

**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**

**REPLY WITNESS STATEMENT OF DR. WONG NAI KEUNG PHILCO
FOR
MTR CORPORATION LIMITED**

I, DR. WONG NAI KEUNG PHILCO, of [REDACTED]

[REDACTED] WILL SAY AS FOLLOWS:

1. I am the same Dr. Philco Wong who gave a statement for MTRCL dated 14 September 2018 ([B131-B153] of the consolidated hearing bundle of the Inquiry).
2. In this witness statement in reply, I address certain matters arising from paragraph 48 of the 1st witness statement of Mr. POON Chuk-Hung, Jason (“Mr. Poon”) in [D23] of the consolidated hearing bundle.
3. I confirm that the contents of this statement are true to the best of my knowledge and belief.
4. In paragraph 48 of Mr. Poon’s 1st witness statement, Mr. Poon said that on or about 9 December 2016, he reported the alleged threaded bar cutting incidents of August 2015 to me. Mr. Poon said that I told him I would handle the matter, and that I expressly asked him not to be outspoken on this matter (see [D23]).
5. As stated in paragraphs 42 and 43 of my witness statement (see [B150]), I did have a telephone conversation with Mr. Poon in late 2016. However, as this telephone conversation took place almost two years ago, I cannot remember the precise date of that telephone conversation.
6. As I have explained in my witness statement, my recollection of that telephone conversation with Mr. Poon was that Mr. Poon complained about payment issues his company had with LCAL. That was why after my telephone conversation with Mr.

Poon, I called Mr. Raymond Au from MTRCL's Procurement and Contracts Department to follow up with Mr. Poon on the commercial matters that Mr. Poon raised with me in that telephone call.

7. As our telephone call took place almost two years ago, I cannot recall whether Mr. Poon mentioned any specific quality issues regarding LCAL's works during our call. However, had Mr. Poon mentioned any threaded bar cutting issues with me during that telephone call, I would have asked the project team (rather than Mr. Raymond Au) to carry out investigation as Mr. Raymond Au's role was to handle procurement and contracts issues rather than works quality-related issues. In any event, I would not simply have followed up on these types of quality issues with Mr. Raymond Au, because I would have considered such allegations on cutting threaded bars as a serious matter.
8. I also recall that my telephone conversation with Mr. Poon was a very brief one. If Mr. Poon did raise any such serious allegations on threaded bar cutting, that telephone call would have lasted much longer.
9. As regards Mr. Poon's contention that I told him "*not to be outspoken*", in view of that which was set out above, it is inconceivable that I had said such words to him in relation to any bar cutting (if that was even raised by Mr. Poon) during that telephone conversation. In fact, I do not recall having said any such words or words to that effect to him in that telephone conversation at all.
10. In the last sentence of paragraph 48 of Mr. Poon's 1st witness statement, Mr. Poon contended that "*[Dr. Philco Wong] also asked me to keep him informed on the matter of the Defective Steel Works through his subordinate, a person called 'Raymond'.*" I assume this is the same Mr. Raymond Au I referred to above. For the same reasons I referred to in paragraph 7 above, I would not have asked Mr. Raymond Au to deal with these types of matters because he was responsible for commercial matters and not qualified to deal with any alleged "*Defective Steel Works*".

Dated the 9th day of October 2018.



Dr. Wong Nai Keung Philco