

**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**

THIRD WITNESS STATEMENT OF KARL SPEED

I, KARL SPEED, of 39/F, Sun Hung Kei Centre, 30 Harbour Road, Hong Kong say as follows:

1. I refer to my First Witness Statement dated 14 September 2018 and my Second Witness Statement dated 14 September 2018 (“**First and Second Statements**”). Unless otherwise stated or the context otherwise requires, any abbreviations shall bear the same meaning as in my First and Second Statements.
2. I make this statement in reply to the following statements submitted to the Commission of Inquiry and address any relevant matters raised in these statements:
 - (a) first witness statement of Mr. POON Chuk-Hung, Jason (“**Jason Poon**”) dated 3 September 2018 (“**Poon’s First Statement**”);
 - (b) second witness statement of Jason dated 28 September 2018 (“**Poon’s Second Statement**”); and
 - (c) third witness statement of Jason Poon dated 11 October 2018 (“**Poon’s Third Statement**”),

(collectively, “**Poon’s First to Third Statements**”).
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, information and belief.
4. Any allegations or matters raised in the statements mentioned in paragraph 2 above (or any other statements) which are not addressed in, or are inconsistent with, my witness statements 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.

Poon's inconsistent statements

5. I am the General Manager of Leighton. I am authorised to make the statements set in paragraphs 6 and 7 below in my capacity as a director of Leighton.
6. Jason Poon has made statements to the Commission, in his First to Third Statements, which are inconsistent with statements he has made to the media.
7. A copy of the relevant media reports with statements made by, or attributed to, Jason Poon or China Technology are produced and marked **Exhibit "LCAL-6"**.

Alleged meetings/discussions with Poon

8. I make the following statements in my personal capacity. In response to paragraphs 59 to 64 of Poon's First Statement, I repeat and confirm the facts and matters stated in paragraphs 5 to 12 of my Second Witness Statement.
9. Specifically, I confirm my recollection of events leading up to and during the meeting on 15 September 2017 as stated in paragraphs 7 to 11 of my Second Witness Statement.
10. Contrary to Jason Poon's allegations in paragraphs 59 and 60 of Poon's First Statement:
 - (a) I did not threaten Jason Poon (or China Technology) with a view to damaging China Technology's reputation;
 - (b) Jason Poon did not show me photographs and a video clip on his mobile phone indicating that there was any cutting of the threaded rebars on the Project;
 - (c) I did not "blackmail" Jason Poon or China Techonology in any way; and

(d) I did not state that both Leighton and MTRCL will badmouth China Technology and would together end China Technology's business.

11. Further, contrary to Jason Poon's allegation in paragraph 63 of his First Statement, I did not meet with him on 18 September 2017. I recall meeting with Jason Poon only once in relation to the Project, which was on the afternoon of 15 September 2017 (as referred to in paragraphs 10 to 11 of my First Witness Statement).

12. I have otherwise met with Jason Poon in relation to the Liantang Project. However, we did not discuss the Project on these occasions.

Dated the 18th day of October 2018.

Signed: Karl Speed.

Karl Speed