

**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**

**WITNESS STATEMENT OF LINCOLN LEONG KWOK KUEN
FOR
MTR CORPORATION LIMITED**

I, **LINCOLN LEONG KWOK KUEN**, of MTR Headquarters Building, Telford Plaza, Kowloon Bay, Kowloon, Hong, Hong Kong, **WILL SAY AS FOLLOWS:-**

Introduction

1. I am the Chief Executive Officer of MTR Corporation Limited ("**MTRCL**"). I make this statement to provide information to the Commission of Inquiry ("**Commission of Inquiry**") into the Diaphragm Wall and Platform Slab Construction Works at the Hung Hom Station Extension under the Shatin to Central Link ("**SCL**") Project appointed by the Chief Executive in Council under section 2 of the Commission of Inquiry Ordinance.
2. My main areas of focus in this statement are to provide information to the Commission of Inquiry as to my role and responsibilities as the Chief Executive Officer, the corporate governance of MTRCL, MTRCL's management and oversight of major capital works projects, as well as MTRCL's investigation into and review of the works at the Hung Hom Station Extension under the SCL Project in recent months. For the reasons which I will shortly turn to, I am not able to address the Commission of Inquiry on the operational and specific engineering aspects raised under the present inquiry, which will be addressed by other current or former employees of MTRCL.

Background

3. By way of background, I joined MTRCL in February 2002 as Finance Director and subsequently became the Finance & Business Development Director in May 2008. I was appointed as the Deputy Chief Executive Officer in July 2012, the Acting Chief Executive Officer in August 2014 and subsequently to my present position as the Chief Executive Officer in March 2015. Prior to joining MTRCL, I worked in the accountancy and investment banking industries in London, Vancouver and Hong Kong.
4. Outside MTRCL, I am also a non-executive director of Mandarin Oriental International Limited, chairman of the Quality Assurance Council of the University Grants Committee, and a vice-patron of The Community Chest of Hong Kong. I qualified as a chartered accountant in England in 1985 and Canada in 1986, and I am a chartered fellow of The Chartered Institute of Logistics and Transport in Hong Kong.
5. I graduated from the University of Cambridge in the United Kingdom with a Bachelor of Arts degree and was subsequently granted a Master of Arts degree from the same University.

My Role and Corporate Governance

6. MTRCL's Board of Directors (the "**Board**") comprises a number of Non-Executive Directors ("**NED**"), a number of Independent Non-executive Directors ("**INED**") and also myself as an Executive Director. The NEDs include Professor Frederick Ma Si-hang, the Non-Executive Chairman; Mr. James Henry Lau Jr., Secretary for Financial Services and the Treasury; Mr. Frank Chan Fan, Secretary for Transport and Housing; Mr. Hon Chi-keung, Permanent Secretary for Development (Works) and also Ms. Mable Chan, Commissioner for Transport. Several Government officials sit on the Board as a consequence of Government's position as the largest shareholder of MTRCL and the right of Government, under s.8 of the Mass Transit Railway Ordinance (Cap. 556), to appoint additional directors to the Board.

7. The day-to-day management of MTRCL is delegated to me, supported by the Executive Committee (the members of the Executive Committee are sometimes collectively referred to as the "Executive Directorate"). The Executive Committee is chaired by me and is comprised of various Executive Directors, including the Projects Director (formerly Dr. Philco Wong Nai-keung as referred to in the letter of Messrs. Lo & Lo on behalf of the Commission of Inquiry dated 27 July 2018).
8. Aside from the Executive Committee, there are various other Committees set up by the Board and which serve different functions. They include, for example, the Audit Committee, the Capital Works Committee and also the Risk Committee.
9. As the Chief Executive Officer, I am the Chairman of the Executive Committee and head the Executive Directorate. I am responsible for the day-to-day management of MTRCL, with the support of the Executive Directors. Each Executive Director in turn manages the business and affairs of a particular division of MTRCL. There is daily communication amongst members of the Executive Committee. Meetings of the Executive Committee are held regularly (generally bi-weekly) and also on an ad hoc basis, wherein business performance will be reviewed, issues of concern will be discussed and business decisions will be made.
10. There are a number of standing sub-committees of the Executive Committee, including the Project Control Group, which was established in 1992 to assist MTRCL in the management of projects under the management of the Projects Division. In addition, if necessary, ad hoc sub-committees may be set up to handle specific incidents, the Crisis Management Group which has recently been set up being one example. I will elaborate on this further below.
11. Given my role, I am not personally involved in the day-to-day management and supervision of any particular division of MTRCL's business. I therefore rely on members of the Executive Committee to draw my attention (or that of the Executive Committee as a whole) to any matters of particular concern. Having said that, there are also check and balance mechanisms in place in and across the different divisions of MTRCL.

Management of Capital Works Projects and Oversight

(1) Projects Director and Projects Team

12. Turning to MTRCL's capital works projects, the Projects Director, who is also a member of the Executive Committee, has overall charge and responsibility therefor. He makes regular reports to the Executive Committee on the progress of these projects and seeks approval where required, e.g. for the award of contracts above the relevant threshold. Any issues of concern will be raised as and when the need arises. The Projects Director in turn leads various project teams in respect of these construction projects.
13. The former Projects Director, Dr. Philco Wong, was the General Manager in charge of the SCL Project from November 2011 to October 2014 and then became Projects Director with effect from 28 October 2014. Dr. Wong had the overall responsibility to report to me and the Executive Committee on matters in relation to the SCL Project, including the works relating to the platform slabs and diaphragm walls in the Hung Hom Station Extension under Contract 1112, which is the subject matter of the present inquiry.
14. The format of the Projects Director's monthly report to the Executive Committee (which was often reviewed at a separate session of the Executive Committee, dedicated to MTRCL's capital projects) was adjusted after the concerns raised in respect of the Express Rail Link ("XRL") Project in 2014 (see paragraphs 19 and 20 below), to give the Executive Committee better oversight of the progress of MTRCL's capital projects, including SCL. This report would be presented to the Executive Committee by the Projects Director with the assistance of the relevant Projects Team General Managers. At such meetings, an update on progress and costs would be given and any issues of concern would be raised, and the members of the Executive Committee would have a chance to ask any questions they may have. In addition, approximately one year before the opening of a new line, "top team" meetings would be established involving the Projects Team and colleagues from Operations and other divisions to prepare for opening. The first "top team" meeting for SCL was held in September 2017.

15. In addition, I had regular one-to-one meetings respectively with the Projects Director and the Projects Director together with Henry Young, Chief Programming Engineer, both meetings generally on a bi-weekly basis and I also made regular site visits to the ongoing projects, including the SCL Project. If there were significant issue of concern, they would be drawn to my attention during these meetings or site visits.
16. The day-to-day reporting in respect of the project works to interested Government departments is handled by the Projects Team led by the Projects Director. Similarly, any reports to the Railway Sub-Committee of the Legislative Council are handled by the Projects Director. Only issues of significant concern will be elevated to me or to the Executive Committee, in which case my attention will be drawn to such matters.
- (2) *An Ongoing and Learning Exercise*
17. I wish to emphasise that MTRCL is a learning organisation and makes continuous efforts to develop and enhance its management systems. This is an ongoing exercise, learning from the experience of not only the successes, but also the challenges experienced in projects undertaken by MTRCL.
18. By way of background, MTRCL has been using its own Project Integrated Management System ("PIMS") to manage railway projects for over 20 years. The system is certified to be ISO9001 compliant. Through the implementation of the PIMS, various significant projects have been successfully delivered. Details of the development of the PIMS and the ISO certification will be explained in detail by members of the Projects Team.
19. In 2014 there was widespread public concern regarding the costs and schedule of the XRL Project. In response to such concern, a Committee of Independent Non-executive directors ("IBC") was established in April 2014 to review and then make recommendations to enhance MTRCL's systems and processes. The IBC made various recommendations in its two reports prepared in July 2014 and October 2014 ("**IBC Reports**"), which were subsequently implemented.

20. In addition, MTRCL also received and implemented recommendations from the Independent Expert Panel chaired by the Hon. Mr Justice Michael Hartmann in its report of December 2014 ("**IEP Report**").
21. Based on the PIMS and coupled with other improvement steps taken throughout the years, these efforts have formed the cornerstone of the present management system of MTRCL for capital works projects. I re-iterate that this is an ongoing exercise and efforts have been and are constantly being made to improve and enhance MTRCL's systems.
22. This can be seen, for example, by the reviews (see paragraphs 49 to 50 below) now being undertaken by MTRCL in response to the recent incidents, which I will explain in further detail below.

(3) *Three-lines of Defence Model*

23. As part of the recommendations of the IBC and the IEP following the XRL experience, multiple checks and balances have been incorporated into the system in respect of MTRCL's capital projects. Specifically, a three lines of defence model is adopted:-
- (a) 1st line of defence - management control – a detailed project management system designed to ensure the quality, environmental management, safety, program, risk and costs are checked. This line of control reports to the Project Teams led by the Projects Director.
 - (b) 2nd line of defence - risk management and compliance oversight – this includes:
 - (1) assurance within the Project Division, including quality audits, safety management audits / inspection, environmental management audits, programme audits, system assurance audits and enterprise risk management; and
 - (2) gateway reviews by the Engineering Division, which is independent from the Projects Team and reports directly to a separate member of the

Executive Committee. These reviews take into account both qualitative and quantitative information to provide an alternative and additional view on the overall 'health' of a project from a cost and schedule point of view.

- (c) 3rd line of defence – internal audit, which reports both directly to me and also to the Board.

(4) *Capital Works Committee, Risk Committee and Audit Committee*

24. Aside from the three lines of defence model, a Capital Works Committee ("CWC") of the Board was also set up in October 2014 to oversee MTRCL's capital works projects. Its mandate includes:-

- (a) oversee any capital project of MTRCL with a capital value in excess of HK\$10 billion , which includes the SCL Project;
- (b) review the progress of such projects, both from a programme and costs perspective;
- (c) check that there are adequate resources for and supervision of such projects;
- (d) keep under review the communication strategy and crisis management plan in respect of each of MTRCL's projects ; and
- (e) report to the Board on a quarterly basis as well as on an ad hoc basis if the Committee deems appropriate.

25. Under the Terms of Reference of the CWC, the members shall be appointed by the Board and shall consist of at least four NEDs, a majority of whom shall be INEDs. The present members of the CWC are: Allan Wong Chi-yun (chair), Dorothy Chan Yuen Tak-fai, Anthony Chow Wing-kin, Hon Chi-keung (Permanent Secretary for Development (Works)), James Kwan Yuk-choi, Lau Ping-cheung Kaizer and Abraham Shek Lai-him.

26. The CWC may request myself, the Projects Director, either one of the Finance Director and the Legal Director & Secretary and a representative from the Company's Corporate Relations department to attend meetings of the CWC. It may also invite other members of the Executive Committee or other employees of MTRCL to attend its meetings. The Projects Director (or his/her delegate) shall be the Secretary of the Committee.
27. To the best of my recollection, I did not participate in meetings of the CWC until June 2018, which I mention below.
28. Aside from the CWC, the Risk Committee also has a role to play in managing the risks arising out of capital works projects. The duties of the Risk Committee include: reviewing MTRCL's Enterprise Risk Management ("ERM") framework, guidelines, policy and procedures for risk assessment and risk management; reviewing MTRCL's top risks and key emerging risks and the controls in place to mitigate such risks; monitoring MTRCL's risk profile; conducting "deep dive" reviews on selected key risk areas; reviewing the effectiveness of the ERM function; and reviewing MTRCL's crisis management arrangements.
29. In addition, the Audit Committee has oversight of, amongst other things, MTRCL's internal control procedures.
30. Both the Risk Committee and the Audit Committee are comprised of NEDs and INEDs.

The Present Incident

31. Matters relating to the SCL Project which had or were anticipated to have a significant impact on the costs or schedule or which gave rise to significant issues in the construction process or risks to MTRCL have been brought to my attention on a regular basis during the lifetime of the project by Dr. Philco Wong, Henry Young, and other members of the projects team and the Executive Committee. So far as I recall, other than general progress updates, the matters that we discussed were mainly issues relating to budget and schedule, and also any major issues encountered during construction.

32. However, issues in relation to steel fixing works at the Hung Hom Station Extension were never brought to my attention or, as far as I am aware, to the attention of the Executive Committee until they were the subject matter of reports by the media at the end of May 2018, after which I was immediately informed by the Corporate Affairs Director of the same.
33. A regular weekly meeting of the Executive Committee was held on 31 May 2018 at which Dr. Philco Wong provided a briefing on the background of the matter to the members of the Executive Committee. It was agreed that further investigation into the matter should be carried out so that a further report could be made to the Board.
34. On the same day, MTRCL received a letter from the Railway Department Office ("RDO") of the Highways Department. In the letter, the RDO requested a report demonstrating that any deficient works had been fully rectified to meet quality requirements. RDO also suggested that, as the joints concerned were an important structural element of the station, MTRCL should seriously consider conducting suitable tests to verify the integrity of the joints.
35. In light of RDO's letter and in order to allay any safety concerns, MTRCL issued a press release later that day, confirming that an independent consultant would be appointed to conduct a loading test to affirm the structural integrity of the aforementioned structures at the Hung Hom Station Extension.
36. Subsequently, on 1 June 2018, MTRCL received a letter from the Buildings Department ("BD") which also requested a report on the issue.
37. On 4 June 2018, I met representatives of Leighton Contractors (Asia) Limited ("LCAL") as well as representatives of LCAL's parent company, CIMIC Group Limited ("CIMIC"), together with Dr. Philo Wong and the Corporate Affairs Director. At the meeting, I requested LCAL to provide us with further information regarding the issue. This was followed up by a letter to LCAL of the same date.
38. I subsequently attended 3 more meetings with LCAL on 11 June 2018, 27 June 2018 and 25 July 2018, as well as having other telephone calls with members of the senior

management of LCAL as well as representatives of CIMIC. On each occasion I made the same request and also asked LCAL to release the relevant information to the public. Regrettably, as at the date hereof, LCAL has chosen not to provide any information to the public.

39. At the request of the Chairman, a special Board meeting was held on 5 June 2018. Dr. Philco Wong and Aidan Rooney attended the meeting and they provided the Board with a briefing on the matter. At the meeting, the Board delegated authority to the CWC to review the report to be provided to the RDO. After the Board meeting, an extension of time to submit the report was requested from the RDO.
40. The requests of the RDO and the BD were initially handled by the Projects Team, led by Aidan Rooney. On 7 June 2018, I held a meeting with the Projects Team to discuss the draft report, at which Philco Wong and Aidan Rooney were present together with the Corporate Affairs Director and members of the Legal Department. At that meeting, we discussed the structure and proposed content of the report and I requested that other teams, including the Legal Department and the Engineering Division, assist in the co-ordination of the responses and provide input to ensure the completeness and accuracy of the report.
41. In addition, a Crisis Management Group, chaired by me, was set up on 11 June 2018 and, prior to this, I held several small group meetings with members of the Executive Committee and Projects Team to discuss the SCL incidents (which included, in addition to the Hung Hom station matter, issues at To Kwa Wan and Exhibition Centre stations) and MTRCL's responses to them. Initially, the Group was convened daily to help better understand matters in connection with the SCL incidents and to help formulate MTRCL's responses to the various allegations being made. The Group continues to meet as at the date of preparing this statement, albeit on a less frequent (than daily) basis. External parties have been invited to attend the meetings of the Group if and when necessary. For example, representatives of Atkins China Ltd, MTRCL's design consultant and CM Wong & Associates, the expert appointed to conduct the load test who I mention below, attended the meetings on a number of occasions. I would also add that MTRCL invited LCAL to attend a meeting of the Group but it declined to do so.

42. In addition, MTRCL has engaged the assistance of experts (where necessary) to check and report on the safety and integrity of the structures at the Hung Hom Station Extension. An independent, leading engineering expert, CM Wong & Associates, has been instructed to conduct a load test to confirm the structural integrity of the EWL Slab. The work of CM Wong is still ongoing. Further details in this regard will be given by other witnesses. I have also instigated weekly inspections of the EWL Slab to monitor the condition to ensure safety.
43. I attended a press conference and radio interview on 6 June 2018 and 7 June 2018 respectively, together with the Chairman, to answer enquiries from the media. A meeting of the Executive Committee was also held on 7 June 2018 at which the matter was discussed.
44. During this period (early June), and as mentioned above, the Projects Team took responsibility for preparing the report to be provided to the RDO, supported by members of the legal team and other divisions and a panel which had been formed to interview relevant current and former members of staff. The report was a collaborative effort involving various personnel and given the nature of the issues raised and the voluminous amount of materials involved, understandably took considerable time and effort to prepare. A draft report was tabled to the CWC for consideration and comments on 14 June 2018, and submitted to the RDO on 15 June 2018 ("**MTRCL Report**").
45. I received and reviewed a number of drafts of the Report and provided some high level feedback to the team on the drafts, but I relied primarily on the Projects Team and my other colleagues in terms of the factual and technical details set out in and exhibited to the document. The drafts of the report were also discussed during the meetings of the Crisis Management Group. I did, however, repeatedly emphasise that the contents of the Report must be verified and supported by documents.
46. In the afternoon of 15 June 2018, I attended a press conference together with the Chairman in which MTRCL informed the media of the submission of the MTRCL Report. I also attended a radio interview together with the Chairman on 16 June 2018.

47. At a Board meeting on 21 June 2018 which I attended, the Chairman put forward, *inter alia*, the following proposals:-
- (a) the CWC be mandated by the Board to conduct a review of MTRCL's project management processes and procedures for the SCL Project, with the assistance of an independent third party consultant; and
 - (b) management to conduct an internal review of the reporting systems for MTRCL's projects with recommendations for improvement, particularly escalating and reporting deficiencies (internally and externally).
48. The Chairman's proposals were supported by the Board unanimously. A press release was issued on 21 June 2018 announcing the mandate of CWC to review the processes and procedures for the SCL Project within MTRCL's project integrated management system ("PIMS"). In this press release, it was also made clear that if any violation was found, MTRCL would take the matter very seriously and report it to relevant law-enforcement agencies.
49. Pursuant to the resolution of the Board which I mention at paragraph 47(b) above, and as also mentioned in paragraph 22 above, a team comprising of members of the Engineering and Projects Divisions was formed on 23 June 2018 to carry out a review of the site supervision system and communication system within MTRCL and for the SCL Project and to recommend improvement measures on these systems. A letter dated 6 July 2018 was issued to the RDO setting out the initial findings.
50. Aside from the above, an external consultant, Turner & Townsend ("T&T"), was appointed by the CWC to carry out the review referred to in paragraph 47(a) above. The review is handled by the CWC and is still ongoing.

Inaccuracies in the MTRCL Report

51. After submission of the MTRCL Report, follow up enquiries were received from RDO. MTRCL issued a letter to the RDO dated 13 July 2018 in response to the follow up enquiries. The outline of the letter was prepared by the Legal Department for input by

the Projects Team, who provided the details of the content and the drawings that were attached to the letter. In this letter (amongst other things), connection details between the EWL Slab and the diaphragm wall were provided. I gave input in one of the Crisis Management Group meetings in relation to the issues to be covered in the letter to the RDO and recall having been provided with a copy of the letter, but my attention was not drawn to the fact, which was subsequently discovered, that the information provided in this letter suggested that there had been a change in the way that the re-bars connecting the EWL Slab and diaphragm wall was constructed.

52. I first knew of the change in the EWL Slab/ diaphragm wall connection from Jason Wong in the period leading up to the meeting of the Crisis Management Group held on 23 July 2018 when this was also discussed. Further detailed information was not available at the time of the meeting though, and it was agreed that the Projects Team should find out all the facts surrounding such change and report to the Group by the time of the next meeting.
53. Then, during the next meeting of the Crisis Management Group on 25 July 2018, Philco Wong reported to the Group that, in the course of preparing for the load test referred to in paragraphs 34 and 42 above to be carried out he had identified a change in the way that the re-bars connecting the EWL Slab and diaphragm wall was constructed. I was also told that, as a result, there were inaccuracies in the MTRCL Report including, in particular, the number of couplers stated in the Report. When asked by members of the Crisis Management Group, the Projects Team could not provide an explanation as to why the change in the construction details had not been identified at the time of preparing the Report, although I understand that members of the Projects Team, James Ho and Derek Ma, have addressed this issue in their witness statements.
54. I considered this matter to be potentially serious and I instructed the Projects Team to find out all of the facts regarding the change in the way that the re-bars connecting the EWL Slab and diaphragm wall was constructed and the number of couplers. On the same day, I also informed the Chairman, who was out of Hong Kong at the time, of this development although I did not go into the details.

55. Subsequently, the Projects Team gathered further information and provided continuing updates to the Crisis Management Group concerning the change in the way that the re-bars connecting the EWL Slab and diaphragm wall was constructed to keep them fully informed. As far as I now understand it, some of the connection details at the top of the diaphragm wall where it connected with the platform slab have been changed from the original design by using lapping bars as opposed to bars connected with couplers. Further details on the change will be explained by members of the Projects Team in their witness statements.
56. I have emphasised to the Projects Team the importance of confirming exactly what has been built. The work in this regard is still ongoing.

My Early Retirement

57. On 6 August 2018, I received a telephone call from the Chairman who asked me to meet with him and Mr. Frank Chan, the Secretary for Transport and Housing. At the meeting, Mr. Frank Chan explained that Government had lost confidence in the Projects Team and specifically identified several senior members of the Projects Team, namely Dr. Philco Wong, TM Lee, Aidan Rooney and Jason Wong whom in the Government's view should be immediately relieved of their responsibilities.
58. Although the matter was still under investigation and issues in connection with Contract 1112 were subject to the upcoming Commission of Inquiry, I understood the concerns of the Government and their request for MTRCL to take decisive action by relieving the senior Projects Team members responsible for the SCL project of their duties.
59. For myself, in light of Government's views, I agreed that I would take early retirement from MTRCL but Mr. Chan suggested, and I agreed to remain in office until a replacement CEO could report for duty.

60. Subsequent to that meeting, I met with Dr. Philco Wong and informed him of the Government's view. In the early hours of 7 August 2018, I received Philco Wong's resignation by email.
61. On 6 August 2018, the Chairman called a Special Board meeting which took place on 7 August 2018, at 10:00 a.m. At the meeting, I explained to the Board members, so far as I was able to do so, the inaccuracies contained in the MTRCL Report. Mr. Frank Chan informed the Board that Government had lost confidence in the project management team of the SCL and that, as such, the Corporation should consider whether senior members of the Projects Team should leave MTRCL. I then reported to the Board the Projects Director's resignation and that I had convened a meeting for that afternoon with Aidan Rooney, TM Lee and Jason Wong when it was proposed to serve notice of termination on those individuals.
62. I also reported to the Board that I had agreed to retire early, but I would remain in my position until a replacement CEO could report for duty.
63. After deliberation, the Board unanimously agreed with these management changes.
64. I would like to make clear that I reached this point not because I felt I was personally responsible for any act or omission on my part, but rather because as the Chief Executive Officer, I am accountable to the shareholders of MTRCL for the actions of the Corporation.
65. After the Board meeting, pursuant to the Board's decision, I met with Dr. Philco Wong to discuss the details of his resignation and with Aidan Rooney, TM Lee and Jason Wong to inform them their employment contracts would be terminated.

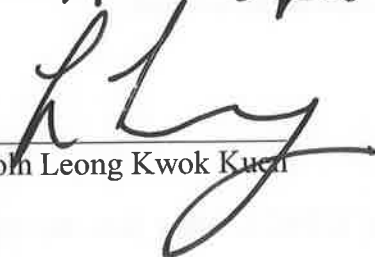
Going Forward

66. Based on the information currently available to the MTRCL, other than the matters already mentioned in this statement and other statements provided to the Commission of Inquiry, I confirm that MTRCL is not aware of any other Defective Steel Works (as

defined in the Letter) in the diaphragm walls and the platform slabs, and is not aware of any other works which raise concerns about public safety.

67. MTRCL is also in the process of investigating the recent discovery of the peeling concrete and honeycomb issues at the EWL Slab referred to in the letter of the solicitors for the Commission of Inquiry dated 11 September 2018.
68. Safety has always been the top priority of MTRCL. Considerable efforts have been made by the MTRCL to ensure public safety over the years and as mentioned above, this is an ongoing and continuing exercise. MTRCL also places great importance on transparency to maintain public confidence. Regarding the present incident, MTRCL has taken various steps to ensure that similar issues will not recur in the future, details of which are mentioned in the statement of the Non-Executive Chairman. MTRCL will also act upon any recommendation the Commission of Inquiry made to improve its system and to restore public confidence in it.
69. Finally, I would like to mention that in preparing this witness statement I have reminded myself of the events in question by reference to various hard copy and electronic documents and materials retrieved by MTRCL's Legal Department, with the assistance of the Corporation's external lawyers, Mayer Brown. There may therefore be matters referred to or stated in other documents which have not been recently placed before me. To that extent, I would be happy to comment on any such other materials at a later date if and when identified and placed before the Commission of Inquiry.

Dated the 14 day of Sept 2018.


Lincoln Leong Kwok Kuen

Corrigendum to the Witness Statement of Lincoln Leong Kwok Kuen
dated 14 September 2018

Page	Paragraph	Content
B117	9	Replace “ <i>Meetings of the Executive Committee are held regularly (generally bi-weekly)</i> ” with “ <i>Meetings of the Executive Committee are held regularly (generally twice a week)</i> ”
B119	15	Replace “ <i>In addition, I had regular one-to-one meetings respectively with the Projects Director and the Projects Director together with Henry Young, Chief Programming Engineer, both meetings generally and on a bi-weekly basis and I also made regular site visits to the ongoing projects, including the SCL Project.</i> ” with “ <i>In addition, I had regular one-to-one meetings respectively with the Projects Director (generally fortnightly) and the Projects Director together with Henry Young, Chief Programming Engineer (generally every three weeks), and I also made regular site visits to the ongoing projects, including the SCL Project.</i> ”
B126	48	Replace “ <i>In this press release, it was also made clear</i> ” with “ <i>At a press conference on the same day and in an earlier press release of 6 June 2018, the Chairman made it clear</i> ”