

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

WITNESS STATEMENT OF CHEUNG CHI WAI

I, **CHEUNG CHI WAI** of 39/F Sun Hung Kai Centre, 30 Harbour Road, Hong Kong, will say as follows:

1. I was, at the times relevant to this statement, a Senior Site Agent employed by Leighton Contractors (Asia) Limited (“**Leighton**”), the main contractor for the Hung Hom Station Extension contract (Contract SCL 1112) (the “**Project**”) under the Shatin-Central rail link project. The project manager for the Project is MTR Corporation Limited (“**MTRCL**”).
2. I make this statement to supplement the third witness statement of Henry Lai dated 24 May 2019 (“**Lai’s Statement**”) (paragraph 11) which is in reply to the witness statement of Ng Man Chun (“**Ng**”) dated 17 May 2019 (“**Ng’s Statement**”).
3. 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 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.
4. 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.

My role and responsibilities

5. I was a Senior Site Agent for the Project between October 2017 and January 2019 (I took a couple of weeks off around Lunar New Year in February 2018 due to family matters), during which I worked in the area of the North Approach Tunnels (“**NAT**”) and was mainly responsible for the tidying-up work and the stitch joints remedial works. I was transferred to and started with another project of Leighton in January 2019.

The conversation between Leighton and Wing & Kwong Steel Engineering Company Limited

6. I note from paragraphs 96 and 97 of Ng's Statement and paragraph 11 of Lai's Statement in response that Ng refers to a conversation which took place in early 2018 at the site office.
7. As far as I can recall, apart from myself, the other individuals who were involved in that conversation should be: Jonathan Kitching (Project Director) and Henry Lai (Engineer) of Leighton, and an individual from Wing & Kwong. I cannot be sure whether that individual from Wing & Kwong was Ng, because I was not involved in the original stitch joint construction and had no dealings with Wing & in that regard.
8. In that conversation, I was responsible for translating into Cantonese what Jonthan Kitching asked the individual from Wing & Kwong, the gist of which I can still remember would be: *to demand the truth from that individual on the percentage that Wing & Kwong's workers had screwed the rebar into the couplers.*

Dated the 30 day of May 2019.

Signed:*Wai*.....

Cheung Chi Wai