.

¹⁸⁶ Third party call note.

¹⁸⁷ Third party call note.

¹⁸⁸ Third party call note.

¹⁸⁹ Third party call note.

labour supply etc, since renewables vessels also work in different waters, from Denmark down to Spain.¹⁹⁰

- C.46 In contrast to Offshore Infrastructure OCS suppliers, whose labour rates are governed by COTA, one Marine customer said that as regards the terms of how labour rates are determined, certain parts of its crew are under union agreements and some are not, and there are different unions for different crew types.¹⁹¹

Additional factors relevant to the Marine Market

Location of vessel for the duration of the contract

- C.47 We asked Marine customers and some competitors whether, at the time of procurement, they knew where the Marine vessel will be located for the duration of the contract.
- C.48 Over half of the customers which responded to this question explained they generally know this in advance.¹⁹² For example, one customer explained that it generally knows the location of its vessel for the duration of the contract, as it has several different projects throughout the UKCS and Netherlands, with each vessel spending on average 30 days – three months in each location,¹⁹³ and two customers explained that while they generally know this information, it's not guaranteed.¹⁹⁴
- C.49 Less than half of the customers who responded to this question said they do not know the location of its vessel for the duration of the contract in advance.¹⁹⁵ One customer explained that the location of its vessels changes frequently as the customer works the spot market, not long-term charter.¹⁹⁶
- C.50 Two Marine competitors said they generally are not aware at the time of procurement where the vessel will be for the duration of the contract:
- (a) One competitor said Marine vessels can move around regionally or globally depending on the client and type of vessel, and that if a client asks for multiple rates for multiple countries, the competitor can provide them.¹⁹⁷
 - (b) Another competitor said some Marine customers have forward work plans and sometimes they upload their forward work plans onto FPAL/Achilles but

¹⁹⁰ Third party call note.

¹⁹¹ Third party call note.

¹⁹² Third party responses to the CMA questionnaire; Third party call note.

¹⁹³ Third party response to the CMA questionnaire dated 12 August 2025, Third party response to the CMA RFI dated 15 September 2025.

¹⁹⁴ Third party response to the CMA questionnaire dated 12 August 2025, Third party call note.

¹⁹⁵ Third party responses to the CMA questionnaire.

¹⁹⁶ Third party response to the CMA questionnaire dated 8 August 2025.

¹⁹⁷ Third party call note.

it is not always accurate. The competitor said Marine customers do their best to provide their forward plans, but when customers are in the middle of a project, it sometimes does not happen.¹⁹⁸

- C.51 One Marine competitor noted that the TGS Offshore database contains publicly available information about what stage each wind park in the world is at in terms of going out to tender, as well as the vessels and Marine companies. The competitor stated that it and its competitors use this data to understand how things are moving in the Marine sector.¹⁹⁹

Location of vessel at the time of procurement

- C.52 We asked Marine customers and some competitors whether the location of the vessel at the time of procurement is important for which suppliers it expects to bid for it.
- C.53 Most Marine customers which responded to this question said that this was not important.²⁰⁰ Two Marine customers explained that this was not important as the provision of services where the vessel will operate is important,²⁰¹ rather than the location of procurement. One Marine customer said that it prefers to have an OCS supplier with an office near the Marine customer's own office in Aberdeen, even if this is a satellite office. It explained that much of the work is people management, and it is easier to make sure this is done properly from nearby.²⁰² Two Marine customers highlighted this was not important as they expected a supplier to service multiple regions.²⁰³ One of these customers explained that, however, where a vessel is based in a region on a mid to long-term basis or where required by local content requirements, it would consider local catering services companies in addition to catering service companies with a regional or global service offering.²⁰⁴
- C.54 One customer said that the location of the vessel at the time of procurement is important, particularly when Local Content requirements are imposed.²⁰⁵
- C.55 One competitor said that the location of the vessel at the time of procurement is important.²⁰⁶

¹⁹⁸ Third party call note.

¹⁹⁹ Third party call note.

²⁰⁰ Third party responses to the CMA questionnaire.

²⁰¹ Third party call note, Third party call note, Third party responses to the CMA questionnaire.

²⁰² Third party call note.

²⁰³ Third party responses to the CMA questionnaire.

²⁰⁴ Third party response to the CMA questionnaire dated 12 August 2025.

²⁰⁵ Third party response to the CMA questionnaire dated 9 September 2025.

²⁰⁶ Third party call note.

- C.56 Two competitors and one third-party service provider in the industry outlined that the location of the vessel at the time of procurement is not important, or that it would consider other factors above this.²⁰⁷
- (a) One third-party service provider in the industry noted it is entirely possible for a UK-based ship owner to look outside UK-based suppliers for its global OCS requirements. The third-party service provider noted that [X] is an example as its vessels work all over the world and it uses [X], a [X] catering supplier, not a UK supplier.²⁰⁸
 - (b) One competitor said it generally does not make a decision to bid based on where the Marine Asset is supplied from, and the competitor does not set any geographic boundaries for its Marine contracts. It said its decision criteria would be more about the reputation of the Marine customer and the payment terms.²⁰⁹
 - (c) One competitor said that there are three parts to be considered for bidding, namely the labour, the food and the administration.²¹⁰ However, the competitor noted that it only has European personnel and therefore would not bid in areas where it did not have the correct setup.²¹¹

Retention of OCS supplier when vessel moves location

- C.57 We asked Marine customers whether, if a vessel moves location, they expect to retain their offshore catering supplier or seek to reprocur.
- C.58 All Marine customers that responded said they would expect to retain their offshore catering supplier.²¹² For example:
- (a) One Marine customer said continuity of service was a preferred condition but since its contractual terms provided for a smooth transition between the outgoing and the incoming caterer, which included the transfer of the stock onboard and an adequate handover, it is prepared to afford a change of caterer if convenient or imposed.²¹³
 - (b) One Marine customer said that its OCS supplier's team will sail with the customer's vessel to whichever location, whether locally or internationally. When asked by the CMA on whether the ability to supply offshore catering in various locations in the North Sea (ie UK, Germany, Denmark and the

²⁰⁷ Third party call note, Third party call note, Third party call note.

²⁰⁷ Third party call note.

²⁰⁸ Third party call note.

²⁰⁹ Third party call note.

²¹⁰ Third party call note.

²¹¹ Third party call note.

²¹² Third party responses to the CMA questionnaire.

²¹³ Third party response to the CMA questionnaire dated 9 September 2025.

Netherlands) is a key factor in the customer's selection of its OCS supplier, the customer replied in the positive.²¹⁴

- (c) One Marine customer said that this provision is usually made in its service contract through the inclusion of rates / pricing for alternative global jurisdictions.²¹⁵ On a call, the customer noted that if Marine Assets change locations, then the customer gets the opportunity to discuss the rates with its OCS supplier to see if the OCS supplier can adhere to local requirements, but equally, the customer said it could tender locally instead and it would depend on which country the vessel moves to, as the customer is sometimes restricted to government-approved catering organisations. If the Marine Asset is in a location long term and the OCS supplier did not have a strong presence in the region, then the customer may retender.²¹⁶
- (d) One Marine customer said is likely the UK-based vessels would only leave the UK region for a short specific time period and that the catering supplier would adapt to the vessel's location.²¹⁷
- (e) One Marine customer said that it would expect to retain its OCS supplier as a global contract. The customer noted that if a Marine Asset moves to an area which its OCS supplier is not able to supply, the customer will procure locally but noted that it would not otherwise proactively consider local alternatives.²¹⁸

C.59 Two competitors and one third-party service provider said that they would attempt to continue to supply the Marine customer, if possible, based on their geographic scope.²¹⁹

- (a) One competitor said it would try to continue to service a Marine Asset which was in the North Sea and moved out of the North Sea but may face difficulties in some geographies.²²⁰ The same competitor said it considered itself not disadvantaged if the Marine customer is in the North Sea, but if the customer's Marine Asset moves outside of the North Sea, then this can create a challenge.²²¹
- (b) One third-party service provider in the industry noted that, where a catering supplier has a contract with a UK customer and the Marine Asset moves to another country for a project, the contract would not be re-bid. The third-party

²¹⁴ Third party call note.

²¹⁵ Third party response to the CMA questionnaire dated 12 August 2025.

²¹⁶ Third party call note.

²¹⁷ Third party response to the CMA questionnaire dated 8 August 2025.

²¹⁸ Third party call note.

²¹⁹ Third party call note; Third party call note; Third party call note.

²²⁰ Third party call note.

²²¹ Third party call note.

service provider explained it is up to the OCS supplier to find a solution for the customer in the new country.²²²

- (c) One competitor said that a customer's contract can cover specific countries with specific rates, and then if a Marine Asset goes to work in a country not specified by those rates, the customer will be able to mutually negotiate those rates but that the competitor reserves the option to not supply the vessel in that geography.²²³

Closeness of competition between the Parties and rivals

Customer views

Offshore Infrastructure customers

C.60 We asked each customer to provide an explanation of their ranking of each OCS supplier for their most recent procurement process. Customers provided the following reasons for why they selected their chosen OCS supplier (including through both open tenders and other opportunity types):

- (a) **Aramark** – several customers mentioned Aramark's cost/pricing was a reason why they selected it as their OCS supplier.²²⁴ Aramark's technical/service quality was also noted by several customers,²²⁵ and Aramark's proven track record in OCS in the UKCS was mentioned by a couple of customers.²²⁶
- (b) **Entier** – several customers listed Entier's pricing or commercial reasons in their explanation for why they selected it as their OCS supplier.²²⁷ Entier's incumbent status was noted by two customers,²²⁸ and its standard of service was also mentioned by a couple of customers.²²⁹ One customer that chose Entier as its OCS supplier noted that it made sense to consolidate and have one supplier rather than multiple contracts with different suppliers.²³⁰
- (c) **ESS** – a couple of customers noted ESS' service quality,²³¹ and two responses mentioned its pricing.²³²

²²² Third party call note.

²²³ Third party call note.

²²⁴ Third party responses to the CMA questionnaire.

²²⁵ Third party responses to the CMA questionnaire.

²²⁶ Third party responses to the CMA questionnaire.

²²⁷ Third party responses to the CMA questionnaire. Third party call note.

²²⁸ Third party responses to the CMA questionnaire.

²²⁹ Third party responses to the CMA questionnaire.

²³⁰ Third party call note.

²³¹ Third party responses to the CMA questionnaire.

²³² Third party responses to the CMA questionnaire dated 22 August 2025.

- (d) **Sodexo** – we did not receive any response from Offshore Infrastructure customers that selected Sodexo in their most recent procurement process.

C.61 Customers provided the following reasoning for why OCS suppliers' bids were unsuccessful:

- (a) **Aramark** – one customer mentioned high pricing as a reason for not selecting Aramark as its OCS supplier,²³³ whilst another noted that Aramark's pricing was competitive despite not selecting Aramark.²³⁴
- (b) **Entier** – customer responses were mixed on Entier's quality and pricing. One customer noted that Entier did not pass its technical evaluation,²³⁵ whilst another said that Entier was rated highly on quality of service, but poorly on price.²³⁶
- (c) **ESS** – the responses of customers which did not select ESS were generally positive in their reasoning. One customer noted that ESS scored highly with the second lowest cost bid,²³⁷ and another said it was good on price and quality of service.²³⁸ One customer ranked ESS first out of four for its technical offering, but third for commercial and health and safety.²³⁹
- (d) **Sodexo** – several customers explained in their responses that Sodexo's pricing/cost was high or not competitive relative to other bids.²⁴⁰ Multiple customers that did not choose Sodexo mentioned poor technical factors or service in their decision.²⁴¹ One customer mentioned that Sodexo's bid was technically acceptable,²⁴² and one mentioned that Sodexo was aware of their standards from a past relationship.²⁴³
- (e) **Francois** – a couple of customers that did not select Francois' bids submitted that Francois' pricing was not competitive.²⁴⁴ One customer said that Francois' bid was not technically acceptable,²⁴⁵ and one customer noted that Francis would be a new supplier to it.²⁴⁶
- (f) **Trinity** – one customer noted that Trinity's bid was more expensive.²⁴⁷

²³³ Third party response to the CMA questionnaire dated 22 August 2025.

²³⁴ Third party response to the CMA questionnaire dated 8 August 2025.

²³⁵ Third party response to the CMA questionnaire dated 12 August 2025.

²³⁶ Third party response to the CMA questionnaire dated 12 August 2025.

²³⁷ Third party response to the CMA questionnaire dated 12 August 2025.

²³⁸ Third party response to the CMA questionnaire dated 12 August 2025.

²³⁹ Third party response to the CMA questionnaire dated 8 August 2025.

²⁴⁰ Third party responses to the CMA questionnaire.

²⁴¹ Third party responses to the CMA questionnaire.

²⁴² Third party response to the CMA questionnaire dated 8 August 2025.

²⁴³ Third party response to the CMA questionnaire dated 8 August 2025.

²⁴⁴ Third party responses to the CMA questionnaire.

²⁴⁵ Third party response to the CMA questionnaire dated 8 August 2025.

²⁴⁶ Third party response to the CMA questionnaire dated 8 August 2025.

²⁴⁷ Third party response to the CMA questionnaire dated 8 August 2025.

(g) **OCL** – one customer said that OCL’s bid did not pass its technical evaluation.²⁴⁸

- C.62 We asked Offshore Infrastructure customers to provide the names of all OCS suppliers that they would likely invite to bid in their next procurement exercise and rate how suitable they think these suppliers would be in providing them with OCS in the UKCS (where 1 is not very suitable and 5 is very suitable).
- C.63 We received responses from [X] Offshore Infrastructure customers, of which [X] listed the suppliers it would likely invite to bid in its next procurement exercise.²⁴⁹
- C.64 Where customers had considered who to invite to tender, all customers expected to invite Aramark,²⁵⁰ and ESS;²⁵¹ and almost all expected to invite Sodexo,²⁵² and Entier.²⁵³
- C.65 Customers generally rated Aramark, Entier, ESS and Sodexo strongly in terms of their suitability as a supplier, with other suppliers generally obtaining lower ratings from customers. Of the customers who rated how suitable it thought a given supplier would be in providing it with OCS in the UKCS (with a value from 1-5):
- (a) Aramark had the highest average rating at 4.8, being considered strong or very strong suitability by all customers who would consider it.²⁵⁴
 - (b) Entier received an average rating of 4.5.²⁵⁵ Most of the customers that would consider Entier rated its suitability as strong (4/5) or very strong (5/5).²⁵⁶
 - (c) ESS received an average rating of 4.3.²⁵⁷ Most customers that would consider ESS rated its suitability of (4/5) or (5/5).²⁵⁸
 - (d) Sodexo received an average rating of 4.3.²⁵⁹ Over half of customers which would consider Sodexo rated its suitability of (4/5) or (5/5).²⁶⁰
 - (e) Francois was listed less frequently, and received a lower average rating of 3.8.²⁶¹

²⁴⁸ Third party response to the CMA questionnaire dated 8 August 2025.

²⁴⁹ We note that two customers indicated they did not have sufficient information to respond to this question. Third party response to the CMA RFI dated 3 September 2025.

²⁵⁰ Third party responses to the CMA questionnaire.

²⁵¹ Third party responses to the CMA questionnaire.

²⁵² Third party responses to the CMA questionnaire.

²⁵³ Third party responses to the CMA questionnaire. [X].

²⁵⁴ Third party responses to the CMA questionnaire. [X].

²⁵⁵ Third party responses to the CMA questionnaire. [X].

²⁵⁶ Third party responses to the CMA questionnaire. [X].

²⁵⁷ Third party responses to the CMA questionnaire.

²⁵⁸ Third party responses to the CMA questionnaire.

²⁵⁹ Third party responses to the CMA questionnaire.

²⁶⁰ Third party responses to the CMA questionnaire.

²⁶¹ Third party responses to the CMA questionnaire.

- (f) Trinity,²⁶² Conntrak,²⁶³ and Foss,²⁶⁴ were also listed less frequently, and received lower average ratings with respect to suitability of 3.3, 3.0 and 2.5 respectively.

Strengths and weaknesses of suppliers

Aramark

- **Strengths:** Several customers mentioned Aramark as a proven incumbent, or had positive performance.²⁶⁵ Other customers mentioned track record or level of experience.²⁶⁶ One customer noted the provision of services onshore and offshore, as well as good menu options, feedback processes and operational efficiencies.²⁶⁷ Another customer mentioned it had previously passed its technical evaluation.²⁶⁸
- **Weaknesses:** A small minority of customers mentioned weaknesses. Two customers mentioned not having experience with Aramark, or them not having familiarity with its assets.²⁶⁹ One customer mentioned delay on implementing innovations and lack of initial investment as a weakness.²⁷⁰

Entier

- **Strengths:** Several customers mentioned experience or track record.²⁷¹ Two customers mentioned Entier being the incumbent.²⁷² Some customers mentioned a good standard of service,²⁷³ and two customers mentioned food quality.²⁷⁴ Two customers mentioned pricing,²⁷⁵ and another customer mentioned that Entier is a member of COTA.²⁷⁶
- **Weaknesses:** Two customers mentioned pricing as a weakness.²⁷⁷

²⁶² Third party responses to questions 11 and 12 of the CMA questionnaire.

²⁶³ Third party responses to questions 11 and 12 of the CMA questionnaire.

²⁶⁴ Third party responses to questions 11 and 12 of the CMA questionnaire.

²⁶⁵ Third party responses to questions 11 and 12 of the CMA questionnaire.

²⁶⁶ Third party responses to questions 11 and 12 of the CMA questionnaire.

²⁶⁷ Third party response to the CMA questionnaire dated 8 August 2025.

²⁶⁸ Third party response to the CMA questionnaire dated 8 August 2025.

²⁶⁹ Third party responses to question 11 of the CMA questionnaire.

²⁷⁰ Third party response to the CMA questionnaire dated 8 August 2025.

²⁷¹ Third party responses to question 11 of the CMA questionnaire.

²⁷² Third party responses to question 11 of the CMA questionnaire.

²⁷³ Third party responses to questions 11 and 12 of the CMA questionnaire.

²⁷⁴ Third party response to the CMA questionnaire dated 8 August 2025; and Third party responses to the CMA questionnaire dated 12 August 2025.

²⁷⁵ Third party responses to question 11 of the CMA questionnaire.

²⁷⁶ Third party response to the CMA questionnaire dated 8 August 2025.

²⁷⁷ Third party responses to the CMA questionnaire.

Sodexo

- **Strengths:** Several customers mentioned Sodexo's experience in supplying OCS.²⁷⁸ Some customers mentioned Sodexo experience with Sodexo in the past.²⁷⁹ Two customers mentioned Sodexo being a local supplier, or having a local setup as a strength,²⁸⁰ and one customer highlighted a strength of Sodexo as having a global presence.²⁸¹ One customer mentioned that the supplier is a member of COTA,²⁸² and another customer mentioned that Sodexo can service onshore and offshore.²⁸³
- **Weaknesses:** Several customers mentioned pricing,²⁸⁴ and one mentioned lack of new savings opportunities or ideas.²⁸⁵ One customer mentioned quality of service,²⁸⁶ and another customer mentioned lack of familiarisation with the customer's assets.²⁸⁷

ESS

- **Strengths:** Some customers mentioned that ESS is a known or experienced supplier.²⁸⁸ Two customers mentioned pricing as a strength.²⁸⁹ Two other customers mentioned that the supplier is local/has a local setup.²⁹⁰ Further one customer noted that this supplier has previously passed their technical evaluation,²⁹¹ and another customer noted awareness of the customers' systems and processes.²⁹² One customer noted that the supplier is a member of COTA as a strength,²⁹³ and another customer mentioned the ability of the supplier to service onshore and offshore.²⁹⁴
- **Weaknesses:** Two customers noted lack of asset familiarisation or previous experience with ESS.²⁹⁵ One customer identified service²⁹⁶ and another customer identified commercial pricing²⁹⁷ as weaknesses. One customer said that there is a lengthy internal approval process within ESS.²⁹⁸ One customer

²⁷⁸ Third party responses to the CMA questionnaire.

²⁷⁹ Third party responses to the CMA questionnaire.

²⁸⁰ Third party responses to the CMA questionnaire.

²⁸¹ Third party response to the CMA questionnaire dated 12 August 2025.

²⁸² Third party response to the CMA questionnaire dated 8 August 2025.

²⁸³ Third party response to the CMA questionnaire dated 8 August 2025.

²⁸⁴ Third party responses to the CMA questionnaire.

²⁸⁵ Third party response to the CMA questionnaire dated 8 August 2025.

²⁸⁶ Third party response to the CMA questionnaire dated 8 August 2025.

²⁸⁷ Third party response to the CMA questionnaire dated 8 August 2025.

²⁸⁸ Third party responses to the CMA questionnaire.

²⁸⁹ Third party responses to the CMA questionnaire.

²⁹⁰ Third party responses to the CMA questionnaire.

²⁹¹ Third party response to the CMA questionnaire dated 8 August 2025.

²⁹² Third party response to the CMA questionnaire dated 8 August 2025.

²⁹³ Third party response to the CMA questionnaire dated 8 August 2025.

²⁹⁴ Third party response to the CMA questionnaire dated 8 August 2025.

²⁹⁵ Third party responses the CMA questionnaire.

²⁹⁶ Third party response to the CMA questionnaire dated 12 August 2025.

²⁹⁷ Third party response to the CMA questionnaire dated 8 August 2025.

²⁹⁸ Third party response to the CMA questionnaire dated 8 August 2025.

said it could not identify a weakness,²⁹⁹ and another customer said it does not hold any current market data.³⁰⁰

Conntrak

- **Strengths:** One customer said that Conntrak has a strong management team with awareness of the customer's systems and processes, a local set up and currently services its rigs in different geographies.³⁰¹ Another customer said that it is a member of COTA.³⁰²
- **Weaknesses:** One customer said that Conntrak is an unknown entity,³⁰³ and another customer explained that it is entrant in the UK region, though backed by a strong and highly experienced management team.³⁰⁴

Francois

- **Strengths:** One customer noted that Francois can provide services across the UKCS and Non-UKCS areas,³⁰⁵ and another customer noted that Francois is a UK-based supplier with extensive experience in the UK region.³⁰⁶ One of those same customers noted that the menu traffic light system is good and easy to follow and that the supplier has good platforms for contact.³⁰⁷ Another customer noted that the supplier had submitted a complete bid in its previous tender.³⁰⁸
- **Weaknesses:** Two customers mentioned that the supplier was more expensive,³⁰⁹ and one of these customers mentioned lack of experience on their rigs as a weakness.³¹⁰ Another customer outlined that the supplier's proposal lacked detail and that the KPIs proposed were very easy to achieve.³¹¹

Trinity

- **Strengths:** One customer said that the supplier is a member of COTA,³¹² and other customer mentioned it can provide services onshore and

²⁹⁹ Third party response to the CMA questionnaire dated 8 August 2025.

³⁰⁰ Third party response to the CMA questionnaire dated 8 August 2025.

³⁰¹ Third party response to the CMA questionnaire dated 8 August 2025.

³⁰² Third party response to the CMA questionnaire dated 8 August 2025.

³⁰³ Third party response to the CMA questionnaire dated 8 August 2025.

³⁰⁴ Third party response to the CMA questionnaire dated 8 August 2025.

³⁰⁵ Third party response to the CMA questionnaire dated 8 August 2025.

³⁰⁶ Third party response to the CMA questionnaire dated 8 August 2025.

³⁰⁷ Third party response to the CMA questionnaire dated 8 August 2025.

³⁰⁸ Third party response to the CMA questionnaire dated 8 August 2025.

³⁰⁹ Third party responses to the CMA questionnaire.

³¹⁰ Third party response to the CMA questionnaire dated 8 August 2025.

³¹¹ Third party response to the CMA questionnaire dated 8 August 2025.

³¹² Third party response to the CMA questionnaire dated 8 August 2025.

offshore.³¹³ Another customer noted that the supplier had submitted a complete bid in its previous tender.³¹⁴

- **Weaknesses:** One customer said that it is an unknown entity,³¹⁵ and another customer said it is more expensive than other suppliers.³¹⁶

C.66 Additionally, on calls with the CMA some Offshore Infrastructure customers outlined further reflections on the strength of OCS suppliers when competing for their business.

- (a) With respect to commercial considerations, one Offshore Infrastructure customer explained on a call with the CMA that when evaluating bids for its most recent tender, there were a number of third-party services associated with the work scope which Aramark charged a markup/management fee ([§]), whereas Entier's bid included providing these services at cost, without a management fee.³¹⁷ The customer explained that Entier also came up [§].³¹⁸
- (b) One Offshore Infrastructure customer noted that, with respect to competition between Aramark and Entier, on its recent tender, Aramark had performed well, its food was of a lower quality than Entier, and that Aramark was more profit-driven.³¹⁹
- (c) One Offshore Infrastructure customer was not aware of Francois at the time of its previous tender, and it said that Francois would struggle to compete. It was not aware of Francois having secured any offshore business with any other O&G operators, but it said that Francois has been in touch more recently.³²⁰ Another customer said it would be surprised if Francois' bid was commercially competitive because it provided a Norwegian catering standard (which is a very high standard, as it included a lot of fish such as smoked salmon), and it was above the standard the customer would be able to justify internally to senior management.³²¹
- (d) One Offshore Infrastructure customer noted that Sodexo had said that it would not bid for the customer's recent tender, which the customer noted was unfortunate and indicated this was quite a big change in the market.³²²

³¹³ Third party response to the CMA questionnaire dated 8 August 2025.

³¹⁴ Third party response to the CMA questionnaire dated 8 August 2025.

³¹⁵ Third party response to the CMA questionnaire dated 8 August 2025.

³¹⁶ Third party response to the CMA questionnaire dated 8 August 2025.

³¹⁷ Third party call note.

³¹⁸ Third party call note.

³¹⁹ Third party call note.

³²⁰ Third party call note.

³²¹ Third party call note.

³²² Third party call note.

- (e) The same Offshore Infrastructure customer noted that if Conntrak was able to provide a good quality, commercially competitive bid, the customer would need to do a lot of work to understand whether Conntrak could provide the standard the customer required (eg the customer would like to speak to Conntrak's other clients for references etc). The customer also indicated it was unsure of Conntrak's footprint in the UKCS, which would also be something the customer would need to look at in detail.³²³
- (f) The same Offshore Infrastructure customer said that it did not think Trinity did this type of work any longer and no longer had a presence in OCS in the UKCS.³²⁴

Marine customers

- C.67 We asked Marine customers to provide the names of all OCS suppliers that they would likely invite to bid in their next procurement exercise and rate how suitable they think these suppliers would be in providing them with OCS in the UKCS (where 1 is not very suitable and 5 is very suitable).
- C.68 Marine customers generally said that they would be likely to invite a larger range of suppliers (than Offshore Infrastructure customers) to bid in their next procurement exercise.
 - (a) One Marine customer said that it would invite Aramark, ESS, Entier, Sodexo, Conntrak, Foss and Northern Marine, and rated these all 3/5, with Entier (its incumbent supplier) as very suitable (5/5).³²⁵
 - (b) One Marine customer said that it would invite Aramark, ESS, Sodexo and Foss, and rated these very suitable (5/5).³²⁶
 - (c) One Marine customer said that it would invite Aramark, ESS, Francois and Ligabue, and rated Aramark and Ligabue, its current suppliers as very suitable (5/5), and ESS and Francois suitable (4/5).³²⁷
 - (d) One Marine customer said that it would invite Aramark, ESS, Entier, Francois, Sodexo, Conntrak, Ligabue, Trinity, Pellegrini, Oceanic Catering, Seatec, Wrist and Self-Supply. It said it could not determine the suitability of these suppliers until a tender exercise.³²⁸

³²³ Third party call note.

³²⁴ Third party call note.

³²⁵ Third party response to the CMA questionnaire.

³²⁶ Third party response to the CMA questionnaire dated 12 August 2025.

³²⁷ Third party response to the CMA questionnaire dated 9 September 2025.

³²⁸ Third party response to the CMA questionnaire dated 12 August 2025.

- (e) One Marine customer submitted that it would not be surprised if Conntrak, Aramark, Francois and others were invited to tender.³²⁹
- (f) One Marine customer said that it has invited Entier, Francois, Conntrak, and OSM Thome, and rated each of these suppliers as very suitable (5/5).³³⁰

C.69 We also asked customers to provide strengths and weaknesses of the suppliers which they would invite to bid. A limited number of Marine customers provided strengths and weaknesses of suppliers they were likely to invite.

- (a) **Aramark:** For strengths, one customer said that the supplier was pure UK-based,³³¹ another noted that it is a current provider.³³² For weaknesses, one customer noted that when it is non-UKCS it that the supplier is expensive,³³³ and another listed that the supplier had no weaknesses.³³⁴
- (b) **Entier:** For strengths, one customer said that it currently meets its needs,³³⁵ and another noted that current incumbent onboard with positive feedback on service and accurate forecasting of annual catering budget for each vessel.³³⁶ Customers which we asked did not provide any weaknesses for Entier.
- (c) **ESS:** One customer said that a strength of the supplier was that it is pure UKCS-based and a weakness is that it is more expensive in the Netherlands.³³⁷ Another customer said the supplier was known as a strength but explained it had not used it recently, or at all in the UKCS.³³⁸
- (d) **Foss:** One customer said strengths of the supplier are that it is non-UKCS based and the food quality and a weakness of the supplier is price.³³⁹
- (e) **Sodexo:** One customer said strengths of the supplier are that it is UKCS-based, and the food quality and a weakness of the supplier is when it is non-UKCS based.³⁴⁰

³²⁹ Third party call note.

³³⁰ Third party response to the CMA questionnaire dated 8 August 2025, Third party response to the CMA RFI.

³³¹ Third party response to the CMA questionnaire dated 12 August 2025.

³³² Third party response to the CMA questionnaire dated 9 September 2025.

³³³ Third party response to the CMA questionnaire dated 12 August 2025.

³³⁴ Third party response to the CMA questionnaire dated 9 September 2025.

³³⁵ Third party response to the CMA questionnaire.

³³⁶ While this customer listed Aramark/Entier with respect to this strength, we have attributed this to Entier rather than the Parties combined as Entier is the customer's existing supplier. Third party response to the CMA questionnaire dated 12 August 2025.

³³⁷ Third party response to the CMA questionnaire dated 12 August 2025.

³³⁸ Third party response to the CMA questionnaire dated 9 September 2025.

³³⁹ Third party response to the CMA questionnaire dated 12 August 2025.

³⁴⁰ Third party response to the CMA questionnaire dated 12 August 2025.

- (f) **Francois:** One customer said the supplier was known as a strength but explained it had not used the supplier at all or specifically in the UKCS.³⁴¹
- (g) **Ligabue:** One customer noted that it is a current provider with positive feedback and listed that the supplier had no weaknesses.³⁴²

C.70 Additionally, on calls with the CMA, some Marine customers outlined further reflections on the strength of OCS suppliers when competing for their business.

- (a) One Marine customer, which currently self-supplies, outlined that it was considering Entier, Francois, IFS, and Wrist Group as suppliers for OCS if it decided to outsource this.³⁴³ The customer confirmed that it has not been approached by Aramark, nor has it considered Aramark as the customer said Aramark was less visible than the other suppliers mentioned, and the customer was unsure if Aramark has a presence in Aberdeen.³⁴⁴
- (b) One global Marine customer noted that it had looked in detail for its most recent tender at Entier and Conntrak. It noted that Francois is a smaller player which does not currently service as many Marine Assets, but said Francois looked like it could do the job well.³⁴⁵
- (c) In its previous tender, one Marine customer said that it was looking for suppliers who had the ability to provide a global service, should the Marine Asset have to relocate to another region, and also suppliers who have the capacity to support a multi-vessel approach. Based on these factors, the customer narrowed it down to Francois and Entier, and then benchmarked them against the customer's own internal self-supply model from a cost-perspective.³⁴⁶
- (d) One Marine customer noted that Aramark scored strongly for track record, scalability and ability to deliver straight away in its previous tender exercise. The customer noted that on the renewables side of its business, the OCS supplier was required to provide personnel and noted that Aramark was very familiar with providing offshore crew, managing certification etc. The customer explained that Aramark also offered fixed costs for a period, which was helpful for the customer's budgeting and forecasting. The customer did not know if Aramark was able to offer these fixed costs because it had secured fixed prices from its suppliers, or if Aramark itself held the risk of prices moving.³⁴⁷

³⁴¹ Third party response to the CMA questionnaire dated 9 September 2025.

³⁴² Third party response to the CMA questionnaire dated 9 September 2025.

³⁴³ Third party call note.

³⁴⁴ Third party call note.

³⁴⁵ Third party call note.

³⁴⁶ Third party call note.

³⁴⁷ Third party call note.

- (e) One Marine customer explained that the size of an OCS supplier would not particularly influence its decision making and it believes that it would have been able to procure the fast-paced service offered by its OCS supplier from larger suppliers too.³⁴⁸

Competitors' views

- C.71 As set out above, we gathered evidence from competitors in Offshore Infrastructure and Marine through questionnaires and held calls with a range of competitors. In this section we summarise:
- (a) views from questionnaires and calls on competitors views on who they compete with, and how strongly they compete with these competitors in the supply of OCS in the UKCS across both Marine and Offshore Infrastructure; and
 - (b) evidence from calls with Offshore Infrastructure and Marine competitors to assess whether, if at all, their views differ with respect to only Marine.

Offshore Infrastructure

- C.72 The evidence in this section sets out who OCS suppliers view as their main competitors in the supply of OCS generally (rather than in the Offshore Infrastructure Market specifically). We outline the rationale for this in Chapter 6. Evidence which specifically relates to competition in the Marine Market is set out separately below.
- C.73 We asked competitors whether they consider that the Parties compete closely with each other in the supply of offshore catering in the UKCS. Almost all competitors³⁴⁹ and a third-party service provider in the industry,³⁵⁰ which responded to this question stated that the Parties compete closely with each other in the supply of OCS in the UKCS. For example, one competitor said that the Parties are two of the three dominant suppliers of OCS in the UKCS.³⁵¹
- C.74 We asked suppliers of OCS for Offshore Infrastructure Assets and for Marine Assets to list their competitors, and rate them on a scale of 1 to 5, with one being a very weak competitor and 5 being a very strong competitor.
- C.75 The responses show that the strongest competitors in the UKCS are Aramark, Entier and ESS. All competitors identified both Aramark and Entier,³⁵² with almost all competitors considering Aramark and Entier to be very strong or strong

³⁴⁸ Third party call note.

³⁴⁹ Third party responses to the CMA questionnaire dated May 2025.

³⁵⁰ Third party response to the CMA questionnaire dated May 2025.

³⁵¹ Third party response to the CMA questionnaire dated 27 May 2025.

³⁵² Third party responses to the CMA questionnaire dated 27 May 2025.

competitors.³⁵³ ESS was identified by all competitors asked,³⁵⁴ and was considered by all competitors asked to be a very strong competitor.³⁵⁵

- C.76 One competitor additionally noted on a call with the CMA that Aramark is one of the largest suppliers in the UKCS by market share alongside ESS UK, followed by Entier and Sodexo.³⁵⁶ It said that the smaller suppliers pick up business on an ad hoc basis.³⁵⁷
- C.77 Sodexo was also identified as an OCS competitor by all competitors asked.³⁵⁸ Competitors had mixed views over the strength of the constraint Sodexo imposes (depending on how much weight they placed on Sodexo's well established global set up compared to its more recent weakening position in the UKCS), with half of respondents considering Sodexo to be a weak or very weak competitor,³⁵⁹ while others considered it strong or very strong.³⁶⁰ Another competitor explained on a call with the CMA that it does not consider Sodexo as strong a competitor as others, as it believed Sodexo only has one client in the North Sea now.³⁶¹
- C.78 Conntrak was identified by half of the competitors asked; and all of these competitors rated Conntrak as 3/5 in terms of how strong they viewed Conntrak as a competitor.³⁶²
- (a) One competitor said on a call with the CMA that Conntrak is roughly the same size as the competitor, but it considered Conntrak to not be present in the North Sea and was more in Dubai.³⁶³
- (b) One competitor identified Conntrak as a recent entrant in the market.³⁶⁴
- C.79 Over half of competitors identified Foss,³⁶⁵ Francois,³⁶⁶ and Trinity³⁶⁷ as OCS competitors.³⁶⁸ All of the competitors who identified Foss,³⁶⁹ Francois,³⁷⁰ and Trinity,³⁷¹ considered them to be a weak or very weak competitor. On a call with the CMA, one competitor outlined that Foss is present in the UKCS but has not won any contracts and has approximately one or two units in the Southern North

³⁵³ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁵⁴ Response to the CMA's questionnaire from a number of third parties.

³⁵⁵ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁵⁶ Third party call note.

³⁵⁷ Third party call note.

³⁵⁸ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁵⁹ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁶⁰ Third party responses to the CMA questionnaire.

³⁶¹ Third party call note.

³⁶² Third party responses to the CMA questionnaire dated 27 May 2025.

³⁶³ Third party call note.

³⁶⁴ Third party call note.

³⁶⁵ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁶⁶ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁶⁷ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁶⁸ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁶⁹ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁷⁰ Third party responses to the CMA's questionnaire dated 27 May 2025.

³⁷¹ Third party responses to the CMA questionnaire dated 27 May 2025.

Sea.³⁷² One competitor outlined that Francois is still trying to break into the UKCS market and is strong in other regions.³⁷³

- C.80 Ligabue,³⁷⁴ and Pelligrini,³⁷⁵ were the only other OCS competitors identified. Both were identified as very weak competitors by one competitor. This competitor remarked that these OCS competitors are present in other geographies with Ligabue being a large competitor in the Middle East and Pelligrini being a large competitor in Africa and the Middle East, but both are looking at the North Sea.³⁷⁶

Marine

- C.81 Competitors which we spoke to generally outlined that while some competitors compete for both Marine and Offshore Infrastructure customers, that the competitor set is different in Marine. Some competitors also highlighted that different OCS suppliers have different strengths when servicing different customer types. In particular:
- (a) One competitor said that it does not service Marine customers and has no aspirations to move back into this sector.³⁷⁷
 - (b) One third-party service provider in the industry said not all OCS suppliers are capable of serving Marine customers.³⁷⁸ For example, the third-party service provider noted that both [X] and considered that this was because they lacked Marine experience. The third-party service provider considered one of the reasons for the Merger was that Aramark was not good at Marine and does not have a good understanding of the Marine industry.³⁷⁹ The third-party service provider noted that Sodexo is very good at the Marine business but does not have much of it.³⁸⁰ It said that the Marine competitors are: Entier, Foss, Sodexo, Celera, Contrak, IFS, plus various companies that support self-supply.³⁸¹
 - (c) Another competitor said that there are different sets of competitors in the O&G sector and the Marine sector.³⁸² It said that its competitors for Marine customers in the North Sea were all the COTA members as well as some non-COTA members such as Francois, Pellegrini, Ligabue and possibly some small independent OCS suppliers that the competitor was not aware

³⁷² Third party call note.

³⁷³ Third party response to the CMA questionnaire dated 27 May 2025.

³⁷⁴ Third party response to the CMA questionnaire dated 27 May 2025.

³⁷⁵ Third party response to the CMA questionnaire dated 27 May 2025.

³⁷⁶ Third party response to the CMA questionnaire dated 27 May 2025.

³⁷⁷ Third party call note.

³⁷⁸ Third party call note.

³⁷⁹ Third party call note.

³⁸⁰ Third party call note.

³⁸¹ Third party call note.

³⁸² Third party call note.

of.³⁸³ It said that Entier caters to customers across O&G and Marine, alongside onshore opportunities, and that Aramark was mainly O&G focused, but did have contracts in the Marine Market.³⁸⁴ The same competitor noted that it appeared that more small and independent companies were willing to bid for opportunities in the renewables market, as it was easier for them to adhere to client requirements and move location compared to larger organisations.³⁸⁵

- (d) One competitor indicated that its top three competitors for Marine customers in the North Sea, were IFS, Entier and Aramark. The competitor also mentioned newer competitors included Foss and Conntrak, the latter of which was previously Middle East-based but was now trying to enter the North Sea and had opened an office in the Netherlands, due to the wind park business.³⁸⁶
- (e) One competitor outlined Conntrak as an additional Marine competitor relative to the competitor's response where customers type was not specified, stating that its key competitors in Marine are Aramark, Entier, Conntrak, Sodexo and ESS.³⁸⁷

C.82 However, one competitor outlined that the key players providing OCS to Marine and Offshore Infrastructure customers were the same.³⁸⁸

C.83 We additionally asked [X] and [X] whether they considered they competed with Aramark or Entier in the supply of OCS in the UKCS or the North Sea (excluding the UKCS).

- (a) [X] considered that it competed with the Parties in the UKCS and the North Sea.³⁸⁹
- (b) [X] said that it did not consider it competed with the Parties in these geographies as it did not do business in the UKCS or the North Sea.³⁹⁰

C.84 We also asked [X] and [X] whom they considered to be their competitors in the UKCS (and the North Sea excluding the UKCS) in the supply of OCS and to indicate the strength of these competitors in these geographies.

- (a) [X] said for both the UKCS and the North Sea (excluding the UKCS) that it considered Aramark, Entier, and ESS as very strong competitors, explaining

³⁸³ Third party call note.

³⁸⁴ Third party call note.

³⁸⁵ Third party call note.

³⁸⁶ Third party call note.

³⁸⁷ Third party call note. Third party response to the CMA questionnaire dated 27 May 2025.

³⁸⁸ Third party call note.

³⁸⁹ Third party response to the CMA questionnaire dated 16 September 2025.

³⁹⁰ It explained its locations of operation are Angola, Cameroon, Congo, Egypt, Mozambique, Nigeria, Italy and United Arab Emirates. Third party response to the CMA questionnaire dated 3 October 2025.

that all three of these suppliers have good established relationships in the UKCS/North Sea. It considered IFS, Conntrak and self-catering as strong competitors, noting that IFS was very strong at training, Conntrak was looking to get into the UKCS, and it noted that a lot of Marine customers self-cater. It listed Francois as a good competitor but outlined Francois only really has one customer (Stena).³⁹¹

- (b) [REDACTED] explained that while it does not compete in the UKCS or the North Sea, it considered its competitors, based on general knowledge and perception of the market, would be Aramark, Entier and Francois, assessing these competitors as strong.³⁹²

Self-supply

Customer evidence

- C.85 We asked Offshore Infrastructure customers and Marine customers if the price offered by all OCS suppliers in the UKCS rose by 5% in a non-negotiable way or the quality of services degraded, whether they would consider taking their OCS in house.³⁹³
- C.86 **Offshore Infrastructure customers:** All of the Offshore Infrastructure customers that responded to the CMA's questionnaires with assets in the UKCS, stated that they would not self-supply in response to a 5% price increase or a degraded service quality.³⁹⁴ Specifically, half of customers indicated that OCS was not the company's core business and therefore they would not be able to provide these services in-house.³⁹⁵ Two customers³⁹⁶ indicated that the supply of OCS was a specialised area and that they did not have the subject matter expertise in-house, and another customer said they required the expertise of OCS suppliers.³⁹⁷
- C.87 **Marine customers:** Over half of the Marine customers which responded to this question said that they would not consider taking this in house.³⁹⁸ Customers explained that the reasons for this were that they were not typically set up in-

³⁹¹ Third party response to the CMA questionnaire dated 16 September 2025.

³⁹² Third party response to the CMA questionnaire dated 3 October 2025.

³⁹³ The CMA's current view is that the Parties would be constrained by self-supply only if their current customers or other customers that currently outsource catering services would consider moving these services in-house. The CMA therefore considers the views of these customers most relevant, as opposed to views of Marine vessel operators which do not procure catering services.

³⁹⁴ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁹⁵ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁹⁶ Third party responses to the CMA questionnaire dated 27 May 2025.

³⁹⁷ Third party response to the CMA questionnaire dated 27 May 2025.

³⁹⁸ Third party responses to the CMA questionnaire; Third party responses to the CMA questionnaire dated 27 May 2025; and Third party call note.

house for this,³⁹⁹ that the supply of food was not their business,⁴⁰⁰ and company policy.⁴⁰¹ Less than half of the Marine customers which responded to this question said they would consider taking this in-house.⁴⁰² One of these customers said that it would consider this if there was cost-benefit to self-supply.⁴⁰³ One customer explained that even at current pricing levels, this was an exercise it did for all its outsourced services.⁴⁰⁴

- C.88 One Marine customer who self-supplies some Marine Assets but outsources its OCS in the North Sea said that how Marine Assets move geographically influenced its approach to OCS. It said for some Marine Assets which are very global and go to locations with local crew requirements, it found it easier to work with the crew and the agencies which have a separated service.⁴⁰⁵
- C.89 We also asked Marine customers on calls about the relative benefits of outsourcing versus self-supplying OCS.
- C.90 One Marine customer, which currently self-supplies using IFS and Anglo Eastern as suppliers of catering and crew respectively, explained that the decision came down to cost implications and the ability to effectively manage manning levels. It noted that while in-house management allowed for full control over quality, crew selection and budget monitoring, transferring responsibility for stock and crew management to the supplier could potentially reduce pressure on the customer's crewing team and remove complications arising with new legislations in the North Sea.⁴⁰⁶
- C.91 One Marine customer said that there were two key trade-offs when deciding between self-supplying and outsourcing:
- (a) Cost: What is most cost-effective for the customer based on what the Marine Asset's location and likely programme (ie where it is moving to around the world); and
 - (b) Service quality and delivery (ie what the delivery is like and whether the crew like the food).⁴⁰⁷
- C.92 The same customer further said that one advantage to outsourcing is having a third-party company specialised in OCS managing that full service, as it allowed offshore teams to focus more on the vessel maintenance and vessel operations.

³⁹⁹ Third party response to the CMA questionnaire; and Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁰⁰ Third party call note; and Third party response to the CMA questionnaire dated 29 August 2025.

⁴⁰¹ Third party response to the CMA questionnaire dated 9 September 2025.

⁴⁰² Third party responses to the CMA questionnaire.

⁴⁰³ Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁰⁴ Third party response to the CMA questionnaire dated 3 September 2025.

⁴⁰⁵ Third party call note.

⁴⁰⁶ Third party call note.

⁴⁰⁷ Third party call note.

The customer had previously flip-flopped between outsourcing and self-supplying, and said ultimately, it depended on whatever suits the customer at the time.⁴⁰⁸

- C.93 When asked whether the customer found the self-supply model (eg using manpower agencies and the customer procuring consumables directly) achieves a similar level of quality and service when compared to using a full-service supplier such as Entier, the customer said it did not have any complaints, which it will receive if the food is bad.⁴⁰⁹
- C.94 When asked about the scale of additional work (ie in terms of people, effort or financial costs) required to self-supply from a procurement perspective, the customer said it would fall in with the rest of the procurement it does for the Marine Asset. The customer said its procurement team had 25 employees and also procured other items for the customers business.⁴¹⁰ Ultimately, the customer does not consider self-supply to be a significant strain, but considered outsourcing will benefit the crewing department, and that it would be a big time save for the customer in terms of managing this. For instance, outsourcing would help with respect to certifications required to go offshore and with the physical logistics of getting the crew from their home location to the Marine Asset.⁴¹¹

Competitor evidence

- C.95 Competitors which we asked generally considered that it was unlikely for Offshore Infrastructure customers to self-supply.⁴¹² For example:
- (a) One competitor outlined that O&G operators do not self-supply due to the complexities of catering, such as compliance with legislation, food safety systems and third-party accreditation, which detracts from the customer's core businesses. It said that as customers get larger, particularly in the O&G market, the customer tend to outsource.⁴¹³
 - (b) One competitor (which does not supply Marine customers) said that within the UKCS specifically, OCS are still mostly outsourced,⁴¹⁴ but that MODUs would probably have the easiest opportunity to self-deliver.⁴¹⁵

⁴⁰⁸ Third party call note.

⁴⁰⁹ Third party call note.

⁴¹⁰ Third party call note.

⁴¹¹ Third party call note.

⁴¹² Third party call note; Third party call note; and Third party call note.

⁴¹³ Third party call note.

⁴¹⁴ Third party call note.

⁴¹⁵ Third party call note.

- C.96 With respect to Marine customers, while two competitors acknowledged that some Marine operators self-supply,⁴¹⁶ other competitors generally considered that customers may still choose to outsource their OCS. For example:
- (a) One competitor outlined that, within the Marine and renewables market, there is a larger portion of customers who cater in-house,⁴¹⁷ but customers who self-supply are usually those with smaller people on board (POB).⁴¹⁸
 - (b) One third-party service provider in the industry said that there is growing complexity within the industry (food safety laws, employment laws, food supply) which meant there was likely more of an opportunity to convince customers to outsource their catering to reduce their risk/simplify their operations.⁴¹⁹
 - (a) One competitor noted that there were a few clients that self-deliver, but that the majority of Marine customers outsource OCS because it can be more financially viable for them to outsource it.⁴²⁰
 - (b) In relation to the extent to which self-supply is possible for Marine customers and whether customers that have previously outsourced their OCS can switch to this model, one competitor noted there was not a simple answer to this, as it depended on the location and duration of the operation, since the service would have to comply with either local or international maritime law.⁴²¹
- C.97 Two competitors explained that once a Marine customer chooses to outsource, the customer would typically not switch back to self-supply.⁴²²
- (a) One competitor said that once a Marine customer outsources, it rarely moves back to insourcing. For larger Marine customers with a larger number of POB or those carrying client passengers, they need some form of food safety credibility such as proper food safety systems, proper process and ideally external accreditation. The competitor said it was very difficult for Marine companies to get those systems in place themselves.⁴²³
 - (b) Another competitor said that self-supply was an option for some customers, however, most customers switch from self-supply to outsourced catering services as opposed to the other way round.⁴²⁴

⁴¹⁶ Third party call notes.

⁴¹⁷ Third party call note.

⁴¹⁸ Third party call note.

⁴¹⁹ Third party call note.

⁴²⁰ Third party call note.

⁴²¹ Third party call note.

⁴²² Third party call note; and Third party call note.

⁴²³ Third party call note.

⁴²⁴ Third party call note.

- C.98 One competitor and one third-party service provider in the industry noted that as Marine customers have an increasing number of Marine Assets, it can start to stretch them with respect to their capacity to self-supply.⁴²⁵
- C.99 Further, one competitor said that some Marine customers who attempted to self-supply eventually switched back to external OCS because OCS is not easy due to challenges associated with self-supply including vessel movements and labour.⁴²⁶
- C.100 Some competitors outlined which factors made it is more likely for particular Marine customers to outsource. For example:
- (a) One third-party service provider in the industry outlined that Marine companies were more likely to self-cater if their Marine Assets operated within a narrow geography and were more likely to outsource if their Marine Assets go all over the world (ie it is much more complex to switch crews etc),⁴²⁷ however another competitor outlined that, in its view, the decision between insourcing and outsourcing does not depend on the geographic movements of the Marine Assets.⁴²⁸
 - (b) One competitor said that the decision to outsource depended on the customer and where the customer was financially. The competitor explained that customers with high fleet utilisation may outsource more services to drive efficiency and save time.⁴²⁹
- C.101 One competitor noted that it offered a full catering solution for a man day rate (ie a price per person), but that it would consider changing its business model to gain market share, or adopt different models for different Marine Assets within the same customer. For example, the competitor explained that it would consider offering a food-only solution (more akin to IFS) if it allowed the competitor to win the larger Marine Assets. The same competitor noted it was interested in contracts with volume, and considered Marine Assets smaller than 20 POB to be non-core.⁴³⁰
- C.102 In addition, we asked customers and competitors about IFS and OSERV as potential suppliers of OCS:
- C.103 Two Marine customers said that they were aware of IFS as a potential offshore catering supplier.
- C.104 One Marine customer noted that IFS did not provide a complete response to an RFI and, as a relatively smaller scale company, had higher costs and

⁴²⁵ Third party call notes.

⁴²⁶ Third party call note.

⁴²⁷ Third party call note.

⁴²⁸ Third party call note.

⁴²⁹ Third party call note.

⁴³⁰ Third party call note.

was not as able to fix rates with its suppliers, so its pricing would fluctuate with inflation etc. The customer also explained that IFS had some additional admin costs and overheads.⁴³¹ One global Marine customer] noted that OSM Thome,⁴³² was a large company and although it had a separate branch for labour, the customer understood from OSM Thome's presentations that it could provide the same services as Entier or Conntrak. However, the customer considered OSM Thome had not put much effort into the tender presentations and did not seem bothered about winning its business.⁴³³

- C.105 When one customer was asked whether the customer saw OSM Thome and its subsidiaries as providing comprehensive OCS or as an agent, the customer stated that it saw OSM Thome as an agent in that context, but the customer is unable to respond specifically with respect to OSERV.⁴³⁴
- C.106 One competitor was asked by the CMA if it considered OSERV as a competitor in the North Sea, and the competitor explained that it believed that OSERV's model was more about supplying offshore foreign workers and the competitor did not consider OSERV to be a competitor in the UKCS market unless OSERV goes through a complete change of an operation model. The competitor believed that OSERV had a large contingent Filipino crew, and it provided Marine crew to Marine Assets which probably made up about 90 to 95% of OSERV's revenue, while catering was just an add on to OSERV's services.⁴³⁵

Switching offshore catering supplier

Customer evidence

- C.107 We asked customers to describe the transition process when a new offshore catering supplier takes over a contract from another offshore catering supplier, as well as the practical changes they experienced when changing offshore catering suppliers.⁴³⁶ The key points on the customer transition process are summarised below:

- (a) **Staff transition process:** Some Offshore Infrastructure customers outlined that staff generally TUPE,⁴³⁷ with one customer explaining that TUPE

⁴³¹ Third party call note.

⁴³² OSERV is under OSM Thome's catering and budget management division.

⁴³³ Third party call note.

⁴³⁴ Third party call note.

⁴³⁵ Third party call note.

⁴³⁶ We asked customers in their response to refer to, but not only to: (i) service quality; (ii) menus and times during which food is served; (iii) complaints and feedback procedures; (iv) which staff (among those you interact with) change, including the head chef; and (v) how long the transition period takes (ie from a new supplier winning a contract to that new supplier serving your employees).

⁴³⁷ Third party responses to the CMA questionnaire.

mitigates risk with the retention of key personnel.⁴³⁸ One Marine customer outlined that it expected staff to TUPE,⁴³⁹ while another customer outlined a more detailed plan for workforce transition, which included checking employment regulations and consulting with affected employees.⁴⁴⁰

- (b) **Service quality:** One Offshore Infrastructure customer outlined that typically, service quality has increased when changing supplier,⁴⁴¹ however two customers explained that service quality can dip initially but tended to stabilise over time.⁴⁴²
- (c) **Length of transition period:** Offshore Infrastructure customers outlined varied transition timeframes ranging from 30 days⁴⁴³ to six months.⁴⁴⁴ Some customers, customers who provided a timeframe suggested approximately three months as either an upper or lower bound for the transition period,⁴⁴⁵ while others suggested longer or shorter timeframes.⁴⁴⁶ Marine customers generally outlined shorter transition timeframes compared to Offshore Infrastructure customers. Transition times included as part of customer responses ranged from 4 days⁴⁴⁷ to 3 months.⁴⁴⁸
- (d) **Management of transition:** Two Offshore Infrastructure customers outlined that the transition was managed by the incoming contractor,⁴⁴⁹ with another customer explaining that this was agreed as part of the tender process.⁴⁵⁰ Similarly to Offshore Infrastructure customers, two Marine customers noted that the transition plan was included as part of the tender process.⁴⁵¹
- (e) Some Offshore Infrastructure customers noted they have not switched OCS suppliers at all, or in a long time, or had personal experience of this.⁴⁵² Two Marine customers also outlined that they have not experienced a transition of OCS supplier.⁴⁵³

C.108 We asked customers whether they considered there were any barriers in switching their offshore catering supplier, and if yes, to explain what these barriers are including by reference to the financial costs or practical risks involved.

⁴³⁸ Third party response to the CMA questionnaire dated 8 August 2025.

⁴³⁹ Third party response to the CMA questionnaire dated 8 August 2025.

⁴⁴⁰ Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁴¹ Third party response to the CMA questionnaire dated 8 August 2025.

⁴⁴² Third party responses to the CMA questionnaire.

⁴⁴³ Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁴⁴ Third party response to the CMA questionnaire dated 22 August 2025.

⁴⁴⁵ Third party responses to the CMA questionnaire.

⁴⁴⁶ Third party responses to the CMA questionnaire dated 12 August 2025.

⁴⁴⁷ Third party response to the CMA questionnaire dated 3 September 2025.

⁴⁴⁸ Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁴⁹ Third party responses to the CMA questionnaire.

⁴⁵⁰ Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁵¹ Third party responses to the CMA questionnaire.

⁴⁵² Third party responses to the CMA questionnaire.

⁴⁵³ Third party responses to the CMA questionnaire.

- C.109 Over half of Offshore Infrastructure customers⁴⁵⁴ and over half of Marine customers⁴⁵⁵ who responded to the question considered that there were not any material barriers to switching OCS supplier.
- C.110 Less than half of Offshore Infrastructure customers⁴⁵⁶ and two Marine customers⁴⁵⁷ who responded to the question considered that there were barriers to switching offshore catering supplier.
- C.111 Some Offshore Infrastructure customers explained their response. Barriers to switching mentioned by Offshore Infrastructure customers included financial implications⁴⁵⁸ the ownership and movement of food between suppliers,⁴⁵⁹ quality/disruption of service,⁴⁶⁰ loss of key personnel,⁴⁶¹ the transition period,⁴⁶² and practical replacement of equipment.⁴⁶³ One customer mentioned a barrier to switching may be the perception of offshore workforce to the change (as switching offshore catering supplier may be viewed as a cost-saving measure by offshore personnel).⁴⁶⁴
- C.112 One Marine customer said that the barriers to switching may be potential issues with operational continuity and end client satisfaction,⁴⁶⁵ and another customer said that while there were barriers, these were limited.⁴⁶⁶

Competitor evidence

- C.113 When a supplier loses a contract, all the crew on board that vessel or asset or platform will transfer via TUPE and as part of COTA. If one tenderer ends up winning it away from the incumbent, the crew will stay in place if they are both members of the union.⁴⁶⁷

Decommissioning

Customer evidence

- C.114 We asked customers whether they expected to decommission any of their assets in the UKCS or non-UKCS parts of the North Sea in the next two years.

⁴⁵⁴ Third party responses to the CMA questionnaire.

⁴⁵⁵ Third party responses to the CMA questionnaire.

⁴⁵⁶ Third party responses to the CMA questionnaire.

⁴⁵⁷ Third party responses to the CMA questionnaire.

⁴⁵⁸ Third party responses to the CMA questionnaire.

⁴⁵⁹ Third party response to the CMA questionnaire dated 22 August 2025.

⁴⁶⁰ Third party responses to the CMA questionnaire.

⁴⁶¹ Third party responses to the CMA questionnaire.

⁴⁶² Third party response to the CMA questionnaire dated 22 August 2025.

⁴⁶³ Third party response to the CMA questionnaire dated 8 August 2025.

⁴⁶⁴ Third party response to the CMA questionnaire dated 8 August 2025.

⁴⁶⁵ Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁶⁶ Third party response to the CMA questionnaire dated 29 August 2025.

⁴⁶⁷ Third party call note.

- C.115 Over half of the Offshore Infrastructure customers with assets in the UKCS who responded to the question did not expect to decommission assets in the UKCS or the North Sea.⁴⁶⁸
- C.116 Under half of Offshore Infrastructure customers with assets in the UKCS who responded to the question did expect to decommission assets in the UKCS or North Sea in the next two years.⁴⁶⁹ Of these customers, over half who specified in which region they expected to decommission assets expect to decommission assets in the UKCS⁴⁷⁰ and one customer expected to decommission assets in the North Sea.⁴⁷¹
- C.117 No Marine customers expected to decommission assets in the UKCS or North Sea in the next two years.⁴⁷²

Barriers to entry and expansion

- C.118 The CMA asked competitors in Offshore Infrastructure and Marine to explain whether there were any barriers facing entrants and small suppliers of OCS to winning business in the UKCS. Half of competitors and one third-party service provider said that there were barriers facing entrants and small suppliers from winning business in the UKCS.⁴⁷³
- C.119 In terms of the barriers facing new entrants:
- (a) One competitor was of the view that these barriers included cash flow management, proven track record, size of the team in Aberdeen, HSEQ and financial performance in the UKCS.⁴⁷⁴ On a call with the CMA, the same competitor noted that, in the North Sea market, it was more difficult for the competitor to demonstrate its technical capability to a national oil company when it often needed to show to customers three to five years of health and safety records, as well as three to five years of technical delivery to other similar customers,⁴⁷⁵ However, the competitor said that OCS suppliers generally can use safety records from operations in other countries.⁴⁷⁶

⁴⁶⁸ Third party responses to the CMA questionnaire.

⁴⁶⁹ Third party responses to the CMA questionnaire.

⁴⁷⁰ Third party responses to the CMA questionnaire.

⁴⁷¹ Third party response to the CMA questionnaire dated 8 August 2025.

⁴⁷² Third party responses to the CMA questionnaire.

⁴⁷³ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁷⁴ Third party response to the CMA questionnaire dated 27 May 2025.

⁴⁷⁵ Third party call note.

⁴⁷⁶ Third party call note.

- (b) Another competitor said that one of the key barriers for new entrants and small suppliers may be requirements to be a member of COTA,⁴⁷⁷ alongside demonstratable experience of working in the UKCS.⁴⁷⁸
- (c) One third-party service provider in the industry identified labour regulations, associated costs and that O&G customers are more likely to go with established suppliers as barriers for new entrants and smaller suppliers.⁴⁷⁹ It explained that this was why it is looking at the Marine sector as opposed to oil and gas,⁴⁸⁰ as platforms and drilling rigs will not be seen as a credible alternative.⁴⁸¹ The third-party service provider noted that as long as a supplier pays the COTA rates and abides by the COTA regulations and rules, there was no reason the supplier had to be a COTA member to bid for work, win work, or operate work in the UK.⁴⁸²

C.120 One Offshore Infrastructure competitor considered it to be relatively easy to enter the offshore catering market in the UKCS or the North Sea. It gave the example of Conntrak Catering which had strong presence in the Middle East and has now entered in the UKCS offshore market.⁴⁸³ The competitor said that it did not consider its decision not to compete in Marine was due to barriers to entry, but rather it was a business decision given the competitor saw other opportunities being more attractive in terms of where it saw growth coming from and where it thought it will get a better return on investment.⁴⁸⁴

C.121 Additionally, two Offshore Infrastructure customers noted relevant considerations about barriers which may affect suppliers' ability to compete for their business.

- (a) One Offshore Infrastructure customer said it was very unlikely that a new entrant would be able to come in with an attractive offering and unseat an established player. It said a reason for this was because OCS customers are very conservative and aim to de-risk as much as possible with respect to both bidder lists and the nominated contractor – which would include risks associated with new entrants in a particular geographic area.⁴⁸⁵
- (b) Another Offshore Infrastructure customer said the main factor about size of the contract and who competes for the business is liquidity of the supplier (ie for the OCS supplier to be able to provide OCS without significantly impacting the OCS supplier's cashflow). It said that to manage this, the customer had staggered the asset to be serviced by the OCS supplier to

⁴⁷⁷ Third party call note.

⁴⁷⁸ Third party response to the CMA questionnaire dated 27 May 2025.

⁴⁷⁹ Third party response to the CMA questionnaire dated 27 May 2025; and Third party call note.

⁴⁸⁰ Third party call note.

⁴⁸¹ Third party call note.

⁴⁸² Third party call note.

⁴⁸³ Third party call note.

⁴⁸⁴ Third party call note.

⁴⁸⁵ Third party call note.

enable the supplier to manage the process better and gradually increase its cashflow.⁴⁸⁶

Importance of scale

- C.122 In addition to the above, the CMA asked competitors in Offshore Infrastructure and Marine whether scale played any role in providing OCS in the UKCS. Over half of the competitors that responded to this question and one third-party service provider in the industry provided responses which supported that scale was an important factor.⁴⁸⁷
- C.123 Competitors submitted that large OCS suppliers have cost advantages that make their bids more cost-effective. Specifically:
- (a) Two competitors said that scale was or may be important to get good commercial deals from the suppliers of raw materials.⁴⁸⁸ One competitor emphasised that price efficiencies and advantages are driven by volume.⁴⁸⁹
 - (b) One competitor said that scale was needed to create a pool of labour that can be used to cover sickness and absences.⁴⁹⁰ The same competitor told the CMA that scale was needed to ensure that bids were cost-effective. However, in order to achieve this scale, the competitor said it was first important to have multiple contracts over which costs could be spread. This created a distinct circularity problem for competitors who do not already have material business in the UKCS.⁴⁹¹
 - (c) One competitor told the CMA that scale enables suppliers to bring down administrative costs and get better deals from suppliers.⁴⁹² On a call with the CMA, the same competitor said that bigger OCS suppliers are able to obtain better prices with food suppliers because of their international presence. However, the competitor said it is still able to compete on food and does not consider that the price it can purchase at weakens it as an OCS supplier.⁴⁹³
- C.124 However, one Offshore Infrastructure competitor said that scale was not particularly important to compete effectively in the offshore catering market; it was about credibility and capability.⁴⁹⁴
- C.125 With respect to the Marine Market specifically:

⁴⁸⁶ Third party call note.

⁴⁸⁷ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁸⁸ Third party response to the CMA questionnaire dated 27 May 2025; and Third party call note.

⁴⁸⁹ Third party call note.

⁴⁹⁰ Third party response to the CMA questionnaire dated 27 May 2025; and Third party call note.

⁴⁹¹ Third party call note.

⁴⁹² Third party response to the CMA questionnaire dated 27 May 2025.

⁴⁹³ Third party call note.

⁴⁹⁴ Third party call note.

- (a) One competitor said it was very hard to say how many Marine Assets it needs to provide OCS to in order to get discounts and rebates with Strachans, and that the competitor said it gets the same service from Strachans as what other larger suppliers would receive, and the competitor did not think the treatment or pricing was any different to what other suppliers are paying.⁴⁹⁵
- (b) One third-party service provider in the industry noted that it was more efficient for a supplier to spread the required resources over 20 or 30 Marine Assets than over two Marine Assets, because the same resource will be needed in both scenarios.⁴⁹⁶

C.126 We also spoke to a supplier to OCS suppliers who explained that it charges each of its customers (OCS suppliers) the same unit price for a given food item irrespective of the size of the customer but the distribution rate it charges will vary dependent on the customer's scale and strength of their commercial negotiations.⁴⁹⁷ However, the supplier considered that the pricing structure that it would offer a smaller OCS supplier (such as Francois) and the pricing structure that it would offer a larger OCS supplier (such as Aramark or ESS) would not be to a point of differential from its perspective that would now allow the OCS supplier to place a credible bid to win business. The supplier considers that it would be up to those smaller OCS suppliers, to be more agile and more innovative around how they structure their deal to try and win business.⁴⁹⁸

Sponsored Entry

- C.127 All of the customers which we asked said that they did not consider they were in a position to sponsor an OCS supplier and had not come across sponsored entry more widely.⁴⁹⁹ In particular, one Marine customer said that such sponsorship would not be the most economical approach, as the customer's projects are too short term, and it would instead revert back to its internal supply model.⁵⁰⁰ One global Marine customer noted that when Entier had been unable to provide OCS in Brazil, the customer switched to another supplier that could operate there.⁵⁰¹
- C.128 All the competitors which we asked said that they had not received any financial sponsorship to enter a market,⁵⁰² with one competitor outlining it had not witnessed any financially sponsored entry in this industry either.⁵⁰³

⁴⁹⁵ Third party call note.

⁴⁹⁶ Third party call note.

⁴⁹⁷ Third party call transcript.

⁴⁹⁸ Third party call transcript.

⁴⁹⁹ Third party call note; and Third party call note.

⁵⁰⁰ Third party call note.

⁵⁰¹ Third party call note.

⁵⁰² Third party call note.

⁵⁰³ Third party call note.

Views on the Merger

Customers' views

Offshore Infrastructure customers

- C.129 Over half of customers responded with having 'neutral' views on the impact of the Merger on competition.⁵⁰⁴ Among these neutral views, some Offshore Infrastructure customers outlined that there remained existing OCS suppliers who could provide the customer with OCS services,⁵⁰⁵ even though one of these customers recognised that the acquisition reduces competition.⁵⁰⁶
- C.130 A small minority of customers' 'neutral' views were driven by the fact that they have no upcoming procurement processes and therefore do not expect the Merger to impact them in the short to medium term.⁵⁰⁷ One of these customers explained that the Merger would make no difference to their operations,⁵⁰⁸ with another customer explaining that it had no intention to go to market for an alternative supplier.⁵⁰⁹
- C.131 Two customers were not sure about the impact of the Merger on competition.⁵¹⁰ For example, one customer said it hoped the Merger did not impact the very good service it received at the moment,⁵¹¹ and another customer mentioned that it would be difficult to determine the impact the Merger would have on the market at this time.⁵¹²
- C.132 A small minority of customers responded with 'positive' views on the impact of the Merger on competition.⁵¹³
- (a) Of these customers, one explained a benefit of the Merger may be scale, explaining that scale is critical to provide the right level of service and that the Merger may strengthen Entier's financial position, facilitate economies of scale and volume discounts.⁵¹⁴

⁵⁰⁴ Third party responses to the CMA questionnaire dated 22 August 2025; and Third party responses to the CMA questionnaire dated 27 May 2025.

⁵⁰⁵ Third party response to the CMA questionnaire dated 22 August 2025; and Third party responses to the CMA questionnaire dated 27 May 2025.

⁵⁰⁶ Third party response to the CMA questionnaire dated 27 May 2025.

⁵⁰⁷ Third party responses to the CMA questionnaire; and Third party response to the CMA questionnaire dated 27 May 2025.

⁵⁰⁸ Third party responses to questions 18 of the CMA questionnaire.

⁵⁰⁹ Third party response to the CMA questionnaire dated 27 May 2025.

⁵¹⁰ Third party response to the CMA questionnaire dated 12 August 2025, Third party response to the CMA questionnaire.

⁵¹¹ Third party response to the CMA questionnaire dated 27 May 2025.

⁵¹² Third party response to the CMA questionnaire dated 12 August 2025.

⁵¹³ Third party responses to the CMA questionnaire; and Third party responses to the CMA questionnaire dated 27 May 2025.

⁵¹⁴ Third party response to the CMA questionnaire dated 27 May 2025.

- (b) One customer outlined that the Merger could bring efficiencies as well as increase resilience within labour provision.⁵¹⁵
- (c) Another customer indicated a benefit of the Merger may be that Aramark will be able to strengthen its global offering outside the North Sea.⁵¹⁶
- (d) Two customers outlined that alternative suppliers would be available,⁵¹⁷ with one of these customers having noted that other COTA members remained in the market.⁵¹⁸
- (e) One customer was optimistic about the benefits the Merger may bring and explained that both companies have a strong proven track record in offshore catering and that the Merger should strengthen this.⁵¹⁹

C.133 Two customers responded with 'negative' views of the impact of the Merger on competition.⁵²⁰

- (a) One of these customers said that the Merger would significantly impact the current marketplace and competition for these services and the Merger would likely mean Entier and Aramark having a 60/70% share of the offshore business for catering and housekeeping support.⁵²¹ On a call with the CMA, this customer noted that commercially, it might see increased costs as a result of the Merger.⁵²²
- (b) Another customer said that the Merger lessened competition and Entier did stand out with a unique selling point previously which was different to the large corporate organisations.⁵²³ Additionally on a call with the CMA, the customer elaborated that given the [X] combined with its assessment that Conntrak and Francois may not be competitive (as they had not been preferred bidders in any of the customer's previous tenders), these factors potentially resulted in the key offshore OCS suppliers being narrowed down to just two - Aramark and ESS only.⁵²⁴

⁵¹⁵ Third party response to the CMA questionnaire dated 27 May 2025.

⁵¹⁶ Third party response to the CMA questionnaire dated 12 August 2025.

⁵¹⁷ Third party response to the CMA questionnaire dated 12 August 2025; and Third party response to the CMA questionnaire dated 27 May 2025.

⁵¹⁸ Third party response to the CMA questionnaire dated 27 May 2025.

⁵¹⁹ Third party response to the CMA questionnaire dated 27 May 2025.

⁵²⁰ Third party responses to the CMA questionnaire dated 27 May 2025.

⁵²¹ Third-party response to the CMA questionnaire dated 27 May 2025.

⁵²² Third party call note.

⁵²³ Third party response to the CMA questionnaire dated 27 May 2025.

⁵²⁴ Third party call note.

Marine customers

- C.134 Four Marine customers had a 'neutral' view of the Merger.⁵²⁵ One customer outlined that it did not see any impact on competition for the supply of OCS as a result of the Merger.⁵²⁶ [✂].⁵²⁷
- C.135 A further non-Party customer had a 'neutral' view but explained that it did not have direct experience with Aramark or Entier and therefore it did not expect a direct impact of the Merger on competition.⁵²⁸
- C.136 Additionally, one Marine customer stated it had no strong views of the Merger on (i) the market locally or (ii) on its own operations. The Marine customer further explained that the impact may be more pronounced in the Offshore Infrastructure Market than the Marine Market.⁵²⁹
- C.137 One Marine customer had a positive view of the Merger and explained that it would like to think the Merger would bring scalable benefits eg price reductions for the use of a combined offering.⁵³⁰

Competitors' views

- C.138 Over half of competitors did not express concerns regarding the Merger.⁵³¹ However:
- (a) One competitor told the CMA that the Merger would have a negative impact on competition. This competitor specifically stated that the Merger would reduce competition and that the merged entity would have a share of supply c.65%.⁵³²
 - (b) Another competitor said that once Aramark and Entier had more than 60% of the market then the competitor had no way of competing with them, but others such as Sodexo and ESS could.⁵³³
 - (c) One competitor considered that the Merger would have a positive effect on competition because, although it reduced the total number of competitors, it

⁵²⁵ Third party response to the CMA questionnaire dated 27 May 2025; and Third party response to the CMA questionnaire dated 9 September 2025.

⁵²⁶ Third party response to the CMA questionnaire dated 9 September 2025.

⁵²⁷ Third party response to the CMA questionnaire dated 12 August 2025.

⁵²⁸ Third party responses to the CMA questionnaire.

⁵²⁹ Third party call note.

⁵³⁰ Third party response to the CMA questionnaire dated 12 August 2025.

⁵³¹ Third party responses to the CMA questionnaire dated 27 May 2025; and Third party response to the CMA questionnaire dated 16 September 2025.

⁵³² Third party response to the CMA questionnaire dated 27 May 2025.

⁵³³ Third party call note.

increased the competitor's chances of being shortlisted for contracts (as typically customers shortlist two to three bidders).⁵³⁴

⁵³⁴ Third party call note.

APPENDIX D: Internal documents

Introduction

- D.1 This Appendix sets out our analysis of the internal documents provided to us by the Parties during the investigation that have informed our assessment.⁵³⁵
- D.2 The Appendix is structured as follows:
- (a) First, we explain our approach to internal documents.
 - (b) Second, we present our analysis of the Parties' internal documents, grouped by topic.
- D.3 The CMA regularly asks parties to provide internal documents (ie documents that merger parties or third parties have generated internally in the ordinary course of business) to inform its investigation.⁵³⁶ Internal documents provide evidence on the perspectives of market participants beyond their direct submissions to the CMA, often from before a merger was under investigation or was in contemplation.

Approach to evidence gathering

- D.4 During the investigation, the Parties submitted internal documents in response to requests for documents at phase 1 and 2.

The Parties' internal documents

Merger rationale

- D.5 We have reviewed documents relating to the rationale for the acquisition.
- D.6 Some Aramark documents demonstrate the view that the acquisition of Entier would protect and/or increase Aramark's margin and/or market share in the UKCS. For example:
- (a) An Aramark document, '[REDACTED]', under the heading '[REDACTED]', lists reasons including to 'cement Aramark's already market leading position in the UKCS and bolster wider regions' and 'removes a significant competitor in the market. Protecting market share and margin'.⁵³⁷

⁵³⁵ We have also received internal documents from one OCS supplier, which we do not cover in this appendix but cover in Chapter 6

⁵³⁶ [CMA2](#), paragraph 9.9(a).

⁵³⁷ Aramark internal document, Annex 115 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 4. Also found in Aramark internal document, Annex 119 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 8.

- (b) An Aramark document, '[REDACTED]', lists under the heading '[REDACTED]', reasons including 'Both defensive and offensive play, creates leading position in UKCS' and 'Removes a significant competitor'.⁵³⁸
- (c) An Aramark document, '[REDACTED]', notes that that the opportunity to acquire Entier would be 'both a defensive and offensive play to reinforce our position in the UK Continental Shelf and [REDACTED]'.⁵³⁹
- (d) An Aramark document, '[REDACTED]', presents a SWOT analysis for the acquisition of Entier. Under the heading 'Strengths', it states 'Would significantly enhance our market position in the North Sea', and under the heading 'Opportunities', it states 'Enhanced number 1 market position would improve our ability to influence market dynamics' and 'Aramark purchasing power expected to improve margins'.⁵⁴⁰
- (e) In an Aramark document, '[REDACTED]', it lists under 'Global Offshore Objectives' for the UKCS to 'consider market strategic acquisition of main competitors in UKCS' and to 'conclude strategic, viable acquisition'.⁵⁴¹

D.7 An Aramark document implies that Aramark was considering acquisitions for the purpose of increasing revenue and margin growth. This document, '[REDACTED]', in a slide titled '[REDACTED]', lists next to '[REDACTED]', '[REDACTED]'.⁵⁴²

D.8 Some Aramark documents, when reviewed in the round, indicate an intention for Aramark to expand into the Marine Market. For example:

- (a) An Aramark document, '[REDACTED]', contains a slide 'Offshore Executive Summary' which lists next to 'Accelerate Growth', 'Renewable/Marine market expansion – particularly in wind farm construction phases'.⁵⁴³
- (b) An Aramark document, '[REDACTED]', lists Entier under '[REDACTED]', with the note: 'Traditional offshore platform sector in the UKCS in which Aramark operates, plus would allow Aramark entry into Marine Services sector'.⁵⁴⁴

⁵³⁸ Aramark internal document, Annex 107, page 2 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025.

⁵³⁹ Aramark internal document, Annex 117 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 22. Similar text appears in Aramark internal document, Annex 447, page 1 to Aramark's response to the CMA's s109 notice dated 7 August 2025.

⁵⁴⁰ Aramark internal document, Annex 392 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁵⁴¹ Aramark internal document, Annex 449 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 23.

⁵⁴² Aramark internal document, Annex 404 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 22.

⁵⁴³ Aramark internal document, Annex 404 to Aramark's response to CMA's s109 notice dated 7 August 2025, slide 22.

⁵⁴⁴ Aramark internal document, Annex 408 to Aramark's response to question 20 of the s109 notice dated 7 August 2025, slide 8.

- (c) An Aramark strategy document '[REDACTED]', in a slide titled '[REDACTED]', presents a table for the financial years [REDACTED]. The slide contains a colour key, [REDACTED].⁵⁴⁵

D.9 Other documents indicate that Aramark considered expansion into marine as a medium-priority, but not a high-priority. For example:

- (a) An Aramark internal document, '[REDACTED]', contains a slide titled '[REDACTED]' which presents Marine as [REDACTED], with other sub-sectors being [REDACTED] (platform, drilling, accommodation barges, and remote camps).⁵⁴⁶ We understand that items marked in [REDACTED] denote a high-priority focus, and [REDACTED] denotes a medium-priority focus.⁵⁴⁷
- (b) Similarly in an Aramark document '[REDACTED]' under '[REDACTED]', the Marine sector is given an [REDACTED] rating for FY25, while each of platform, drilling, accommodation barge, and remote camps are rated [REDACTED].⁵⁴⁸ We understand that items marked in [REDACTED] denote a high-priority focus, and [REDACTED] denotes a medium-priority focus.⁵⁴⁹ It additionally notes that the profile of the Marine sector differs by geography, and that it is less attractive in [REDACTED].⁵⁵⁰

D.10 Some Aramark documents, when reviewed in the round, recognise Entier's strength in Marine services, noting that Aramark has not traditionally operated in this sector. For example:

- (a) An Aramark strategy document, '[REDACTED]', lists its major competitors in the UKCS, and notes that Entier has '[REDACTED]'.⁵⁵¹ Another strategy document lists its competitors in the North Sea, and notes that Entier has '[REDACTED]'.⁵⁵²
- (b) An Aramark document, '[REDACTED]', notes that '[REDACTED]'.⁵⁵³
- (c) The same Aramark document lists under the heading '[REDACTED]', bullets including '[REDACTED]'.⁵⁵⁴

⁵⁴⁵ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 15.

⁵⁴⁶ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 12.

⁵⁴⁷ We note that this document [REDACTED]. [REDACTED]. Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 12.

⁵⁴⁸ Aramark internal document, Annex 446 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 20.

⁵⁴⁹ We note that this document [REDACTED]. [REDACTED]. Aramark internal document, Annex 458 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 15.

⁵⁵⁰ Aramark internal document, Annex 446 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 20.

⁵⁵¹ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 8.

⁵⁵² Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁵⁵³ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 5, question 21.

⁵⁵⁴ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 8, question 21.

- (d) The same Aramark document lists under the heading '[REDACTED]', reasons including 'Diversified Portfolio; [REDACTED]'.⁵⁵⁵

D.11 Some Aramark documents show that Aramark was considering a strategy involving acquisitions for the purpose of diversification and entry into new sectors. For example:

- (a) An Aramark Document, '[REDACTED]', contains a slide titled '[REDACTED]', in which for 'UK / Ireland', the listed 'approach' is presented as being in order to '[REDACTED]'.⁵⁵⁶ We understand that this statement includes reference to Aramark's offshore and onshore activities in the UK.⁵⁵⁷
- (b) An Aramark document, '[REDACTED]', lists under '[REDACTED]' that it '[REDACTED]', and separately that it '[REDACTED]'.⁵⁵⁸ The latter comment appears without the former comment in another Aramark document, '[REDACTED]'.⁵⁵⁹
- (c) An Aramark document, '[REDACTED]', lists in a slide titled '[REDACTED]' an action to '[REDACTED]'.⁵⁶⁰

Geographic market definition

D.12 We have reviewed documents relating to the geographic definition of the market for OCS.

D.13 Aramark's documents distinguish the global offshore segment of the business from the onshore business. When these documents break these categories down further, Aramark generally refers to the UK or UKCS, rather than the North Sea as a whole.

- (a) In Aramark's offshore business review documents, where it considers splits by region, it considers the UK/UKCS as separate from other North Sea countries such as Denmark, Netherlands, and Norway. For example:
- (i) An Aramark document, '[REDACTED]', lists its operating hubs including UK, Norway, Denmark and the Netherlands, separately, presenting the total addressable market volume and market leader, and competitor sets

⁵⁵⁵ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 7, question 21. See also, Aramark internal document, Annex 115 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 4, question 21.

⁵⁵⁶ Aramark internal document, Annex 240 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 7, question 23.

⁵⁵⁷ In the same Aramark document, in a table with heading '[REDACTED]', '[REDACTED]' is listed with the comment '[REDACTED]'. We therefore view that the '[REDACTED]' refers to both Aramark's onshore and offshore business in the UK throughout the document (Aramark internal document, Annex 240 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 6, question 23.).

⁵⁵⁸ Aramark internal document, Annex 117 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 26.

⁵⁵⁹ Aramark internal document, Annex 107 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 2.

⁵⁶⁰ Aramark internal document, Annex 470 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 6.

separately by these hubs.⁵⁶¹ However, we note that a later Aramark document, '[REDACTED]' presents a map grouping its operating hubs into 'North Sea' (comprising of the UK, Netherlands, Norway and Denmark), presenting its market share and the market leader for this region as a whole.⁵⁶²

- (ii) An Aramark document, '[REDACTED]', presents revenue, AOI (adjusted operating income) and P&L (profit and loss) by region, splitting out the UKCS as distinct from Denmark, Netherlands, and Norway.⁵⁶³
- (b) In Aramark's strategy documents, the UK is considered separately from other countries with continental shelves in the North Sea. For example:
 - (i) In an Aramark internal document, '[REDACTED]', in a slide titled '[REDACTED]', the geographical regions of Norway, Denmark, and the UK are assessed separately and given separate priority ratings.⁵⁶⁴ Additionally, this document presents financial forecasts for UKCS, Denmark and Norway separately.⁵⁶⁵
 - (ii) Similarly in '[REDACTED]' under '[REDACTED]', the geographies of Norway, the UK, Denmark and Holland are each assessed separately; the UK and Holland are given a different rating to Norway and Denmark, for FY25.⁵⁶⁶
 - (iii) Similarly in an Aramark internal document, '[REDACTED]', each of the geographical regions of Norway, Denmark, UK and the Netherlands are given distinct priority ratings.⁵⁶⁷ Additionally, it distinguishes strategy by region, noting that the UK is a '[REDACTED]', whereas for Scandinavia (Denmark and Norway), its '[REDACTED]' is noted as '[REDACTED]' with '[REDACTED]'.⁵⁶⁸
 - (iv) An Aramark document, '[REDACTED]', provides information specific to the UKCS offshore market. It notes that '[REDACTED]'. It also notes '[REDACTED]', and that '[REDACTED]'.⁵⁶⁹
- (c) An Aramark document, which includes a revenue analysis for a potential acquisition of Entier, splits revenue forecasts by region, distinguishing the

⁵⁶¹ Aramark internal document, Annex 129 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slides 5 and 10-11.

⁵⁶² Aramark internal document, Annex 123 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 5.

⁵⁶³ Aramark internal document, Annex 014 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slides 3 and 6.

⁵⁶⁴ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025.

⁵⁶⁵ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 19.

⁵⁶⁶ Aramark internal document, Annex 446 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 20.

⁵⁶⁷ Aramark internal document, Annex 459 revised to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 15.

⁵⁶⁸ Aramark internal document, Annex 459 revised to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 13.

⁵⁶⁹ Aramark internal document, Annex 105 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 1.

UKCS from Denmark, Northway and the Netherlands, and calculates market shares for the UKCS pre- and post-acquisition.⁵⁷⁰

D.14 Some Aramark documents identify different competitor sets by country. For example:

- (a) An Aramark document, '[REDACTED]', identifies a different market leader and competitor set for each of the UK, Norway, Denmark, the Netherlands, USGoM, Mexico, Trinidad & Tobago.⁵⁷¹
- (b) An Aramark internal document, '[REDACTED]', presents market shares for its 'major competitors' separately for the UKCS ([REDACTED]), Scandinavia ([REDACTED]) and Gulf of Mexico ([REDACTED]).^{572,573}
- (c) An Aramark document, '[REDACTED]', in a slide titled '[REDACTED]', presents Aramark's major competitors for the North Sea collectively, and separately from its competitors in the US Gulf of Mexico.⁵⁷⁴ However, it notes on the same slide that '[REDACTED]' while '[REDACTED]'. It also notes that ESS' acquisition of 4Service in Norway adds '[REDACTED]'.⁵⁷⁵

D.15 Entier documents generally refer to the UKCS or UK North Sea as distinct from other geographic regions.

- (a) An Entier document, '[REDACTED]', notes that Entier retained its position as 'number one caterer in the UK North Sea'.⁵⁷⁶
- (b) An Entier board presentation lists the UKCS as a '[REDACTED]', as distinct from the EMEA (Europe, the Middle East, and Africa).⁵⁷⁷ However, elsewhere in this document, it presents maps of its current and prospective offshore operations and groups UKCS operations under 'EMEA'.⁵⁷⁸
- (c) An Entier document, '[REDACTED]', contains analysis of the landscape for oil and gas energy production in the UK, separately from 'Rest of the world' and

⁵⁷⁰ Aramark internal document, Annex 133 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, sheets [REDACTED]. As noted in a previous footnote, we consider that this document relates to the acquisition of Entier.

⁵⁷¹ Aramark internal document, Annex 129 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slides 10-11.

⁵⁷² Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 8.

⁵⁷³ We consider the term '[REDACTED]' to mean self-supply, self-operate and/or 'in-house', and we use these terms interchangeably.

⁵⁷⁴ Aramark internal document, Annex 459 revised to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁵⁷⁵ Aramark internal document, Annex 459 revised to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁵⁷⁶ Entier internal document, Annex 186 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slides 4 and 14.

⁵⁷⁷ Entier internal document, Annex 189 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 11.

⁵⁷⁸ Entier internal document, Annex 189 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slides 3 and 8.

‘Australia’. Similarly when describing the offshore wind sector, it describes separately the US, Australia, and the UK.⁵⁷⁹

- (d) Entier’s board documents generally do not split out its operations by regions within the North Sea, however a number of its board documents present an ‘Offshore UKCS Market Overview’ including its shares of supply.⁵⁸⁰

Competitors

The majority of the Parties’ internal documents do not explicitly distinguish between the Offshore Infrastructure Market and the Marine Market. However, unless stated otherwise, our provisional view is that these documents primarily refer to the Offshore Infrastructure Market, although they may also include some consideration of competitor dynamics in the Marine Market. That is because: (i) the Parties submitted that, in view of Aramark’s current relative lack of presence in Marine, there is no reason why its internal documents would discuss competition for Marine,⁵⁸¹ and (ii) many of these documents refer to ESS as part of the main competitor set, whereas [REDACTED].⁵⁸²

D.16 Some Aramark internal documents indicate that it considers its main competitors to be Entier, ESS and Sodexo, although Sodexo has become a weaker competitor over time. Aramark documents acknowledge other competitors less often. For example:

- (a) An Aramark strategy document, ‘[REDACTED]’, in a slide describing major competitors for the UKCS, lists ESS, Sodexo, Entier, Francois, and Self-Deliver, alongside their market shares.⁵⁸³ It presents an additional graphic highlighting ESS, Entier, and Sodexo specifically, with additional commentary:
 - (i) ESS is described as its ‘[REDACTED]’, with ‘[REDACTED]’, and notes ‘[REDACTED]’.
 - (ii) Entier is described as having ‘[REDACTED]’, and notes ‘[REDACTED]’.
 - (iii) Sodexo is described as having ‘[REDACTED]’, and ‘[REDACTED]’.
- (b) An Aramark strategy document, ‘[REDACTED]’, presents the market shares of its ‘Major Competitors’ in the **North Sea** [REDACTED], ie ESS (+4Service), Aramark (+Entier), ‘Other’, Coor FM, and Sodexo respectively. It notes that ‘[REDACTED]’ with

⁵⁷⁹ Entier internal document, Annex 208 to Entier’s response to the CMA Enquiry Letter dated 18 March 2025, pages 18-21.

⁵⁸⁰ For example: Entier internal document, Annex 354 to Entier’s response to the CMA’s s109 notice dated 7 August 2025, pages 10-11; Entier internal document, Annex 355 to Entier’s response to the CMA’s s109 notice dated 7 August 2025, page 9; and Entier internal document, Annex 359 to Entier’s response to the CMA’s s109 notice dated 7 August 2025, page 10.

⁵⁸¹ Parties’ response to the Phase 1 Decision, 22 August 2025, paragraph 3.8.

⁵⁸² Third party call note.

⁵⁸³ Aramark internal document, Annex 130 to Aramark’s response to the CMA Enquiry Letter dated 18 March 2025, slide 8.

the Parties' combined market share '[REDACTED]'.⁵⁸⁴ It presents a graphic highlighting ESS, Entier, 4Service and Conntrak specifically, with additional commentary:

- (i) ESS is noted as having '[REDACTED]' which has '[REDACTED]'. ESS is described as having '[REDACTED]'.⁵⁸⁵
 - (ii) Entier is also noted as having '[REDACTED]', with '[REDACTED]'. However, the document describes Entier as having '[REDACTED]' and notes its '[REDACTED]'.⁵⁸⁶
 - (iii) 4Service is noted as '[REDACTED]', with its '[REDACTED]' which '[REDACTED]'. It also notes that 4Service is the '[REDACTED]'.⁵⁸⁷
 - (iv) Conntrak is described as having '[REDACTED]' and '[REDACTED]'. It is noted as having an '[REDACTED]' and being a '[REDACTED]'.⁵⁸⁸
- (c) An Aramark document, '[REDACTED]', with the title '[REDACTED]', notes in a slide titled '[REDACTED]' that ESS, Aramark and Entier hold a larger share of UKCS market, but Sodexo remains a key competitor '[REDACTED]'. Aramark notes additionally that '[REDACTED]'.⁵⁸⁹

D.17 An Aramark internal document implies that it also considers Foss, Conntrak, Francois, and Self-Supply to be competitors. This document, '[REDACTED]', compares the competitor set by operating region. Under the heading 'UK', Aramark lists ESS, Sodexo, Entier, Foss, Conntrak, In-House, and Francois.⁵⁹⁰ We understand that this document is referring to the Offshore Infrastructure and Marine Markets together, as '[REDACTED]' and Self-Supply is not widely present in the Offshore Infrastructure Market.

D.18 In response to the Phase 1 Decision, the Parties submitted that Aramark's internal documents reflect a competitive threat posed by Conntrak considering entry into the North Sea.⁵⁹¹ The Parties refer to an Aramark document, '[REDACTED]'.⁵⁹² In this document:

(a) Aramark considered who it thinks Conntrak will bid for, noting:

- (i) '[REDACTED]'.⁵⁹³

⁵⁸⁴ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁵⁸⁵ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁵⁸⁶ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁵⁸⁷ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁵⁸⁸ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁵⁸⁹ Aramark internal document, Annex 118 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁵⁹⁰ Aramark internal document, Annex 129 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 11.

⁵⁹¹ [Parties' response to the Phase 1 Decision](#), 22 August 2025, paragraph 5.9.

⁵⁹² Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025.

⁵⁹³ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

(ii) '[REDACTED]'.⁵⁹⁴

(iii) '[REDACTED]'.⁵⁹⁵

(b) Aramark considered where Conntrak is trying to '[REDACTED]', noting that '[REDACTED]'.⁵⁹⁶

(c) Aramark considered what Conntrak's supply chain looks like, noting that '[REDACTED]'.⁵⁹⁷

D.19 The same Aramark document, '[REDACTED]', also notes that:

(a) '[REDACTED]'.⁵⁹⁸

(b) '[REDACTED]'. It also notes that '[REDACTED]'.⁵⁹⁹

(c) '[REDACTED]'.⁶⁰⁰

D.20 Aramark submitted deal memos for customers, which present information about upcoming opportunities to supply catering services, including a table of competitor information.

D.21 In our review of Aramark's deal memos for Offshore Infrastructure customers in the UKCS, Aramark generally list Entier, Sodexo and ESS as its competitors. Of the eight deal memos for Offshore Infrastructure customers in the UKCS, all eight list Sodexo and ESS ([REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED])⁶⁰¹ and five list Entier ([REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]).⁶⁰² Francois is listed in one deal memo ([REDACTED]).⁶⁰³ BaxterStorey ([REDACTED]) and CH&CO ([REDACTED]) are listed in one each, in both cases for

⁵⁹⁴ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁵⁹⁵ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁵⁹⁶ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁵⁹⁷ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁵⁹⁸ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁵⁹⁹ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁶⁰⁰ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁶⁰¹ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4; Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4; Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 4-5; Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 3-4; Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6; Aramark internal document, Annex 407 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 7; Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 5; and Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

⁶⁰² Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4; Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 4-5; Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 3-4; Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6; and Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 5.

⁶⁰³ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 4-5.

opportunities involving assets onshore and offshore, and in both cases with the note that these competitors cannot serve the offshore locations.^{604,605}

(a) Aramark's deal memo for [REDACTED] ([REDACTED]) describes an opportunity in 2024 for one floating production storage and offloading (FPSO) asset in the UK.⁶⁰⁶ In this deal memo, Aramark lists its competitors for this opportunity as Sodexo, ESS, and Entier.⁶⁰⁷

(i) When describing Sodexo:

(1) Under the heading for '[REDACTED]', Aramark notes that Sodexo will '[REDACTED]' as this bid is for long-term work with no decommissioning or redundancy liability. It also notes that Sodexo could potentially work with this customer in Brazil, and that it previously managed a unit in Norway.⁶⁰⁸

(2) Under the heading for '[REDACTED]', Aramark notes that Sodexo has only 2 operating sites in the UKCS, though adding that one is an FPSO. It also notes Sodexo's '[REDACTED]'.⁶⁰⁹

(ii) When describing ESS:

(1) Under the heading for '[REDACTED]', Aramark notes that ESS has '[REDACTED]', and that it's '[REDACTED]', '[REDACTED]' ([REDACTED]). It also notes that ESS currently work with Equinor and '[REDACTED]', and that Altera will take this feedback onboard.⁶¹⁰

(2) Under the heading for '[REDACTED]', Aramark notes that ESS don't currently work with the customer, and is '[REDACTED]'.⁶¹¹

(3) Additionally, Aramark notes that it proposes to adjust its offer in response to ESS, noting '[REDACTED]' and that '[REDACTED]'.⁶¹²

(iii) When describing Entier, under the heading for '[REDACTED]', Aramark notes that it's a '[REDACTED]' and '[REDACTED]'. It also notes that Entier has '[REDACTED]'.⁶¹³

⁶⁰⁴ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶⁰⁵ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 4-5.

⁶⁰⁶ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁶⁰⁷ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶⁰⁸ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶⁰⁹ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶¹⁰ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶¹¹ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶¹² Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁶¹³ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

- (b) Aramark's deal memo for [REDACTED] ([REDACTED]) describes an opportunity in 2024 for two offshore assets in the UKCS and Netherlands respectively, and two locations onshore in the UK. In this deal memo, Aramark lists its competitors as Sodexo, ESS, and BaxterStorey.⁶¹⁴
- (i) When describing Sodexo:
- (1) Under the heading for '[REDACTED]', Aramark notes that Sodexo can deliver both offshore and onshore, with greater offshore strength in the Netherlands than Aramark. It notes that Sodexo may be a '[REDACTED]', and that there is a '[REDACTED]' ([REDACTED])⁶¹⁵ as Sodexo is an incumbent on one of the assets. It also notes that Sodexo is an incumbent on one of the assets.⁶¹⁶
 - (2) Under the heading for '[REDACTED]', Aramark notes that Sodexo is a '[REDACTED]' with a '[REDACTED]'. It also notes that Sodexo '[REDACTED]'.⁶¹⁷
- (ii) When describing ESS:
- (1) Under the heading for '[REDACTED]', Aramark notes ESS '[REDACTED]', and that ESS has '[REDACTED]'. It also notes that ESS is the market leader in the Netherlands.
 - (2) Under the heading for '[REDACTED]', Aramark notes that ESS' recent win of Apache will '[REDACTED]' them. Aramark also notes that this opportunity may be '[REDACTED]'.⁶¹⁸
- (iii) When describing BaxterStorey:
- (1) Under the heading for '[REDACTED]', Aramark notes that BaxterStorey is seemingly delivering a positive service across the onshore sites, and that it took service from Aramark in 2015-2016. Aramark also notes that BaxterStorey will be pricing aggressively '[REDACTED]'.⁶¹⁹
 - (2) Under the heading for '[REDACTED]', Aramark notes that BaxterStorey is '[REDACTED]', and that there is '[REDACTED]'.⁶²⁰
- (c) Aramark's deal memo for [REDACTED] ([REDACTED]) describes an opportunity in 2023 for seven assets offshore in the UKCS and one onshore in the UK. In this deal

⁶¹⁴ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶¹⁵ See Aramark's deal memo for [REDACTED] in paragraph A.21(c) below.

⁶¹⁶ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶¹⁷ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶¹⁸ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶¹⁹ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶²⁰ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

memo, Aramark lists its competitors as Sodexo, ESS, Entier, CH&CO, and Francois.⁶²¹

(i) When describing Sodexo:

- (1) Under the heading for '[REDACTED]', Aramark notes that Sodexo '[REDACTED]'. Aramark also notes that Sodexo are hiring and rebuilding a team, adding that Sodexo could '[REDACTED]'.⁶²²
- (2) Under the heading for '[REDACTED]', Aramark notes that Sodexo is a '[REDACTED]' with only 2 remaining contracts, and that it lacks '[REDACTED]'.⁶²³

(ii) When describing ESS:

- (1) Under the heading for '[REDACTED]', Aramark notes that ESS has had recent successes in UKCS, that it can deliver both onshore and offshore, as well as that it is bidding aggressively for large contracts.⁶²⁴
- (2) Under the heading for '[REDACTED]', Aramark notes that ESS '[REDACTED]' as Aramark have just taken Shelf Drilling off ESS due to '[REDACTED]'. Aramark also notes that one of ESS' operations managers had just resigned.⁶²⁵

(iii) When describing Entier:

- (1) Under the heading for '[REDACTED]', Aramark notes that Entier delivers a '[REDACTED]', that Entier operates local operations with shared labour between the sites, and that Entier '[REDACTED]'.⁶²⁶
- (2) Under the heading for '[REDACTED]', Aramark notes that Entier's '[REDACTED]' service comes at a '[REDACTED]' price' and recently requested a '[REDACTED]'. Aramark also notes that another Entier client ([REDACTED]) has also approached the market recently, which Aramark believes is because Entier asked for a '[REDACTED]' on this contract. Aramark adds that '[REDACTED]'.⁶²⁷

(iv) When describing CH&CO:

⁶²¹ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 4-5.

⁶²² Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶²³ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶²⁴ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶²⁵ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶²⁶ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁶²⁷ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

- (1) Under the heading for '[REDACTED]', Aramark notes that CH&CO operates comparable onshore sites which it recently retained.⁶²⁸
 - (2) Under the heading for '[REDACTED]', Aramark notes that CH&CO has no offshore presence, with '[REDACTED]'.⁶²⁹
- (v) When describing Francois:
- (1) Under the heading for '[REDACTED]', Aramark notes Francois' '[REDACTED]', adding that it '[REDACTED]'.
 - (2) Under the heading for '[REDACTED]', Aramark notes that Francois has no onshore or offshore platform case studies, and has an '[REDACTED]'.⁶³⁰
- (d) Aramark's deal memo for [REDACTED] ([REDACTED]) describes a price request in 2023 for eight rigs in the UK and one in the Netherlands. In this deal memo, Aramark lists its competitors as Entier, ESS, and Sodexo.⁶³¹
- (i) When describing Entier:
- (1) Under the heading for '[REDACTED]', Aramark notes that the client has '[REDACTED]' as incumbents, and that the price request '[REDACTED]'. Aramark also notes that there is a '[REDACTED]' between Entier and the client's senior personnel.⁶³²
 - (2) Under the heading for '[REDACTED]', Aramark notes that Entier has '[REDACTED]', and that Entier '[REDACTED]'.⁶³³
 - (3) Additionally, in a section titled '[REDACTED]', Aramark noted '[REDACTED]', one of which is to '[REDACTED]'.⁶³⁴
- (ii) When describing ESS:
- (1) Under the heading for '[REDACTED]', Aramark notes that ESS has a strong presence in UK offshore, and existing operations in the Netherlands offshore.⁶³⁵

⁶²⁸ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁶²⁹ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁶³⁰ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁶³¹ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 3-4.

⁶³² Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶³³ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶³⁴ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 3.

⁶³⁵ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

- (2) Under the heading for '[REDACTED]', Aramark notes that ESS has a '[REDACTED]'.⁶³⁶
- (iii) When describing Sodexo:
 - (1) Under the heading for '[REDACTED]', Aramark notes that Sodexo is '[REDACTED]' and will '[REDACTED]'.⁶³⁷
 - (2) Under the heading for '[REDACTED]', Aramark notes Sodexo's '[REDACTED]', and that Sodexo has lost several clients in the past 2 years.⁶³⁸
- (e) Aramark's deal memo for [REDACTED] ([REDACTED]) describes an opportunity in 2022 for ten locations offshore in the UKCS, an office onshore in the UK, and a terminal onshore in the UK. In this deal memo, Aramark lists its competitors as Sodexo, ESS and Entier.⁶³⁹
 - (i) When describing Sodexo,
 - (1) Under the heading for '[REDACTED]', Aramark notes that Sodexo '[REDACTED]' as only two offshore contracts remain, and that '[REDACTED]'. Aramark also notes that Sodexo '[REDACTED]', and that Sodexo has been the incumbent for over 15 years, knows the sites, services, suppliers and subcontractors, and has '[REDACTED]'.⁶⁴⁰
 - (2) Under the heading for '[REDACTED]' including '[REDACTED]', and that its '[REDACTED]' with the loss of Ithaca Energy.⁶⁴¹
 - (ii) When describing ESS:
 - (1) Under the heading for '[REDACTED]', Aramark notes that ESS has a '[REDACTED]', having '[REDACTED]', and that ESS has '[REDACTED]' and are '[REDACTED]'.⁶⁴²
 - (2) Under the heading '[REDACTED]', Aramark notes that ESS '[REDACTED]', and that ESS have '[REDACTED]'. Aramark also notes that ESS used to have business with [REDACTED] in 2004 which it lost to Sodexo, but Aramark '[REDACTED]'.⁶⁴³
 - (iii) When describing Entier:

⁶³⁶ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶³⁷ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶³⁸ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶³⁹ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁴⁰ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁴¹ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁴² Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁴³ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

- (1) Under the heading '[REDACTED]', Aramark notes that Entier is '[REDACTED]' and that this is a '[REDACTED]' at Sodexo with reduced risk and high-volume turnover. Aramark also notes that Entier has a '[REDACTED]'.⁶⁴⁴
 - (2) Under the heading '[REDACTED]', Aramark notes that Entier has '[REDACTED]' and are '[REDACTED]'.⁶⁴⁵
- (f) Aramark's deal memo for [REDACTED] ([REDACTED]) describes an opportunity in 2021-2022 for 3 offshore platforms in the UKCS and office onshore in the UK.⁶⁴⁶ In this deal memo, Aramark lists its competitors as ESS and Sodexo but did provide strengths and weaknesses for either as in other deal memos.⁶⁴⁷
- (g) Aramark's deal memo for [REDACTED] ([REDACTED]) describes an opportunity in 2021 for seven offshore platforms in the UKCS.⁶⁴⁸ In this deal memo, Aramark identifies its other competitors as Sodexo, ESS and Entier.⁶⁴⁹
- (i) When describing Sodexo:
 - (1) Under the heading '[REDACTED]', Aramark notes that Sodexo has been on [REDACTED] assets for '[REDACTED]'.⁶⁵⁰
 - (2) Under the heading '[REDACTED]', Aramark notes that '[REDACTED]' and that '[REDACTED]'.⁶⁵¹
 - (ii) When describing ESS:
 - (1) Under the heading '[REDACTED]', Aramark notes that ESS has '[REDACTED]'.⁶⁵²
 - (2) Under the heading '[REDACTED]', Aramark notes that ESS lost the business to Aramark in 2016 and '[REDACTED]'.⁶⁵³
 - (iii) When describing Entier:
 - (1) Under the heading '[REDACTED]', Aramark notes that Entier has a '[REDACTED]'.⁶⁵⁴

⁶⁴⁴ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁴⁵ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁴⁶ Aramark internal document, Annex 407 to Aramark's response to the CMA's s109 notice dated 7 August 2025, pages 3-4.

⁶⁴⁷ Aramark internal document, Annex 407 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 7.

⁶⁴⁸ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, pages 3-4.

⁶⁴⁹ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 5.

⁶⁵⁰ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁵¹ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁵² Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁵³ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁵⁴ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

- (2) Under the heading '[REDACTED]', Aramark notes that Entier will be '[REDACTED]'.⁶⁵⁵
- (h) Aramark's deal memo for [REDACTED] ([REDACTED]) describes an opportunity in 2020-2021 for a jack-up unit operating in the UKCS, specifically in the southern North Sea.⁶⁵⁶ In this deal memo, Aramark identifies its competitors as Sodexo and ESS.⁶⁵⁷
- (i) When describing Sodexo:
- (1) Under the heading '[REDACTED]', Aramark notes that Sodexo was the last catering provider onboard the asset, and will be known to the rig superintendent. Aramark also notes that Sodexo has further business with [REDACTED] in the UK and internationally.⁶⁵⁸
- (2) Under the heading '[REDACTED]', Aramark notes that there has been a '[REDACTED]' with a '[REDACTED]'. It notes that Sodexo '[REDACTED]'.⁶⁵⁹
- (ii) When describing ESS:
- (1) Under the heading '[REDACTED]', Aramark notes that ESS is '[REDACTED]'.⁶⁶⁰
- (2) Under the heading '[REDACTED]', Aramark notes that ESS has also undergone significant senior management changes, and that ESS has the '[REDACTED]' where it will '[REDACTED]'.⁶⁶¹

D.22 Some Entier documents imply that it considers its main competitors to be Aramark, ESS and Sodexo, but also considers other competitors. For example:

- (a) An Entier document, '[REDACTED]', describes the 'principal competitors' to its RSG business (offshore) as Aramark, Sodexo, and ESS.⁶⁶² The same document also describes Entier's 'main competitors' offshore as Aramark, ESS and Sodexo, and describes 'other competitors' as including Foss, Conntrak, Francois, IFS, Connect and Atlas.⁶⁶³
- (b) Entier's information memorandum (which was intended for prospective acquirers of Entier) (dated July 2022) presents its market share in the UKCS,

⁶⁵⁵ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 5.

⁶⁵⁶ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 2.

⁶⁵⁷ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

⁶⁵⁸ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

⁶⁵⁹ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

⁶⁶⁰ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

⁶⁶¹ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

⁶⁶² Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 23.

⁶⁶³ Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 23.

listing the shares of the following competitors: Aramark, ESS, Sodexo, Self-supply ('Self'), and 'Others'.⁶⁶⁴

- D.23 An Entier document implies that it considers self-supply to be a competitive alternative, though not a main source of competition. This document, '[REDACTED]', lists its 'main competitors' as described in paragraph D.22(b), then lists 'other competitors'. Included in 'other competitors', it notes that '[REDACTED]'.⁶⁶⁵
- D.24 An Entier document implies that it considers the poaching of its staff to be a competitive threat. This document, '[REDACTED]', lists '[REDACTED]'. It describes mitigating actions including '[REDACTED]'.⁶⁶⁶

Shares of supply

- D.25 We have reviewed documents relating to the Parties' shares of supply in the markets for OCS.
- D.26 Aramark's internal documents present its share of supply:
- (a) An Aramark document dated January 2024, '[REDACTED]', describes its share supply in the UKCS (by revenue) as [40-50]%. Other competitors' shares are listed, namely ESS with [30-40]%, Entier with [20-30]%, 'Self-Deliver' with [0-5]%, Sodexo with [0-5]%, and Francois with [0-5]%.⁶⁶⁷ We note that the shares of all listed suppliers sum to 100%.
 - (b) An Aramark document analysing shares of supply (by revenue) for the UKCS pre- and post-acquisition of Entier lists shares of supply for the UKCS pre-acquisition, as [30-40]% for Aramark, [30-40]% for ESS, [20-30]% for Entier, [0-5]% for 'Self-Deliver', [0-5]% for Sodexo, and [0-5]% for Francois. Post-acquisition, Aramark and Entier are listed as having a combined share of [60-70]%.⁶⁶⁸
- D.27 Additionally, Aramark documents indicate that Aramark considered itself to be the market leader in the UKCS prior to the acquisition of Entier.
- (a) An Aramark document describing the potential acquisition of Entier, '[REDACTED]', notes under the heading '[REDACTED]' that the acquisition 'expands leadership positions in UKCS/[REDACTED]'.⁶⁶⁹

⁶⁶⁴ Entier internal document, Annex 366 to Entier's response to the CMA's s109 notice dated 7 August 2025, slide 48.

⁶⁶⁵ Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 14.

⁶⁶⁶ Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 83.

⁶⁶⁷ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 8.

⁶⁶⁸ Aramark internal document, Annex 133 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, sheet '[REDACTED]'. As noted in a previous footnote, we consider that this document relates to the acquisition of Entier.

⁶⁶⁹ Aramark internal document, Annex 117 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 26.

- (b) Another Aramark document, '[REDACTED]', under the heading '[REDACTED]', notes that the acquisition of Entier would 'cement Aramark's already market leading position in the UKCS and bolster wider regions'.⁶⁷⁰

D.28 An Entier document, '[REDACTED]', presents shares of supply (by POB) from 2008 to 2023. Entier's share of supply in 2023 is described as approximately [30-40]%. Other competitors' shares are listed, namely Aramark with approximately [20-30]%, ESS with approximately [20-30]%, IFS with approximately [5-10]%, 'Self' with approximately [5-10]%, Francois with approximately [0-5]%, Sodexo with approximately [0-5]%, and Trinity with approximately [0-5]%. Additionally, Foss, Conntrak and Celera are listed as having shares of [0-5]%.⁶⁷¹

D.29 Aramark and Entier documents imply that less than 10% of the market is accounted for by self-supply:

- (a) An Aramark document from 2024 calculates the share of self-supply in the UKCS by revenue as 2%.⁶⁷² Similarly, an Aramark document calculating shares pre- and post-acquisition calculates the share of self-supply at 2%.⁶⁷³
- (b) An Entier document, '[REDACTED]', presents shares of supply by POB from 2023, with self-supply representing 6% of the market.

Barriers to entry and expansion

D.30 Some Aramark internal email exchanges suggest that Aramark is able to offer discounts for contracts involving more assets, including when combining [REDACTED]. For example:

- (a) In an internal email exchange regarding an invitation to tender from a customer ([REDACTED]), involving two offshore lots and one onshore lot, Aramark identifies that it is in Aramark's '[REDACTED]' to bid for all three lots, because ESS and Sodexo are '[REDACTED]', and because [REDACTED].⁶⁷⁴ Aramark later notes that '[REDACTED]' and that '[REDACTED]'.⁶⁷⁵
- (b) In an email exchange between Aramark and a customer ([REDACTED]) Aramark notes that it offered several forms of discount to the customer, including '[REDACTED]'. It proposed that it could offer an additional discount if it could secure the customer's two campaigns in Norway, having already been confirmed as the catering provider for a vessel in the UKCS.⁶⁷⁶

⁶⁷⁰ Aramark internal document, Annex 115 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁶⁷¹ Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 15.

⁶⁷² Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 8.

⁶⁷³ Aramark internal document, Annex 133 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, sheet.

⁶⁷⁴ Aramark internal document, Annex 657 to Aramark's response to the CMA's s109 notice dated 7 August 2025.

⁶⁷⁵ Aramark internal document, Annex 657 to Aramark's response to the CMA's s109 notice dated 7 August 2025.

⁶⁷⁶ Aramark internal document, Annex 581 to Aramark's response to the CMA's s109 notice dated 7 August 2025.

- D.31 Aramark deal memos imply that [REDACTED]. For example:
- (a) An Aramark deal memo for a customer which Aramark notes as a '[REDACTED]' ([REDACTED]), lists as a [REDACTED].⁶⁷⁷ However, it notes the '[REDACTED]' that it is '[REDACTED]'.⁶⁷⁸
 - (b) An Aramark deal memo ([REDACTED]) notes that Aramark '[REDACTED]' the last competitive tender for the customer's Norwegian business because '[REDACTED]', and that '[REDACTED]'. It goes on to note that '[REDACTED]'.⁶⁷⁹
 - (c) An Aramark document, '[REDACTED]', describes how '[REDACTED]'.⁶⁸⁰
- D.32 Aramark documents imply that it considered the potential acquisition of Norsk Offshore Catering, which would allow it to enter the Norwegian market. For example:
- (a) An Aramark document considering the acquisition of Norsk Offshore Catering, '[REDACTED]', under '[REDACTED]', notes that the acquisition enables Aramark '[REDACTED]' and enables Aramark to participate in multi-region bids including in Norway.⁶⁸¹
 - (b) An Aramark document, '[REDACTED]', describes how an '[REDACTED]' of NOC would '[REDACTED]', and how Norway represents an '[REDACTED]'. It additionally notes that Aramark had '[REDACTED]'.⁶⁸²
 - (c) An Aramark document, '[REDACTED]', under the imperative of '[REDACTED]', notes '[REDACTED]'.⁶⁸³
- D.33 An Aramark deal memo implies that having a presence onshore and offshore may be an advantage for opportunities involving offshore and onshore assets, and conversely that lacking the ability to service both is a weakness. Specifically:
- (a) In an Aramark deal memo, '[REDACTED]', Aramark notes as part of its '[REDACTED]' the '[REDACTED]'. Additionally, under '[REDACTED]', it notes that '[REDACTED]'.⁶⁸⁴
 - (b) In the same document, when describing competitors, Aramark notes as '[REDACTED]' for Sodexo that it '[REDACTED]', and for ESS it notes '[REDACTED]'. [REDACTED]', it notes for Sodexo that Sodexo '[REDACTED]'.⁶⁸⁵

⁶⁷⁷ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁶⁷⁸ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁶⁷⁹ Aramark internal document, Annex 167 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 1-2.

⁶⁸⁰ Aramark internal document, Annex 129 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 21.

⁶⁸¹ Aramark internal document, Annex 152 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 4.

⁶⁸² Aramark internal document, Annex 123 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 12.

⁶⁸³ Aramark internal document, Annex 097 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 1.

⁶⁸⁴ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 2 and 4.

⁶⁸⁵ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

- D.34 Entier documents imply that it uses [REDACTED]. For example:
- (a) Entier's information memorandum (which was intended for prospective acquirers of Entier) ([REDACTED]) includes case studies of winning offshore contracts due to onshore service delivery. Specifically:
 - (i) It notes that [REDACTED] awarded Entier's offshore business (RSG) additional vessels '[REDACTED]'.⁶⁸⁶
 - (ii) It notes that [REDACTED] has organised events for RSG clients onshore, such as for [REDACTED] and [REDACTED] management teams, and also for companies who are not existing RSG clients, such as [REDACTED] and [REDACTED].⁶⁸⁷ It further notes that '[REDACTED]'.
 - (b) An Entier [REDACTED] notes under '[REDACTED]' that targets for its Fresh business are '[REDACTED]' including which '[REDACTED]'.⁶⁸⁸
 - (c) An Entier [REDACTED] notes that six of its offshore contracts have come from '[REDACTED]'.⁶⁸⁹
- D.35 One Aramark document indicates that having business in the Arabian Gulf is beneficial for winning certain global customers. This document, discussing its Arabian Gulf business strategy ('[REDACTED]'), describes a customer ([REDACTED]) bringing its UKCS operations to market, and notes that '[REDACTED]'.⁶⁹⁰

Marine

- D.36 Some Aramark documents indicate that there are differences between Marine and the other sectors it serves.
- (a) An Aramark document, '[REDACTED]', lists under 'Types of Installation/Market Segments' four different items. It lists separately: 'Oil and Gas Platform (Fixed, FPSO, FSO, NUI's)', 'Mobile Offshore Drilling Units (Jack-Ups, Semi-Subs, Drill-ships)', 'Accommodation Barges (Jack-Ups, Semi-Subs)', and 'Renewable Energy / Marine (Jack-Ups, Vessels)'.⁶⁹¹
 - (b) An Aramark document, '[REDACTED]', notes that Entier's other 'main sector' in offshore is Marine services, which Aramark '[REDACTED]'.⁶⁹² Additionally, in relation to Marine:
 - (i) It notes that many incumbents self-operate catering services, and that '[REDACTED]'.

⁶⁸⁶ Entier internal document, Annex 366 to Entier's response to the CMA's s109 notice dated 7 August 2025, page 30.

⁶⁸⁷ Entier internal document, Annex 366 to Entier's response to the CMA's s109 notice dated 7 August 2025, page 35.

⁶⁸⁸ Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, page 23.

⁶⁸⁹ Entier internal document, Annex 202 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, page 19.

⁶⁹⁰ Aramark internal document, Annex 420 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 3.

⁶⁹¹ Aramark internal document, Annex 129 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 6.

⁶⁹² Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

- (ii) It notes that Entier's main competitors are Sodexo, ISS and IFS (Belgium).⁶⁹³
- (iii) It notes that there are '[X]' as most vessels are on very short contracts.⁶⁹⁴
- (iv) It describes local labour requirements for marine vessels, noting that Marine services providers occasionally add '[X]' staff for specific jurisdictions, such as in Saudi Arabia where suppliers keep the normal crew onboard, but add Saudi nationals to fulfil local requirements.⁶⁹⁵
- (c) An Aramark document, [X], lists under '[X]' two imperatives relating to Marine. It lists '[X]', and '[X]'.⁶⁹⁶
- (d) An Aramark document relating to the acquisition, [X], notes as part of a '[X]' that:
 - (i) Regarding '[X]', Aramark is to '[X]'.
 - (ii) Regarding '[X]', that '[X]'.⁶⁹⁷
- (e) An Aramark strategy document for the Arabian Gulf offshore business, [X], includes comments which imply that Marine customers are different from other customer types.⁶⁹⁸ It notes that:
 - (i) Aramark's Gulf business '[X]' which are '[X]'.
 - (ii) Marine clients are '[X]' and '[X]'.

D.37 Aramark and Entier documents indicate that the Parties each track the proportion of their offshore business that is servicing Marine customers. For example:

- (a) An Aramark document presenting its operational splits pre- and post-acquisition calculates its pre-acquisition split as [5-10]% Marine, and Entier's as [20-30]% Marine. It calculates its combined (post-acquisition) split as [10-20]% Marine.⁶⁹⁹

⁶⁹³ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁶⁹⁴ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁶⁹⁵ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁶⁹⁶ Aramark internal document, Annex 449 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 23.

⁶⁹⁷ Aramark internal document, Annex 118 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 6.

⁶⁹⁸ Aramark internal document, Annex 420 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3. Also in Aramark internal document, Annex 418 to the CMA's s109 notice dated 7 August 2025, page 3.

⁶⁹⁹ Aramark internal document, Annex 133 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, sheet.

- (b) An Entier document, '[