

Aramark
Form SD
May 31, 2018

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM SD

SPECIALIZED DISCLOSURE REPORT

Aramark
(Exact name of Registrant as Specified in its Charter)

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| Delaware | 001-36223 | 20-8236097 |
| (State or other Jurisdiction of Incorporation) | (Commission File Number) | (IRS Employer Identification No.) |

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|--|------------|
| 1101 Market Street Philadelphia, Pennsylvania | 19107 |
| (Address of Principal Executive Offices) | (Zip Code) |

Stephen R. Reynolds
Executive Vice President, General Counsel and Secretary
(215) 238-3000
(Name and telephone number, including area code, of the person to contact in connection with this report.)

Check the appropriate box below to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to
 December 31, 2017

Section 1 - Conflict Minerals Disclosure

Item 1.01 - Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure

Aramark (the “Company”) is a leading global provider of food, facilities, and uniform services to education, healthcare, business and industry, and sports, leisure and corrections clients. Our core market is the United States, which is supplemented by an additional 18-country footprint serving many of the fastest growing global geographies. The Company operates its business in three reportable segments that share many of the same operating characteristics: Food and Support Services United States, Food and Support Services International, and Uniform and Career Apparel. This Form SD disclosure is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (“Rule 13p-1”). Pursuant to Rule 13p-1, the Company undertook to determine whether the products it manufactured or contracted to manufacture during the period beginning January 1, 2017, and ending December 31, 2017, contained conflict minerals necessary to the functionality or production of such products. “Conflict minerals” are defined as cassiterite, columbite-tantalite, gold, wolframite and their derivatives, which are limited to tin, tantalum, and tungsten (“3TG”).

The Company evaluated its products to determine whether any such products may contain 3TG. Based on this review, the Company determined that, in 2017, it manufactured or contracted to manufacture: (1) certain uniform and other garments and work clothes that contain metal components, such as certain zippers and snaps, and (2) certain metal equipment, such as tables, trays, and baskets, in each case, that may contain 3TG that may be necessary to the functionality or production of these products (such products or components of such products, the “Covered Products”). The Company worked with its suppliers to determine whether any of the Covered Products contain 3TG. The Company received responses from the vast majority of its suppliers that were identified as having (a) manufactured certain of the Covered Products for the Company or (b) supplied materials that were used by the Company in its manufacturing of certain of the Covered Products. Following this review, the Company determined that tin is necessary to the functionality or production of certain of the Covered Products. The Company conducted a reasonable country of origin inquiry to determine whether any of the tin contained in the Covered Products originated in the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia (together, the “Covered Countries”) or from recycled or scrap sources. The Company’s primary means of determining the country of origin of the tin contained in the Covered Products was conducting a supply chain inquiry based on the Conflict Minerals Reporting Template developed by the Conflict-Free Sourcing Initiative with the Company’s direct suppliers of the Covered Products that contain tin eliciting, as applicable, information regarding (i) the presence of tin contained in materials supplied to the Company, (ii) the refiner or smelter of the tin, (iii) the country of origin of the tin, (iv) whether the tin came from scrap or recycled sources, and (v) other relevant information regarding the supplier’s (or its suppliers’) practices concerning 3TG. The Company reviewed and evaluated each response received from this inquiry and followed up by phone or email to confirm responses where necessary.

Based on the reasonable country of origin inquiry described above, the Company has in good faith concluded that it has no reason to believe that the tin contained in materials, components or products supplied to the Company and included in the Covered Products for the period covered by this report (i) originated in any of the Covered Countries or (ii) came from recycled or scrap sources.

In accordance with the requirements under Rule 13p-1, the above disclosure is also available on the Company’s website at <http://www.aramark.com> under Investor Relations: Reports: SEC Filings.

Item 1.02 - Exhibit

Not applicable.

Section 2 - Exhibits

Item 2.01 - Exhibits

None.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the Registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

Aramark

By: /s/ Stephen R. Reynolds

Name: Stephen R. Reynolds

Title: Executive Vice President, General Counsel and Secretary

May 31, 2018