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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 view is that Marine is a developing 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 of

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.

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 the following challenges:

- (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 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:
 - (i) As outlined in Chapter 4, our 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.
 - (ii) We understand that the shares presented in Table A.4 include Marine customers with highly mobile global assets (specifically Technip). 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. To align with the relevant product market, our view is that the Technip contract should be excluded from these shares of supply, as to include the Technip contract into this calculation would overstate the competitive position of Conntrak, and understate that 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,

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

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:

- (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

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.

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 responses to the CMA questionnaire dated 27 May 2025 [X]; and [X].

which subsequently spend time outside the UKCS or the North Sea, this revenue is excluded from our shares of supply calculations.

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.

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

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.

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 as

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.

explained in paragraph above A.12(c)(ii), Technip is excluded from these shares of supply.²⁶

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]	[10-20]
Entier	[20-30]	[20-30]	[30-40]	[20-30]
Parties	[20-30]	[30-40]	[40-50]	[30-40]
Sodexo	[50-60]	[40-50]	[30-40]	[40-50]
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 Sodexo had the largest share for Marine from 2022-2024, with an average share of [40-50]%, with this decreasing over the period from [50-60]% to [30-40]%. The Merged Entity has a smaller share of supply for Marine than Offshore Infrastructure at [30-40]% on average from 2022-2024. Entier had a share of supply of [20-30]% on average from 2022-2024. Aramark had a [10-20]% share of supply on average from 2022-2024. 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.

²⁶ We also note that [REDACTED].

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 2020.²⁷ Similarly, we requested data from OCS customers on their most recent opportunities in relation to OCS in the UKCS.²⁸ In our request, we asked for both tenders and other non-tender

²⁷ Third party responses 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 1 September 2025; Third party response to the CMA's RFI dated 2 September 2025; Third party response to the CMA questionnaire dated 10 September 2025; Third party responses to the CMA RFI dated 15 September 2025; Third party response to the CMA questionnaire dated 16 September 2025; Third party response to the CMA questionnaire dated 17 September 2025; Third party response to the CMA RFI dated 18 September 2025; Third party response to the CMA RFI dated 25 September 2025; Third party response to the CMA RFI dated 26 September 2025; and Third party response to the CMA's RFI dated 3 October 2025.

²⁸ 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 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; 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

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 6.²⁹

- B.3 In some cases, we supplemented the data received with further information gathered during calls with OCS suppliers and customers.³⁰

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.³¹ 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:³²

- (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.³³

- 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.

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 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.

²⁹ 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.

³⁰ Third party call note.

³¹ 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.

³² 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.

³³ I.e, when considering a match, the two tenders must not list different winners.

- (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.³⁴ 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 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,³⁵ 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.³⁶
- (e) For the purposes of this analysis, in instances where a customer did not indicate that it shortlisted any suppliers, we have treated the customer as having shortlisted a supplier where the customer fully evaluated the bid or ultimately selected that supplier (where we are aware of such instance).

B.8 After taking these steps and applying the matching process, our final dataset consists of [40-50] tenders.³⁷ Of these tenders:

³⁴ 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.

³⁵ This includes non-North Sea UKCS.

³⁶ In cases where no other respondent mentioned the tender.

³⁷ 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 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,

- (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 view is that these do not significantly impact the results presented above. For instance, 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 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]).³⁸
- 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

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).

³⁸ Additionally, [10-20] 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

<i>Customer type</i>	<i>Assets exclusively in the UKCS</i>	<i>Assets exclusively in the non-UKCS North Sea</i>	<i>Assets in both the UKCS and non-UKCS North Sea</i>	<i>All tenders</i>
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)

<i>Supplier</i>	<i>No. of bids</i>	<i>No. of times shortlisted</i>	<i>% of bids shortlisted for</i>	<i>No. of tenders won</i>	<i>% of bids won</i>
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. As explained in paragraph A.12(c)(ii) above, Technip has been excluded from our analysis, as it does not align with the relevant product market.³⁹ 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 more than one tender ([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.

³⁹ As described in Chapter 4, Aramark does not compete for Marine customers that require the OCS supplier to service their Marine fleet globally, of which Technip is an example.

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 ([10-20]) 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 [X]. 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)

<i>Supplier</i>	<i>2020</i>	<i>2021</i>	<i>2022</i>	<i>2023</i>	<i>2024</i>	<i>2025</i>	<i>Total</i>
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 below, our 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 Offshore Infrastructure customers and Marine customers.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 the CMA questionnaire. Third party responses to the CMA RFI dated 26 September 2025, Third party response to the CMA RFI dated 11 August 2025; Third party response to the CMA RFI dated 15 September 2025; Third party response to the CMA RFI dated 2 October 2025.

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 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.31(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. Aramark internal document, Annex 720 to Parties' response to the CMA RFI dated 15 September 2025, Annex 720.

⁴² Third party responses to the CMA questionnaire; Third party response to the CMA's RFI dated 1 September 2025, and Third party response to the CMA's RFI dated 5 September 2025

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.

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[illegible]

† [✂]. (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.39 Of the [REDACTED] customers with upcoming opportunities, we have information from [REDACTED] customers regarding which suppliers they are likely to invite to bid. Of these customers, in summary:

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.

- (a) All customers expect to invite Aramark and Entier to bid.⁵⁰
- (b) All customers expect to invite ESS to bid.⁵¹
- (c) Almost all customers expect to invite Sodexo to bid.⁵²
- (d) Almost all of customers expect to invite Francois to bid.⁵³
- (e) Half of customers expect to invite Conntrak to bid.⁵⁴
- (f) Two customers expect to invite Foss to bid.⁵⁵
- (g) One customer expects to invite Trinity to bid.⁵⁶
- (h) No other suppliers were listed by these six customers as suppliers they expect to invite to bid.

B.40 We note that one customer included in Table B.12 has recently undertaken a benchmarking exercise with Aramark, ESS, Entier and Conntrak to determine whether it will launch a tender in the next two of years.⁵⁷ [X].⁵⁸ We have excluded this customer from the statistics regarding which suppliers are likely to be invited to bid (in B.39 above), on the basis that we do not have information on who that customer expects to invite to bid following the conclusion of its benchmarking exercise.⁵⁹

B.41 We note that one additional customer not included in Table B.12 submitted that it has an upcoming procurement process, but that the tender process will be managed by another customer who also has an upcoming procurement process (which is included in Table B.12). We have treated these together as one opportunity and, for the purposes of the analysis regarding which suppliers they are likely to invite to bid, used the submission provided by the customer managing the tender process.

⁵⁰ Third party responses to the CMA questionnaire; and Third party response to the CMA RFI dated 26 September 2025.

⁵¹ Third party responses to the CMA questionnaire; and Third party response to the CMA RFI dated 26 September 2025.

⁵² Third party responses to the CMA questionnaire.

⁵³ Third party responses to the CMA questionnaire; and Third party response to the CMA RFI dated 26 September 2025.

⁵⁴ Third party responses to the CMA questionnaire; and Third party response to the CMA RFI dated 26 September 2025.

⁵⁵ Third party response to the CMA questionnaire; and Third party response to the CMA RFI dated 26 September 2025.

⁵⁶ Third party response to the CMA questionnaire.

⁵⁷ Third party response to the CMA RFI dated 30 September 2025.

⁵⁸ Third party response to the CMA RFI dated 2 December 2025.

⁵⁹ We note that prior to concluding its benchmarking exercise, this customer submitted that it would likely invite to bid. Third party response to the CMA questionnaire dated 8 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
[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].

‡ [REDACTED] (Third party call note)

† [REDACTED] (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.42 We have identified [REDACTED] upcoming opportunities in the Marine Market in the next two years.

B.43 Of the [REDACTED] customers with upcoming opportunities, we have information from [REDACTED] customers regarding which OCS suppliers they are likely to invite to bid. Of these customers, in summary:

- (a) All of these customers expect to invite Aramark;⁶⁰
- (b) Three quarters of these customers expect to invite ESS.⁶¹
- (c) Three quarters of these customers expect to invite Francois;⁶²
- (d) Two of these customers expect to invite Conntrak;⁶³
- (e) Two of these customers expect to invite Sodexo;⁶⁴
- (f) Two of these customers expect to invite Ligabue;⁶⁵
- (g) One of these customers expects to invite Foss;⁶⁶ and

⁶⁰ Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA questionnaire dated 3 September 2025; Third party response to the CMA questionnaire dated 9 September 2025; Third party call notes; Third party response to the CMA RFI dated 15 September 2025.

⁶¹ Third party response to the CMA questionnaire dated 12 August 2025; Third party response to the CMA questionnaire dated 9 September 2025; Third party call notes; 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 3 September 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 call note. Third party response to the CMA questionnaire dated 3 September 2025. Third party call note.

⁶⁴ 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.

⁶⁵ 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.

⁶⁶ Third party response to the CMA questionnaire dated 12 August 2025. Third party response to the CMA RFI dated 15 September 2025.

- (h) 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.⁶⁷

⁶⁷ 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.⁶⁸ 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,⁶⁹ 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 sent a

⁶⁸ We additionally sent questionnaires to some customers of IFS and OSERV which are not summarised in this appendix.

⁶⁹ Third party responses to the CMA questionnaire dated 8 August 2025.

follow-up request to [REDACTED] Offshore Infrastructure customers with assets in the UKCS to better understand the tender process and the concept of 'track record', and we received responses from almost all of them [REDACTED].⁷⁰ We also held 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 a key supplier [REDACTED] to the Parties and their competitors.

Factors important in the selection of OCS suppliers

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.⁷¹ Just over half of customers also identified experience in supplying OCS as an important factor when choosing a supplier,⁷² 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.⁷³ Other factors frequently identified related to the quality of services/food,⁷⁴ and compliance with health and safety standards.⁷⁵
 - (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,

⁷⁰ We also sent these questions to two Marine customers and these responses are not summarised in this appendix. Third party responses to the CMA RFI dated 24 November 2025.

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

⁷² Third party responses to the CMA questionnaire dated 27 May 2025.

⁷³ Third party responses to the CMA's questionnaire dated 27 May 2025.

⁷⁴ Third party response to the CMA questionnaire dated 27 May 2025.

⁷⁵ Third party responses to the CMA questionnaire dated 27 May 2025.

it planned to look at alternative ways of doing things in order to reduce offshore personnel.⁷⁶

- (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.⁷⁷

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,⁷⁸ including through FPAL/Achilles,⁷⁹ while other customers narrowed down potential suppliers using criteria.⁸⁰ Some of these criteria included experience in providing OCS in the region of operation,⁸¹ and membership of COTA.⁸² 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.⁸³
- (b) For Offshore Infrastructure customers who extended or negotiated, two customers noted good performance of their current supplier,⁸⁴ with one of these customers noting having extended due to a global contract discount.⁸⁵ Two other customers mentioned continuity of service as a reason for contract extension.⁸⁶ 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.⁸⁷
- (c) Some Marine customers listed similar criteria to Offshore Infrastructure customers, such as that the supplier is an incumbent,⁸⁸ health and safety,⁸⁹

⁷⁶ Third party call note.

⁷⁷ Third party call note.

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

⁷⁹ We understand FPAL/Achilles is database which provides a repository of potential suppliers including those of OCS.

⁸⁰ Third party responses to the CMA questionnaire dated 8 August 2025.

⁸¹ Third party responses to the CMA questionnaire.

⁸² Third party response to the CMA questionnaire dated 8 August 2025.

⁸³ Third party response to the CMA questionnaire dated 12 August 2025.

⁸⁴ Third party responses to questions the CMA questionnaire.

⁸⁵ Third party response to the CMA questionnaire dated 8 August 2025.

⁸⁶ Third party responses to the CMA questionnaire.

⁸⁷ Third party response to the CMA questionnaire dated 8 August 2025.

⁸⁸ Third party responses to the CMA questionnaire.

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

experience,⁹⁰ and service quality.⁹¹ 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 invited suppliers which were able to service globally,⁹² One customer invited suppliers which had a presence in Northern Europe,⁹³ 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.⁹⁴ 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.⁹⁵

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 considerations⁹⁶ and over half of the customers who responded to this question mentioned quality of food/service/performance.⁹⁷
- (b) A small minority of Offshore Infrastructure customers mentioned that they would consider switching at the end of the current contract,⁹⁸ and two mentioned that they would consider switching as a result of HSE incidents/safety.⁹⁹
- (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.¹⁰⁰
 - (ii) High crew attrition.¹⁰¹

⁹⁰ Third party responses to the CMA questionnaire.

⁹¹ Third party responses to the CMA questionnaire.

⁹² Third party response to the CMA questionnaire dated 8 August 2025.

⁹³ Third party response to the CMA questionnaire dated 12 August 2025.

⁹⁴ Third party response to the CMA questionnaire dated 12 August 2025.

⁹⁵ Third party call note.

⁹⁶ Third party responses to the CMA questionnaire.

⁹⁷ Third party responses to the CMA questionnaire.

⁹⁸ Third party responses to the CMA questionnaire.

⁹⁹ Third party responses to the CMA questionnaire.

¹⁰⁰ Third party response to the CMA questionnaire dated 12 August 2025.

¹⁰¹ Third party response to the CMA questionnaire dated 8 August 2025.

- (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.¹⁰²
- (iv) Supplier strategy.¹⁰³
- (d) Additionally, we also note the following points were factors for certain Marine customers:
 - (i) Project specific requirements (including Local Content requirements, fiscal constraints).¹⁰⁴
 - (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.¹⁰⁵

C.10 We also asked customers how important or unimportant a list of factors would be,¹⁰⁶ 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.

Supplier has a local presence in the area

- C.11 Over half of Offshore Infrastructure customers rated a supplier having a local presence in the area as 4 or above out of 5,¹⁰⁷ with a small minority of customers rating this 2 or below out of 5.¹⁰⁸ Some Offshore Infrastructure customers explained that this was important for the local supply chain,¹⁰⁹ and the management of relationships.¹¹⁰
- C.12 Almost all Marine customers rated a supplier having a local presence in the area as 4 or above out of 5.¹¹¹ 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

¹⁰² Third party response to the CMA questionnaire dated 8 August 2025.

¹⁰³ Third party response to the CMA questionnaire dated 8 August 2025.

¹⁰⁴ Third party response to the CMA questionnaire dated 9 September 2025.

¹⁰⁵ Third party response to the CMA questionnaire dated 12 August 2025.

¹⁰⁶ 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.

¹⁰⁷ Third party responses to the CMA questionnaire.

¹⁰⁸ Third party responses to the CMA questionnaire.

¹⁰⁹ Third party responses to the CMA questionnaire.

¹¹⁰ Third party responses to the CMA questionnaire.

¹¹¹ Third party responses to the CMA questionnaire.

ultimately comes down to price and capability in areas the vessel is planned to operate in.¹¹²

- C.13 One Marine customer considered local presence important but not pivotal,¹¹³ 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.¹¹⁴

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

- C.14 Most Offshore Infrastructure customers who responded to this question rated senior management staff having prior experience in offshore catering in the UKCS as 4 or above out of 5 as to whether they would invite a supplier to bid or bilaterally negotiate with them.¹¹⁵
- C.15 Some of these Offshore Infrastructure customers explained that this is important as there are specific requirements associated with the UKCS,¹¹⁶ including local regulations. For example, one customer said it is crucial that the supplier understands the UKCS environment,¹¹⁷ 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.¹¹⁸ Another customer said that it is a niche area of catering and requires the relevant knowledge and expertise to run properly.¹¹⁹ One customer explained that senior management are important, but that field personnel are more important.¹²⁰
- C.16 All Marine customers who responded to this question rated senior management staff having prior experience in offshore catering in the UKCS as 4 or above out of 5 as to whether they would invite a supplier to bid or bilaterally negotiate with them.¹²¹ One Marine customer qualified their response with the statement that this is only important for the provision of services in the UKCS,¹²² and another customer explained that this is important as the UKCS, and wider North Sea/Northern Europe is its focus.¹²³ One Marine customer said that an

¹¹² Third party call note.

¹¹³ Third party response to the CMA questionnaire dated 12 August 2025.

¹¹⁴ Third party call note.

¹¹⁵ Third party responses to the CMA questionnaire.

¹¹⁶ Third party responses to the CMA questionnaire.

¹¹⁷ Third party response to the CMA questionnaire dated 8 August 2025.

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

¹¹⁹ Third party response to the CMA questionnaire dated 8 August 2025.

¹²⁰ Third party response to the CMA questionnaire dated 12 August 2025.

¹²¹ Third party responses to the CMA questionnaire.

¹²² Third party response to the CMA questionnaire dated 9 September 2025.

¹²³ Third party response to the CMA questionnaire dated 12 August 2025.

understanding of local regulations, food and ethics,¹²⁴ was important, and another Marine customer said local expertise¹²⁵ was important.

Senior management staff has prior experience in offshore catering globally

- C.17 Overall, Offshore infrastructure customers considered the global experience of senior management less important than UKCS experience.
- C.18 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 out of 5.¹²⁶ Less than half of these customers explained that while this is important, it is not as important as UKCS experience.¹²⁷
- C.19 Just under half of Offshore Infrastructure customers rated this as 2 or below out of 5.¹²⁸ Two customers explained that they considered this not or not very important as they do not have assets outside the North Sea/UKCS,¹²⁹ and another customer explained that this is not relevant to its operations.¹³⁰
- C.20 Two Offshore Infrastructure customers who responded to this question rated this as 4 out of 5,¹³¹ and no Offshore Infrastructure customer rated this 5 out of 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.¹³²
- C.21 Marine customers overall considered global experience of senior management more important than Offshore Infrastructure customers. Less than half of Marine customers rated this factor as 4 or above out of 5,¹³³ while two Marine customers rated this 2 or below out of 5.¹³⁴

Supplier's track record in the UKCS

- C.22 Almost all Offshore Infrastructure customers who responded to this question rated the supplier's track record in the UKCS as 4 or above out of 5 as to whether they would invite a supplier to bid or bilaterally negotiate with them.¹³⁵ Customers variously provided reasons for their response including that a UKCS track record:

¹²⁴ Third party response to the CMA questionnaire dated 12 August 2025.

¹²⁵ Third party response to the CMA questionnaire dated 3 September 2025.

¹²⁶ Third party responses to the CMA questionnaire.

¹²⁷ Third party responses to the CMA questionnaire.

¹²⁸ Third party responses to the CMA questionnaire.

¹²⁹ Third party responses to the CMA questionnaire.

¹³⁰ Third party response to the CMA questionnaire dated 12 August 2025.

¹³¹ Third party responses to the CMA questionnaire.

¹³² Third party response to the CMA questionnaire dated 8 August 2025.

¹³³ Third party responses to the CMA questionnaire.

¹³⁴ Third party responses to question 17 of the CMA questionnaire.

¹³⁵ Third party responses to the CMA questionnaire.

- (a) provides confidence in a supplier's capability,¹³⁶ with one explaining that this reduces risk of operational or compliance issues in the UKCS;¹³⁷
- (b) directly demonstrates the ability to deliver services under local, operational, legal and regulatory conditions, describing UKCS performance is a key differentiator;¹³⁸
- (c) was a minimum requirement in their previous tender exercise and would be in future exercises;¹³⁹
- (d) is essential¹⁴⁰ or very important;¹⁴¹ and
- (e) is good for reference.¹⁴²

- C.23 One customer stated that it is crucial that the supplier understands the UKCS environment,¹⁴³ and two other customers mentioned service as a key factor.¹⁴⁴ One other customer further stated that as Offshore catering has a direct impact on offshore morale, track record is considered very important.¹⁴⁵
- C.24 Only two Offshore Infrastructure customers which responded to this question rated this 3 out of 5 or below.¹⁴⁶ One of these explained that all suppliers that meet the compliance and safety criteria would be considered, and that cost and safety are key consideration factors.¹⁴⁷
- C.25 Similarly, almost all Marine customers which responded to the question rated the supplier's track record in the UKCS as 4 or above out of 5 as to whether they would invite a supplier to bid or bilaterally negotiate with them.¹⁴⁸ Only one customer¹⁴⁹ rated this 2 or below out of 5, and subsequently further explained that an OCS supplier's track record in the customer's selection of OCS supplier was a relevant consideration in its equation, but it is not a showstopper.¹⁵⁰

¹³⁶ Third party responses to the CMA questionnaire.

¹³⁷ Third party responses to the CMA questionnaire.

¹³⁸ Third party response to the CMA questionnaire dated 8 August 2025.

¹³⁹ Third party response to the CMA questionnaire dated 8 August 2025.

¹⁴⁰ Third party response to the CMA questionnaire dated 8 August.

¹⁴¹ Third party responses to the CMA questionnaire.

¹⁴² Third party response to the CMA questionnaire dated 8 August.

¹⁴³ Third party responses to the CMA questionnaire dated 8 August.

¹⁴⁴ Third party responses to the CMA questionnaire.

¹⁴⁵ Third party response to the CMA questionnaire.

¹⁴⁶ Third party responses to the CMA questionnaire.

¹⁴⁷ Third party response to the CMA questionnaire dated 8 August 2025.

¹⁴⁸ 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 (Third party response to the CMA questionnaire dated 9 September 2025).

¹⁴⁹ Third party response to the CMA questionnaire dated 3 September 2025.

¹⁵⁰ Third party call note.

Supplier's track record globally

- C.26 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.27 Some Offshore Infrastructure customers rated this as 4 or above out of 5 as to whether they would invite a supplier to bid or bilaterally negotiate with them,¹⁵¹ while just under half of Offshore Infrastructure customers rated this 2 or below out of 5.¹⁵²
- C.28 Customers who rated this as 4 or above out of 5 reasoned that this is because global track record indicates broader credibility and ability to scale,¹⁵³ and that it is important to consider for any HSE incidents,¹⁵⁴ but both of these customers considered it less important than UKCS track record.
- C.29 Similarly, of the customers who rated this factor 3 out of 5,¹⁵⁵ some noted that global track record is not as relevant/important as UKCS track record.¹⁵⁶ In particular, one of these customers noted that a strong global track record shows stability, scalability, and maturity of systems, and is useful when considering innovation or contingency sourcing but without local UKCS relevance, it carries less weight.¹⁵⁷ One customer noted that if there was a material concern such as financial stability or poor HSEQ, it would give global track record consideration.¹⁵⁸
- C.30 Customers who rated this factor 2 or below out of 5 said that this was because global track record is not a pre-requisite,¹⁵⁹ not relevant to its operations,¹⁶⁰ not a critical factor,¹⁶¹ and one customer explained that it has no global track record requirement.¹⁶²
- C.31 Similarly, less than half of Marine customers rated this as 4 or above out of 5,¹⁶³ and less than half of Marine customers rated this 3 out of 5.¹⁶⁴

¹⁵¹ Third party responses to the CMA questionnaire.

¹⁵² Third party responses to the CMA questionnaire.

¹⁵³ Third party response to the CMA questionnaire dated 08 August.

¹⁵⁴ Third party response to the CMA questionnaire dated 08 August.

¹⁵⁵ Third party responses to the CMA questionnaire.

¹⁵⁶ Third party responses to the CMA questionnaire.

¹⁵⁷ Third party response to the CMA questionnaire dated 08 August.

¹⁵⁸ Third party response to the CMA questionnaire dated 08 August.

¹⁵⁹ Third party response to the CMA questionnaire dated 08 August.

¹⁶⁰ Third party response to the CMA questionnaire dated 08 August.

¹⁶¹ Third party response to the CMA questionnaire dated 08 August.

¹⁶² Third party response to the CMA questionnaire dated 08 August.

¹⁶³ Third party responses to the CMA questionnaire.

¹⁶⁴ Third party responses to the CMA questionnaire.

Further evidence on track record from Offshore Infrastructure customers

- C.32 We asked Offshore Infrastructure customers whether they would consider procuring OCS in the UKCS, from a supplier that does not have any prior experience of providing OCS, and whether this would differ if the supplier was already active elsewhere, including for example the North Sea or globally.
- C.33 Three quarters of customers who responded to this question said they would not consider procuring OCS in the UKCS from a supplier which does not have any prior experience of providing OCS.¹⁶⁵ Some customers which said they would not consider this variously explained that experience offshore is required due to the critical nature of the service¹⁶⁶ and the high risk and unique offshore environment.¹⁶⁷
- C.34 On a call, one customer explained that an OCS supplier's track record outside the UKCS would not provide the customer with confidence.¹⁶⁸
- C.35 Some of the customers who said they would not consider procuring OCS in the UKCS from a supplier which does not have any prior experience of providing OCS mentioned that this may differ if a supplier is active in other geographies.¹⁶⁹ For example, these customers said that:
- (a) Experience of working in the UKCS and providing the required services under similar contract(s) elsewhere is a key aspect. If experience can be fully demonstrated of providing similar services elsewhere globally then this would be different.¹⁷⁰
 - (b) Consideration may be given to suppliers who may not have been active in the North Sea but can demonstrate they have been active globally. However, this would depend on the tender criteria and tender objectives at the time of requirement as high likelihood that these suppliers would score less in any technical tender evaluation due to experience.¹⁷¹ On a call, the same customer explained that a brand-new entity without prior offshore knowledge could take a few years to build the necessary capability and track record. It stressed that experience within the sector and offshore catering was a key factor in its previous tender process, as the risk of appointing an inexperienced contractor was considered too high.¹⁷²

¹⁶⁵ Third party response to the CMA questionnaire dated 27 May 2025.

¹⁶⁶ Third party response to the CMA questionnaire dated 27 May 2025.

¹⁶⁷ Third party response to the CMA questionnaire dated 27 May 2025.

¹⁶⁸ Third party call note.

¹⁶⁹ Third party responses to the CMA questionnaire dated 27 May 2025.

¹⁷⁰ Third party response to the CMA questionnaire dated 27 May 2025.

¹⁷¹ Third party response to the CMA questionnaire dated 27 May 2025.

¹⁷² Third party call note.

- (c) Proven experience of OCS is a key requirement, but suppliers who have experience from other regions globally may be considered, provided that the experience extended to offshore provision.¹⁷³

C.36 Some customers stated that they would consider procuring OCS for the UKCS from a supplier which does not have any prior experience of providing OCS.¹⁷⁴

- (a) One customer mentioned that it is happy to support new entrants and was one of Entier's first offshore customers.¹⁷⁵
- (b) Another explained that it would consider [X] who it currently uses elsewhere as its management team have experience and have connections with competent personnel, and that there are other companies like this,¹⁷⁶ but considering alternative suppliers more generally, said that it was not sure as to whether a provider's experience in other geographies would give it enough comfort in the relevant provider's ability to service the customer up to the required standard.¹⁷⁷
- (c) Despite reporting that it would consider alternative suppliers not active in offshore catering currently, one customer recognised that it would be challenging for suppliers without an existing offshore business to meet the tender requirements compared to a supplier already active offshore in the North Sea or globally.¹⁷⁸

C.37 We asked Offshore Infrastructure customers what previous experience they require from a prospective OCS supplier as regards (i) minimum duration (ie for how long the OCS supplier had served the customer or other customers) and (ii) timing (ie how long ago the OCS supplier had served the customer or other customers). We also asked these customers whether there was anything else relevant to track record when evaluating the suitability of an OCS supplier.

- (a) Less than half of the customers that responded to this question told us that they would prefer OCS suppliers to have a minimum of two to five years' experience,¹⁷⁹ and one additional customer stated its preference is for OCS suppliers to have ten years' experience.¹⁸⁰ Of these, some customers specified this should be (or would be ideally) in the UKCS.¹⁸¹

¹⁷³ Third party response to the CMA questionnaire dated 27 May 2025.

¹⁷⁴ Third party responses to the CMA questionnaire dated 27 May..

¹⁷⁵ Third party response to the CMA questionnaire dated 27 May.

¹⁷⁶ Third party response to the CMA questionnaire dated 27 May.

¹⁷⁷ Third party call note.

¹⁷⁸ Third party response to the CMA questionnaire dated 27 May.

¹⁷⁹ Third party responses to the CMA questionnaire dated 24 November 2025.

¹⁸⁰ Third party response to the CMA RFI dated 24 November 2025.

¹⁸¹ Third party responses to the CMA questionnaire dated 24 November 2025.

- (b) One other customer did not state whether it had a minimum duration, but stated that it would be looking for suppliers to demonstrate experience of executing similar services / work within the UKCS during the last five years.¹⁸²
- (c) Half of customers that responded to this question stated that they do not require a minimum or typical duration or timing of previous experience.¹⁸³
 - (i) Nevertheless, over half of these customers indicated that they generally take into account the experience and track record of prospective OCS suppliers,¹⁸⁴ including, for example, whether they can demonstrate recent experience in supplying OCS. For example:
 - (1) One customer said that the first stage of the technical evaluation process included pass/fail criteria which focused on the number of fixed offshore oil & gas platforms required to be serviced simultaneously (three or more assets) rather than duration or timing.¹⁸⁵
 - (2) One customer said that in demonstration of a sustained and recent track record it looks for evidence of consistent performance over several years rather than isolated or outdated engagements.¹⁸⁶
 - (3) One customer said that it expects suppliers to demonstrate a meaningful and sustained period of offshore catering experience, typically in the range of several years, with more weight placed on ongoing or recently completed contracts. The same customer clarified that broader global experience can add value, but that it does not substitute for UKCS experience.¹⁸⁷
 - (4) According to one of these customers, track record in other industries may also be relevant.¹⁸⁸
 - (ii) In addition, some customers who did not have a minimum or typical track record requirement¹⁸⁹ variously outlined additional factors which contribute to capability, including experience of the supplier¹⁹⁰ and of known or nominated individuals within the business,¹⁹¹ industry

¹⁸² Third party response to the CMA RFI dated 24 November 2025.

¹⁸³ Third party responses to the CMA RFI dated 24 November 2025.

¹⁸⁴ Third party responses to the CMA RFI dated 24 November 2025.

¹⁸⁵ Third party response to the CMA RFI dated 24 November 2025.

¹⁸⁶ Third party response to the CMA RFI dated 24 November 2025.

¹⁸⁷ Third party response to the CMA RFI dated 24 November 2025.

¹⁸⁸ Third party response to the CMA RFI dated 24 November 2025.

¹⁸⁹ Third party responses to the CMA RFI dated 24 November 2025.

¹⁹⁰ Third party responses to the CMA RFI dated 24 November 2025.

¹⁹¹ Third party response to the CMA RFI dated 24 November 2025.

connections,¹⁹² reputation,¹⁹³ and scale, including of its previous operations¹⁹⁴ and other customers.¹⁹⁵

C.38 We asked Offshore Infrastructure customers to what extent they consider track record to be driven by specific individuals or teams at their OCS supplier.

- (a) Less than half of the customers that responded to this question indicated that specific individuals/teams were not as important as other factors in relation to track record.¹⁹⁶ For example,
 - (i) one customer said that it sees track record being driven by the organisation as a whole and their ability to provide competent and experienced personnel.¹⁹⁷
 - (ii) Another customer described its experience of track record as mainly relating to the overall systems for each supplier, rather than the track record of specific individuals.¹⁹⁸
 - (iii) One customer described that it evaluates track record primarily at the organisational level and does not attribute it to specific individuals, but also described the contribution of senior management and supervisory roles, in particular onshore senior management or contract leadership.¹⁹⁹
 - (iv) One customer described that for a recent tender, its technical evaluation included a technical score for the nominated onshore and offshore personnel, noting that only tenderers who had experience providing OCS to fixed offshore oil and gas platforms in the UKCS would have passed the initial criteria.²⁰⁰
 - (v) One customer described that it places primacy on overall ability to demonstrate successful and recent services to a similar installation in the UKCS.²⁰¹
 - (vi) Another customer responded that track record is not specific individuals, but rather the support they provide as an overall team both

¹⁹² Third party response to the CMA RFI dated 24 November 2025.

¹⁹³ Third party response to the CMA RFI dated 24 November 2025.

¹⁹⁴ Third party response to the CMA RFI dated 24 November 2025.

¹⁹⁵ Third party response to the CMA RFI dated 24 November 2025.

¹⁹⁶ Third party responses to the CMA RFI dated 24 November 2025.

¹⁹⁷ Third party response to the CMA RFI dated 24 November 2025.

¹⁹⁸ Third party response to the CMA RFI dated 24 November 2025.

¹⁹⁹ Third party response to the CMA RFI dated 24 November 2025.

²⁰⁰ Third party response to the CMA RFI dated 24 November 2025.

²⁰¹ Third party response to the CMA RFI dated 24 November 2025.

onshore and offshore personnel, noting customer testimonials specifically.²⁰²

- (b) One customer described that it does not consider track record to be driven by individuals or teams within an OCS supplier but would seek for a bidder to demonstrate competence of key personnel. This customer did not specify which personnel it was referring to.²⁰³
- (c) Less than half of customers that responded to this question explained that they are interested in the track record of key operational staff involved in servicing the contract with customers listing onshore and offshore staff.²⁰⁴ Among these, several customers described the importance of both the offshore crew and the account/contract/operations managers onshore.²⁰⁵
- (d) A small minority of customers that responded to this question highlighted the importance of the company CEO and/or key decision makers onshore.²⁰⁶
 - (i) Two customers described the role of the CEO in establishing or sustaining the ethos and culture of a company.²⁰⁷ One of these customers also described the role of the Camp Boss on an installation as a crucial role required to ensure success.²⁰⁸
 - (ii) One customer described track record as strongly influenced by the experience and oversight of senior management within the OCS supplier. It added that senior management with prior UKCS offshore catering experience is particularly important.²⁰⁹

C.39 We asked Offshore Infrastructure customers what evidence of track record they would require an OCS supplier to be able to demonstrate, at a minimum, to (i) be invited to tender, shortlisted, or be awarded the contract to service their business in the UKCS, and (ii) agree to assign a contract to them. Customers were also asked to consider the relevance (if any) of marine experience.

C.40 Just over half of customers that responded to this question mentioned customer testimonials, feedback or references.²¹⁰

C.41 Just under half of customers that responded to this question did not mention customer testimonials, feedback or references, but considered that other criteria

²⁰² Third party response to the CMA RFI dated 24 November 2025.

²⁰³ Third party response to the CMA RFI dated 24 November 2025.

²⁰⁴ Third party responses to the CMA RFI dated 24 November 2025.

²⁰⁵ Third party responses to the CMA RFI dated 24 November 2025.

²⁰⁶ Third party responses to the CMA RFI dated 24 November 2025.

²⁰⁷ Third party responses to the CMA RFI dated 24 November 2025.

²⁰⁸ Third party responses to the CMA RFI dated 24 November 2025.

²⁰⁹ Third party response to the CMA RFI dated 24 November 2025.

²¹⁰ Third party responses to the CMA RFI dated 24 November 2025.

would satisfy the above, but the criteria varied from customer to customer.²¹¹ These criteria include, but are not limited to:

- (a) being an established catering provider working in remote industries or having people working from them who have experience of this;²¹²
- (b) a proven track record,²¹³ or previous history working with the customer or its peers;²¹⁴
- (c) demonstration of capabilities;²¹⁵
- (d) being based locally in the Aberdeen area;²¹⁶
- (e) maintaining satisfactory HSQE/HSE standards;²¹⁷
- (f) the ability to provide experienced and competent personnel to perform work on an UKCS offshore asset;²¹⁸
- (g) staffing and mobilisation plans;²¹⁹
- (h) experience on fixed assets in the UKCS;²²⁰ and
- (i) other elements in the customer's tender evaluation criteria.²²¹

C.42 Over half of the Offshore Infrastructure customers commented on the relevance of Marine experience when considering what evidence of track record they would require an OCS supplier to be able to demonstrate. Of these customers:

- (a) Over half indicated that, when considering what evidence of track record they would require an OCS supplier to be able to demonstrate, they would not regard Marine experience as relevant evidence of track record.²²² In particular:
 - (i) One customer responded that experience servicing the Offshore Energy Sector would be mandatory,²²³ and another customer that the supplier must have UKCS offshore experience.²²⁴

²¹¹ Third party responses to the CMA RFI dated 24 November 2025.

²¹² Third party response to the CMA RFI dated 24 November 2025.

²¹³ Third party response to the CMA RFI dated 24 November 2025.

²¹⁴ Third party response to the CMA RFI dated 24 November 2025.

²¹⁵ Third party response to the CMA RFI dated 24 November 2025.

²¹⁶ Third party response to the CMA RFI dated 24 November 2025.

²¹⁷ Third party responses to the CMA RFI dated 24 November 2025.

²¹⁸ Third party response to the CMA RFI dated 24 November 2025.

²¹⁹ Third party response to the CMA RFI dated 24 November 2025.

²²⁰ Third party response to the CMA RFI dated 24 November 2025.

²²¹ Third party response to the CMA RFI dated 24 November 2025.

²²² Third party responses to the CMA RFI dated 24 November 2025.

²²³ Third party response to the CMA RFI dated 24 November 2025.

²²⁴ Third party response to the CMA RFI dated 24 November 2025.

- (ii) One customer responded that Marine experience may not be fully relevant as its asset is classed as a Floating, Production, Storage and Offloading Vessel (**FPSO**), and not a Platform Supply Vessel (**PSV**).²²⁵
 - (iii) One customer responded that it would not consider Marine experience relevant to the provision of OCS to customers of Offshore Infrastructure in the UKCS,²²⁶ and another customer stated that Marine experience is not relevant to its current UK operations.²²⁷
 - (iv) One customer responded that Marine experience is not applicable as it does not use an OCS supplier for Marine services,²²⁸ and another customer responded that Marine experience is not a consideration for it, as it does not have any marine assets.²²⁹
- (b) Less than half indicated that they would regard Marine experience as relevant evidence of track record.²³⁰
- (i) One of these customers responded that Marine experience may be considered supportive where relevant, but would not be sufficient on its own.²³¹
 - (ii) Another customer responded that it would require an OCS supplier to be an established catering provider working in remote industries or have people working for them who have experience of this, and added that it considered Marine as an example of remote industries.²³² It described on a call that, [REDACTED].²³³
 - (iii) One customer specified that feedback would need to be from customers in a comparable industry sector, listing as examples: Mobile Offshore Units, Offshore Platforms, Diving Support or Offshore Construction Vessel operators; within the UKCS.²³⁴
- (c) Some customers who responded to our RFI did not comment directly on the relevance of Marine experience when considering what evidence of track record they would require an OCS supplier to be able to demonstrate, however, two of these customers indicated whether they would find Marine experience to be relevant elsewhere in their responses. Specifically:

²²⁵ Third party response to the CMA RFI dated 24 November 2025.

²²⁶ Third party response to the CMA RFI dated 24 November 2025.

²²⁷ Third party response to the CMA RFI dated 24 November 2025.

²²⁸ Third party response to the CMA RFI dated 24 November 2025.

²²⁹ Third party response to the CMA RFI dated 24 November 2025.

²³⁰ Third party responses to the CMA RFI dated 24 November 2025.

²³¹ Third party response to the CMA RFI dated 24 November 2025.

²³² Third party response to the CMA RFI dated 24 November 2025.

²³³ Third party call note.

²³⁴ Third party responses to the CMA RFI dated 24 November 2025.

- (i) One customer indicated elsewhere that it would require evidence of track record from customers similar to itself (ie Offshore Infrastructure). It did not comment on Marine experience directly but, when asked about the minimum duration and timing of previous experience required from a prospective OCS supplier, noted that relevant recent experience onboard a similar installation would be essential.²³⁵
- (ii) One customer indicated elsewhere in its response that Marine evidence would be relevant to track record. In response to a question asking whether there is anything which an OCS supplier could acquire/offer to address the gap in their track record, it noted that, in theory, a supplier with limited track record could address gaps by demonstrating relevant experience in similar environments (such as Marine) or by providing a clear plan that gives confidence in their health and safety plan/processes, and food-safety management.²³⁶

C.43 In summary, when considering whether Marine experience would be relevant to track record:

- (a) A majority of customers indicated that they would not regard Marine experience as relevant evidence of track record.²³⁷
- (b) A minority of customers indicated that they would regard Marine experience as relevant evidence of track record, and of these, one noted that it would not be sufficient on its own.²³⁸

C.44 We asked Offshore Infrastructure customers what evidence, if any, they may decide to proactively seek out (eg by those customers speaking to other Offshore Infrastructure Asset operators).

- (a) A majority customers that responded to this question said they may seek some form of feedback, eg from their staff, the OCS supplier's other clients, peer companies, consultant etc.²³⁹ An additional customer responded that it would seek out information on how the supplier had successfully retained previous business.²⁴⁰
- (b) A minority of customers that responded to this question said they do not have a formal requirement to seek external evidence or that it is not something it would typically do, though one of these customers noted that it had previously used external experts to support its tender process, and would

²³⁵ Third party response to the CMA RFI dated 24 November 2025.

²³⁶ Third party response to the CMA RFI dated 24 November 2025.

²³⁷ Third party responses to the CMA RFI dated 24 November 2025.

²³⁸ Third party responses to the CMA RFI dated 24 November 2025; Third party call note.

²³⁹ Third party responses to the CMA RFI dated 24 November 2025.

²⁴⁰ Third party response to the CMA RFI dated 24 November 2025.

consider seeking further validation if circumstances change or new risks emerge.²⁴¹

- C.45 We asked Offshore Infrastructure customers whether there is anything which an OCS supplier (who, in the customer's view, lacks the requisite track record) could acquire/offer to address the gap in their track record.
- (a) Just over half of customers that responded to this question indicated that there is nothing an OCS supplier could acquire/offer to compensate for a lack of track record.²⁴²
 - (b) Less than half of customers that responded to this question indicated that there may be other factors which they could consider to address a gap in the OCS supplier's track record, but the relevant factor varied from customer to customer.²⁴³ These factors include, but are not limited to:
 - (i) current client references;²⁴⁴
 - (ii) a clear plan that gives the customer confidence in the OCS supplier's health and safety plan/process, and food management;²⁴⁵
 - (iii) experience in similar environments;²⁴⁶ and
 - (iv) employing people with previous experience with a proven track record of managing an OCS supplier within the region.²⁴⁷

Competitor evidence

- C.46 When asked what factors competitors thought customers would consider when selecting their OCS supplier, the key factors highlighted by competitors included price,²⁴⁸ quality,²⁴⁹ health and safety.²⁵⁰
- C.47 Two competitors said that having a local presence in the UK is important.²⁵¹
- (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

²⁴¹ Third party responses to the CMA RFI dated 24 November 2025.

²⁴² Third party responses to the CMA RFI dated 24 November 2025.

²⁴³ Third party responses to the CMA RFI dated 24 November 2025.

²⁴⁴ Third party response to the CMA RFI dated 24 November 2025.

²⁴⁵ Third party response to the CMA RFI dated 24 November 2025.

²⁴⁶ Third party responses to the CMA RFI dated 24 November 2025.

²⁴⁷ Third party response to the CMA RFI dated 24 November 2025.

²⁴⁸ Third party call notes.

²⁴⁹ Third party call notes.

²⁵⁰ Third party call notes.

²⁵¹ Third party call notes.

noted that tenderers typically prefer suppliers who bid under the same nationality and language or have entities in that country.²⁵²

- (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.²⁵³

C.48 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.²⁵⁴
- (b) One competitor said some customers contact the main suppliers in the UKCS who have offshore experience, credibility and the skillset required.²⁵⁵
- (c) One competitor explained that it is important to have a senior management with UKCS-specific experience for expanding in the UKCS region.²⁵⁶
- (d) Two competitors noted that they are asked for evidence of their experience in offshore catering as part of the tender process²⁵⁷ with one reporting in particular it provides case studies and client testimonies, noting customers also request a list of existing customers in about half of tenders.²⁵⁸

C.49 With respect to the relevance of Marine experience in servicing Offshore Infrastructure customers:

- (a) One third-party service provider in the industry said that while marine experience is not completely irrelevant to servicing Offshore Infrastructure customers, it is not sufficient to establish credibility in servicing platforms and drilling rigs.²⁵⁹
- (b) One competitor said that its assumption would be that customers are likely to view experience in marine operations as credible when pitching for oil and gas contracts, as the services are similar and often delivered in similar conditions.²⁶⁰

C.50 With respect to experience in other geographies as relevant to acquiring customers in the UKCS:

²⁵² Third party call note.

²⁵³ Third party call note.

²⁵⁴ Third party call note.

²⁵⁵ Third party call note.

²⁵⁶ Third party call note.

²⁵⁷ Third party call notes.

²⁵⁸ Third party call note.

²⁵⁹ Third party call note.

²⁶⁰ Third party call note.

- (a) One competitor suggested that, depending on the client's priorities, the ability to demonstrate delivery of similar services in other parts of the world would hold some weight in terms of demonstration of track record.²⁶¹
- (b) One competitor noted that lack of UK experience would not significantly hinder offshore catering suppliers without a UKCS presence if they had the right people and operational standards.²⁶²

C.51 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.²⁶³
- (b) One competitor mentioned diversity and scope of the offer and social value.²⁶⁴

C.52 One competitor said [X].²⁶⁵

C.53 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.²⁶⁶

The tender process

Geographical scope of tenders

C.54 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 Sea or divided into separate regions within the North Sea, for example, UK waters separate from Danish waters.²⁶⁷

²⁶¹ Third party call note.

²⁶² Third party call note.

²⁶³ Third party call note.

²⁶⁴ Third party call note.

²⁶⁵ Third party call note.

²⁶⁶ Third party call note.

²⁶⁷ Third party call note.

- (b) One competitor said that most customers tender separately for each geographic area in the North Sea.²⁶⁸
- (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.²⁶⁹

C.55 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.²⁷⁰

C.56 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.²⁷¹ 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.²⁷²
- (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.²⁷³
- (c) One Marine customer outlined that it had tendered for its current OCS supplier ([X]) globally, due to the complexity of managing multiple contacts.²⁷⁴

C.57 One competitor said that the tender and procurement process for Marine customers is the same as other types of customers.²⁷⁵

Shortlisting potential bidders

C.58 We asked customers to explain how much effort (for example in terms of depth of research about potential bidders, time, etc) is dedicated to considering whom to

²⁶⁸ Third party call note.

²⁶⁹ Third party call note.

²⁷⁰ Third party call note.

²⁷¹ Third party call note.

²⁷² Third party call note.

²⁷³ Third party call note.

²⁷⁴ Third party call note.

²⁷⁵ Third party call note.

invite to bid and evaluating these bids to decide whom to shortlist versus engaging with the suppliers after they have been shortlisted.

- C.59 Customer responses indicate that the time spent selecting bidders, evaluating bids and shortlisting bidders varies across customers in line with different tender processes. Less than half of customers indicated that they spend relatively little time selecting who to invite to bid and/or evaluating these bids,²⁷⁶ with some of these customers noting they use databases to find the list of pre-qualified suppliers.²⁷⁷ One customer explained that it spends relatively little time selecting suppliers to invite to bid but clarified that there is detailed evaluation once bids are received.²⁷⁸ However, a small minority of customers indicated that they spend significant effort on initial evaluations of suppliers.²⁷⁹ A greater proportion of customers in response to this question outlined their tender process without indicating the relative effort at each stage, or indicated that this was equal across stages.²⁸⁰
- C.60 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.61 Customers generally explained that the shortlisting process can include a presentation from the supplier and responding to clarification questions on the bid.²⁸¹ Less than half of the customers we asked said that negotiations do take place,²⁸² 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.²⁸³ All customers we asked said that they would not disclose details of competing bids other bidders.²⁸⁴
- C.62 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.²⁸⁵

²⁷⁶ Third party responses to the CMA RFI dated 24 November 2025.

²⁷⁷ Third party responses to the CMA RFI dated 24 November 2025.

²⁷⁸ Third party response to the CMA RFI dated 24 November 2025.

²⁷⁹ Third party responses to the CMA RFI dated 24 November 2025.

²⁸⁰ Third party responses to the CMA RFI dated 24 November 2025.

²⁸¹ Third party responses to the CMA RFI dated 15 September 2025.

²⁸² Third party responses to the CMA RFI dated 15 September 2025.

²⁸³ Third party responses to the CMA RFIs dated 15 September 2025.

²⁸⁴ Third party follow up responses to the CMA RFI dated 15 September 2025; and Third party call note.

²⁸⁵ Third party call note.

- C.63 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.²⁸⁶ Another competitor said it always negotiates with its customers on an open-book basis.²⁸⁷

Contracts

- C.64 One competitor noted that contracts vary in terms of length from one to five years or beyond (with or without options).²⁸⁸ Another competitor said that Marine contracts in particular tend to have a shorter term (for example, three months) than fixed platforms (typically three to five years).²⁸⁹
- C.65 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).²⁹⁰ Another Offshore Infrastructure customer outlined that while the food cost is closed book, COTA rates mean labour markups are visible.²⁹¹ 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.²⁹²
- C.66 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).²⁹³

²⁸⁶ Third party call note.

²⁸⁷ Third party call note.

²⁸⁸ Third party call note.

²⁸⁹ Third party call note.

²⁹⁰ Third party call note.

²⁹¹ Third party call note.

²⁹² Third party call note.

²⁹³ Third party call note.

- C.67 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.²⁹⁴

Marine

Differences between Marine customers and Offshore Infrastructure customers

- C.68 Competitors generally outlined that servicing Marine customers is different from servicing Offshore Infrastructure customers.²⁹⁵ 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,²⁹⁶ with one competitor mentioning that European labour is required for vessels in the North Sea,²⁹⁷ and another competitor outlining that there may be local requirements when Marine vessels change country in terms of crew.²⁹⁸
 - (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.²⁹⁹
 - (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.³⁰⁰ 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,³⁰¹ and another competitor said it aimed to obtain food at the lowest cost whilst maintaining the quality while moving locations.³⁰² 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

²⁹⁴ Third party call note.

²⁹⁵ Third party call notes.

²⁹⁶ Third party call notes.

²⁹⁷ Third party call note.

²⁹⁸ Third party call note.

²⁹⁹ Third party call note.

³⁰⁰ Third party call notes.

³⁰¹ Third party call note.

³⁰² Third party call note.

as the vessel moves countries, the OCS supplier has to work quite closely with its suppliers to source produce/supplies.³⁰³

- C.69 One competitor stated that it required a different mindset to service Marine customers relative to O&G customers,³⁰⁴ 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.³⁰⁵
- C.70 Another competitor, which does not service Marine customers, outlined that vessels tend to move cross-border, creating complications from a legal (ie tax) perspective.³⁰⁶
- C.71 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, labour supply etc, since renewables vessels also work in different waters, from Denmark down to Spain.³⁰⁷
- C.72 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.³⁰⁸

Additional factors relevant to the Marine Market

Location of vessel for the duration of the contract

- C.73 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.74 Over half of the customers which responded to this question explained they generally know this in advance.³⁰⁹ 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

³⁰³ Third party call note.

³⁰⁴ Third party call note.

³⁰⁵ Third party call note.

³⁰⁶ Third party call note.

³⁰⁷ Third party call note.

³⁰⁸ Third party call note.

³⁰⁹ Third party responses to the CMA questionnaire; and Third party call note.

spending on average 30 days – three months in each location,³¹⁰ and two customers explained that while they generally know this information, it is not guaranteed.³¹¹

- C.75 Less than half of the customers who responded to this question said they do not know the location of their vessel for the duration of the contract in advance.³¹² One customer explained that the location of its vessels changes frequently as the customer works the spot market, not long-term charter.³¹³
- C.76 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.³¹⁴
 - (b) Another competitor said some Marine customers have forward work plans and sometimes they upload their forward work plans onto FPAL/Achilles but 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.³¹⁵
- C.77 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.³¹⁶

Location of vessel at the time of procurement

- C.78 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.79 Most Marine customers which responded to this question said that this was not important.³¹⁷ Two Marine customers explained that this was not important as the provision of services where the vessel will operate is important,³¹⁸ rather than the location of procurement. One Marine customer said that it prefers to have an OCS

³¹⁰ Third party response to the CMA questionnaire dated 12 August 2025; and Third party response to the CMA RFI dated 15 September 2025.

³¹¹ Third party response to the CMA questionnaire dated 12 August 2025; Third party call note.

³¹² Third party response to the CMA questionnaire.

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

³¹⁴ Third party call note.

³¹⁵ Third party call note.

³¹⁶ Third party call note.

³¹⁷ Third party response to the CMA questionnaire.

³¹⁸ Third party call notes; Third party responses to the CMA questionnaire.

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.³¹⁹ Two Marine customers highlighted this was not important as they expected a supplier to service multiple regions.³²⁰ 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.³²¹

- C.80 One customer said that the location of the vessel at the time of procurement is important, particularly when Local Content requirements are imposed.³²²
- C.81 One competitor said that the location of the vessel at the time of procurement is important.³²³
- C.82 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 they would consider other factors above this.³²⁴
 - (a) One third-party service provider in the industry noted it is entirely possible for a ship owner active in the UK 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.³²⁵
 - (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.³²⁶
 - (c) One competitor said that there are three parts to be considered for bidding, namely the labour, the food and the administration.³²⁷ 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.³²⁸

³¹⁹ Third party call note.

³²⁰ Third party responses to the CMA questionnaire.

³²¹ Third party response to the CMA questionnaire dated 12 August 2025.

³²² Third party response to the CMA questionnaire dated 9 September 2025.

³²³ Third party call note.

³²⁴ Third party call notes.

³²⁴ Third party call note

³²⁵ Third party call note.

³²⁶ Third party call note.

³²⁷ Third party call note.

³²⁸ Third party call note.

Retention of OCS supplier when vessel moves location

- C.83 We asked Marine customers whether, if a vessel moves location, they expect to retain their offshore catering supplier or seek to reprocur.
- C.84 All Marine customers that responded said they would expect to retain their offshore catering supplier.³²⁹ 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.³³⁰
 - (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 Netherlands) is a key factor in the customer's selection of its OCS supplier, the customer replied in the positive.³³¹
 - (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.³³² 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.³³³
 - (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.³³⁴
 - (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

³²⁹ Third party responses to the CMA questionnaire; and Third party call note.

³³⁰ Third party response to the CMA questionnaire dated 9 September 2025.

³³¹ Third party call note.

³³² Third party response to the CMA questionnaire dated 12 August 2025.

³³³ Third party call note.

³³⁴ Third party response to the CMA questionnaire dated 8 August 2025.

but noted that it would not otherwise proactively consider local alternatives.³³⁵

- C.85 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.³³⁶
- (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.³³⁷ 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.³³⁸
 - (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 service provider explained it is up to the OCS supplier to find a solution for the customer in the new country.³³⁹
 - (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.³⁴⁰

Closeness of competition between the Parties and rivals

Customer views

Offshore Infrastructure customers

- C.86 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 selecting their chosen OCS supplier (including through both open tenders and other types of opportunity):
- (a) **Aramark** – several customers mentioned Aramark's cost/pricing as a reason why they selected it as their OCS supplier.³⁴¹ Aramark's technical/service

³³⁵ Third party call note.

³³⁶ Third party call notes.

³³⁷ Third party call note.

³³⁸ Third party call note.

³³⁹ Third party call note.

³⁴⁰ Third party call note.

³⁴¹ Third party responses to the CMA questionnaire.

quality was also noted by several customers,³⁴² and Aramark's proven track record in OCS in the UKCS was mentioned by a couple of customers.³⁴³

- (b) **Entier** – several customers listed Entier's pricing or commercial reasons in their explanation for why they selected it as their OCS supplier.³⁴⁴ Entier's incumbent status was noted by two customers,³⁴⁵ and its standard of service was also mentioned by a couple of customers.³⁴⁶ 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.³⁴⁷
- (c) **ESS** – a couple of customers noted ESS' service quality,³⁴⁸ and two customers mentioned its pricing.³⁴⁹
- (d) **Sodexo** – we did not receive any response from Offshore Infrastructure customers that selected Sodexo in their most recent procurement process.

C.87 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,³⁵⁰ whilst another noted that Aramark's pricing was competitive despite not selecting Aramark.³⁵¹
- (b) **Entier** – customer responses were mixed on Entier's quality and pricing. One customer noted that Entier did not pass its technical evaluation,³⁵² whilst another said that Entier was rated highly on quality of service, but poorly on price.³⁵³
- (c) **ESS** – the responses of customers which did not select ESS were generally positive. One customer noted that ESS scored highly with the second lowest cost bid,³⁵⁴ and another said it was good on price and quality of service.³⁵⁵ One customer ranked ESS first out of four for its technical offering, but third for commercial and health and safety.³⁵⁶

³⁴² Third party responses to the CMA questionnaire.

³⁴³ Third party responses to the CMA questionnaire.

³⁴⁴ Third party responses to the CMA questionnaire; Third party call note.

³⁴⁵ Third party responses to the CMA questionnaire.

³⁴⁶ Third party responses to the CMA questionnaire.

³⁴⁷ Third party call note.

³⁴⁸ Third party responses to the CMA questionnaire.

³⁴⁹ Third party response to the CMA questionnaire dated 22 August 2025.

³⁵⁰ Third party response to the CMA questionnaire dated 22 August 2025.

³⁵¹ Third party response to the CMA questionnaire dated 8 August 2025.

³⁵² Third party response to the CMA questionnaire dated 12 August 2025.

³⁵³ Third party response to the CMA questionnaire dated 12 August 2025.

³⁵⁴ Third party response to the CMA questionnaire dated 12 August 2025.

³⁵⁵ Third party response to the CMA questionnaire dated 12 August 2025.

³⁵⁶ Third party response to the CMA questionnaire dated 8 August 2025.

- (d) **Sodexo** – several customers explained in their responses that Sodexo’s pricing/cost was high or not competitive relative to other bids.³⁵⁷ Multiple customers that did not choose Sodexo mentioned [REDACTED].³⁵⁸ One customer mentioned that Sodexo’s bid was technically acceptable,³⁵⁹ and one mentioned that Sodexo was aware of its standards from a past relationship.³⁶⁰
- (e) **Francois** – a couple of customers that did not select Francois submitted that Francois’ pricing was not competitive.³⁶¹ One customer said that Francois’ bid was [REDACTED],³⁶² and one customer noted that Francis would be a new supplier to it.³⁶³
- (f) **Trinity** – one customer noted that Trinity’s bid was more expensive.³⁶⁴
- (g) **OCL** – one customer said that OCL’s bid did not pass [REDACTED].³⁶⁵

- C.88 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.89 We received responses from [REDACTED] Offshore Infrastructure customers, of which [REDACTED] listed the suppliers they would likely invite to bid in their next procurement exercise.³⁶⁶
- C.90 Where customers had considered who to invite to tender, all customers expected to invite Aramark,³⁶⁷ and ESS;³⁶⁸ and almost all expected to invite Sodexo,³⁶⁹ and Entier.³⁷⁰
- C.91 Customers generally rated Aramark, Entier, ESS and Sodexo strongly in terms of their suitability as a supplier, with other suppliers generally obtaining lower ratings

³⁵⁷ Third party responses to the CMA questionnaire.

³⁵⁸ Third party responses to the CMA questionnaire.

³⁵⁹ Third party response to the CMA questionnaire dated 8 August 2025.

³⁶⁰ Third party response to the CMA questionnaire dated 8 August 2025.

³⁶¹ Third party responses to the CMA questionnaire.

³⁶² Third party response to the CMA questionnaire dated 8 August 2025.

³⁶³ Third party response to the CMA questionnaire dated 8 August 2025.

³⁶⁴ Third party response to the CMA questionnaire dated 8 August 2025.

³⁶⁵ Third party response to the CMA questionnaire dated 8 August 2025.

³⁶⁶ We note that two customers indicated they did not have sufficient information to respond to this question.

(Third party response to the CMA questionnaire dated 8 August 2025; and Third party response to the CMA RFI dated 3 September 2025).

³⁶⁷ Third party responses to the CMA questionnaire; and Third party response to the CMA RFI dated 26 September 2025. [REDACTED].

³⁶⁸ Third party responses to the CMA questionnaire; and Third party response to the CMA RFI dated 26 September 2025.

³⁶⁹ Third party responses to the CMA questionnaire.

³⁷⁰ Third party responses to the CMA questionnaire; Third party response to the CMA RFI dated 26 September 2025; Third party call note. [REDACTED].

from customers. Of the customers who rated how suitable they thought a given supplier would be in providing them with OCS in the UKCS (with a value from 1-5):

- (a) Aramark had the highest average rating at 4.8, with all customers that would consider it rating its suitability as a supplier as 5 out of 5 or 4 out of 5.³⁷¹
- (b) Entier received an average rating of 4.6.³⁷² Almost all of the customers that would consider Entier rated its suitability as 4 out of 5 or 5 out of 5.³⁷³
- (c) ESS received an average rating of 4.4.³⁷⁴ Most customers that would consider ESS rated its suitability as 4 out of 5 or 5 out of 5.³⁷⁵
- (d) Sodexo received an average rating of 4.4.³⁷⁶ Over half of customers that would consider Sodexo rated its suitability as 4 out of 5 or 5 out of 5.³⁷⁷
- (e) Francois was listed less frequently and received a lower average rating of 3.9 (out of 5).³⁷⁸
- (f) Trinity,³⁷⁹ Contrak,³⁸⁰ and Foss,³⁸¹ were also listed less frequently, and received lower average ratings with respect to suitability of 3.3, 3.0 and 2.5 out of 5 respectively.

Strengths and weaknesses of suppliers

Aramark

- **Strengths:** Several customers mentioned Aramark as a proven incumbent, or had positive performance.³⁸² Other customers mentioned track record or level of experience.³⁸³ One customer noted the provision of services onshore and offshore, as well as good menu options, feedback processes and operational efficiencies.³⁸⁴ Another customer mentioned it had previously passed its technical evaluation.³⁸⁵

³⁷¹ Third party responses to the CMA questionnaire. [X].

³⁷² Third party responses to the CMA questionnaire. [X].

³⁷³ Third party responses to the CMA questionnaire. [X].

³⁷⁴ Third party responses to the CMA questionnaire.

³⁷⁵ Third party responses to the CMA questionnaire.

³⁷⁶ Third party responses to the CMA questionnaire.

³⁷⁷ Third party responses to the CMA questionnaire.

³⁷⁸ Third party responses to the CMA questionnaire; and Third party response to the CMA RFI dated 26 September 2025.

³⁷⁹ Third party responses to the CMA questionnaire.

³⁸⁰ Third party responses to the CMA questionnaire.

³⁸¹ Third party responses to the CMA questionnaire.

³⁸² Third party responses to the CMA questionnaire.

³⁸³ Third party responses to the CMA questionnaire.

³⁸⁴ Third party response to the CMA questionnaire dated 8 August 2025.

³⁸⁵ Third party response to the CMA questionnaire dated 8 August 2025.

- **Weaknesses:** A small minority of customers mentioned weaknesses. Two customers mentioned not having experience with Aramark, or Aramark not having familiarity with its assets.³⁸⁶ One customer mentioned delay on implementing innovations and lack of initial investment as a weakness.³⁸⁷

Entier

- **Strengths:** Several customers mentioned experience or track record.³⁸⁸ Two customers mentioned Entier being the incumbent.³⁸⁹ Some customers mentioned a good standard of service,³⁹⁰ and two customers mentioned food quality.³⁹¹ Two customers mentioned pricing,³⁹² and another customer mentioned that Entier is a member of COTA.³⁹³
- **Weaknesses:** Two customers mentioned pricing as a weakness.³⁹⁴

Sodexo

- **Strengths:** Several customers mentioned Sodexo's experience in supplying OCS.³⁹⁵ Some customers mentioned experience with Sodexo in the past.³⁹⁶ Two customers mentioned Sodexo being a local supplier, or having a local setup as a strength,³⁹⁷ and one customer highlighted a strength of Sodexo as having a global presence.³⁹⁸ One customer mentioned that Sodexo is a member of COTA,³⁹⁹ and another customer mentioned that Sodexo can service onshore and offshore.⁴⁰⁰
- **Weaknesses:** Several customers mentioned pricing,⁴⁰¹ and one mentioned [X].⁴⁰² One customer mentioned quality of service,⁴⁰³ and another customer mentioned lack of familiarisation with the customer's assets.⁴⁰⁴

³⁸⁶ Third party responses to question 11 of the CMA questionnaire.

³⁸⁷ Third party response to the CMA questionnaire dated 8 August 2025.

³⁸⁸ Third party responses to the CMA questionnaire.

³⁸⁹ Third party responses to the CMA questionnaire.

³⁹⁰ Third party responses to questions 11 and 12 of the CMA questionnaire.

³⁹¹ Third party response to the CMA questionnaire dated 8 August 2025; and Third party responses to the CMA questionnaire dated 12 August 2025.

³⁹² Third party responses to the CMA questionnaire.

³⁹³ Third party response to the CMA questionnaire dated 8 August 2025.

³⁹⁴ Third party responses to the CMA questionnaire.

³⁹⁵ Third party responses to the CMA questionnaire.

³⁹⁶ Third party responses to the CMA questionnaire.

³⁹⁷ Third party responses to the CMA questionnaire.

³⁹⁸ Third party response to the CMA questionnaire dated 12 August 2025.

³⁹⁹ Third party response to the CMA questionnaire dated 8 August 2025.

⁴⁰⁰ Third party response to the CMA questionnaire dated 8 August 2025.

⁴⁰¹ Third party responses to the CMA questionnaire.

⁴⁰² Third party response to the CMA questionnaire dated 8 August 2025.

⁴⁰³ Third party response to the CMA questionnaire dated 8 August 2025.

⁴⁰⁴ Third party response to the CMA questionnaire dated 8 August 2025.

ESS

- **Strengths:** Some customers mentioned that ESS is a known or experienced supplier.⁴⁰⁵ Two customers mentioned pricing as a strength.⁴⁰⁶ Two other customers mentioned that ESS is local/has a local setup.⁴⁰⁷ Further one customer noted that ESS has previously passed its technical evaluation,⁴⁰⁸ and another customer noted awareness of the customers' systems and processes.⁴⁰⁹ One customer noted that ESS is a member of COTA as a strength,⁴¹⁰ and another customer mentioned the ability of ESS to service onshore and offshore.⁴¹¹
- **Weaknesses:** Two customers noted lack of asset familiarisation or previous experience with ESS.⁴¹² One customer identified service⁴¹³ and another customer identified commercial pricing⁴¹⁴ as weaknesses. One customer said that there is [X].⁴¹⁵ One customer said it could not identify a weakness,⁴¹⁶ and another customer said it does not hold any current market data.⁴¹⁷

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.⁴¹⁸ Another customer said that it is a member of COTA.⁴¹⁹
- **Weaknesses:** One customer [said that Conntrak is an unknown entity,⁴²⁰ and another customer explained that it is an entrant in the UK region, though backed by a strong and highly experienced management team.⁴²¹

⁴⁰⁵ Third party responses to the CMA questionnaire.

⁴⁰⁶ Third party responses to the CMA questionnaire.

⁴⁰⁷ Third party responses to the CMA questionnaire.

⁴⁰⁸ Third party response to the CMA questionnaire dated 8 August 2025.

⁴⁰⁹ Third party response to the CMA questionnaire dated 8 August 2025.

⁴¹⁰ Third party response to the CMA questionnaire dated 8 August 2025.

⁴¹¹ Third party response to the CMA questionnaire dated 8 August 2025.

⁴¹² Third party responses the CMA questionnaire.

⁴¹³ Third party response to the CMA questionnaire dated 12 August 2025.

⁴¹⁴ Third party response to the CMA questionnaire dated 8 August 2025.

⁴¹⁵ Third party response to the CMA questionnaire dated 8 August 2025.

⁴¹⁶ Third party response to the CMA questionnaire dated 8 August 2025.

⁴¹⁷ Third party response to the CMA questionnaire dated 8 August 2025.

⁴¹⁸ Third party response to the CMA questionnaire dated 8 August 2025.

⁴¹⁹ Third party response to the CMA questionnaire dated 8 August 2025.

⁴²⁰ Third party response to the CMA questionnaire dated 8 August 2025.

⁴²¹ Third party response to the CMA questionnaire dated 8 August 2025.

Francois

- **Strengths:** One customer noted that Francois can provide services across the UKCS and Non-UKCS areas,⁴²² and another customer noted that Francois is a UK-based supplier with extensive experience in the UK region.⁴²³ One of those customers noted that the menu traffic light system is good and easy to follow and that Francois has good platforms for contact.⁴²⁴ Another customer noted that Francois had submitted a complete bid in its previous tender.⁴²⁵
- **Weaknesses:** Two customers mentioned that Francois was more expensive,⁴²⁶ and one of these customers mentioned lack of experience on their rigs as a weakness.⁴²⁷ Another customer outlined that Francois' proposal lacked [X].⁴²⁸

Trinity

- **Strengths:** One customer said that Trinity is a member of COTA,⁴²⁹ and other customer mentioned it can provide services onshore and offshore.⁴³⁰ Another customer noted that Trinity had submitted a complete bid in its previous tender.⁴³¹
- **Weaknesses:** One customer said that it is an unknown entity,⁴³² and another customer said it is more expensive than other suppliers.⁴³³

C.92 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 ([X]), whereas Entier's bid included providing these services at cost, without

⁴²² Third party response to the CMA questionnaire dated 8 August 2025.

⁴²³ Third party response to the CMA questionnaire dated 8 August 2025.

⁴²⁴ Third party response to the CMA questionnaire dated 8 August 2025.

⁴²⁵ Third party response to the CMA questionnaire dated 8 August 2025.

⁴²⁶ Third party responses to the CMA questionnaire.

⁴²⁷ Third party response to the CMA questionnaire dated 8 August 2025.

⁴²⁸ Third party response to the CMA questionnaire dated 8 August 2025.

⁴²⁹ Third party response to the CMA questionnaire dated 8 August 2025.

⁴³⁰ Third party response to the CMA questionnaire dated 8 August 2025.

⁴³¹ Third party response to the CMA questionnaire dated 8 August 2025.

⁴³² Third party response to the CMA questionnaire dated 8 August 2025.

⁴³³ Third party response to the CMA questionnaire dated 8 August 2025.

a management fee.⁴³⁴ The customer explained that Entier also came up [redacted].⁴³⁵

- (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.⁴³⁶
- (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.⁴³⁷ 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.⁴³⁸
- (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.⁴³⁹
- (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.⁴⁴⁰
- (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.⁴⁴¹

Marine customers

- C.93 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

⁴³⁴ Third party call note.

⁴³⁵ Third party call note.

⁴³⁶ Third party call note.

⁴³⁷ Third party call note.

⁴³⁸ Third party call note.

⁴³⁹ Third party call note.

⁴⁴⁰ Third party call note.

⁴⁴¹ Third party call note.

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.94 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 out of 5, with Entier (its incumbent supplier) as very suitable (5 out of 5).⁴⁴²
- (b) One Marine customer said that it would invite Aramark, ESS, Sodexo and Foss, and rated these very suitable (5 out of 5).⁴⁴³
- (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 out of 5), and ESS and Francois suitable (4 out of 5).⁴⁴⁴
- (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. ⁴⁴⁵
- (e) One Marine customer submitted that it would not be surprised if Conntrak, Aramark, Francois and others were invited to tender.⁴⁴⁶
- (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 out of 5).⁴⁴⁷

C.95 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 Aramark was pure UK-based,⁴⁴⁸ another noted that it is a current provider.⁴⁴⁹ For weaknesses, one

⁴⁴² Third party response to the CMA questionnaire dated 8 August 2025; Third party response to the CMA questionnaire dated 27 May 2025; and Third party response to the CMA RFI dated 11 August 2025.

⁴⁴³ Third party response to the CMA questionnaire dated 12 August 2025, and Third party response to the CMA RFI dated 15 September 2025.

⁴⁴⁴ Third party response to the CMA questionnaire dated 9 September 2025.

⁴⁴⁵ Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁴⁶ Third party call note.

⁴⁴⁷ Third party response to the CMA questionnaire dated 8 August 2025. Third party response to the CMA RFI dated 21 August 2025.

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

⁴⁴⁹ Third party response to the CMA questionnaire dated 9 September 2025.

customer noted that the supplier is expensive outside the UKCS.⁴⁵⁰ Another noted that Aramark had no weaknesses.⁴⁵¹

- (b) **Entier:** For strengths, one customer said that it currently meets its needs,⁴⁵² and another noted that it is the current incumbent onboard with positive feedback on service and accurate forecasting of annual catering budget for each vessel.⁴⁵³ Customers which we asked did not provide any weaknesses for Entier.
- (c) **ESS:** One customer said that a strength of ESS is that it is pure UKCS-based and a weakness is that it is more expensive in the Netherlands.⁴⁵⁴ Another customer said ESS was known as a strength but explained it had not used it recently, or at all in the UKCS.⁴⁵⁵
- (d) **Foss:** One customer said strengths of Foss are that it is non-UKCS based and food quality and a weakness is price.⁴⁵⁶
- (e) **Sodexo:** One customer said strengths are that it is UKCS-based and food quality and a weakness is when it is non-UKCS based.⁴⁵⁷
- (f) **Francois:** One customer said Francois was known as a strength but explained it had not used it at all or specifically in the UKCS.⁴⁵⁸
- (g) **Ligabue:** One customer noted that it is a current provider with positive feedback and listed no weaknesses.⁴⁵⁹

C.96 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.⁴⁶⁰ 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.⁴⁶¹

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

⁴⁵¹ Third party response to the CMA questionnaire dated 9 September 2025.

⁴⁵² Third party response to the CMA RFI dated 11 August 2025.

⁴⁵³ 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).

⁴⁵⁴ Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁵⁵ Third party response to the CMA questionnaire dated 9 September 2025.

⁴⁵⁶ Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁵⁷ Third party response to the CMA questionnaire dated 12 August 2025.

⁴⁵⁸ Third party response to the CMA questionnaire dated 9 September 2025.

⁴⁵⁹ Third party response to the CMA questionnaire dated 9 September 2025.

⁴⁶⁰ Third party call note.

⁴⁶¹ Third party call note.

- (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.⁴⁶²
- (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.⁴⁶³
- (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.⁴⁶⁴
- (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.⁴⁶⁵

Competitors' views

C.97 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) competitors' views from questionnaires and calls 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

⁴⁶² Third party call note.

⁴⁶³ Third party call note.

⁴⁶⁴ Third party call note.

⁴⁶⁵ Third party call note.

- (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.98 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.99 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 competitors⁴⁶⁶ and a third-party service provider in the industry,⁴⁶⁷ 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.⁴⁶⁸
- C.100 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 1 being a very weak competitor and 5 being a very strong competitor.
- C.101 The responses show that the strongest competitors in the UKCS are Aramark, Entier and ESS. All competitors identified both Aramark and Entier,⁴⁶⁹ with almost all competitors rating Aramark's and Entier's strength as competitors as 4 or above out of 5.⁴⁷⁰ All competitors asked identified ESS,⁴⁷¹ with all these competitors rating ESS' strength as 5 out of 5.⁴⁷²
- C.102 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.⁴⁷³ It said that the smaller suppliers pick up business on an ad hoc basis.⁴⁷⁴
- C.103 Sodexo was also identified as an OCS competitor by all competitors asked.⁴⁷⁵ 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

⁴⁶⁶ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁶⁷ Third party response to the CMA questionnaire dated 27 May 2025.

⁴⁶⁸ Third party response to the CMA questionnaire dated 27 May 2025.

⁴⁶⁹ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁷⁰ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁷¹ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁷² Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁷³ Third party call note.

⁴⁷⁴ Third party call note.

⁴⁷⁵ Third party responses to the CMA questionnaire dated 27 May 2025.

respondents rating Sodexo's strength as a competitor as 2 out of 5,⁴⁷⁶ while others rated it as 5 out of 5.⁴⁷⁷ 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.⁴⁷⁸

C.104 Conntrak was identified by half of the competitors asked; and all of these competitors rated Conntrak as 3 out of 5 in terms of how strong they viewed Conntrak as a competitor.⁴⁷⁹

(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.⁴⁸⁰

(b) One competitor identified Conntrak as a recent entrant in the market.⁴⁸¹

C.105 Over half of competitors identified Foss,⁴⁸² Francois,⁴⁸³ and Trinity⁴⁸⁴ as OCS competitors.⁴⁸⁵ All of the competitors who identified Foss,⁴⁸⁶ Francois,⁴⁸⁷ and Trinity,⁴⁸⁸ rated their strength as 3 out of 5 or below. On a call with the CMA, one competitor outlined that Foss is present in the UKCS but [X] and has approximately one or two units in the Southern North Sea.⁴⁸⁹ One competitor outlined that Francois is still trying to break into the UKCS market and is strong in other regions.⁴⁹⁰

C.106 Ligabue,⁴⁹¹ and Pelligrini,⁴⁹² were the only other OCS competitors identified. Both were rated as 1 out of 5 in terms of their strength as 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.⁴⁹³

⁴⁷⁶ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁷⁷ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁷⁸ Third party call note.

⁴⁷⁹ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁸⁰ Third party call note.

⁴⁸¹ Third party call note.

⁴⁸² Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁸³ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁸⁴ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁸⁵ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁸⁶ Third party responses to the CMA questionnaire dated 27 May 2025.

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

⁴⁸⁸ Third party responses to the CMA questionnaire dated 27 May 2025.

⁴⁸⁹ Third party call note.

⁴⁹⁰ Third party response to the CMA questionnaire dated 27 May 2025.

⁴⁹¹ Third party response to the CMA questionnaire dated 27 May 2025.

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

⁴⁹³ Third party response to the CMA questionnaire dated 27 May 2025.

Marine

- C.107 Competitors which we spoke to generally outlined that while some competitors compete for both Marine and Offshore Infrastructure customers, 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.⁴⁹⁴
 - (b) One third-party service provider in the industry said not all OCS suppliers are capable of serving Marine customers.⁴⁹⁵ 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.⁴⁹⁶ The third-party service provider noted that Sodexo is very good at the Marine business but does not have much of it.⁴⁹⁷ It said that the Marine competitors are: Entier, Foss, Sodexo, Celera, Conntrak, IFS, plus various companies that support self-supply.⁴⁹⁸
 - (c) Another competitor said that there are different sets of competitors in the O&G sector and the Marine sector.⁴⁹⁹ 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 of.⁵⁰⁰ 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.⁵⁰¹ 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.⁵⁰²
 - (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

⁴⁹⁴ Third party call note.

⁴⁹⁵ Third party call note.

⁴⁹⁶ Third party call note.

⁴⁹⁷ Third party call note.

⁴⁹⁸ Third party call note.

⁴⁹⁹ Third party call note.

⁵⁰⁰ Third party call note.

⁵⁰¹ Third party call note.

⁵⁰² Third party call note.

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.⁵⁰³

- (e) One competitor outlined Conntrak as an additional Marine competitor relative to the competitor's response where customer type was not specified, stating that its key competitors in Marine are Aramark, Entier, Conntrak, Sodexo and ESS.⁵⁰⁴

C.108 However, one competitor outlined that the key players providing OCS to Marine and Offshore Infrastructure customers were the same.⁵⁰⁵

C.109 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.⁵⁰⁶

- (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.⁵⁰⁷

C.110 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 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).⁵⁰⁸

- (b) [X] 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

⁵⁰³ Third party call note.

⁵⁰⁴ Third party call note. Third party response to the CMA questionnaire dated 27 May 2025.

⁵⁰⁵ Third party call note.

⁵⁰⁶ Third party response to the CMA questionnaire dated 16 September 2025.

⁵⁰⁷ 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).

⁵⁰⁸ Third party response to the CMA questionnaire dated 16 September 2025.

the market, would be Aramark, Entier and Francois, assessing these competitors as strong.⁵⁰⁹

Self-supply

Customer evidence

- C.111 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.⁵¹⁰
- C.112 **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 degradation in service quality.⁵¹¹ 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.⁵¹² Two customers,⁵¹³ 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.⁵¹⁴
- C.113 **Marine customers:** Over half of the Marine customers which responded to this question said that they would not consider taking this in house.⁵¹⁵ Customers explained that the reasons for this were that they were not typically set up in-house for this,⁵¹⁶ that the supply of food was not their business,⁵¹⁷ and company policy.⁵¹⁸ Less than half of the Marine customers which responded to this question said they would consider taking this in-house.⁵¹⁹ One of these customers said that it would consider this if there was cost-benefit to self-supply.⁵²⁰ One customer explained that even at current pricing levels, this was an exercise it did for all its outsourced services.⁵²¹

⁵⁰⁹ Third party response to the CMA questionnaire dated 3 October 2025; and Third party response to the CMA RFI dated 6 October 2025.

⁵¹⁰ 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.

⁵¹¹ Third party responses to the CMA questionnaire dated 27 May 2025;

⁵¹² Third party responses to the CMA questionnaire dated 27 May 2025.

⁵¹³ Third party responses to question 9 of the CMA questionnaire dated 27 May 2025.

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

⁵¹⁵ Third party responses to the CMA questionnaire. Third party responses to the CMA questionnaire dated 27 May 2025. Third party call note.

⁵¹⁶ Third party response to the CMA questionnaire dated 27 May 2025; and Third party response to the CMA questionnaire dated 12 August 2025.

⁵¹⁷ Third party call note; and Third party response to the CMA questionnaire dated 29 August 2025.

⁵¹⁸ Third party response to the CMA questionnaire dated 9 September 2025.

⁵¹⁹ Third party responses to the CMA questionnaire.

⁵²⁰ Third party response to the CMA questionnaire dated 12 August 2025.

⁵²¹ Third party response to the CMA questionnaire dated 3 September 2025.

- C.114 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.⁵²²
- C.115 We also asked Marine customers on calls about the relative benefits of outsourcing versus self-supplying OCS.
- C.116 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.⁵²³
- C.117 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).⁵²⁴
- C.118 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. The customer had previously flip-flopped between outsourcing and self-supplying, and said ultimately, it depended on whatever suits the customer at the time.⁵²⁵
- C.119 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.⁵²⁶

⁵²² Third party call note.

⁵²³ Third party call note.

⁵²⁴ Third party call note.

⁵²⁵ Third party call note.

⁵²⁶ Third party call note.

C.120 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 customer's business.⁵²⁷ 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.⁵²⁸

Competitor evidence

C.121 Competitors which we asked generally considered that it would be as unlikely that Offshore Infrastructure customers would self-supply.⁵²⁹ 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.⁵³⁰
- (b) One competitor (which does not supply Marine customers) said that within the UKCS specifically, OCS are still mostly outsourced,⁵³¹ but that MODUs would probably have the easiest opportunity to self-deliver.⁵³²

C.122 With respect to Marine customers, while two competitors noted that some Marine operators self-supply,⁵³³ 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,⁵³⁴ but customers who self-supply are usually those with smaller people on board (POB).⁵³⁵
- (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

⁵²⁷ Third party call note.

⁵²⁸ Third party call note.

⁵²⁹ Third party call notes.

⁵³⁰ Third party call note.

⁵³¹ Third party call note.

⁵³² Third party call note.

⁵³³ Third party call notes.

⁵³⁴ Third party call note.

⁵³⁵ Third party call note.

customers to outsource their catering to reduce their risk/simplify their operations.⁵³⁶

- (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.⁵³⁷
- (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.⁵³⁸

C.123 Two competitors explained that once a Marine customer chooses to outsource, the customer would typically not switch back to self-supply.⁵³⁹

- (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.⁵⁴⁰
- (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.⁵⁴¹

C.124 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.⁵⁴²

C.125 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.⁵⁴³

C.126 Some competitors outlined which factors made it is more likely for particular Marine customers to outsource. For example:

⁵³⁶ Third party call note.

⁵³⁷ Third party call note.

⁵³⁸ Third party call note.

⁵³⁹ Third party call notes.

⁵⁴⁰ Third party call note.

⁵⁴¹ Third party call note.

⁵⁴² Third party call notes.

⁵⁴³ Third party call note.

- (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),⁵⁴⁴ 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.⁵⁴⁵
- (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.⁵⁴⁶

C.127 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.⁵⁴⁷

C.128 In addition, we asked customers and competitors about IFS and OSERV as potential suppliers of OCS:

- (a) Two Marine customers said that they were aware of IFS as a potential offshore catering supplier.
- (b) One Marine customer noted that IFS did not provide [REDACTED] to an RFI and, as a relatively smaller scale company, [REDACTED]. The customer also explained that IFS had some additional admin costs and overheads.⁵⁴⁸
- (c) One global Marine customer noted that OSM Thome,⁵⁴⁹ 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 [REDACTED] into the tender presentations and did not [REDACTED] about winning its business.⁵⁵⁰

⁵⁴⁴ Third party call note.

⁵⁴⁵ Third party call note.

⁵⁴⁶ Third party call note.

⁵⁴⁷ Third party call note.

⁵⁴⁸ Third party call note.

⁵⁴⁹ OSERV is under OSM Thome's catering and budget management division.

⁵⁵⁰ Third party call note.

- (d) When one customer was asked whether it 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 was unable to respond specifically with respect to OSERV.⁵⁵¹
- (e) 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 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.⁵⁵²

Switching offshore catering supplier

Customer evidence

C.129 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.⁵⁵³ The key points on the customer transition process are summarised below:

- (a) **Staff transition process:** Some Offshore Infrastructure customers outlined that staff generally TUPE,⁵⁵⁴ with one customer explaining that TUPE mitigates risk with the retention of key personnel.⁵⁵⁵ One Marine customer outlined that it expected staff to TUPE,⁵⁵⁶ while another customer outlined a more detailed plan for workforce transition, which included checking employment regulations and consulting with affected employees.⁵⁵⁷
- (b) **Service quality:** One Offshore Infrastructure customer outlined that typically, service quality has increased when changing supplier,⁵⁵⁸ however two

⁵⁵¹ Third party call note.

⁵⁵² Third party call note.

⁵⁵³ 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).

⁵⁵⁴ Third party responses to the CMA questionnaire.

⁵⁵⁵ Third party response to the CMA questionnaire dated 8 August 2025.

⁵⁵⁶ Third party response to the CMA questionnaire dated 8 August 2025.

⁵⁵⁷ Third party response to the CMA questionnaire dated 12 August 2025.

⁵⁵⁸ Third party response to the CMA questionnaire dated 8 August 2025.

customers explained that service quality can dip initially but tended to stabilise over time.⁵⁵⁹

- (c) **Length of transition period:** Offshore Infrastructure customers outlined varied transition timeframes ranging from 30 days⁵⁶⁰ to six months.⁵⁶¹ Some customers who provided a timeframe suggested approximately three months as either an upper or lower bound for the transition period,⁵⁶² while others suggested longer or shorter timeframes.⁵⁶³ Marine customers generally outlined shorter transition timeframes compared to Offshore Infrastructure customers. Transition times included as part of customer responses ranged from four days⁵⁶⁴ to three months.⁵⁶⁵
- (d) **Management of transition:** Two Offshore Infrastructure outlined that the transition was managed by the incoming contractor,⁵⁶⁶ with another customer explaining that this was agreed as part of the tender process.⁵⁶⁷ Similarly to Offshore Infrastructure customers, two Marine customers noted that the transition plan was included as part of the tender process.⁵⁶⁸
- (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.⁵⁶⁹ Two Marine customers also outlined that they have not experienced a transition of OCS supplier.⁵⁷⁰

C.130 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.

C.131 Over half of Offshore Infrastructure customers⁵⁷¹ and over half of Marine customers⁵⁷² who responded to the question considered that there were not any material barriers to switching OCS supplier.

⁵⁵⁹ Third party responses to the CMA questionnaire.

⁵⁶⁰ Third party response to the CMA questionnaire dated 12 August 2025.

⁵⁶¹ Third party response to the CMA questionnaire dated 22 August 2025.

⁵⁶² Third party responses to the CMA questionnaire.

⁵⁶³ Third party responses to the CMA questionnaire dated 12 August 2025.

⁵⁶⁴ Third party response to the CMA questionnaire dated 3 September 2025.

⁵⁶⁵ Third party response to the CMA questionnaire dated 12 August 2025.

⁵⁶⁶ Third party responses to the CMA questionnaire.

⁵⁶⁷ Third party response to the CMA questionnaire dated 12 August 2025.

⁵⁶⁸ Third party responses to the CMA questionnaire.

⁵⁶⁹ Third party responses to the CMA questionnaire.

⁵⁷⁰ Third party responses to the CMA questionnaire.

⁵⁷¹ Third party responses to the CMA questionnaire.

⁵⁷² Third party responses to the CMA questionnaire.

- C.132 Less than half of Offshore Infrastructure customers⁵⁷³ and two Marine customers⁵⁷⁴ who responded to the question considered that there were barriers to switching offshore catering supplier.
- C.133 Some Offshore Infrastructure customers explained their response. Barriers to switching mentioned by Offshore Infrastructure customers included financial implications,⁵⁷⁵ the ownership and movement of food between suppliers,⁵⁷⁶ quality/disruption of service,⁵⁷⁷ loss of key personnel,⁵⁷⁸ the transition period,⁵⁷⁹ and practical replacement of equipment.⁵⁸⁰ 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).⁵⁸¹
- C.134 One Marine customer said that the barriers to switching may be potential issues with operational continuity and end client satisfaction,⁵⁸² and another customer said that while there were barriers, these were limited.⁵⁸³

Competitor evidence

- C.135 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.⁵⁸⁴

Decommissioning

Customer evidence

- C.136 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.
- C.137 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.⁵⁸⁵

⁵⁷³ Third party responses to the CMA questionnaire.

⁵⁷⁴ Third party responses to the CMA questionnaire.

⁵⁷⁵ Third party responses to the CMA questionnaire.

⁵⁷⁶ Third party response to the CMA questionnaire dated 22 August 2025.

⁵⁷⁷ Third party responses to the CMA questionnaire.

⁵⁷⁸ Third party responses to the CMA questionnaire.

⁵⁷⁹ Third party response to the CMA questionnaire dated 22 August 2025.

⁵⁸⁰ Third party response to the CMA questionnaire dated 8 August 2025.

⁵⁸¹ Third party response to the CMA questionnaire dated 8 August 2025.

⁵⁸² Third party response to the CMA questionnaire dated 12 August 2025.

⁵⁸³ Third party response to the CMA questionnaire dated 29 August 2025.

⁵⁸⁴ Third party call note.

⁵⁸⁵ Third party responses to the CMA questionnaire.

- C.138 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.⁵⁸⁶ Of these customers, over half who specified in which region they expected to decommission assets expect to decommission assets in the UKCS⁵⁸⁷ and one customer expected to decommission assets in the North Sea.⁵⁸⁸
- C.139 No Marine customers expected to decommission assets in the UKCS or North Sea in the next two years.⁵⁸⁹

Competitor evidence

- C.140 One competitor explained that North Sea assets (ie including those in the UKCS) have historically been owned by large players in the energy sector, but are increasingly being divested and this presents an opportunity for smaller OCS suppliers to bid for opportunities.⁵⁹⁰ However, one third-party service provider in the industry noted that Offshore Infrastructure customers are more likely to choose an established OCS supplier in the UKCS,⁵⁹¹ and one competitor noted that the majority of customers already have OCS suppliers and therefore the number of new opportunities is decreasing.⁵⁹²

Barriers to entry and expansion

- C.141 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.⁵⁹³
- C.142 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.⁵⁹⁴ On a call with the CMA, the same competitor noted that, in the North Sea market, it was more difficult for it 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,

⁵⁸⁶ Third party responses to the CMA questionnaire.

⁵⁸⁷ Third party responses to the CMA questionnaire.

⁵⁸⁸ Third party response to the CMA questionnaire dated 8 August 2025.

⁵⁸⁹ Third party responses to the CMA questionnaire.

⁵⁹⁰ Third party call note.

⁵⁹¹ Third party call note.

⁵⁹² Third party call note.

⁵⁹³ Third party responses to question 11b of the CMA questionnaire dated 27 May 2025.

⁵⁹⁴ Third party response to the CMA questionnaire dated 27 May 2025.

as well as three to five years of technical delivery to other similar customers.⁵⁹⁵ However, the competitor said that OCS suppliers generally can use safety records from operations in other countries.⁵⁹⁶

- (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,⁵⁹⁷ alongside demonstratable experience of working in the UKCS.⁵⁹⁸
- (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.⁵⁹⁹ It explained that this was why it is looking at the Marine sector as opposed to oil and gas,⁶⁰⁰ as it will not be seen as a credible alternative for platforms and drilling rigs.⁶⁰¹ 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.⁶⁰²

C.143 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 which had strong presence in the Middle East and has now entered in the UKCS offshore market.⁶⁰³ 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.⁶⁰⁴

C.144 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.⁶⁰⁵

⁵⁹⁵ Third party call note.

⁵⁹⁶ Third party call note.

⁵⁹⁷ Third party call note.

⁵⁹⁸ Third party response to the CMA questionnaire dated 27 May 2025.

⁵⁹⁹ Third party response to the CMA questionnaire dated 27 May 2025. Third party call note.

⁶⁰⁰ Third party call note.

⁶⁰¹ Third party call note.

⁶⁰² Third party call note.

⁶⁰³ Third party call note.

⁶⁰⁴ Third party call note.

⁶⁰⁵ Third party call note.

- (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 enable the supplier to manage the process better and gradually increase its cashflow.⁶⁰⁶

Importance of scale

- C.145 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 one third-party service provider in the industry provided responses which indicated that scale was an important factor.⁶⁰⁷
- C.146 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.⁶⁰⁸ One competitor emphasised that price efficiencies and advantages are driven by volume.⁶⁰⁹
 - (b) One competitor said that scale was needed to create a pool of labour that can be used to cover sickness and absences.⁶¹⁰ 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.⁶¹¹
 - (c) One competitor told the CMA that scale enables suppliers to bring down administrative costs and get better deals from suppliers.⁶¹² 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.⁶¹³

⁶⁰⁶ Third party call note.

⁶⁰⁷ Third party responses to the CMA questionnaire dated 27 May 2025.

⁶⁰⁸ Third party response to the CMA questionnaire dated 27 May 2025; and Third party call note.

⁶⁰⁹ Third party call note.

⁶¹⁰ Third party response to the CMA questionnaire dated 27 May 2025; and Third party call note.

⁶¹¹ Third party call note.

⁶¹² Third party response to the CMA questionnaire dated 27 May 2025.

⁶¹³ Third party call note.

- C.147 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.⁶¹⁴
- C.148 With respect to the Marine Market specifically:
- (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 said it gets the same service from Strachans as other larger suppliers receive, and the competitor did not think the treatment or pricing was any different to what other suppliers are paying.⁶¹⁵
 - (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.⁶¹⁶
- C.149 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.⁶¹⁷ 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.⁶¹⁸

Sponsored entry

- C.150 All of the customers which we asked said that they did not consider they were in a position to sponsor an OCS supplier.⁶¹⁹
- C.151 We asked Offshore Infrastructure customers to explain whether they would provide financial assistance to help an OCS supplier who is new to the UKCS to enter and/or expand to supply offshore catering services in the UKCS (specifying that this may be an OCS supplier currently active only in different geographies), and if so, to explain under what circumstances would this be the case, and if not, why this would not be the case. The evidence is that Offshore Infrastructure

⁶¹⁴ Third party call note.

⁶¹⁵ Third party call note.

⁶¹⁶ Third party call note.

⁶¹⁷ Third party call transcript.

⁶¹⁸ Third party call transcript.

⁶¹⁹ Third party call notes. Third party responses to the CMA RFI dated 24 November 2025.

customers would be both unwilling and highly unlikely to trigger entry by sponsoring a new entrant,⁶²⁰ and no customers suggested a circumstance in which they would be likely to trigger entry is in response to a worsening of the Parties competitive offering as a result of the Merger. For example, one customer said that suppliers are expected to have the capability to support their own offering,⁶²¹ and another customer said that it believed supporting a level playing field through clear requirements, open market tendering, and equal opportunity is the most appropriate way to encourage market participation.⁶²² One customer said that while it could not fully rule this out, it would be highly unlikely to provide financial assistance to help a new entrant to the UKCS market expand or supply offshore catering services. It said that, given where it is in its asset lifecycle, the risk associated with contracting a supplier without an established track record in this region would generally outweigh any potential benefit.⁶²³

- C.152 One Marine customer said that such sponsorship would not be the most economical approach, as its projects are too short term, and it would instead revert back to its internal supply model.⁶²⁴ 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.⁶²⁵
- C.153 All the competitors which we asked said that they had not received any financial sponsorship to enter a market,⁶²⁶ with one competitor outlining it had not witnessed any financially sponsored entry in this industry either.⁶²⁷

Views on the Merger

Customers' views

Offshore Infrastructure customers

- C.154 Over half of customers responded with 'neutral' views on the impact of the Merger on competition.⁶²⁸ Among these neutral views:
- (a) Some Offshore Infrastructure customers outlined that there remained existing OCS suppliers who could provide the customer with OCS services,⁶²⁹ even

⁶²⁰ No Offshore Infrastructure customer said they were likely to sponsor an entrant (Third party responses to the CMA RFI dated 24 November 2025).

⁶²¹ Third party response to the CMA RFI dated 24 November 2025.

⁶²² Third party response to the CMA RFI dated 24 November 2025.

⁶²³ Third party response to the CMA RFI dated 24 November 2025.

⁶²⁴ Third party call note.

⁶²⁵ Third party call note.

⁶²⁶ Third party call notes.

⁶²⁷ Third party call note.

⁶²⁸ Third party responses to the CMA questionnaire; Third party responses to the CMA questionnaire dated 27 May 2025.

⁶²⁹ Third party response to the CMA questionnaire dated 22 August 2025; and Third party responses to the CMA questionnaire dated 27 May 2025.

though one of these customers recognised that the acquisition reduces competition.⁶³⁰

- (b) 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.⁶³¹ One of these customers explained that the Merger would make no difference to its operations,⁶³² with another customer explaining that it had no intention to go to market for an alternative supplier.⁶³³
- (c) Two customers were not sure about the impact of the Merger on competition.⁶³⁴ For example, one customer said it hoped the Merger did not impact the very good service it received at the moment,⁶³⁵ and another customer mentioned that it would be difficult to determine the impact the Merger would have on the market at this time.⁶³⁶
- (d) One customer responded that it does not have a view on the impact of the acquisition on competition.⁶³⁷ In addition, two customers did not provide an explanation of their neutral view about the impact of the acquisition on competition.⁶³⁸

C.155 A small minority of customers responded with 'positive' views on the impact of the Merger on competition.⁶³⁹

- (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.⁶⁴⁰
- (b) One customer outlined that the Merger could bring efficiencies as well as increase resilience within labour provision.⁶⁴¹
- (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.⁶⁴²

⁶³⁰ Third party response to the CMA questionnaire dated 27 May 2025.

⁶³¹ Third party responses to the CMA questionnaire dated 22 August 2025; and Third party responses to the CMA questionnaire dated 27 May 2025.

⁶³² Third party responses to questions 18 of the CMA questionnaire dated 22 August 2025.

⁶³³ Third party response to the CMA questionnaire dated 27 May 2025.

⁶³⁴ Third party response to the CMA questionnaire dated 12 August 2025; and Third party response to the CMA questionnaire dated 27 May 2025.

⁶³⁵ Third party response to the CMA questionnaire dated 27 May 2025.

⁶³⁶ Third party response to the CMA questionnaire dated 12 August 2025.

⁶³⁷ Third party response to the CMA questionnaire dated 27 May 2025.

⁶³⁸ Third party responses to the CMA questionnaire dated 27 May 2025.

⁶³⁹ Third party responses to the CMA questionnaire, Third party responses to the CMA questionnaire dated 27 May 2025.

⁶⁴⁰ Third party response to the CMA questionnaire dated 27 May 2025.

⁶⁴¹ Third party response to the CMA questionnaire dated 27 May 2025.

⁶⁴² Third party response to the CMA questionnaire dated 12 August 2025.

- (d) Two customers outlined that alternative suppliers would be available,⁶⁴³ with one of these customers having noted that other COTA members remained in the market.⁶⁴⁴
- (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.⁶⁴⁵

C.156 Two customers responded with 'negative' views of the impact of the Merger on competition.⁶⁴⁶

- (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.⁶⁴⁷ On a call with the CMA, this customer noted that commercially, it might see increased costs as a result of the Merger.⁶⁴⁸
- (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.⁶⁴⁹ Additionally on a call with the CMA, the customer elaborated that given the [REDACTED], 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.⁶⁵⁰

Marine customers

C.157 Four Marine customers had a 'neutral' view of the Merger.⁶⁵¹ One customer outlined that it did not see any impact on competition for the supply of OCS as a result of the Merger.⁶⁵² [REDACTED].⁶⁵³

⁶⁴³ Third party response to the CMA questionnaire dated 12 August 2025; and Third party response to the CMA questionnaire dated 27 May 2025.

⁶⁴⁴ Third party response to the CMA questionnaire dated 27 May 2025.

⁶⁴⁵ Third party response to the CMA questionnaire dated 27 May 2025.

⁶⁴⁶ Third party responses to the CMA questionnaire dated 27 May 2025.

⁶⁴⁷ Third-party response to the CMA questionnaire dated 27 May 2025.

⁶⁴⁸ Third party call note.

⁶⁴⁹ Third party response to the CMA questionnaire dated 27 May 2025.

⁶⁵⁰ Third party call note.

⁶⁵¹ Third party response to the CMA questionnaire dated 27 May 2025; and Third party response to the CMA questionnaire dated 9 September 2025.

⁶⁵² Third party response to the CMA questionnaire dated 9 September 2025.

⁶⁵³ Third party response to the CMA questionnaire dated 12 August 2025.

- C.158 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.⁶⁵⁴
- C.159 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.⁶⁵⁵
- C.160 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.⁶⁵⁶

Competitors' views

- C.161 Over half of competitors did not express concerns regarding the Merger.⁶⁵⁷ 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%.⁶⁵⁸
 - (b) Another competitor said that once Aramark and Entier had more than 60% of the market it had no way of competing with them, but others such as Sodexo and ESS could.⁶⁵⁹
 - (c) One competitor considered that the Merger would have a positive effect on competition because, although it reduced the total number of competitors, it increased the competitor's chances of being shortlisted for contracts (as typically customers shortlist two to three bidders).⁶⁶⁰

⁶⁵⁴ Third party responses to the CMA questionnaire dated 29 August 2025.

⁶⁵⁵ Third party call note.

⁶⁵⁶ Third party response to the CMA questionnaire dated 12 August 2025.

⁶⁵⁷ Third party responses to the CMA questionnaire dated 27 May 2025; and Third party response to the CMA questionnaire dated 16 September 2025.

⁶⁵⁸ Third party response to the CMA questionnaire dated 27 May 2025.

⁶⁵⁹ Third party call note.

⁶⁶⁰ 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.⁶⁶¹
- 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.⁶⁶² 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 suggest Aramark considered 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'.⁶⁶³

⁶⁶¹ We have also received internal documents from one OCS supplier ([REDACTED]), which we do not cover in this appendix but cover in Chapter 6.

⁶⁶² CMA2, paragraph 9.9(a).

⁶⁶³ 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'.⁶⁶⁴
- (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]'.⁶⁶⁵
- (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'.⁶⁶⁶
- (e) An Aramark document, '[REDACTED]', lists under 'Global Offshore Objectives' for the UKCS to 'consider market strategic acquisition of main competitors in UKCS' and to 'conclude strategic, viable acquisition'.⁶⁶⁷

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]'.⁶⁶⁸

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'.⁶⁶⁹
- (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'.⁶⁷⁰

⁶⁶⁴ Aramark internal document, Annex 107, page 2 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025

⁶⁶⁵ 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.

⁶⁶⁶ Aramark internal document, Annex 392 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁶⁶⁷ Aramark internal document, Annex 449 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 23.

⁶⁶⁸ Aramark internal document, Annex 404 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 22.

⁶⁶⁹ Aramark internal document, Annex 404 to Aramark's response to CMA's s109 notice dated 7 August 2025, slide 22.

⁶⁷⁰ 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].⁶⁷¹

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).⁶⁷² We understand that items marked in [REDACTED] denote a high-priority focus, and [REDACTED] denotes a medium-priority focus.⁶⁷³
- (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].⁶⁷⁴ We understand that items marked in [REDACTED] denote a high-priority focus, and [REDACTED] denotes a medium-priority focus.⁶⁷⁵ It additionally notes that the profile of the Marine sector differs by geography, and that it is less attractive in [REDACTED].⁶⁷⁶

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]'.⁶⁷⁷ Another strategy document lists its competitors in the North Sea, and notes that Entier has '[REDACTED]'.⁶⁷⁸
- (b) An Aramark document, '[REDACTED]', notes that '[REDACTED]'.⁶⁷⁹
- (c) The same Aramark document lists under the heading '[REDACTED]', bullets including '[REDACTED]'.⁶⁸⁰

⁶⁷¹ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 15.

⁶⁷² Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 12.

⁶⁷³ We note that this document [REDACTED]. Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 12.

⁶⁷⁴ Aramark internal document, Annex 446 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 20.

⁶⁷⁵ We note that this document [REDACTED]. Aramark internal document, Annex 458 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 15.

⁶⁷⁶ Aramark internal document, Annex 446 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 20.

⁶⁷⁷ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 8.

⁶⁷⁸ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁶⁷⁹ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 5, question 21.

⁶⁸⁰ 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]'.⁶⁸¹

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]'.⁶⁸² We understand that this statement includes reference to Aramark's offshore and onshore activities in the UK.⁶⁸³
- (b) An Aramark document, '[REDACTED]', lists under '[REDACTED]' that it '[REDACTED]', and separately that it '[REDACTED]'.⁶⁸⁴ The latter comment appears without the former comment in another Aramark document, '[REDACTED]'.⁶⁸⁵
- (c) An Aramark document, '[REDACTED]', lists in a slide titled '[REDACTED]' an action to '[REDACTED]'.⁶⁸⁶

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

⁶⁸¹ 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.

⁶⁸² Aramark internal document, Annex 240 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 7, question 23.

⁶⁸³ 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).

⁶⁸⁴ Aramark internal document, Annex 117 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 26.

⁶⁸⁵ Aramark internal document, Annex 107 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 2.

⁶⁸⁶ 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.⁶⁸⁷ 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.⁶⁸⁸

- (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.⁶⁸⁹
- (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.⁶⁹⁰ Additionally, this document presents financial forecasts for UKCS, Denmark and Norway separately.⁶⁹¹
 - (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 FY25.⁶⁹²
 - (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.⁶⁹³ 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]'.⁶⁹⁴
 - (iv) An Aramark document, '[REDACTED]', provides information specific to the UKCS offshore market. It notes that '[REDACTED]'. It also notes '[REDACTED]', and that '[REDACTED]'.⁶⁹⁵
- (c) An Aramark document, which includes a revenue analysis for a potential acquisition of Entier, splits revenue forecasts by region, distinguishing the

⁶⁸⁷ Aramark internal document, Annex 129 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slides 5 and 10-11.

⁶⁸⁸ Aramark internal document, Annex 123 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 5.

⁶⁸⁹ Aramark internal document, Annex 014 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slides 3 and 6.

⁶⁹⁰ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025.

⁶⁹¹ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 19.

⁶⁹² Aramark internal document, Annex 446 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 20.

⁶⁹³ Aramark internal document, Annex 459 revised to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 15.

⁶⁹⁴ Aramark internal document, Annex 459 revised to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 13.

⁶⁹⁵ 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.⁶⁹⁶

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.⁶⁹⁷
- (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]).^{698,699}
- (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.⁷⁰⁰ However, it notes on the same slide that '[REDACTED]'. It also notes that ESS' acquisition of 4Service in Norway adds '[REDACTED]'.⁷⁰¹

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'.⁷⁰²
- (b) An Entier board presentation lists the UKCS as a '[REDACTED]', as distinct from the EMEA (Europe, the Middle East, and Africa).⁷⁰³ However, elsewhere in this document, it presents maps of its current and prospective offshore operations and groups UKCS operations under 'EMEA'.⁷⁰⁴
- (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

⁶⁹⁶ 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.

⁶⁹⁷ Aramark internal document, Annex 129 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slides 10-11.

⁶⁹⁸ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 8.

⁶⁹⁹ We consider the term '[REDACTED]' to mean self-supply, self-operate and/or 'in-house', and we use these terms interchangeably.

⁷⁰⁰ Aramark internal document, Annex 459 revised to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁷⁰¹ Aramark internal document, Annex 459 revised to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁷⁰² Entier internal document, Annex 186 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slides 4 and 14.

⁷⁰³ Entier internal document, Annex 189 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 11.

⁷⁰⁴ 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.⁷⁰⁵

- (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.⁷⁰⁶

Competitors

- D.16 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 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;⁷⁰⁷ and (ii) many of these documents refer to ESS as part of the main competitor set, whereas [REDACTED].⁷⁰⁸
- D.17 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.⁷⁰⁹ 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

⁷⁰⁵ Entier internal document, Annex 208 to Entier’s response to the CMA Enquiry Letter dated 18 March 2025, pages 18-21.

⁷⁰⁶ 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.

⁷⁰⁷ Parties’ response to the Phase 1 Decision, 22 August 2025, paragraph 3.8.

⁷⁰⁸ Third party call note.

⁷⁰⁹ 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]'.⁷¹⁰ 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]'.⁷¹¹
 - (ii) Entier is also noted as having '[REDACTED]', with '[REDACTED]'. However, the document describes Entier as having '[REDACTED]' and notes its '[REDACTED]'.⁷¹²
 - (iii) 4Service is noted as '[REDACTED]', with its '[REDACTED]' which '[REDACTED]'. It also notes that 4Service is the '[REDACTED]'.⁷¹³
 - (iv) Conntrak is described as having '[REDACTED]' and '[REDACTED]'. It is noted as having an '[REDACTED]' and being a '[REDACTED]'.⁷¹⁴
- (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]'.⁷¹⁵

D.18 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.⁷¹⁶ 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.19 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.⁷¹⁷ The Parties refer to an Aramark document, '[REDACTED]'.⁷¹⁸ In this document:

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

- (i) '[REDACTED]'.⁷¹⁹

⁷¹⁰ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁷¹¹ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁷¹² Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁷¹³ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁷¹⁴ Aramark internal document, Annex 459 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 9.

⁷¹⁵ Aramark internal document, Annex 118 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁷¹⁶ Aramark internal document, Annex 129 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 11.

⁷¹⁷ Parties' response to the Phase 1 Decision, 22 August 2025, paragraph 5.9.

⁷¹⁸ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025.

⁷¹⁹ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

(ii) '[REDACTED]'.⁷²⁰

(iii) '[REDACTED]'.⁷²¹

(b) Aramark considered where Conntrak is trying to '[REDACTED]', noting that '[REDACTED]'.⁷²²

(c) Aramark considered what Conntrak's supply chain looks like, noting that '[REDACTED]'.⁷²³

D.20 The same Aramark document, '[REDACTED]', also notes that:

(a) '[REDACTED]'.⁷²⁴

(b) '[REDACTED]'. It also notes that '[REDACTED]'.⁷²⁵

(c) '[REDACTED]'.⁷²⁶

D.21 Aramark submitted deal memos for customers, which present information about upcoming opportunities to supply catering services, including a table of competitor information.

D.22 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 nine deal memos for Offshore Infrastructure customers in the UKCS, all nine list Sodexo and ESS ([REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED])⁷²⁷ and six list Entier ([REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED]).⁷²⁸ Francois is listed in two deal memos

⁷²⁰ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁷²¹ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁷²² Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁷²³ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁷²⁴ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁷²⁵ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁷²⁶ Aramark internal document, Annex 461 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁷²⁷ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, pages 3-4.; 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.

⁷²⁸ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 3; 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.

([REDACTED], [REDACTED]).⁷²⁹ Conntrak is listed in one deal memo ([REDACTED]).⁷³⁰ BaxterStorey ([REDACTED]) and CH&CO ([REDACTED]) are listed in one each, in both cases for opportunities involving assets onshore and offshore, and in both cases with the note that these competitors cannot serve the offshore locations.^{731,732}

(a) Aramark's deal memo for EnQuest ([REDACTED]) describes an opportunity in 2025, with a decision in January 2026, for offshore assets in the UK.⁷³³ In this deal memo, Aramark lists its competitors for this opportunity as Entier, ESS, Francois, Conntrak and Sodexo.⁷³⁴

(i) When describing Entier:

- (1) Under the heading for 'Strengths', Aramark notes that Entier have incumbent knowledge and know the client/contract well.⁷³⁵
- (2) Under the heading for 'Weaknesses', Aramark notes 'Discussion on call'.⁷³⁶

(ii) When describing ESS:

- (1) Under the heading for 'Strengths', Aramark notes that ESS have won three out of four competitive UKCS tenders, that it is bidding aggressively commercially (noting '[REDACTED]'), and that it has a '[REDACTED]' working in local communities. It also notes that ESS is '[REDACTED]' with a '[REDACTED]'.⁷³⁷
- (2) The space under the heading for 'Weaknesses' is left blank.⁷³⁸

(iii) When describing Francois:

⁷²⁹ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 3; Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 4-5.

⁷³⁰ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 4.

⁷³¹ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷³² Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 4-5.

⁷³³ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, pages 1-2.

⁷³⁴ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 3-4.

⁷³⁵ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 3.

⁷³⁶ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 3.

⁷³⁷ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 3.

⁷³⁸ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 3.

- (1) Under the heading for 'Strengths', Aramark notes that Francois [REDACTED].⁷³⁹
 - (2) Under the heading for 'Weaknesses', Aramark notes that Francois [REDACTED], where the RFQ [request for quote] calls for tenderers [REDACTED]. It also notes that Francois [REDACTED].⁷⁴⁰
- (iv) When describing Conntrak:
- (1) Under the heading for 'Strengths', Aramark notes that Conntrak [REDACTED].⁷⁴¹
 - (2) Under the heading for 'Weaknesses', Aramark notes that Conntrak [REDACTED], having resigned in 2025, where the RFQ (request for quote) calls for tenderers [REDACTED]. It also notes that Conntrak [REDACTED].⁷⁴²
- (v) When describing Sodexo, Aramark notes that Sodexo are '[REDACTED]'.⁷⁴³
- (vi) Additionally, Aramark notes that, with the exception of Sodexo, that 'it is not clear who is bidding on this process', and that several clarifications have been received by multiple bidders.⁷⁴⁴
- (b) Aramark's deal memo for [REDACTED] ([REDACTED]) describes an opportunity in 2024 for one floating production storage and offloading (**FPSO**) asset in the UK.⁷⁴⁵ In this deal memo, Aramark lists its competitors for this opportunity as Sodexo, ESS, and Entier.⁷⁴⁶
- (i) When describing Sodexo:
- (1) Under the heading for 'Strengths', 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.⁷⁴⁷

⁷³⁹ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 3.

⁷⁴⁰ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 3.

⁷⁴¹ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 4.

⁷⁴² Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 4.

⁷⁴³ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 4.

⁷⁴⁴ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, page 4.

⁷⁴⁵ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 2.

⁷⁴⁶ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁴⁷ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

- (2) Under the heading for 'Weaknesses', 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]'.⁷⁴⁸
- (ii) When describing ESS:
 - (1) Under the heading for 'Strengths', 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.⁷⁴⁹
 - (2) Under the heading for 'Weaknesses', Aramark notes that ESS don't currently work with the customer, and is '[REDACTED]'.⁷⁵⁰
 - (3) Additionally, Aramark notes that it proposes to adjust its offer in response to ESS, noting '[REDACTED]' and that '[REDACTED]'.⁷⁵¹
 - (iii) When describing Entier, under the heading for 'Strengths', Aramark notes that it's a '[REDACTED]' and '[REDACTED]'. It also notes that Entier has '[REDACTED]'.⁷⁵²
 - (c) 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.⁷⁵³
 - (i) When describing Sodexo:
 - (1) Under the heading for 'Strengths', 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])⁷⁵⁴ as Sodexo is an incumbent on one of the assets. It also notes that Sodexo is an incumbent on one of the assets.⁷⁵⁵
 - (2) Under the heading for 'Weaknesses', Aramark notes that Sodexo is a '[REDACTED]' with a '[REDACTED]'. It also notes that Sodexo '[REDACTED]'.⁷⁵⁶

⁷⁴⁸

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

⁷⁴⁹ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁵⁰ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁵¹ Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁷⁵² Aramark internal document, Annex 166 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁵³ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁵⁴ See Aramark's deal memo for [REDACTED] in paragraph A.21(c).

⁷⁵⁵ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁵⁶ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

- (ii) When describing ESS:
 - (1) Under the heading for 'Strengths', 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 'Weaknesses', Aramark notes that ESS' recent win of Apache will '[REDACTED]' them. Aramark also notes that this opportunity may be '[REDACTED]'.⁷⁵⁷
- (iii) When describing BaxterStorey:
 - (1) Under the heading for 'Strengths', 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]'.⁷⁵⁸
 - (2) Under the heading for 'Weaknesses', Aramark notes that BaxterStorey is '[REDACTED]', and that there is '[REDACTED]'.⁷⁵⁹
- (d) 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 memo, Aramark lists its competitors as Sodexo, ESS, Entier, CH&CO, and Francois.⁷⁶⁰
 - (i) When describing Sodexo:
 - (1) Under the heading for 'Strengths', Aramark notes that Sodexo '[REDACTED]'. Aramark also notes that Sodexo is hiring and rebuilding a team, adding that Sodexo could '[REDACTED]'.⁷⁶¹
 - (2) Under the heading for 'Weaknesses', Aramark notes that Sodexo is a '[REDACTED]' with only 2 remaining contracts, and that it lacks '[REDACTED]'.⁷⁶²
 - (ii) When describing ESS:
 - (1) Under the heading for 'Strengths', Aramark notes that ESS has had recent successes in UKCS, that it can deliver both onshore

⁷⁵⁷ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁵⁸ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁵⁹ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁶⁰ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 4-5.

⁷⁶¹ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁶² Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

and offshore, as well as that it is bidding aggressively for large contracts.⁷⁶³

- (2) Under the heading for 'Weaknesses', Aramark notes that ESS' '[REDACTED]' and that Aramark have just taken Shelf Drilling off ESS due to '[REDACTED]'. Aramark also notes that one of ESS' operations managers had just resigned.⁷⁶⁴

(iii) When describing Entier:

- (1) Under the heading for 'Strengths', Aramark notes that Entier delivers a '[REDACTED]', that Entier operates local operations with shared labour between the sites, and that Entier '[REDACTED]'.⁷⁶⁵
- (2) Under the heading for 'Weaknesses', 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]'.⁷⁶⁶

(iv) When describing CH&CO:

- (1) Under the heading for 'Strengths', Aramark notes that CH&CO operates comparable onshore sites which it recently retained.⁷⁶⁷
- (2) Under the heading for 'Weaknesses', Aramark notes that CH&CO has no offshore presence, with '[REDACTED]'.⁷⁶⁸

(v) When describing Francois:

- (1) Under the heading for 'Strengths', Aramark notes Francois' '[REDACTED]', adding that it '[REDACTED]'.⁷⁶⁹
- (2) Under the heading for 'Weaknesses', Aramark notes that Francois has no onshore or offshore platform case studies, and has an '[REDACTED]'.⁷⁶⁹

⁷⁶³ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁶⁴ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁶⁵ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁷⁶⁶ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁷⁶⁷ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁷⁶⁸ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁷⁶⁹ Aramark internal document, Annex 164 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

- (e) 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.⁷⁷⁰
- (i) When describing Entier:
- (1) Under the heading for 'Strengths', Aramark notes that the client has '[REDACTED]' as incumbent, and that the price request '[REDACTED]'. Aramark also notes that there is a '[REDACTED]' between Entier and the client's senior personnel.⁷⁷¹
 - (2) Under the heading for 'Weaknesses', Aramark notes that Entier has '[REDACTED]', and that Entier '[REDACTED]'.⁷⁷²
 - (3) Additionally, in a section titled '[REDACTED]', Aramark noted '[REDACTED]', one of which is to '[REDACTED]'.⁷⁷³
- (ii) When describing ESS:
- (1) Under the heading for 'Strengths', Aramark notes that ESS has a strong presence in UK offshore, and existing operations in the Netherlands offshore.⁷⁷⁴
 - (2) Under the heading for 'Weaknesses', Aramark notes that ESS has a '[REDACTED]'.⁷⁷⁵
- (iii) When describing Sodexo:
- (1) Under the heading for 'Strengths', Aramark notes that Sodexo is '[REDACTED]' and will '[REDACTED]'.⁷⁷⁶
 - (2) Under the heading for 'Weaknesses', Aramark notes Sodexo's '[REDACTED]', and that Sodexo has lost several clients in the past 2 years.⁷⁷⁷
- (f) 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

⁷⁷⁰ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 3-4.

⁷⁷¹ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁷² Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁷³ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 3.

⁷⁷⁴ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁷⁵ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁷⁶ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁷⁷⁷ Aramark internal document, Annex 163 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

onshore in the UK. In this deal memo, Aramark lists its competitors as Sodexo, ESS and Entier.⁷⁷⁸

(i) When describing Sodexo:

- (1) Under the heading for 'Strengths', 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]'.⁷⁷⁹
- (2) Under the heading for 'Weaknesses' including '[REDACTED]', that it '[REDACTED]', and that its '[REDACTED]' with the loss of Ithaca Energy.⁷⁸⁰

(ii) When describing ESS:

- (1) Under the heading for 'Strengths', Aramark notes that ESS has a '[REDACTED]', having '[REDACTED]', and that ESS has '[REDACTED]' and are '[REDACTED]'.⁷⁸¹
- (2) Under the heading 'Weaknesses', 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]'.⁷⁸²

(iii) When describing Entier:

- (1) Under the heading 'Strengths', 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]'.⁷⁸³
- (2) Under the heading '[REDACTED]', Aramark notes that Entier has '[REDACTED]'.⁷⁸⁴

- (g) 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.⁷⁸⁵ 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.⁷⁸⁶

⁷⁷⁸ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁷⁹ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁸⁰ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁸¹ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁸² Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁸³ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁸⁴ Aramark internal document, Annex 414 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁸⁵ Aramark internal document, Annex 407 to Aramark's response to the CMA's s109 notice dated 7 August 2025, pages 3-4.

⁷⁸⁶ Aramark internal document, Annex 407 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 7.

- (h) Aramark's deal memo for [REDACTED] ([REDACTED]) describes an opportunity in 2021 for seven offshore platforms in the UKCS.⁷⁸⁷ In this deal memo, Aramark identifies its other competitors as Sodexo, ESS and Entier.⁷⁸⁸
- (i) When describing Sodexo:
- (1) Under the heading 'Strengths', Aramark notes that Sodexo has been on [REDACTED] assets for '[REDACTED]'.⁷⁸⁹
 - (2) Under the heading 'Weaknesses', Aramark notes that '[REDACTED]' and that '[REDACTED]'.⁷⁹⁰
- (ii) When describing ESS:
- (1) Under the heading 'Strengths', Aramark notes that ESS has '[REDACTED]'.⁷⁹¹
 - (2) Under the heading 'Weaknesses', Aramark notes that ESS lost the business to Aramark in 2016 and '[REDACTED]'.⁷⁹²
- (iii) When describing Entier:
- (1) Under the heading 'Strengths', Aramark notes that Entier has a '[REDACTED]'.⁷⁹³
 - (2) Under the heading 'Weaknesses', Aramark notes that Entier will be '[REDACTED]', adding that '[REDACTED]'.⁷⁹⁴
- (i) 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.⁷⁹⁵ In this deal memo, Aramark identifies its competitors as Sodexo and ESS.⁷⁹⁶
- (i) When describing Sodexo:
- (1) Under the heading 'Strengths', Aramark notes that Sodexo was the last catering provider onboard the asset, and will be known to

⁷⁸⁷ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, pages 3-4.

⁷⁸⁸ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 5.

⁷⁸⁹ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁹⁰ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁹¹ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁹² Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁹³ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 6.

⁷⁹⁴ Aramark internal document, Annex 395 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 5.

⁷⁹⁵ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 2.

⁷⁹⁶ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

the rig superintendent. Aramark also notes that Sodexo has further business with [REDACTED] in the UK and internationally.⁷⁹⁷

- (2) Under the heading 'Weaknesses', Aramark notes that there has been a '[REDACTED]' with a '[REDACTED]'. It notes that Sodexo '[REDACTED]'.⁷⁹⁸

(ii) When describing ESS:

- (1) Under the heading 'Strengths', Aramark notes that ESS is '[REDACTED]'.⁷⁹⁹
- (2) Under the heading 'Weaknesses', Aramark notes that ESS has also undergone significant senior management changes, and that ESS has the '[REDACTED]' where it will '[REDACTED]'.⁸⁰⁰

D.23 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.⁸⁰¹ The same document also describes Entier's '[REDACTED]' offshore as Aramark, ESS and Sodexo, and describes '[REDACTED]' as including Foss, Conntrak, Francois, IFS, Connect and Atlas.⁸⁰²
- (b) Entier's information memorandum (which was intended for prospective acquirers of Entier) (dated July 2022) presents its market share in the UKCS, listing the shares of the following competitors: Aramark, ESS, Sodexo, Self-supply ('Self'), and 'Others'.⁸⁰³

D.24 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 '[REDACTED]' as described in paragraph D.22(b), then lists '[REDACTED]'. Included in '[REDACTED]', it notes that '[REDACTED]'.⁸⁰⁴

D.25 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]'.⁸⁰⁵

⁷⁹⁷ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

⁷⁹⁸ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

⁷⁹⁹ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

⁸⁰⁰ Aramark internal document, Annex 389 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 3.

⁸⁰¹ Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 23.

⁸⁰² Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 23.

⁸⁰³ Entier internal document, Annex 366 to Entier's response to the CMA's s109 notice dated 7 August 2025, slide 48.

⁸⁰⁴ Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 14.

⁸⁰⁵ Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 83.

Aramark's tender documents

- D.26 We have reviewed documents related to Aramark and Entier's participation in recent tenders for opportunities to supply offshore infrastructure customers in the UKCS.
- D.27 We have reviewed Aramark documents relating to a tender in late-2025 for an opportunity to supply offshore catering service to [REDACTED]. Aramark's internal documents suggest [REDACTED]. These documents suggest that Aramark's decision to bid [REDACTED], and that Aramark considered [REDACTED].⁸⁰⁶
- (a) In an Aramark internal email chain, Aramark comments that it is '[REDACTED]' and notes that '[REDACTED]'.⁸⁰⁷ Additionally:
 - (i) In a subsequent email, Aramark implies that a competitor may be more willing to bid, commenting that '[REDACTED]'. The same email notes that [REDACTED]. It suggests that Aramark should understand [REDACTED]. It asks whether it expects [REDACTED].⁸⁰⁸ Aramark also comments that it [REDACTED].⁸⁰⁹
 - (ii) In another subsequent email, Aramark comments that '[REDACTED]', adding that '[REDACTED]'.⁸¹⁰
 - (b) Another Aramark internal email chain regarding this opportunity describes the margins as '[REDACTED]' which, among other factors, makes the contract '[REDACTED]', but also notes that '[REDACTED]'.⁸¹¹ Additionally, subsequent emails:
 - (i) Aramark comments that it [REDACTED] noting that '[REDACTED]'.⁸¹²
 - (ii) Aramark suggests that Aramark, Entier, ESS, Sodexo, Conntrak and Francois will be invited to bid.⁸¹³
 - (iii) Aramark comments that [REDACTED].⁸¹⁴
 - (c) In a deal memo produced by Aramark regarding this opportunity, Aramark describes the [REDACTED]. It also notes the opportunity is '[REDACTED]'.⁸¹⁵

⁸⁰⁶ Aramark internal documents; Annex 1021 to Aramark's response to the CMA's s109 notice dated 20 November 2025; Annex 1054 to Aramark's response to the CMA's s109 notice dated 20 November 2025. [REDACTED]; Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, pages 2-3; Annex 1019 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸⁰⁷ Aramark internal document, Annex 1021 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸⁰⁸ Aramark internal document, Annex 1021 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸⁰⁹ Aramark internal document, Annex 1021 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸¹⁰ Aramark internal document, Annex 1021 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸¹¹ Aramark internal document, Annex 1054 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸¹² Aramark internal document, Annex 1054 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸¹³ Aramark internal document, Annex 1054 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸¹⁴ Aramark internal document, Annex 1054 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸¹⁵ Aramark internal document, Annex 1037(ii) to Aramark's response to the CMA's s109 notice dated 20 November 2025, pages 2-3.

- (d) In an Aramark internal email chain discussing clarifications provided by [REDACTED] regarding its tender opportunity, Aramark notes that the responses are '[REDACTED]'.⁸¹⁶

D.28 As part of Aramark's tender submission to [REDACTED], it submitted responses to technical questions with information regarding its contractor representative, reference clients, and examples of its experience transferring employees through the TUPE process. In these documents:

- (a) Aramark provided information about the contractor representative [REDACTED].⁸¹⁷
- (b) Under the heading 'Reference Clients – Offshore', Aramark provided [REDACTED].⁸¹⁸ Aramark also provided [REDACTED].⁸¹⁹
- (c) Aramark provided [REDACTED] ([REDACTED]) to demonstrate its approach to TUPE.⁸²⁰ Aramark also submitted [REDACTED].⁸²¹ ([REDACTED])

D.29 In Entier's executive summary of its tender submission to [REDACTED], Entier [REDACTED].⁸²²

Shares of supply

D.30 We have reviewed documents relating to the Parties' shares of supply in the markets for OCS.

D.31 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]%.⁸²³ 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-

⁸¹⁶ Aramark internal document, Annex 1019 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸¹⁷ Aramark internal document, Annex 1089 to Aramark's response to the CMA's s109 notice dated 20 November 2025, pages 13-14.

⁸¹⁸ Aramark internal document, Annex 1185 to Aramark's response to the CMA's s109 notice dated 20 November 2025, pages 3-4.

⁸¹⁹ Aramark internal document, Annex 1185 to Aramark's response to the CMA's s109 notice dated 20 November 2025, pages 12-15.

⁸²⁰ Aramark internal document, Annex 1178 to Aramark's response to the CMA's s109 notice dated 20 November 2025.

⁸²¹ Aramark internal document, Annex 1160 to Aramark's response to the CMA's s109 notice dated 20 November 2025, pages 17-19.

⁸²² Entier internal document, Annex 925 to Entier's response to the CMA's s109 notice dated 20 November 2025, page 5.

⁸²³ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 8.

acquisition, Aramark and Entier are listed as having a combined share of [60-70]%.⁸²⁴

- D.32 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, '[X]', notes under the heading '[X]' that the acquisition 'expands leadership positions in UKCS/[X]'.⁸²⁵
 - (b) Another Aramark document, '[X]', under the heading '[X]', notes that the acquisition of Entier would 'cement Aramark's already market leading position in the UKCS and bolster wider regions'.⁸²⁶
- D.33 An Entier document, '[X]', 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]%.⁸²⁷
- D.34 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%.⁸²⁸ Similarly, an Aramark document calculating shares pre- and post-acquisition calculates the share of self-supply at 2%.⁸²⁹
 - (b) An Entier document, '[X]', presents shares of supply by POB from 2023, with self-supply representing 6% of the market.

Barriers to entry and expansion

- D.35 Some Aramark internal email exchanges suggest that Aramark is able to offer discounts for contracts involving more assets, including when combining [X]. For example:
- (a) In an internal email exchange regarding an invitation to tender from a customer ([X]), involving two offshore lots and one onshore lot, Aramark identifies that it is in Aramark's '[X]' to bid for all three lots, because ESS

⁸²⁴ Aramark internal document, Annex 133 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, sheet '[X]'. As noted in a previous footnote, we consider that this document relates to the acquisition of Entier.

⁸²⁵ Aramark internal document, Annex 117 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 26.

⁸²⁶ Aramark internal document, Annex 115 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁸²⁷ Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, slide 15.

⁸²⁸ Aramark internal document, Annex 130 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 8.

⁸²⁹ Aramark internal document, Annex 133 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, sheet '[X]'.

and Sodexo are '[X]', and because [X].⁸³⁰ Aramark later notes that '[X]' and that '[X]'.⁸³¹

- (b) In an email exchange between Aramark and a customer ([X]), Aramark notes that it offered several forms of discount to the customer, including '[X]'. 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.⁸³²

D.36 Aramark deal memos imply that [X]. For example:

- (a) An Aramark deal memo for a customer which Aramark notes as a '[X]' ([X]), lists as a [X].⁸³³ However, it notes the '[X]' that it is '[X]'.⁸³⁴
- (b) An Aramark deal memo ([X]) notes that Aramark '[X]' the last competitive tender for the customer's Norwegian business because '[X]', and that '[X]'. It goes on to note that '[X]'.⁸³⁵
- (c) An Aramark document, '[X]', describes how '[X]'.⁸³⁶

D.37 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, '[X]', under '[X]', notes that the acquisition enables Aramark '[X]' and enables Aramark to participate in multi-region bids including in Norway.⁸³⁷
- (b) An Aramark document, '[X]', describes how an '[X]' of NOC would '[X]', and how Norway represents an '[X]'. It additionally notes that Aramark had '[X]'.⁸³⁸
- (c) An Aramark document, '[X]', under the imperative of '[X]', notes '[X]'.⁸³⁹

⁸³⁰ Aramark internal document, Annex 657 to Aramark's response to the CMA's s109 notice dated 7 August 2025.

⁸³¹ Aramark internal document, Annex 657 to Aramark's response to the CMA's s109 notice dated 7 August 2025.

⁸³² Aramark internal document, Annex 581 to Aramark's response to the CMA's s109 notice dated 7 August 2025.

⁸³³ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁸³⁴ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁸³⁵ Aramark internal document, Annex 167 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 1-2.

⁸³⁶ Aramark internal document, Annex 129 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 21.

⁸³⁷ Aramark internal document, Annex 152 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 4.

⁸³⁸ Aramark internal document, Annex 123 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 12.

⁸³⁹ Aramark internal document, Annex 097 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, slide 1.

- D.38 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]'.⁸⁴⁰
 - (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]'.⁸⁴¹
- D.39 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]'.⁸⁴²
 - (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].⁸⁴³ It further notes that '[REDACTED]'.
 - (b) An Entier [REDACTED] notes under '[REDACTED]' that targets for its Fresh business are '[REDACTED]' including which '[REDACTED]'.⁸⁴⁴
 - (c) An Entier [REDACTED] notes that six of its offshore contracts have come from '[REDACTED]'.⁸⁴⁵
- D.40 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]'.⁸⁴⁶

Marine

- D.41 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

⁸⁴⁰ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, pages 2 and 4.

⁸⁴¹ Aramark internal document, Annex 169 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 4.

⁸⁴² Entier internal document, Annex 366 to Entier's response to the CMA's s109 notice dated 7 August 2025, page 30.

⁸⁴³ Entier internal document, Annex 366 to Entier's response to the CMA's s109 notice dated 7 August 2025, page 35.

⁸⁴⁴ Entier internal document, Annex 185 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, page 23.

⁸⁴⁵ Entier internal document, Annex 202 to Entier's response to the CMA Enquiry Letter dated 18 March 2025, page 19.

⁸⁴⁶ Aramark internal document, Annex 420 to Aramark's response to the CMA's s109 notice dated 7 August 2025, slide 3.

(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)'.⁸⁴⁷

- (b) An Aramark document, '[REDACTED]', notes that Entier's other 'main sector' in offshore is Marine services, which Aramark '[REDACTED]'.⁸⁴⁸ Additionally, in relation to Marine:
 - (i) It notes that many incumbents self-operate catering services, and that '[REDACTED]'.
 - (ii) It notes that Entier's main competitors are Sodexo, ISS and IFS (Belgium).⁸⁴⁹
 - (iii) It notes that there are '[REDACTED]' as most vessels are on very short contracts.⁸⁵⁰
 - (iv) It describes local labour requirements for marine vessels, noting that Marine services providers occasionally add '[REDACTED]' staff for specific jurisdictions, such as in Saudi Arabia where suppliers keep the normal crew onboard, but add Saudi nationals to fulfil local requirements.⁸⁵¹
- (c) An Aramark document, '[REDACTED]', lists under '[REDACTED]' two imperatives relating to Marine. It lists '[REDACTED]', and '[REDACTED]'.⁸⁵²
- (d) An Aramark document relating to the acquisition, '[REDACTED]', notes as part of a '[REDACTED]' that:
 - (i) Regarding '[REDACTED]', Aramark is to '[REDACTED]'.
 - (ii) Regarding '[REDACTED]', that '[REDACTED]'.⁸⁵³
- (e) An Aramark strategy document for the Arabian Gulf offshore business, '[REDACTED]', includes comments which imply that Marine customers are different from other customer types.⁸⁵⁴ It notes that:
 - (i) Aramark's Gulf business '[REDACTED]' which are '[REDACTED]'.
 - (ii) Marine clients are '[REDACTED]' and '[REDACTED]'.

⁸⁴⁷ Aramark internal document, Annex 129 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 6.

⁸⁴⁸ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁸⁴⁹ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁸⁵⁰ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁸⁵¹ Aramark internal document, Annex 120 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 5.

⁸⁵² Aramark internal document, Annex 449 to Aramark's response to the CMA's s109 notice dated 7 August 2025, page 23.

⁸⁵³ Aramark internal document, Annex 118 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, page 6.

⁸⁵⁴ 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.

- D.42 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.⁸⁵⁵
 - (b) An Entier document, '[REDACTED]', presents its RSG business split by sector, in which Marine (as distinct from renewables, accommodation, and decommissioning) represents [10-20]% of its RSG business.

⁸⁵⁵ Aramark internal document, Annex 133 to Aramark's response to the CMA Enquiry Letter dated 18 March 2025, sheet '[REDACTED]'.

APPENDIX E: Margins

Introduction

- E.1 This Appendix sets out (i) the data on gross and net margins provided to us by the Parties, and (ii) the factors the Parties consider contribute to variations in margins between Marine Assets and Offshore Infrastructure Assets, as well as between OCS and onshore catering.

Parties' submissions

- E.2 The Parties have provided the CMA with revenue, cost and gross margin figures for the fiscal years 2021, 2022, 2023, 2024, and 2025 (minus the last two months of 2025 for Entier as its FY runs to the end of September 2025).⁸⁵⁶ We have conducted the following exercises in relation to that data:

- (a) In Table E.1, we divided gross margins by revenue and multiplied the resulting figures by 100.
- (b) In Table E.2, we divided food costs by revenue and multiplied the resulting figures by 100.
- (c) In Table E.3, we divided labour costs by revenue and multiplied the resulting figures by 100.

- E.3 The Parties have also provided the CMA with net margins for the fiscal years 2021, 2022, 2023, 2024, and 2025. To calculate these figures, which are provided in Table E.4, Aramark apportioned its overheads attributable to its OCS business overall according to the revenue generated by each business unit (ie O&G, MODU, and Marine) within the North Sea. Aramark then subtracted these apportioned overhead figures from the gross margin figures, before dividing the resulting figure by revenue (and then multiplying by 100). Entier used a similar methodology.⁸⁵⁷

⁸⁵⁶ The data provided by Entier includes its entire Offshore business (including Australia). The data provided by Aramark includes its entire North Sea Offshore business (ie including UKCS and the rest of the North Sea). Source: Entier's response to s109(3) issued on 5 September 2025, and Aramark's response to s109(7) issued on 15 October 2025.

⁸⁵⁷ Parties' Response to Additional Evidence Paper dated 11 December 2025.

Table E.1: Entier and Aramark gross margins (%)

Entier					Aramark			
	O&G	MODU	Marine			O&G	MODU	Marine
2021	[0-10]	[0-10]	[0-10]		2021	[10-20]	[0-10]	[10-20]
2022	[0-10]	[0-10]	[10-20]		2022	[10-20]	[0-10]	[10-20]
2023	[0-10]	[0-10]	[0-10]		2023	[10-20]	[0-10]	[10-20]
2024	[0-10]	[0-10]	[0-10]		2024	[0-10]	[0-10]	[0-10]
2025	[0-10]	[0-10]	[0-10]		2025	[0-10]	[0-10]	[0-10]

Source: Extrapolated from data provided by Parties in response to P2-s109-03 dated 5 September 2025; and, with regard to Aramark's figures for 2024 and 2025, from data provided by Aramark in response to P2 s109-07 dated 15 October 2025.

Table E.2: Entier and Aramark food costs as a percentage of revenue (%)

Entier					Aramark			
	O&G	MODU	Marine			O&G	MODU	Marine
2021	[20-30]	[20-30]	[30-40]		2021	[10-20]	[10-20]	[10-20]
2022	[20-30]	[20-30]	[30-40]		2022	[10-20]	[20-30]	[10-20]
2023	[20-30]	[20-30]	[30-40]		2023	[20-30]	[20-30]	[20-30]
2024	[20-30]	[20-30]	[30-40]		2024	[10-20]	[20-30]	[20-30]
2025	[20-30]	[20-30]	[30-40]		2025	[10-20]	[20-30]	[20-30]

Source: Extrapolated from data provided by Parties in response to P2-s109-03 dated 5 September 2025; and, with regard to Aramark's figures for 2024 and 2025, from data provided by Aramark in response to P2 s109-07 dated 15 October 2025.

Table E.3: Entier and Aramark labour costs as a percentage of revenue (%)

Entier					Aramark			
	O&G	MODU	Marine			O&G	MODU	Marine
2021	[60-70]	[60-70]	[50-60]		2021	[60-70]	[60-70]	[60-70]
2022	[60-70]	[60-70]	[50-60]		2022	[60-70]	[60-70]	[60-70]
2023	[60-70]	[60-70]	[50-60]		2023	[60-70]	[60-70]	[60-70]
2024	[50-60]	[60-70]	[50-60]		2024	[60-70]	[70-80]	[60-70]
2025	[60-70]	[60-70]	[50-60]		2025	[60-70]	[70-80]	[60-70]

Source: Extrapolated from data provided by Parties in response to P2-s109-03 dated 5 September 2025; and, with regard to Aramark's figures for 2024 and 2025, from data provided by Aramark in response to P2 s109-07 dated 15 October 2025.

Table E.4: Entier and Aramark net margins (%)

Entier					Aramark			
	O&G	MODU	Marine			O&G	MODU	Marine
2021	[0-10]	[0-10]	[0-10]		2021	[0-10]	[0-10]	[0-10]
2022	[0-10]	[0-10]	[10-20]		2022	[0-10]	[0-10]	[0-10]
2023	[0-10]	[0-10]	[0-10]		2023	[0-10]	[0-10]	[0-10]
2024	[0-10]	[0-10]	[0-10]		2024	[0-10]	[0-10]	[0-10]
2025	[0-10]	[0-10]	[0-10]		2025	[0-10]	[0-10]	[0-10]

Source: Parties' Response to Additional Evidence Paper dated 11 December 2025.

E.4 Based on the above figures, the Parties stated that:

- (a) The low margins in Offshore Infrastructure Assets are a reflection of Offshore Infrastructure customers' strong countervailing buyer power.⁸⁵⁸
- (b) The CMA's claims about limited competitive constraints post-Merger are not corroborated by the Parties' consistently low profit margins.⁸⁵⁹

E.5 As shown in Table E.4 margins are generally higher in Marine Assets than in Offshore Infrastructure Assets. We have also received evidence that margins in onshore catering are significantly higher than for Offshore Infrastructure Assets.⁸⁶⁰ When we asked the Parties to explain the differences in margins between Offshore Infrastructure Assets versus Marine Assets and onshore catering, the Parties submitted that:⁸⁶¹

- (a) Marine is a less mature market than Offshore Infrastructure, which allows for greater pricing flexibility and margin potential.
- (b) Marine has a different operational structure to Offshore Infrastructure. Marine contracts typically require more intensive management and logistical support and are generally more complex in nature. These additional costs are accounted for within overheads rather than being deducted from gross margins, thereby preserving gross margin levels.
- (c) Labour costs in Marine are generally lower than in Offshore Infrastructure.
- (d) Onshore catering is associated with lower labour costs, and lower food distribution costs.
- (e) Onshore catering involves extensive planning, capital investment, and management, and is generally bespoke. This leads to higher overheads, which are reflected in premium pricing.
- (f) Onshore catering is associated with greater revenue volatility. This dynamic introduces both risk and opportunity, especially during periods of economic fluctuation such as inflation.

⁸⁵⁸ Paragraph 1.2(c) of the Parties' response to the Phase 1 decision.

⁸⁵⁹ Paragraph 2.8(b) of the Parties' response to the Phase 1 decision.

⁸⁶⁰ Entier internal document, Annex 331 to Entier's response to the CMA's s109 notice dated 7 August 2025, showing that for the year ended September 2024 Wild Thyme and FRESH, Entier's two onshore catering divisions (both active primarily or exclusively in the UK), produced gross margins of [10-20]% and [10-20]%, respectively. Aramark does not record data for its onshore catering division in the UK as a whole. However, it acknowledged in its response to the CMA's s109(3), issued on 5 September 2025, that gross margins in onshore catering are generally higher than in OCS.

⁸⁶¹ Entier's response to Questions 9 and 10 of the CMA's s109(3), issued on 5 September 2025, and Aramark's response to Questions 9 and 11 of the CMA's s109(3), issued on 5 September 2025.