

COMPLETED ACQUISITION BY ARAMARK LIMITED OF ENTIER LIMITED

Notice of intention to make an Order pursuant to sections 41 and 84 of and Schedule 10 to the Enterprise Act 2002 and public consultation on the proposed Order

Background

1. On 24 January 2025, Aramark Limited (**Aramark Limited**) acquired 90% of the issued share capital in Entier Limited (**Entier**) (the **Merger**).
2. On 25 March 2025, the Competition and Markets Authority (the **CMA**) made an initial enforcement order (**IEO**) pursuant to [section 72\(2\)](#) of the Enterprise Act 2002 (the **Act**) addressed to Aramark, Aramark Investments Limited (**AIL**), Aramark Limited and Entier for the purposes of preventing pre-emptive action in accordance with that section.
3. On 5 August 2025, in exercise of its duty under [section 22\(1\)](#) of the Act, the CMA made a reference to its Chair for the constitution of a Group of CMA Panel Members to investigate and report on the Merger pursuant to [section 35\(1\)](#) of the Act.
4. On 17 November 2025, the CMA issued directions under the IEO for the appointment of a monitoring trustee (the **Monitoring Trustee**) for the purpose of securing compliance with the IEO.
5. On 15 January 2026, the CMA published a final report pursuant to [section 38](#) of the Act (the **Report**) which concluded (among other matters) that the Merger had resulted, or may be expected to result, in a substantial lessening of competition (**SLC**) in the Offshore Infrastructure Market (as defined in the Report) in the United Kingdom and that the CMA should take remedial action.
6. As set out in the Report, the CMA decided that a divestiture remedy (the Entier UK Divestment) as specified in the Report would be effective and proportionate to remedy the SLC and its adverse effects (the **Remedy**).
7. On 13 February 2026, Aramark Limited filed at the Competition Appeal Tribunal (the **Tribunal**) a notice of application for review of the Report pursuant to section 120 of the Act. The notice was filed out of time.
8. On 15 February 2026, Aramark Limited made a retrospective application to the Tribunal for an extension of time to file its notice of application pursuant to Rule

25(3) of the Tribunal's Rules.¹ On 10 March 2026, the Tribunal handed down its judgment, rejecting the application.

9. On 17 March 2026, the CMA extended the statutory period for discharging its duty to take remedial action as it considered that there were special reasons to do so. The reasons included that, despite extensive engagement, it had not been possible to agree the terms of final undertakings for the purposes of taking remedial action further to the Report and in the circumstances it was necessary to consult on a draft final order within the extended statutory period.²
10. The CMA requires the implementation of the Remedy (specified in Article 3 and Schedule 5), which will be subject to the following safeguards:
 - (a) the addressees of the proposed Order will be subject to regular reporting requirements;
 - (a) the Monitoring Trustee will monitor compliance with the Order, including the progress of the implementation of the Remedy;
 - (b) the purchaser must be an Approved Purchaser in accordance with the Suitable Purchaser Criteria in Schedule 1;
 - (c) the proposed Order includes provisions enabling the CMA to direct the appointment of a Divestiture Trustee to effect the final disposal of the Divestiture Business in accordance with the conditions set out in Article 10; and
 - (d) the proposed Order also includes provisions enabling the CMA to direct the appointment of a Hold Separate Manager with executive powers to operate the Divestiture Business in order to maintain its competitiveness and separation from the Aramark Group business, if the CMA sees fit to the extent that it considers that there has been an increase in the risk of asset deterioration, in accordance with Article 11 and Schedule 4.
11. The CMA now hereby gives notice pursuant to [paragraph 2 of Schedule 10](#) to the Act that the [CMA proposes to make the linked proposed Order](#) and invites written representations on the proposed Order from any person or persons who wish to comment.
12. Representations should reach the CMA via email by Monday, 27 April 2026, and should be addressed to: Steven.Pantling@cma.gov.uk
13. The CMA will consider any written representations made in accordance with this Notice and may make modifications to the proposed Order as a result. In the absence of any written representations, or in the event that the CMA decides, on consideration of representations made, not to make material amendments to the Order, the CMA proposes to make the Order pursuant to [section 84](#) of the Act. If the CMA considers that any representation necessitates

¹ [The Competition Appeal Tribunal Rules 2015](#).

² [Notice of extension of statutory period](#).

any material change to the proposed Order, the CMA will give notice of the proposed modifications.

14. The Order may be varied or revoked by the CMA in accordance with sections [84\(3\)](#) and [162](#) of the Act.
15. This Notice and a non-confidential version of the Order will be published on the CMA website.

Signed by authority of the CMA

Richard Feasey

Inquiry Group Chair

25 March 2026