



Prepared by: Aramark Tax Department

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Background

In accordance with Schedule 19 Finance Act 2016, this document sets out the UK Tax Strategy for the year ended 30 September 2018, specifically:

1. The approach of the UK group to risk management and governance arrangements in relation to UK taxation.
2. The attitude of the group towards tax planning (so far as affecting UK taxation) and the level of risk in relation to UK taxation that the group is prepared to accept.
3. The approach of the UK group towards its dealings with HMRC.

This policy applies to Aramark Limited and all UK entities in its group (the 'UK group').

References to UK taxation are to the taxes and duties set out in paragraph 15(1) of Schedule 19 which includes Income Tax, Corporation Tax, PAYE, NIC, VAT and Stamp Duty Land Tax.

Tax Strategy

The main focus of Aramark's tax strategy is to ensure that the Group remains compliant with the relevant and applicable tax laws in each jurisdiction in which it operates. The submission of tax filings and remittance of tax liabilities on a timely basis forms a key part of this strategy.

The tax strategy of the UK group is aligned with that of the ultimate parent company of the Group, Aramark, a U.S public traded company on the New York Stock Exchange.

Further details relating to the tax strategy are provided below;

1. Risk Management and Governance Arrangements

The task of the Tax Department is to ensure we have the resources and processes in place to identify and meet our local and global compliance filing requirements, SEC reporting for taxes, and respond to and or address any related audit issues arising from such filings.

The mission is to accomplish this while working with the operations with the objective to comply in a manner minimising tax risks and inefficiencies supporting business decisions across its business centres worldwide.

The tax department actively seeks to identify, manage and minimise any tax risks through the following;

- employment of sufficiently qualified and trained staff,
- operation of robust internal control systems and
- use of external advisors where necessary.

The CFO of the UK group is regularly updated on tax matters by the tax department. Through this open and regular communication, the tax department highlights the importance of tax compliance and managing and minimising tax risk for the UK group.

The UK tax department also has regular communications with the tax departments located in other jurisdictions, in particular the U.S, to ensure that any potential cross border risks which may arise are monitored and minimised.

The UK group has defined policies and controls which form the basis of the UK tax strategy and ensure that it remains compliant with the relevant UK tax legislation.

The UK Group's annual compliance with the Senior Accounting Officer requirements and the internal controls relating to it contribute towards the approach to identification, management and minimisation of tax risks.

These actions are part of and in addition to general guidelines and procedures required for risk management (including Sarbanes-Oxley and FIN 48) that are in place for public companies, such as the UK group's ultimate parent.

2. Attitude towards tax planning and level of risk

The attitude to tax planning of the group is to ensure that Aramark complies efficiently with all legal requirements.

Understanding the business operations is the key objective in order to manage tax risk. This allows the Tax Department to review and analyse the required compliance and tax reporting matters. The attitude to tax planning of the group is to ensure that Aramark complies efficiently with all legal requirements.

The tax department are involved in key transactions, issues or strategies. This allows for the appropriate engagement with the relevant departments within the business.

Following an appreciation of the facts, a summary and review of the matters will typically be prepared or discussed with the relevant business team. Further conversations and recommendations may take place with the Chief Financial Officer, Legal Director, Human Resources Director or other relevant Senior Executives within both the UK, and wider global group, as appropriate.

The Tax Department works closely with external advisors where appropriate in relation to complex and/or specialist areas of tax where additional expertise and clarification is required.

3. Relationship with HMRC

The UK Group has an open and positive relationship with HMRC which is maintained through the annual risk review meeting and other regular communications. The UK Group is also committed to making appropriate disclosure of all relevant tax issues through the submission of tax returns and in responding to information requests in a timely manner.

The UK Group adopts a co-operative approach to HMRC enquiries. Further, should any inadvertent errors be identified, the UK Group seeks to amend these as soon as reasonably possible.

Further Information

If you require any further information please do not hesitate to contact the Aramark Tax Department on +44 113 230 5307.