

**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**

FOURTH WITNESS STATEMENT OF STEPHEN LUMB

I, STEPHEN LUMB, of 3 9/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 fourth witness statement to supplement the First Witness Statement submitted to the Commission of Inquiry.
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.

Investigation of the alleged cutting of threaded bars

4. On 6 January 2017 at 10:52 am, Anthony Zervaas forwarded to me the email sent to him by Jason Poon at 09:45am earlier that morning alleging malpractice in relation to the coupler connections on the EWL Slab (produced and marked **Exhibit "SL- 4"**). This is the only email from Jason Poon that I saw at that time. I was not aware that Anthony Zervaas exchanged further emails with Jason Poon around that time.
5. On 6 January 2017 at 11:19am, I sent a reply email to Anthony Zervaas confirming that one of my Design Managers, Guntung, would attend the site and commence an investigation into the allegation that afternoon whilst I would provide the necessary support, guidance and direction as required (produced and marked

Exhibit "SL- 5").

6. During the period from 6 January 2017 to around 11 January 2017, Guntung was mostly on site conducting the investigation.

7. My understanding is Guntung discussed the allegation with at least the following site team members:
 - a) Kevin Harman
 - b) Betty Ng
 - c) Kian Law
 - d) William Holden
 - e) Joe Tam
 - f) Andy Ip
 - g) Man Sze Ho

8. I also scheduled various site visits to monitor the progress of this investigation. My calendar records indicate that I attended the site on 9, 10 and 11 January 2017 (produced and marked **Exhibit "SL- 6")**.

9. The information obtained by Guntung from his discussions and enquiries with the site team was relayed to me orally and was incorporated by Guntung into the draft of the report. I can confirm that any relevant information obtained by Guntung would have been captured in the report dated 17 January 2017 (Exhibit "SL-1").

Dated the 15th day of November 2018.

Signed:



Stephen Lumb