

EXHIBITS LIST

- 1 CV of Mr. JEAN-CHRISTOPHE, JACQUES-OLIVIER GILLARD and Intrafor's Corporate Brochure on Ground Engineering Experiences
- 2 Sub-contract with Bachy Soletanche Group Limited together with the additional Partnering Agreement
- 3 Sub-contract with Hung Choi Engineering Company Limited
- 4 Method Statements Revision 00 to 04 inclusive for the assembly of re-bar cages
- 5 Inspection and Test Plans dated 26th June 2013, 28th June 2013, 8th July 2013 and 29th November 2013 for cages and connections
- 6 Cage by cage inspection record samples (EM98, EH93,EH101,EH77 and EH81) signed by MTRC, Leighton and Intrafor
- 7 Photograph showing the yellow beam is in the steel yard
- 8 Photograph showing the crane at the diaphragm wall location in July 2013
- 9 Photograph abstracted/zoomed in the screen; Panel "EM 98" can be seen marked in chalk on the tremie pipe.
- 10 Series of photographs taken in relation to the installation of the first panel EM98
- 11 Tolerances for cracks and water seepage allowed in the subcontract between Leighton and Intrafor.
- 12 A photograph abstracted from Apple Daily of 30 May 2018 showing water mark.
- 13 Responsibility Matrix in the sub-contract between Intrafor and Leighton
- 14 An Organisation Chart for the sub-contract works
- 15 List of the personnel based on our records that were engaged to occupy the roles identified in the Organisation Chart
- 16 Quality Supervision Plan for Quality Control Coordinator
- 17 Project Quality Plan for QA/QC
- 18 A list of managers and supervisors involved with the steel fixing works and

the construction of the reinforcement cages

- 19 A list of the workers involved with the steel fixing works
- 20 Extract from BOSA Standard Manual for Couplers Installation Method
- 21 Buildings Department letter reference BD RAIL/30SCL/02-1112(S)
- 22 Section 19 *Deep Foundation Works* of the Materials and Workmanship Specification for Civil Engineering Works (Volume 2)
- 23 Section 10 *Steel Reinforcement* of the Materials and Workmanship Specification for Civil Engineering Works (Volume 1)
- 24 Intrafor Quality, Health, Safety and Environmental systems Manual
- 25 Intrafor Company QSE Policy
- 26 Project Quality and Safety Plans
- 27 RISC forms concerning the reinforcement cages
- 28 Snag List of Diaphragm Wall prepared by MTR received from Leighton
- 29 Intrafor's letter dated 16 October 2013 regarding non-conformities on BOSA couplers and its follow up audit report
- 30 Shop drawings for the construction of the East diaphragm wall together with the as-built drawings issued by Intrafor and endorsed by Leighton

IN THE MATTER OF

THE 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

2nd WITNESS STATEMENT OF

MR JEAN-CHRISTOPHE, JACQUES-OLIVIER GILLARD

EXHIBITS LIST

- 31 Leighton Panel Records sent to Intrafor on 15 June 2015

- 32 Package of supplemental information to BD in relation to the As-built Drawings and Record Plans for the diaphragm wall

- 33 Panel Record Summaries under Intrafor Transmittal 990

- 34 List of workers from Hung Choi who were involved in steel fixing works

- 35 Comments by Hung Choi as recorded on day work sheets

- 36 Instructions to pour concrete at reduced heights for panels EH-104, EH-105, EH-106 and EH-108

- 37 Shop drawings, As-built Diaphragm Wall Eveloped Elevations and Leighton as-built drawings for panels EH-104, EH-105, EH-106, EH-108 and EH-109

- 38 Original and replacement Batch 6 Intrafor Panel Record Summaries for panels EH-104, EH-105, EH-106, EH-108 and EH-109

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3rd WITNESS STATEMENT OF

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EXHIBITS LIST

- 40 Simon Fung (Intrafor) email dated 24 September 2014, enclosing Ryan Kow email dated 23 September 2014 and also enclosing David Wilson (Atkins) email dated 5 July 2013
- 41 Brett Buckland (Leighton) email dated 17 July 2013
- 42 Panel EM-98: Leighton submission of shop drawings and bar bending schedules to MTRC; MTRC approval of shop drawings and bar bending schedules
- 43 Kobe Law (Leighton) email dated 24 April 2015, enclosing Kingsley Lam (MTRC) email dated 24 April 2015 and Atkins Design Report dated 25 February 2015