

**Commission of Inquiry into the Diaphragm Wall and Platform Slab Construction
Works at the Hung Hom Station Extension under the Shatin to Central Link Project**

SECOND WITNESS STATEMENT OF JOE TAM

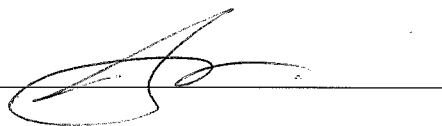
I, JOE TAM, of 39/F Sun Hung Kai Centre, 30 Harbour Road, Hong Kong, say as follows:

1. I refer to my first witness statement dated 2 October 2018 (“**First Witness Statement**”). Unless otherwise stated or the context otherwise requires, any abbreviations shall bear the same meaning as in my First Witness Statement.
2. I make this statement in response to the statements of China Technology’s witnesses. Any allegations or matters raised in those statements (or any other statements) which are inconsistent with my First Witness Statement are denied. If I do not address any allegations or matters raised in other witness statements, it should not be construed as an admission on my part.
3. Unless otherwise stated, the facts stated herein are within my personal knowledge and are true. Where the facts and matters stated herein are not within my own knowledge, they are based on the stated sources and are true to the best of my knowledge.
4. The witnesses from China Technology allege that they witnessed the threaded ends of rebars being cut in specific locations on the site and on specific dates. It is therefore relevant to identify the final dates when reinforcement would have been installed in each area of the EWL Slab and NSL Slab. I worked as Construction Manager on the EWL Slab and NSL Slab and can comment on this matter.
5. I note that the last concrete pours for the following areas of the EWL Slab and NSL Slab were completed on the following dates:
 - (a) EWL Slab - Area HKC - 16 August 2016 (Bay 3);
 - (b) NSL Slab - Area A - 21 May 2016 (Bay A NSL 5);
 - (c) NSL Slab - Area B - 18 May 2016 (B NSL B2); and
 - (d) NSL Slab - Area C - 26 April 2016 (C1 NSL C1-0).

6. My knowledge of the dates of all concrete pours for EWL Slab and NSL Slab is taken from the concrete test results for the EWL Slab and NSL Slab. In particular, the dates noted above for the concrete pours reflects the “sample date” in the test results. These test results were prepared by an independent laboratory. A copy of these concrete pour test results is produced and marked **Exhibit “JT-6”**.

Dated the 22 day of October 2018.

Signed:

A handwritten signature in black ink, appearing to be 'Joe Tam', written over a horizontal line.

Joe Tam