

21 JANUARY 2022

**Report of the Inquiry
Committee for the accident
at Stars Engrg Pte Ltd on
24 February 2021**

(PART II – ANNEXES)

TABLE OF CONTENTS

Part II – Annexes

ANNEX A – STOP WORK ORDER	A-1
ANNEX B – BIOGRAPHIES OF IC MEMBERS	B-1
ANNEX C – LETTERS OF APPOINTMENT	C-1
ANNEX D – TERMS OF REFERENCE OF THE IC	D-1
ANNEX E – OPENING STATEMENT	E-1
ANNEX F – LIST OF WITNESSES	F-1
ANNEX G – LIST OF EXHIBITS	G-1
ANNEX H – LIST OF WITNESS STATEMENTS AND SUBMISSIONS	H-1
ANNEX I – EXPERT REPORTS	I-1
ANNEX J – WRITTEN REPRESENTATIONS	J-1
ANNEX K – CLOSING SUBMISSIONS	K-1
ANNEX L – EXTRACTS FROM THE WORKPLACE SAFETY AND HEALTH ACT	L-1
ANNEX M – EXTRACTS FROM THE WORKPLACE SAFETY AND HEALTH (RISK MANAGEMENT) REGULATIONS	M-1
ANNEX N - EXTRACTS FROM THE WORKPLACE SAFETY AND HEALTH (GENERAL PROVISIONS) REGULATIONS.....	N-1
ANNEX O – EXTRACTS OF COMBUSTIBLE DUST-RELATED LEGISLATION	O-1

ANNEX A – STOP WORK ORDER



STOP WORK ORDER
WORKPLACE SAFETY AND HEALTH ACT
(Cap 354A, 2009 Rev Ed)

Section 21

TO:

STARS ENGRG PTE. LTD.
15 CHANGI NORTH STREET 1 #01-24
I-LOFTS @ CHANGI SINGAPORE 498765

Our Ref. : 201024323G0004

Date : 26/02/2021

ORDER NO:SWO2021/010

In the Matter of Workplace at:
32E TUAS AVENUE 11
PLATINUM@PIONEER
SINGAPORE 636854

I, the Deputy Commissioner for Workplace Safety and Health, am satisfied that the workplace at **32E TUAS AVENUE 11 PLATINUM@PIONEER SINGAPORE 636854**, which is a workplace within the meaning of the Workplace Safety and Health Act (Cap 354A, 2009 Rev Ed) (the "Act") is in such a condition that operations carried on therein cannot be so carried on with due regard to the safety, health and welfare of the persons at work.

2 In exercise of the powers conferred upon me under section 21(5) read with section 21(2) of the Act, I hereby order you, **STARS ENGRG PTE. LTD.**, the Occupier of the said workplace, to immediately cease any **any work or process** until the following measures in **Annex A** have been taken to my satisfaction.

3 If you do not comply with this Order, you will be guilty of an offence under section 21(7) of the Act and shall be liable on conviction to a fine not exceeding \$500,000 or to imprisonment for a term not exceeding 12 months or to both and, in the case of a continuing offence, to a further fine not exceeding \$20,000 for every day or part thereof during which the offence continues after conviction.

4 Pursuant to section 21(8) read with section 7(4) of the Act, if you fail to comply with this Order, I may at all reasonable times enter upon the said workplace and take such measures and do such work as may be necessary to give effect to this Order, and take appropriate measures to prevent unauthorised entry to any area or unauthorised access to any machinery, equipment, plant or article affected by this Order. Pursuant to section 21(9) of the Act, any costs and expenses incurred by the Commissioner for Workplace Safety and Health under section 21(8) of the Act may be recovered as a debt due to the Government from you, the person served with this Order.

Made this on 26/02/2021

SEBASTIAN TAN
DEPUTY COMMISSIONER FOR WORKPLACE SAFETY AND HEALTH
SINGAPORE

Occupational Safety and Health Division
MOM Services Centre
1500 Bendemeer Road, Singapore 339946
Tel (65) 6438 5122
Fax NA
www.mom.gov.sg/wsh
mom_oshd@mom.gov.sg

I confirm that I have received the original of this Order No. **SWO2021/010** on behalf of **STARS ENGRG PTE. LTD.** on **26th** day of **February 2021**.



Name, Designation and
Signature of Recipient

Mund Hafidz

I, ~~TAN KAI CHAO~~ ^{AA} an Inspector, hereby declare that I have served the original of this order upon
General manager Chua Shi Yong
_____ on 26/2/21 at 1530 hrs. _____

A handwritten signature in blue ink, appearing to be 'Hafidz', written over a horizontal line.

Inspector

Date: 26/02/2021

ANNEX B – BIOGRAPHIES OF IC MEMBERS



SENIOR DISTRICT JUDGE ONG HIAN SUN

Ong Hian Sun graduated with a Bachelor of Civil Engineering (1st Class Hons) in 1981 from the University of Adelaide followed by a Master of Science (Civil Engineering) from National University of Singapore (NUS) in 1985. He also graduated with Bachelor of Laws (Hons) from the NUS in 1988 and Master of Laws from the University of London in 1989.

He joined the Attorney-General's Chambers (AGC) of Singapore in September 1989 as a Deputy Public Prosecutor. From September 1989 until February 2008, he held various appointments in the Criminal Justice Division of the AGC. He was also the Senior State Counsel who led evidence in the Inquiry vis-à-vis the collapse of the Circle Line at Nicoll Highway on 20 April 2004. In June 2008 he was appointed as the Director of the Commercial Affairs Department. On 1 July 2011, he was reposted to AGC and appointed the Chief Prosecutor of the State Prosecution Division. In May 2013, he joined the State Courts and was designated the Principal District Judge of the Criminal Justice Division from October 2013 until April 2020. He is currently the Senior District Judge attached to the Presiding Judge's Office of the State Courts.



ER LUCAS NG HONG KIANG

Er. Lucas Ng was appointed in July 2004 as the General Manager of Plant of Petrochemical Corporation of Singapore (Private) Limited (PCS), an upstream company of the Singapore Petrochemical Complex incorporated in 1977. He has been serving the company for more than 36 years since 1984 and is experienced in technical, engineering, maintenance, process and operations of several petrochemical plants and associated infrastructures, contributed to execution of various major projects including PCS-II project in 1994-1997 and many plant turnarounds. He is currently responsible for the entire operations of PCS facilities in Ayer Merbau supporting its downstream companies in Jurong Island, Singapore.

He is actively leading and driving his workforce including contractors in the workplace safety and health activities and is committed to process safety management beyond PCS. He chairs the company's Health, Safety and Environment (HSE) Management Committee, and the Reliability Management Committee. He co-chaired and organized the 5th Global Summit on Process Safety (GSPS), representing Singapore Chemical industry council (SCIC) as Chairman of SCIC – GSPS Organising Committee, with CCPS in 2019.

Er. Ng is also serving in several institutions and committees, both in academic institutions, government agencies, professional bodies and trade associations. He was the Chair of Partnerships Working Group for WSH 2028 Tripartite Strategy Committee of Ministry of Manpower. He is currently the Chair of Chemical Standards Committee (CSC) by Standards Development Organisation at Singapore Chemical Industry Council (SDO@SCIC), the Chair of Jurong Island Vision Zero Group, Co-chair of Oil & Gas and Petrochemical Sub-committee of Institution of Engineers Singapore (IES). Er. Ng is also the Panel Member of the External Review Panel on SAF Safety (ERPSS).

He has been in the hydrocarbon processing industries for more than 40 years since his graduation as a chemical engineer in 1980 from the then University of Singapore, advocating process safety, fire & security, asset integrity & reliability, water conservation and energy efficiency. Er. Ng is a registered Professional Engineer (Chemical) with Professional Engineers Board of Singapore, and a Chartered Engineer (Chemical and Process) with the Chartered Engineer Board / IES.

He believes in building up a workforce with strong teamwork spirit, occupational safety and process safety culture towards Vision Zero, and Responsible Care[®], committing to continuous improvement in all endeavours. He shared the challenges to respond to COVID-19 situation from the high hazards installation perspectives in ensuring business continuity with emphasis on process safety.



DR PETER NAGLER

Dr. Peter Nagler has been appointed as Chief Innovation Officer (CINO) of A*STAR in November 2019. Concurrently, he has been serving as the Executive Director of the Institute of Chemical and Engineering Sciences (ICES) from January 2018 till December 2021. As of January 2022, he serves as Advisor to ICES.

He has gained more than 30 years leadership experience in the chemical industry, comprising global operational (P+L) responsibilities as well as worldwide innovation management functions. He served as Head of International Innovation (2015-2016), after he has held the position of Chief Innovation Officer (CIO) at Evonik Industries AG (2011-2015); since 2009 he has been responsible for Corporate Innovation. Before, he has held several positions such as Regional President South America in Sao Paulo, Brazil (2005-2007), and Head of the Fine Chemicals and Exclusive Synthesis & Catalysts Business Units (2000-2005). From 1993 to 1997, he worked in Paris at Evonik's subsidiary Rexim – first as Marketing Director and later as Managing Director.

He had joined Degussa AG in 1986 as a research chemist after studying chemistry at the Johann Wolfgang Goethe-University in Frankfurt and Biochemistry at the University of Nice. He received his Ph.D. in Organic Chemistry from the Goethe-University, in 1985.

He serves on the Advisory Board of Fraunhofer ISC (Würzburg) and the advisory board of C&EN. He has furthermore been appointed Adjunct Professor to the Department of Chemical and Biomolecular Engineering of the National University of Singapore.

ANNEX C – LETTERS OF APPOINTMENT



MINISTER
MINISTRY OF MANPOWER
SINGAPORE

Mr. Ong Hian Sun
Senior District Judge, State Courts

INQUIRY COMMITTEE APPOINTED UNDER SECTION 26 OF THE WORKPLACE SAFETY AND HEALTH ACT

On 24 Feb 2021, an explosion occurred at Stars Engrg Pte Ltd. Eight workers suffered burns and were hospitalised. As of today, three have succumbed to their injuries, two are in intensive care unit, and three are in High Dependency wards. Another 2 workers from an opposite unit also suffered minor injuries and have been discharged from hospital.

2 In exercise of the powers conferred under Section 26 of the Workplace Safety and Health Act, I hereby appoint you as the Chairman of the Inquiry Committee. You will hold the inquiry, together with two other Assessors, Dr. Peter Nagler, A*Star Chief Innovation Officer, and Executive Director of the Institute of Chemical and Engineering Sciences (ICES), Agency for Science, Technology and Research, and Er. Lucas Ng, General Manager of Plant, Petrochemical Corporation of Singapore (Private) Limited to ascertain the causes and circumstances of the incident. The terms of reference are annexed hereto.

Dated this 2nd day of March 2021.



JOSEPHINE TEO



Er. Lucas Ng Hong Kiang
General Manager of Plant, Petrochemical Corporation of Singapore
(Private) Limited (PCS)

INQUIRY COMMITTEE APPOINTED UNDER SECTION 26 OF THE WORKPLACE SAFETY AND HEALTH ACT

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2 In exercise of the powers conferred under Section 26 of the Workplace Safety and Health Act, I hereby appoint you as the Assessor of the Inquiry Committee. You will hold the inquiry, together with Chairman, Senior District Judge, Mr Ong Hian Sun and other Assessor, Dr. Peter Nagler, A*Star Chief Innovation Officer, and Executive Director of the Institute of Chemical and Engineering Sciences (ICES), Agency for Science, Technology and Research, to ascertain the causes and circumstances of the incident. The terms of reference are annexed hereto.

Dated this 2nd day of March 2021.

JOSEPHINE TEO



MINISTER
MINISTRY OF MANPOWER
SINGAPORE

Dr. Peter Nagler
Chief Innovation Officer, A*Star
Executive Director, Institute of Chemical & Engineering Sciences,
Agency for Science, Technology and Research

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Dated this 2nd day of March 2021.

JOSEPHINE TEO

ANNEX D – TERMS OF REFERENCE OF THE IC

- (a) Inquire into and ascertain the causes and circumstances of the accident that led to an explosion at the premises of Stars Engrg Pte Ltd located at 32E Tuas Ave 11 on 24 February 2021.
- (b) Make recommendations to prevent the recurrence of such an accident at workplaces.
- (c) Consider the evidence put before the Inquiry Committee as led by State Counsel from the Attorney-General's Chambers.
- (d) Make and submit a report of its proceedings, findings, recommendations and any other relevant observations related to the cause of the accident to the Minister for Manpower.
- (e) If the District Judge appointed to the Inquiry Committee is of the opinion that criminal proceedings ought to be instituted against any person in connection with the accident, he shall also forward a copy of the report to the Public Prosecutor.

ANNEX E – OPENING STATEMENT

INQUIRY
UNDER SECTION 26 OF THE WORKPLACE SAFETY AND HEALTH ACT (CAP. 354A)
INTO THE FATAL ACCIDENT
AT STARS ENGRG PTE LTD'S WORKPLACE AT 32E TUAS AVENUE 11

OPENING STATEMENT

I. INTRODUCTION

1. On 5 March 2021, the Minister for Manpower appointed an Inquiry Committee ("**IC**") under s 26(1) of the Workplace Safety and Health Act (Cap. 354A) to inquire into the causes and circumstances that led to a fatal explosion and fire at the workplace of Stars Engrg Pte Ltd ("**Stars**") at 32E Tuas Avenue 11 ("**Tuas Site**") on 24 February 2021 (the "**Accident**").

II. TERMS OF REFERENCE

2. The Terms of Reference ("**TOR**") for the IC are to:
 - (1) Inquire into and ascertain the causes and circumstances of the Accident.
 - (2) Make recommendations to prevent the recurrence of such an accident at workplaces.
 - (3) Consider the evidence put before the IC as led by State Counsel.
 - (4) Make and submit a report of the IC's proceedings, findings, recommendations and any other relevant observations related to the cause of the Accident to the Minister for Manpower.

- (5) If the learned Senior District Judge Ong Hian Sun (Chairman of the IC) is of the opinion that criminal proceedings ought to be instituted against any person in connection with the Accident, he shall also forward a copy of the report to the Public Prosecutor.
3. TOR 1 will be the focus of the first tranche of the Inquiry hearing. TOR 2 will be addressed in a later tranche of hearing.

III. **MOM INVESTIGATION TEAM**

4. The investigation into the Accident has been led by an investigation team from the Ministry of Manpower, Occupational Safety and Health Division ("**MOM**"):
 - (1) Chief Investigation Officer Ms Jaime Lim;
 - (2) Asst Chief Investigation Officer Mr Mohamed Haniffa Ibrahim; and
 - (3) Investigation Officer Mr Lucas SH Ng.

IV. **INTERESTED PARTY**

5. Stars is participating in the Inquiry hearing as an interested party. It is a fire protection contractor and is in the business of providing design-built fire protection systems.
6. The Accident took place at Stars' workshop at Level 1 of the Tuas Site ("**workshop**"). At this workshop, Stars' workers produced a fire-rated insulation wrap ("**fire wrap**"). A key component of the fire wrap was a clay material ("**fire clay**") which the workers made using an industrial kneader / mixer machine ("**Mixer Machine**"). The fire clay would be wrapped with other materials to assemble the finished fire wrap product. We will elaborate on this background, which is material to appreciating the circumstances and causes of the Accident, at Section VI below.

V. WITNESSES

7. The fact witnesses who will be called to give evidence are (not listed in the sequence in which they will be called; names abbreviated according to how they addressed each other, where applicable):

In relation to Stars

- (1) Mr Chua Xing Da ("**Mr Chua**") – sole director and sole shareholder of Stars; overall-in-charge of production at the Tuas Site.
- (2) Mr Lwin Moe Tun ("**Moe**") – engineer overseeing production at the Tuas Site.
- (3) Mr Imam ("**Imam**") – worker involved in production at the workshop from around June to early October 2020, and end-December 2020 to early January 2021.
- (4) Mr Molla Md Nasim ("**Nasim**") – worker involved in production at the workshop in 2020; welder.
- (5) Mr Mehedi ("**Mehedi**") – worker involved in production at the workshop from June 2020 to 24 February 2021.
- (6) Mr Hossain Jitu ("**Jitu**") – working at the workshop on 24 February 2021.
- (7) Mr Molla Md Yousuf ("**Yousuf**") – working at the workshop on 24 February 2021.
- (8) Mr Rahad Asfaquzzaman ("**Rahad**") – working at the workshop on 24 February 2021.
- (9) Mr Ahmmed Lizon ("**Lizon**") – working at the workshop on 24 February 2021.
- (10) Mr Pandi Muruganantham ("**Murugan**") – Project Manager for projects at external worksites.
- (11) Mr Sarkar Shibu – Safety Coordinator.

(12) Mr Chua Shi Yong (Desmond) – company secretary and general manager.

From P3 Project Pte Ltd (“P3”)

(13) Mr Zhao Jian Wang – supervisor at P3, which occupies units opposite Stars’ workshop; injured by the Accident.

(14) Mr Miah Md Azam – worker at P3; injured by the Accident.

From Ming Hup Trading Pte Ltd (“MHT”)

(15) Ms Sharon Lee Sio Cheng – Sales Manager at MHT, supplier of Idemitsu Daphne Thermic 32-S oil (“**thermic oil**” or “**oil**”) to Stars.

8. Expert reports for this tranche have also been submitted by:

(1) Matcor Technology & Services Pte Ltd (“**Matcor**”) on 10 September 2021 (“**Matcor’s Report**”).

(2) Dr Shaik Mohamed Salim (“**Dr Salim**”) on 13 September 2021 (“**Dr Salim’s Report**”).

(3) Emeritus Prof Chew Yong Tian on 13 September 2021.

(4) Stars’ instructed expert – Dr David Rose from Hawkins & Associates (Singapore) Pte Ltd (“**Hawkins**”) on 15 September 2021.

9. Investigators from the Singapore Civil Defence Force, Fire Investigation Unit (“**SCDF**”) (which has submitted an investigation report dated 14 September 2021 (“**SCDF’s Report**”)) and the MOM investigation team will also be testifying.

VI. RELEVANT BACKGROUND

Layout of the Tuas Site and workshop

10. The Tuas Site is located within an industrial development known as Platinum@Pioneer. The development comprises 2 buildings housing terrace units:



11. Stars' Unit 32E has 3 floors. Level 3 is a dormitory housing some of Stars' workers. Level 2 was used to store the materials for making fire clay and fire wrap.
12. Level 1 was the workshop where fire clay and fire wrap were made:
- (1) View of the workshop, from front shutters facing in **[S-162]**:



(2) Roller machine flattening fire clay [S-27]:



(3) Photos of fire wrap [S-69]:



The Mixer Machine

13. The Mixer Machine was purchased by Mr Chua in August 2019, from Laizhou Keda Chemical Machinery Co., Ltd (“**Laizhou Keda**”) in China, via the ‘Alibaba’ online platform. It was delivered to Stars in October / November 2019. It was installed on the Platform on 12 June 2020 **[S-50]**:



14. The front of the Mixer Machine faces the rear of the workshop, while the back of the Mixer Machine faces the front shutters.
15. 3D sketch of the front and back of the Mixer Machine with some of its main components labelled:

Front view

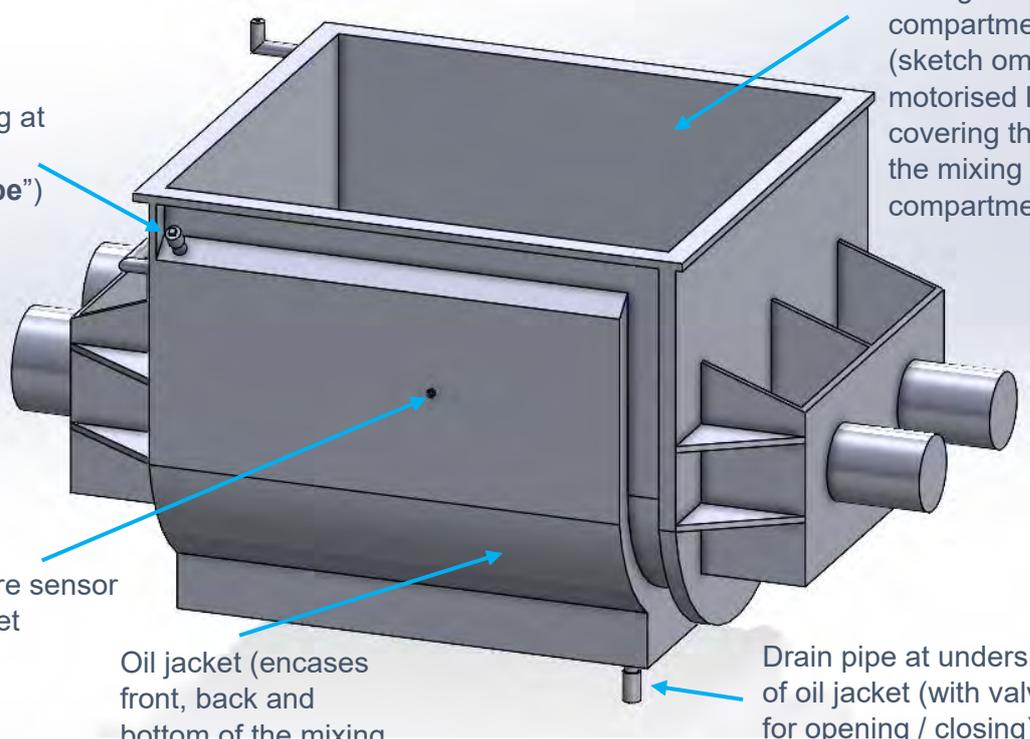
Joint/pipe opening at the front of the oil jacket ("**Front Pipe**")

Fixture for temperature sensor for oil jacket

Oil jacket (encases front, back and bottom of the mixing compartment)

Drain pipe at underside of oil jacket (with valve for opening / closing) ("**Drain Pipe**")

Mixing compartment (sketch omits the motorised lid covering the top of the mixing compartment)



Back view

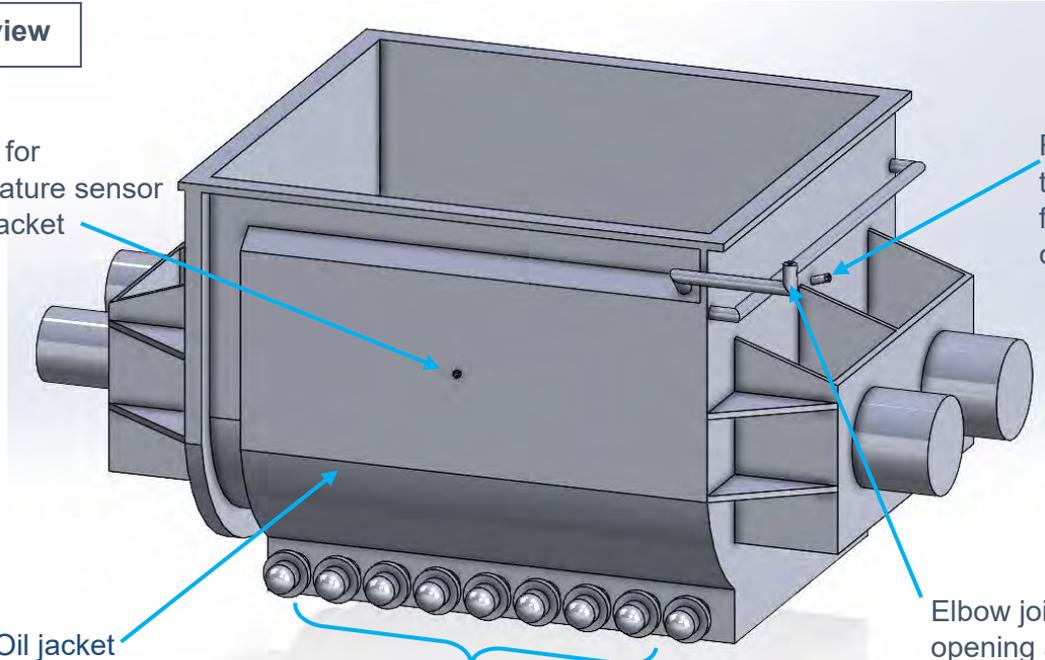
Fixture for temperature sensor for oil jacket

Oil jacket

9 heaters in the bottom of the oil jacket (in this Inquiry, we number the heaters 1 to 9, from right to left)

Fixture for temperature sensor for mixing compartment

Elbow joint/pipe opening at the back of the oil jacket ("**Back Pipe**")



16. Mixing compartment: There are sigma-shaped blades within, which rotate to mix the water, **potato starch**, boric acid, silicon oil, aluminium trihydrate and bentonite clay used to make fire clay. When mixing is completed, the mixing compartment can be tilted forward for removal of the contents [**S-106**].



17. When tilted, the Front Pipe would have to be closed to prevent oil in the oil jacket flowing out. The Mixer Machine was delivered with 1 end cap placed on the Front Pipe.
18. Oil jacket: The oil jacket had to be filled with thermic oil, which would be heated by the heaters. The heated oil would in turn heat the contents in the mixing compartment.
19. Oil was added to the oil jacket through a blue funnel. The Mixer Machine was delivered with the blue funnel attached to the Back Pipe [**S-46**].



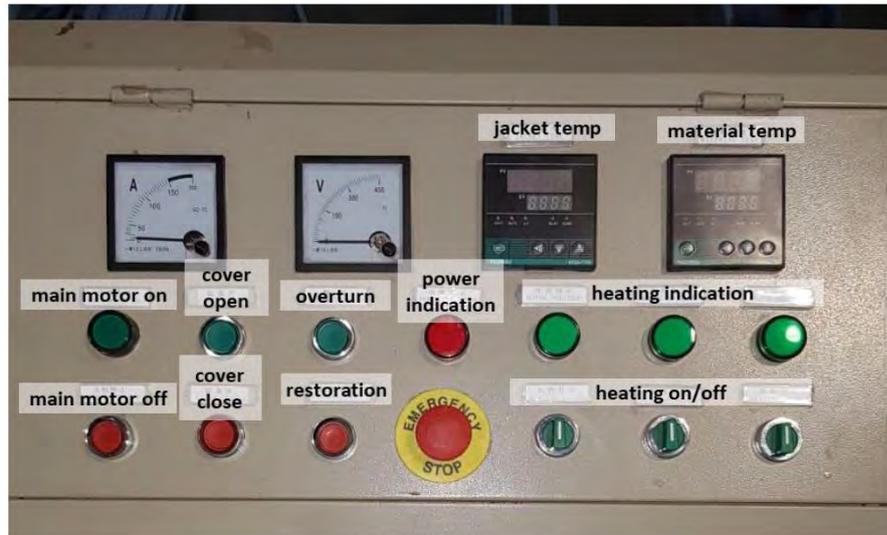
20. The User Guide provided by Laizhou Keda stated the following in respect of the design of the oil jacket **[S-271]**:
- (1) Design temperature: 200°C.
 - (2) Operating temperature: 70-160°C.
 - (3) Working pressure: $\leq 0.2\text{Mpa}$.
21. Heaters: Each heater comprised 3 U-shaped metal tubes / coils, the ends of which connected to 6 terminals on the heater flange **[S-127]**.



22. The metal tubes portion of the heaters would be inserted into the bottom of the oil jacket through openings for the heaters. There were gaskets placed between the openings and the heater flanges. From the outside, the flanges would be bolted to the openings, to keep the heaters in place. Yellow hub caps covered the heater terminals **[S-59]**.



23. The heaters were connected by wiring to a control panel, at which there were switches to turn the heaters on and off.
24. The Mixer Machine was delivered with 9 spare heaters.
25. Temperature sensors: The Mixer Machine came with 2 resistance temperature detectors / sensors (“**RTD**” or “**temperature sensor**”):
 - (1) One temperature sensor was for the oil jacket temperature. It was connected at one end to the control panel. There were fixtures on the front and back of the oil jacket, to which the other end of this temperature sensor could be attached. Readings from this temperature sensor would show up on the jacket temperature screen on the control panel. This temperature sensor operated on an interlock system – a specific temperature could be pre-set, and once reached, the heaters would be automatically switched off.
 - (2) The other temperature sensor was for the material in the mixing chamber. It was connected at one end to the control panel. There was a fixture on the side of the Mixer Machine (which was the exterior wall of the mixing chamber), to which the other end of this temperature sensor could be attached. Readings from this temperature sensor would show up on the material temperature screen on the control panel.
26. It is undisputed that, when operating the Mixer Machine, Stars did not attach the respective temperature sensors to their respective fixtures on the Mixer Machine. Instead, Stars placed either one of the temperature sensors (used interchangeably) into the mixing compartment to measure the temperature of the water being heated in there. The temperature in the oil jacket was never measured or monitored.
27. Control panel: The control panel / console was placed on the Platform next to the back of the Mixer Machine. See labelled control panel:



VII. CIRCUMSTANCES LEADING TO THE ACCIDENT

28. When considering the circumstances leading to the Accident, we respectfully invite the IC to consider the following key issues:

- (1) How was the Mixer Machine designed to operate?
- (2) Was the amount of oil used in the oil jacket for operation of the Mixer Machine sufficient at all material times?
- (3) Were there problems with the way Stars was operating the Mixer Machine?
- (4) Were there red flags, right up to the morning of 24 February 2021, indicating that continued operation of the Mixer Machine as Stars was doing, posed huge risk to the safety of the workers? In this connection, the categories of notable events leading up to the Accident include:
 - a. Burned / damaged heaters;
 - b. Leaks from the oil jacket;
 - c. Smoke coming out from the bottom of the oil jacket; and
 - d. Fires at the Mixer Machine.

- (5) What should have been done, but was not done, by those in charge of production at the Tuas Site, when red flags presented?
- (6) What kind of safety and operational training / guidance was given to the workers in respect of the Tuas Site production work, and was that adequate?
- (7) What were the working environment / conditions at the workshop like, particularly in relation to combustible dust hazards?

29. The IC will be hearing directly from the workers on the last 2 issues.

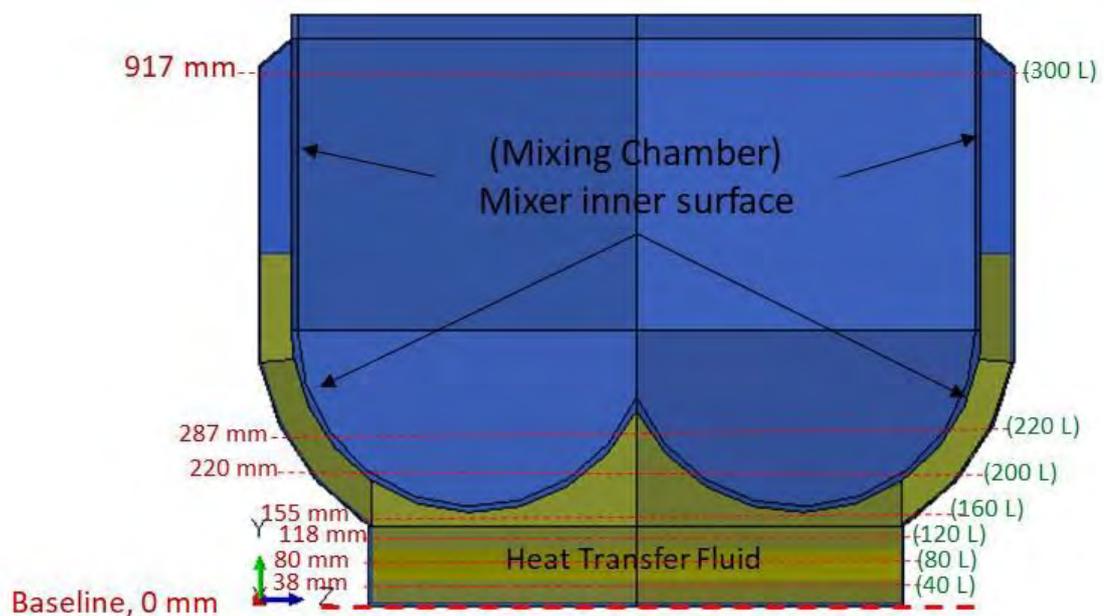
30. For present purposes, we propose to give the IC a flavour of the chronology of key events leading up to the Accident, which will shed some light on the first 4 issues.

16 June 2020 – 2 buckets of thermic oil purchased

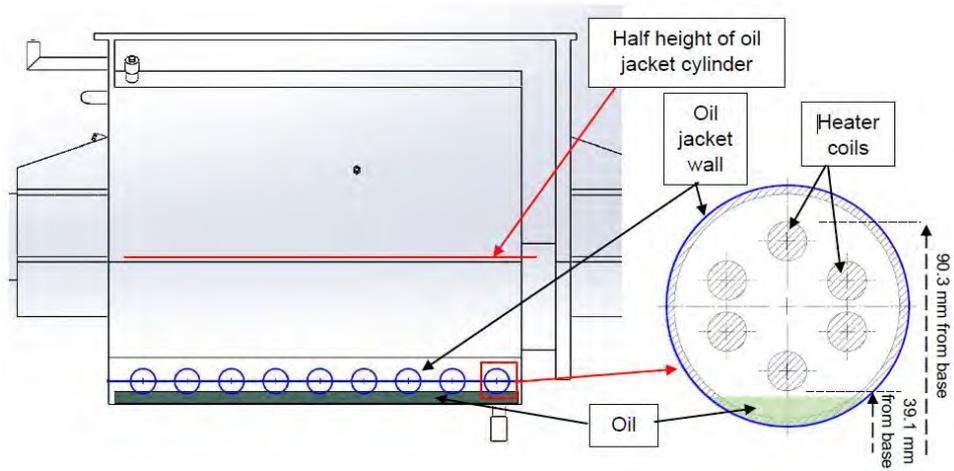
31. The first purchase of thermic oil by Stars / Mr Chua was made on 16 June 2020. 2 x 20L buckets of thermic oil were purchased and poured into the oil jacket that day.

32. Dr Salim and Matcor have modelled what certain fill volumes of oil would correspond to in terms of oil levels in the oil jacket – e.g.:

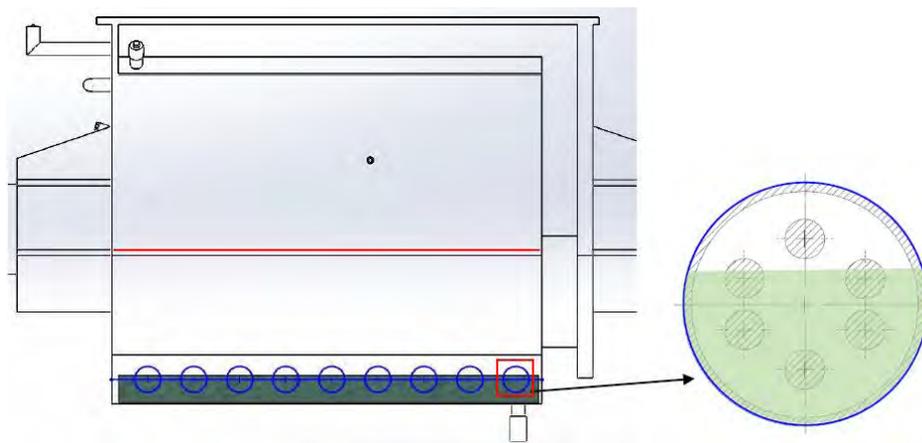
- (1) Figure B.6 from Dr Salim's Report:



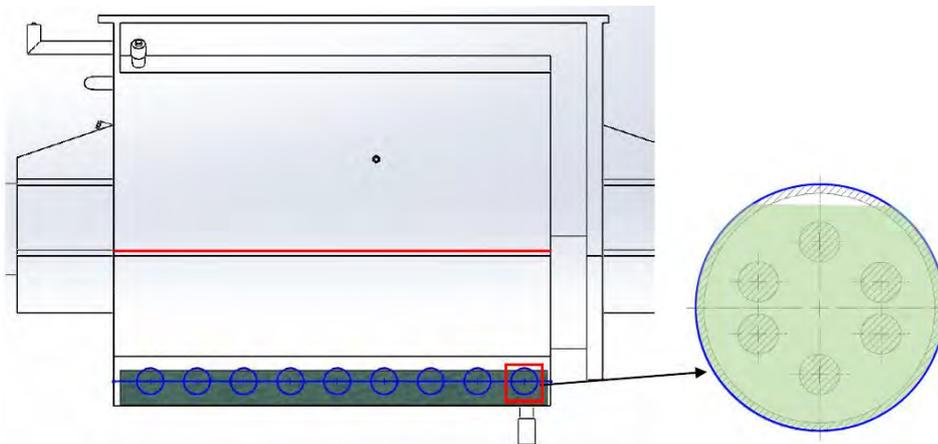
(2) Figure 212 (oil fill level at 40L) from Matcor's Report:



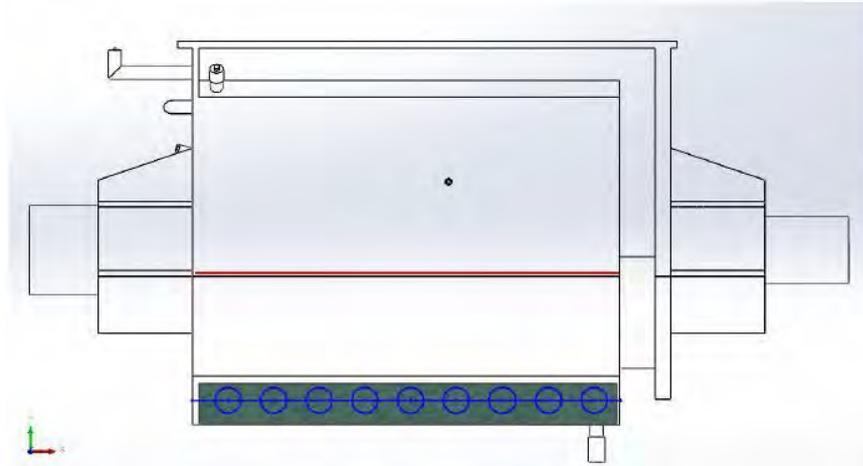
(3) Figure 216 (oil fill level at 80L) from Matcor's Report:



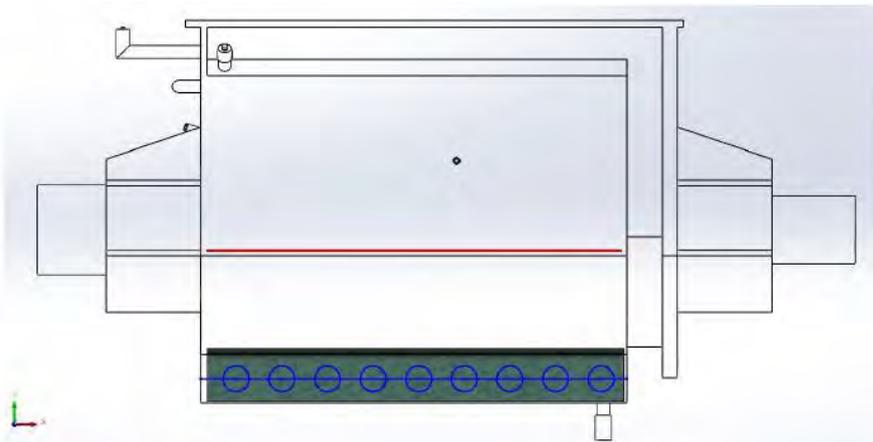
(4) Figure 218 (oil fill level at 100L) from Matcor's Report:



- (5) Figure 220 (oil fill level at 120L) from Matcor's Report:



- (6) Figure 224 (oil fill level at 160L) from Matcor's Report:



33. It is undisputed that the Mixer Machine was used to make fire clay at least 3 times from 16 June 2020 to before 7 August 2020.

7 August 2020 – running out of oil

34. On 7 August 2020 night, Moe instructed Imam to make a batch of fire clay. While operating the Mixer Machine, Imam suspected that the oil in the oil jacket was running out.
35. Slightly past midnight on 8 August 2020, Imam informed Mr Chua about the situation:

- (1) WhatsApp messages between Imam and Mr Chua on 8 August 2020, from 12:27am to 12:34am **[S-6]**:



- (2) Video sent by Imam to Mr Chua on 8 August 2020, 12:30am **[S-151]**.
- (3) Voice message from Imam to Mr Chua on 8 August 2020, 12:31am **[S-183]**.

8 August 2020 – burned Heater No. 1 replaced

36. The IC will hear the following from Imam. In the morning of 8 August 2020, Imam started making a batch of fire clay. While the Mixer Machine was in operation, a spark and smoke came out from Heater No. 1.
37. Imam turned off the Mixer Machine. He then drained out the oil in the oil jacket, which came to about 1.5 x 20L buckets.
38. Imam removed Heater No. 1 – one of its heating rods was found to be deformed from burning:
- (1) Photo of damaged Heater No. 1, sent by Imam to Mr Chua on 8 August 2020, 9:30am **[S-6]**:



- (2) Photo of damaged Heater No. 1, sent by Imam to Mr Chua on 8 August 2020, 9:40am **[S-6]**:



39. The damaged heater was replaced with a new spare heater that morning. Later that afternoon, the Mixer Machine was operated again to make fire clay.

From 8 August 2020 – Front Pipe and Back Pipe closed

40. Further to instructions given by Mr Chua on 8 August 2020, Imam also closed each of the Front Pipe and Back Pipe openings with an end cap. Except for a few and brief occasions (e.g. when oil was added to the oil jacket through the Back Pipe), the openings remained closed thenceforth, including when the heaters were turned on during the Mixer Machine's operation.
41. See photos of the closed Front Pipe and Back Pipe:



8 August 2020 – 4 buckets of thermic oil purchased

42. Mr Chua purchased 4 x 20L buckets of thermic oil on 8 August 2020. They were delivered to the Tuas Site that day, after the damaged Heater No. 1 incident.
43. On 8 August 2020, Imam put into the oil jacket:
- (1) The 1.5 buckets of used oil that had been drained out in the morning; and
 - (2) 3 new buckets of oil.

44. Oil from the fourth new bucket was added into the oil jacket by Imam later in August 2020, and, as the IC will hear Mr Chua say, incrementally by Mr Chua thereafter.

45. No new buckets of oil were purchased by Stars until 5 February 2021 (see [64] below).

28 August 2020 – smoke from oil jacket; black oil with sediments; deteriorated gaskets

46. The IC will hear from Imam that in the morning of 28 August 2020, he noticed smoke coming out from the area where the Mixer Machine's heaters were located.

47. Imam and Mehedi drained the oil in the oil jacket out, so as to check the heaters. It was observed that the drained oil was black in colour, and that there were black sediments in the oil. A video of this was sent by Imam to Moe on 28 August 2020, 1:32pm **[S-156]**.

48. When the heaters were removed, it was observed that the gaskets on the heater openings of the oil jacket had deteriorated. See photo **[S-113]** (green 'X' marks the deteriorated white-coloured gasket):



X

49. The old worn-out gaskets were replaced by new gaskets.

50. The drained oil, less the heavier black sediments which had settled at the bottom of the buckets, was poured back into the oil jacket.

21 September 2020 – smoke from oil jacket

51. On 21 September 2020, while operating the Mixer Machine, Imam noticed smoke or oil vapour coming out from the bottom of the oil jacket at the back of the Mixer Machine, near the heaters. Imam notified Moe:

- (1) Video sent by Imam to Moe on 21 September 2020, 9:55am **[S-157]**.
- (2) Voice message from Imam to Moe on 21 September 2020, 9:55am **[S-203]**.
- (3) Voice message from Moe to Imam on 21 September 2020, 9:57am **[S-205]**.

28 September 2020 – leak in oil jacket discovered

52. On 28 September 2020, Imam and Mehedi noticed a leak in the front bottom left corner of the oil jacket when the Mixer Machine was operated. Imam notified Moe:

- (1) Photo sent by Imam to Moe on 28 September 2020, 10:25am (blue circle drawn by Imam) **[S-52]**:



- (2) Message accompanying above photo, sent by Imam to Moe on 28 September 2020, 10:25am **[S-11]**:

S/No	Instant Message #	Date and Time (GMT +8 hours)	From	Body	Attachment	Label
4098	3568	28/09/2020 10:25 AM	6591225408@s.whatsapp.net imam	hole have small	4923263b-5ee2-400d-9a16-eb87cf46695c.jpg	

53. The IC will hear from Mr Chua that he was informed of this leak in late September 2020.

54. Imam expressed at that time that the leak should be closed by welding:

- (1) Messages between Imam and Moe on 28 September 2020, at 10:26am **[S-11]**:

S/No	Instant Message #	Date and Time (GMT +8 hours)	From	Body	Attachment	Label
4099	3569	28/09/2020 10:26 AM	6591225408@s.whatsapp.net imam	need to welding bro		
4100	3570	28/09/2020 10:26 AM	6596578507@s.whatsapp.net Mpe	Ask <u>nasim</u> or <u>mahedi</u>		
4101	3571	28/09/2020 10:26 AM	6591225408@s.whatsapp.net imam	ok noted		
4102	3572	28/09/2020 10:26 AM	6591225408@s.whatsapp.net imam	<u>i evething</u> I <u>infrom</u> you		

(2) Messages between Imam and Moe on 30 September 2020, from 7:59pm to 8:01pm [S-11]:

S/No	Instant Message #	Date and Time (GMT +8 hours)	From	Body	Attachment	Label
4122	3592	30/09/2020 07:59 PM	6591225408@s.whatsapp.net imam	now small. hole		
4123	3593	30/09/2020 08:00 PM	6591225408@s.whatsapp.net imam	later big hole		
4124	3594	30/09/2020 08:00 PM	6596578507@s.whatsapp.net Mpe	Just tell him		
4125	3595	30/09/2020 08:00 PM	6591225408@s.whatsapp.net imam	ok		
4126	3596	30/09/2020 08:00 PM	6596578507@s.whatsapp.net Mpe	If now no settle		
4127	3597	30/09/2020 08:00 PM	6596578507@s.whatsapp.net Mpe	Later problem can u answer		
4128	3598	30/09/2020 08:00 PM	6596578507@s.whatsapp.net Mpe	Said like this		
4129	3599	30/09/2020 08:00 PM	6591225408@s.whatsapp.net imam	yesterday i talk to <u>hin radet</u>		
4130	3600	30/09/2020 08:00 PM	6591225408@s.whatsapp.net imam	he <u>say</u> can't		
4131	3601	30/09/2020 08:00 PM	6591225408@s.whatsapp.net imam	no problem		
4132	3602	30/09/2020 08:01 PM	6591225408@s.whatsapp.net imam	<u>tommrow mahadi welding</u>		

55. Nasim was the only certified welder at Stars at the time. In any event, no welding of the leak in the oil jacket was done, until after the events of 12 October 2020 (see [58]-[61] below).

1 October 2020 – black sediments in drained oil

56. On 1 October 2019, the oil in the oil jacket was drained out. See photo sent by Mehedi to the “SHIELD+ Daily” WhatsApp group chat on 1 October 2019 at 6:44pm [S-53]:

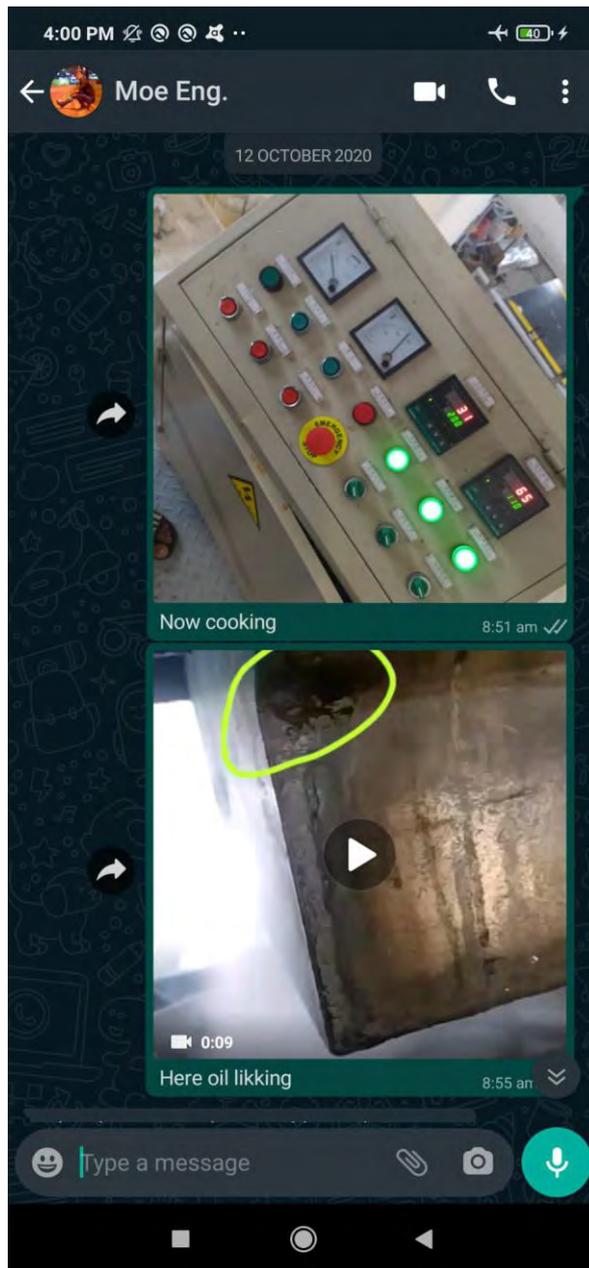


57. It was observed that there were black sediments in the drained oil. The drained oil, less the black sediments which settled at the bottom of the containers, was poured back into the oil jacket later that day.

12 October 2020 – oil leaking from oil jacket; subsequent welding

58. On 12 October 2020, Mehedi notified Moe of oil leaking from the oil jacket during operation of the Mixer Machine:

- (1) Message sent by Mehedi to Moe on 12 October 2020, 8:55am [S-13]:



(2) Video sent by Mehedi to Moe on 12 October 2020, 8:55am **[S-158]**.

59. The IC will hear from Mehedi that this leak was in the same area as, and appeared larger than, the leak discovered on 28 September 2020.
60. The IC will hear from Mr Chua that he saw Mehedi's 12 October 2020 video of the leak on that same day.
61. Nasim subsequently welded the leaking area.

8 January 2021 – smoke from oil jacket’s bottom corners

62. On 8 January 2021, Moe informed Mr Chua that he saw smoke coming out from the bottom corners of the Mixer Machine’s oil jacket when the heaters were turned on:

(1) Video sent by Moe to Mr Chua on 8 January 2021, 1:57pm [S-159].

(2) Messages from Moe to Mr Chua on 8 January 2021, 1:58pm [S-14]:



63. The IC will hear from Moe that, from that time until the next incident on 12 February 2021 (see [65] below), white smoke came out from the bottom corners of the oil jacket in the last 10 minutes of the operation of the heaters whenever the Mixer Machine was used to make fire clay.

5 February 2021 – another 4 buckets of thermic oil purchased

64. On 5 February 2021, Stars purchased another 4 x 20L buckets of oil. Of these, 2 unused buckets were found after the Accident. It is unknown what became of the other 2 buckets.

12 February 2021 – fire on the Mixer Machine

65. The IC will hear from Mehedi that at around 4:50pm on 12 February 2021, a fire broke out at the front bottom right corner of the Mixer Machine / oil jacket, which the workers managed to put out. See:

- (1) Photo sent by Mr Subbaiyan Marimuthu (“**Marimuthu**”) to Mr Chua on 12 February 2021, 6:17pm **[S-63]**:



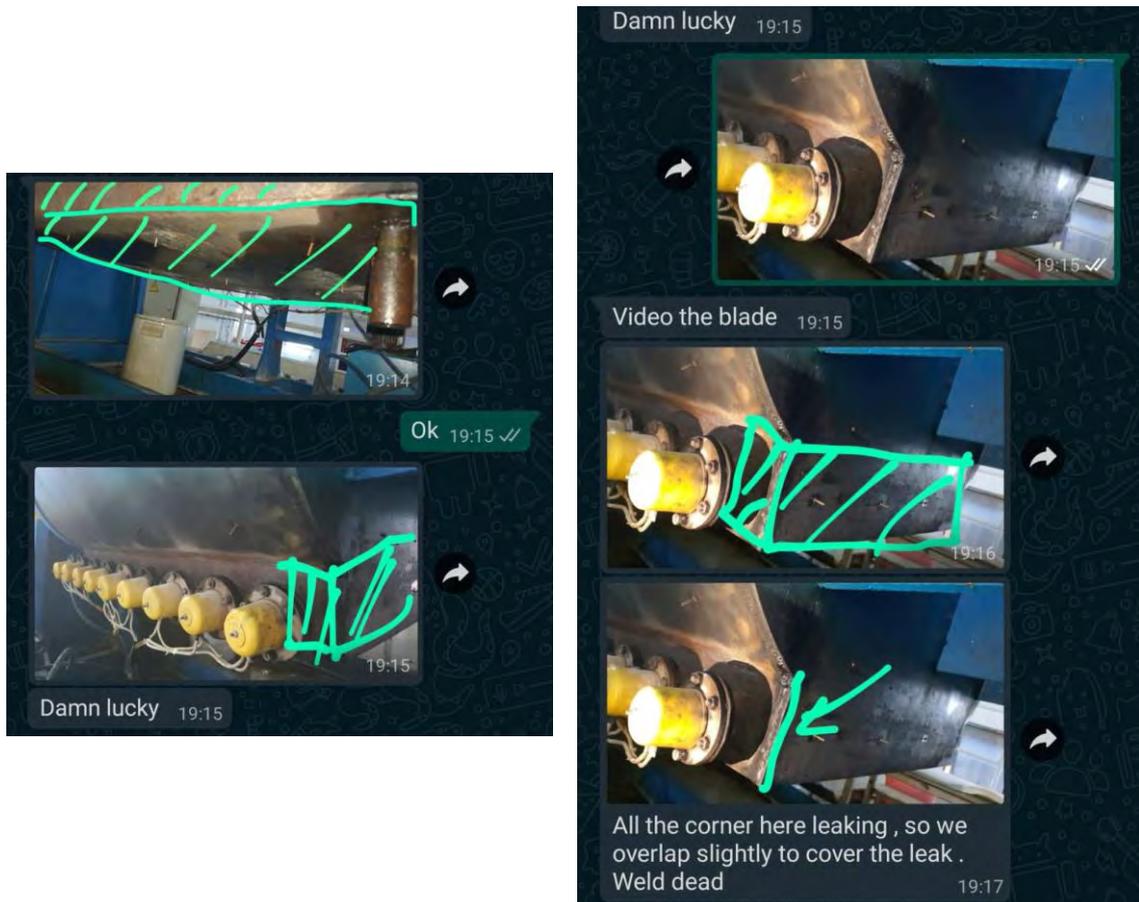
- (2) Video sent by Mehedi to the “SHIELD+ Team” WhatsApp group chat on 12 February 2021, 4:59pm **[S-160]**.

66. Murugan went down to the Tuas Site to manage the situation. Murugan found, amongst others:

- (1) Video sent by Murugan to Mr Chua on 12 February 2021, 18:10hrs **[S-163]**.

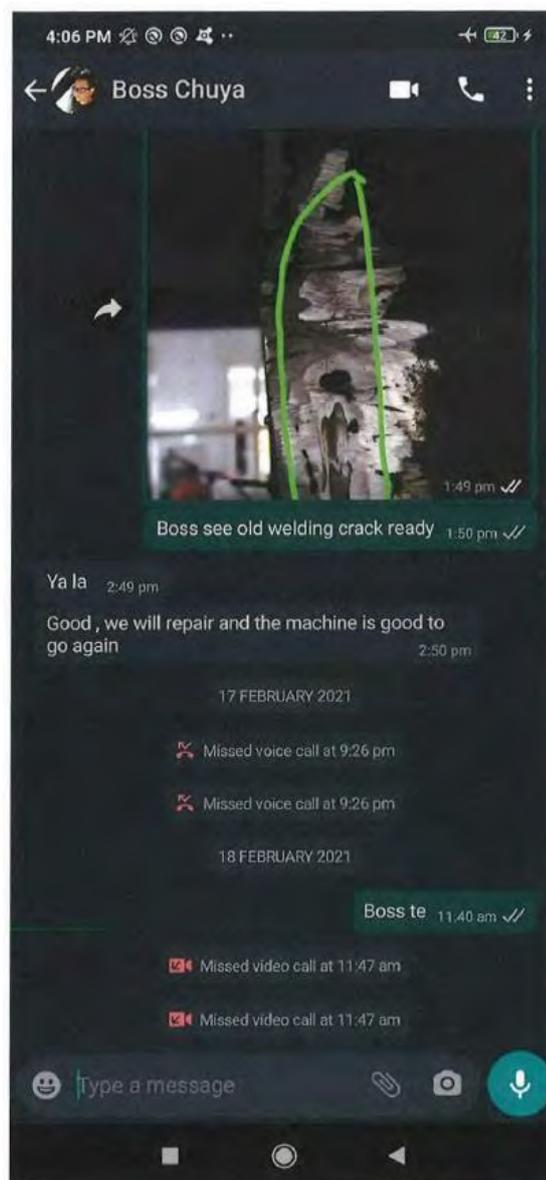
- (2) Video sent by Murugan to Mr Chua on 12 February 2021, 18:40hrs **[S-165]**.

67. At the close of that day’s activity, Mr Chua gave instructions for Nasim to weld the four bottom corners of the oil jacket, and to weld an additional base plate to the underside of the oil jacket / Mixer Machine – see messages from Mr Chua to Murugan on 12 February 2021, 19:14hrs to 19:17hrs (green markings in photos made by Mr Chua) **[S-20]**:



13 February 2021 – cracks found on oil jacket

68. Nasim commenced welding operations on 13 February 2021 by grinding the four corners of the Mixer Machine / oil jacket. Mehedi was present. Nasim and Mehedi observed a hairline crack on each of the two front bottom corners of the oil jacket.
69. Mehedi sent Mr Chua a photo and message in respect of the crack at the front bottom left corner:
- (1) Messages from Mehedi to Mr Chua on 13 February 2021, 1:49pm to 1:50pm [S-21]:



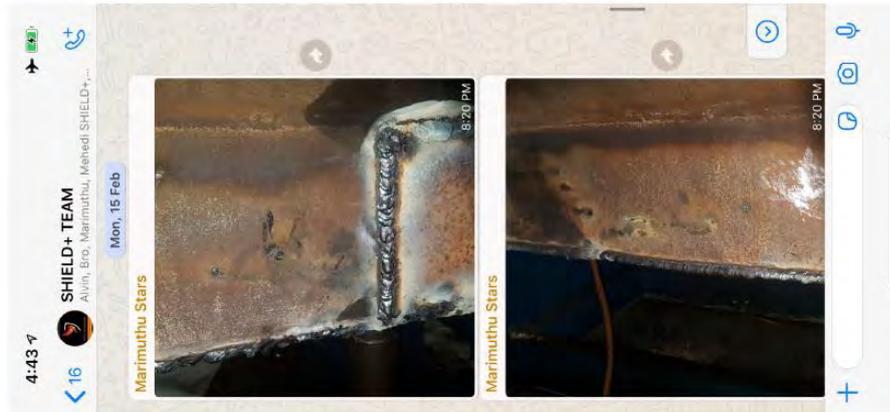
- (2) Photo sent by Mehedi to Mr Chua on 13 February 2021, 1:49pm [S-65]:



15 to 16 February 2021 – welding of Mixer Machine by Nasim

70. Over 15 and 16 February 2021, Nasim completed the welding work. The IC will hear from Nasim that, in sum, he:
- (1) Applied four layers of welding to each of the four bottom corners of the oil jacket.

- (2) Welded an L-shaped plate onto each of the front bottom right and left corners of the oil jacket. See first photo from Marimuthu to the “SHIELD+ Team” group chat on 15 February 2021, 8:20pm **[S-25]**:



- (3) Welded a base plate (with a hole cut out for the drain pipe) to cover the underside of the Mixer Machine. See second photo from Marimuthu to the “SHIELD+ Team” group chat on 15 February 2021, 8:20pm **[S-25]** (immediately above).

17 February 2021 – insulation installed on the oil jacket’s exterior surfaces

71. On 17 February 2021, new insulation, comprising fibre only, was installed on the oil jacket’s exterior surfaces – see photos sent by Marimuthu to the “SHIELD+ Team” group chat on 17 February 2021, 8:52pm **[S-70; S-72]**:

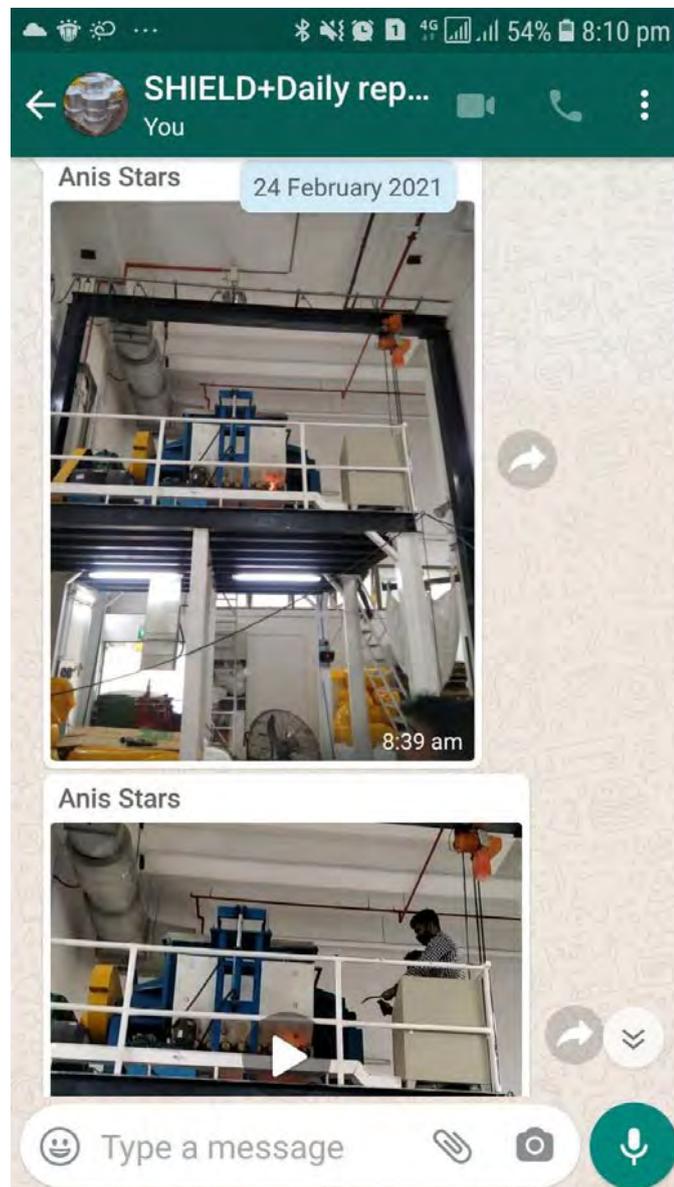


24 February 2021 – events leading up to the Accident

72. There were 8 workers working at the workshop on 24 February 2021: (1) Marimuthu (who had joined the Tuas Site production team as supervisor in January 2021); (2) Mr Shohel Md (“**Shohel**”); (3) Mr Anisuzzaman Md (“**Anis**”); (4) Lizon; (5) Mehedi; (6) Jitu; (7) Yousuf; and (8) Rahad.

73. At around 8.39am that morning, a small fire broke out at Heater No. 2 on the Mixer Machine. Mehedi put out the fire with a fire extinguisher. See:

(1) Photo sent by Anis to the “SHIELD+ Daily” WhatsApp group chat on 24 February 2021, 8:39am [S-29]:



(2) Video sent by Anis to the “SHIELD+ Daily” WhatsApp group chat on 24 February 2021, 8:48am **[S-168]**.

74. Marimuthu sent the photo of the small fire (see [73(1)] above), and photos of the damaged Heater No. 2, to Moe:

(1) Photo sent by Marimuthu to Moe on 24 February 2021, 8:40am **[S-75]**:



(2) Photo sent by Marimuthu to Moe on 24 February 2021, 8:40am **[S-76]**:



- (3) Photo sent by Marimuthu to Moe on 24 February 2021, 9:04am **[S-78]**:



- (4) Photo sent by Marimuthu to Moe on 24 February 2021, 9:04am **[S-79]**:



75. Moe forwarded the photos to Mr Chua at 9:21am **[S-32]**. Further photos of the damaged / burned Heater No. 2 were also sent by Marimuthu to Chua:

- (1) Photos sent by Marimuthu to Mr Chua on 24 February 2021, 10:06am **[S-80; S-81]**:



(2) Photo sent by Marimuthu to Mr Chua on 24 February 2021, 10:09am **[S-82]**:



76. Moe and Marimuthu exchanged WhatsApp messages between 8:41am to 10:10am. Amongst others, they discussed changing the damaged heater **[S-30]**.
77. Mr Chua and Marimuthu had 4 phone calls at 9:59am, 10:07am, 10:10am and 10:13am **[S-33]**.

78. At 11:13am, Marimuthu took a photo showing the damaged Heater No. 2 bolted into the oil jacket, with green tape around its wiring [S-83]:



79. The IC will hear from Moe that a similar photo to that at [78] above was sent by Marimuthu to him at 11:13am; but Moe deleted this photo from his and Marimuthu's phones after the Accident. Moe had replied to Marimuthu at 11:32 am saying "Ok let me know ASAP" [S-30, IM#257]; but Moe also deleted this message from his and Marimuthu's phones after the Accident. The damaged Heater No. 2 with the green taped-wiring was found still in the oil jacket, after the Accident.
80. The IC will hear from some of the workers that, shortly before the explosion occurred, they heard the sound of the Mixer Machine in operation. In addition, SCDF will present its finding that, during their investigation on 25 February 2021, the Moulded Case Circuit Breaker (MCCB) of the Mixer Machine's control panel and the control panel switches for the heaters were in an "ON" state, indicating that at the time of the explosion, electrical power was supplied to the Mixer Machine and its heaters were turned on.

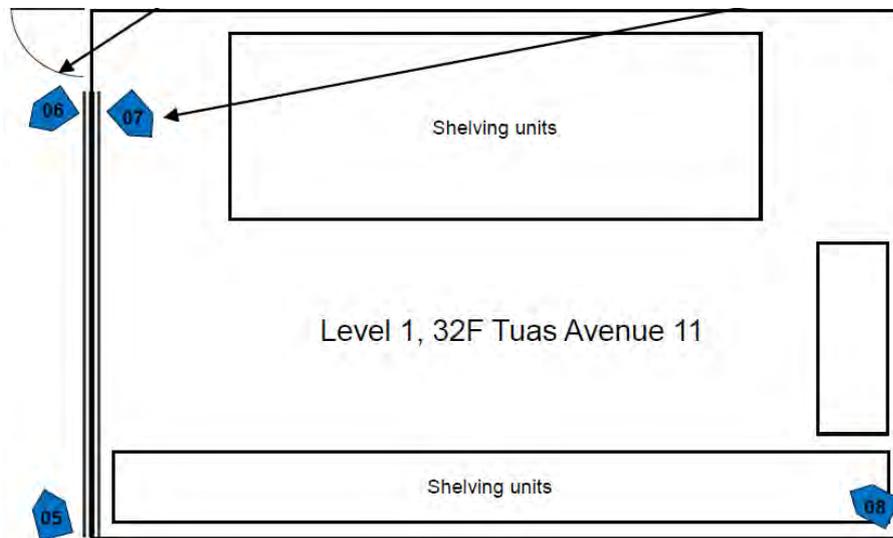
81. After the Accident, the Front Pipe, Back Pipe and Drain Pipe leading to the Mixer Machine's oil jacket were all found to be closed, indicating that the oil jacket was a closed system at the time of the explosion.

VIII. THE ACCIDENT

24 February 2021 – the explosion and fires

82. The CCTV footage obtained from Alif-Engineering Pte Ltd, which occupied Unit 32F next to Stars' Unit 32E, are instructive – indicating a large explosion first occurred at around 11:22am, followed in the next few minutes by flash fires:

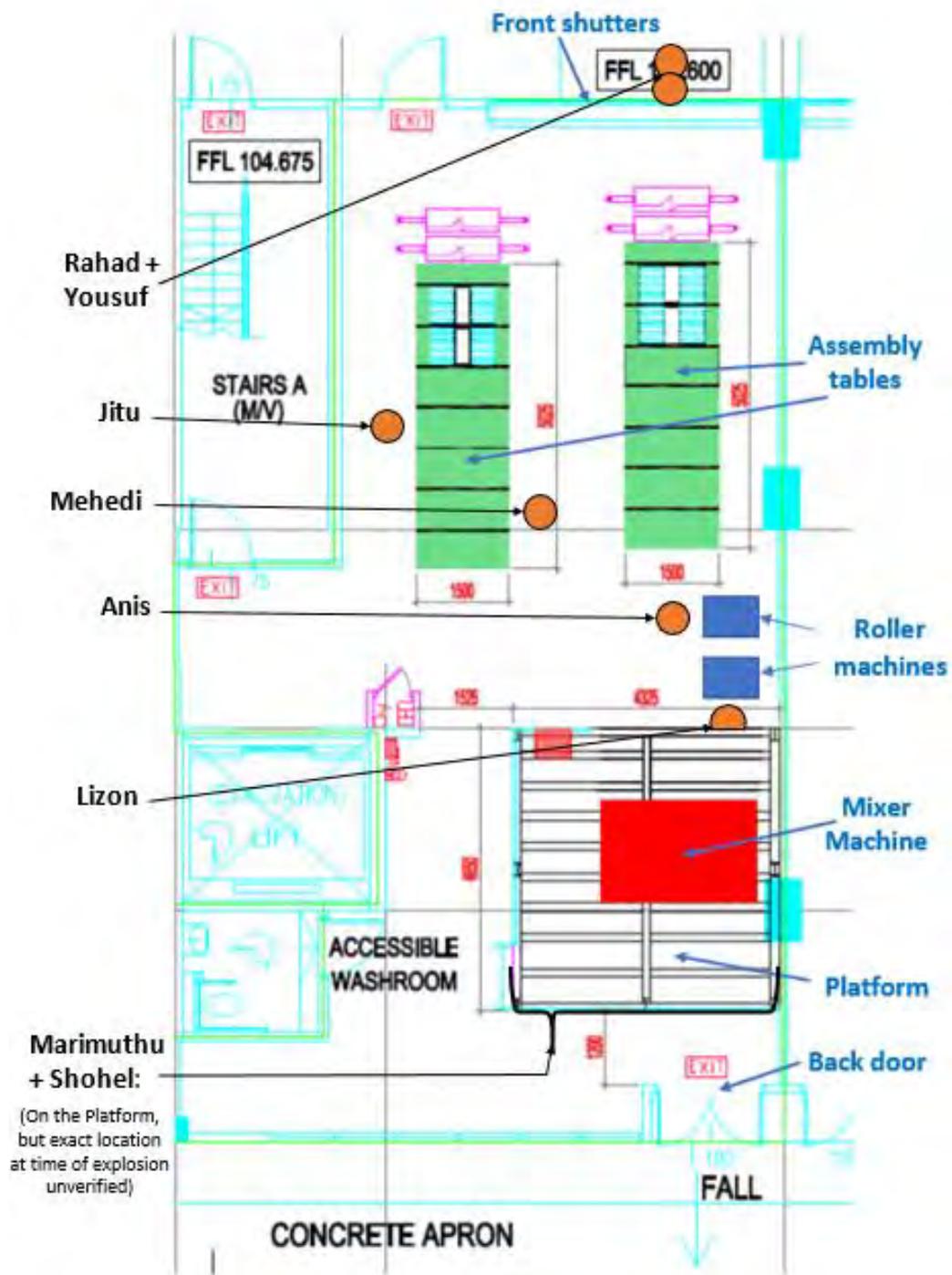
- (1) Unit 32E and Unit 32F share a common wall at Level 1 – see marked site plan [S-269].
- (2) Location of Cameras 8 and 7 in Unit 32F Level 1 – see SCDF's Report, Annex H:



- (3) Footage from Camera 8 at time-stamp 23:15:41 (adjusted time on 24 February 2021 = 11:22:29hrs); 23:17:05 (adjusted time on 24 February 2021 = 11:23:53hrs); 23:17:45 (adjusted time on 24 February 2021 = 11:24:33hrs) [S-182].

- (4) Footage from Camera 7 at time-stamp 23:15:41 (adjusted time on 24 February 2021 = 11:22:29hrs); 23:18:15 (adjusted time on 24 February 2021 = 11:25:03hrs) [S-181].

83. When the explosion occurred, the workers were in various locations at the workshop:



84. The IC will hear from the witnesses that, at the time of the explosion, they felt, amongst others:
- (1) Yousuf – Intense heat and an impact across his back, that caused him to fall about 2m in the direction beyond the front shutters and outside the workshop.
 - (2) Rahad – A huge push, that caused him to fly about 2m in the direction beyond the front shutters and outside the workshop.
 - (3) Mehedi – A gust of hot air pushing him, and causing him to fall.
 - (4) Lizon – As if something hot had fallen on the back of his neck.
 - (5) Jitu – Hot oil splashing on him and on the wall above him.
85. SCDF arrived at the scene at 11:30am, and put out the fires in the workshop by about 11:46am.

Aftermath – damage and injuries

86. Damage to the Mixer Machine: multiple damage, but primarily, the lower portion of the back of the oil jacket had ruptured open along its welding seams:
- (1) Figure 10 from Matcor's Report:



- (2) Figure 9 from Matcor's Report:



87. Damage to property:

- (1) See walk-through of scan of premises done by Envista Forensics on 23 March 2021.
- (2) P3's Unit 38A – glass window panels on the rear wall were blasted out of their metal frames **[S-136]**:



88. Casualties:

- (1) Anis, Marimuthu and Shohel suffered from, amongst others, burns to approximately 90% of their total body surface area, and passed away in the night and early morning of 24 and 25 February 2021. Their cause of death was certified as "Severe Burns". See Autopsy Reports **[S-213; S-215; S-214]**.

- (2) Mehedi, Lizon, Yousuf, Rahad and Jitu suffered a litany of serious burn injuries, including Total Body Surface Area (TBSA) burns ranging from 35-58% TBSA, and ocular thermal injury. See Medical Reports [**S-219; S220; S221; S-222; S-223**]. The IC will hear further from them on their injuries and state of recovery.
- (3) Mr Zhao Jian Wang and Mr Miah Md Azam suffered relatively lighter injuries. See Medical Reports [**S-225; S-224**]. The IC will also hear from them.

IX. CAUSES OF THE ACCIDENT

Technical causes of the Accident

89. In considering the causes of the Accident, we respectfully submit that the first-order matter for the IC to determine is the technical causes of the Accident. Where the technical causes are concerned, we posit that there will be 3 issues for the IC to determine:
 - (1) What was the technical cause(s) of the rupture of oil jacket's back bottom weld seams?
 - (2) What was the technical cause(s) of the explosion?
 - (3) What was the technical cause(s) of the subsequent flash fires?
90. Based on their respective reports, the chemical engineering experts appear to agree that, based on the type and extent of damage found, the explosion was a chemical explosion involving the ignition of thermic oil aerosols. Where their views presently differ is regarding the mechanics of how such chemical explosion occurred – whether it occurred from inside the oil jacket; or occurred following a physical rupture of the oil jacket due to internal overpressure.
91. On the issues of rupture of the oil jacket's weld seams and the explosion, the IC will thus hear from the experts on, and have to decide, *inter alia*:
 - (1) Were the heaters in the oil jacket over-heated?

- (2) If yes, how did the heaters become over-heated? Did insufficient oil in the oil jacket (and corresponding lack of contact of the oil with the heaters and/or the mixing chamber's surfaces) play a part, and if so, how?
 - (3) If yes, what was the effect of over-heating in the oil jacket? In particular, what effect did that have on the internal pressure level within the oil jacket, especially when the oil jacket was operated as a closed system?
 - (4) What effect would the build-up of high internal pressure inside the oil jacket have, in particular at the weld seams?
 - (5) What was the quality of the affected welding, what accounted for such quality, and what effect (if any) did that have on the rupture of the welds?
 - (6) How and where would combustible thermic oil aerosols have been formed? Was that the fuel source of the explosion?
 - (7) What was the ignition source(s)?
92. Regarding the flash fires – The IC will hear that the Institute of Chemical and Engineering Sciences, A*STAR (“**ICES**”) conducted chemical analysis on samples collected by the MOM investigators from surfaces and bulk samples in the workshop, after the Accident. The ICES results indicate that potato starch residues were present in various locations and surfaces in the workshop. The IC will hear from the experts on, and have to decide, *inter alia*:
- (1) The presence of flash fires following the primary explosion.
 - (2) The combustibility of potato starch powder.
 - (3) Whether the flash fires were caused by combustion of potato starch powders? If yes, how did that occur? For example, were dust clouds formed when the overpressure from the explosion suspended surface accumulations of potato starch? How did the combustible dust cloud(s) ignite – for example, on contact with the initial flames from the primary explosion?

Underlying and/or contributing factors leading to the Accident

93. Beyond the technical causes, we also invite the IC to consider what factors created or contributed to the conditions that allowed for the technical causes of the Accident to occur. In considering such factors, we respectfully submit that the answers to the issues posed at [28] above – for example, and critically, *were obvious red flags ignored* – will be germane.

X. CONCLUSION

94. The evidence to be heard on the circumstances and causes of the Accident in this tranche of the Inquiry hearing will facilitate the evidence to be led on recommendations to prevent the recurrence of such an accident at workplaces, in the next tranche of the hearing. There will no doubt be many important lessons to learn from this tragic accident, to ensure it is never again repeated.

Dated this 20th day of September 2021.



Kristy Tan, SC / Ang Feng Qian / Sivakumar Ramasamy / Amanda Sum
State Counsel, Attorney-General's Chambers

ANNEX F – LIST OF WITNESSES

INQUIRY

**UNDER SECTION 26 OF THE WORKPLACE SAFETY AND HEALTH
ACT
INTO THE FATAL ACCIDENT
AT STARS ENGRG PTE LTD'S WORKPLACE AT 32E TUAS AVE 11**

LIST OF WITNESSES

18 November 2021

LIST OF WITNESSES

State's witnesses

S/N	Witness	Language
Factual witnesses		
SW-1	Imam	Bengali
SW-2	Mehedi	Bengali
SW-3	Molla Mohammad Nasim	Bengali
SW-4	Pandi Muruganantham	Tamil
SW-5	Chua Xing Da	English
SW-6	Hossain Jitu	Bengali
SW-7	Molla Md Yousuf	Bengali
SW-8	Rahad Asfaquzzaman	Bengali
SW-9	Ahmmmed Lizon	Bengali
SW-10	Miah Md Azam	Bengali
SW-11	Zhao Jian Wang	Mandarin
SW-12	Lwin Moe Tun	Burmese
SW-13	Sarkar Shibu	Bengali
SW-14	Chua Shi Yong Desmond	English
SW-15	Sharon Lee	English
Expert witnesses		
SW-16	Mr Robert Shandro (Matcor)	English
SW-17	Mr Ashley Ng (Matcor)	English
SW-18	Dr Shaik Mohamed Salim (A*Star)	English
SW-19	Emeritus Prof. Chew Yong Tian	English
Investigation officers		
SW-20	Maj Huang Weikang (SCDF)	English

S/N	Witness	Language
SW-21	Ms Lim Yin Yin Jaime (MOM)	English
Representatives from agencies providing recommendations		
SW-22	Mr Ong Beng Yang (SMF)	English
SW-23	Mr Felipe Ong (IES)	English
SW-24	Mr Niranjan Masurekar (SISO)	English
SW-25	Col Ng Geok Meng (SCDF)	English
SW-26	Mr Christopher Koh (WSHC)	English
SW-27	Mr Silas Sng (MOM)	English

Stars' witnesses

S/N	Witness	Language
Expert witness		
STW-1	Dr David Rose (Hawkins)	English

ANNEX G – LIST OF EXHIBITS

INQUIRY

**UNDER SECTION 26 OF THE WORKPLACE SAFETY AND HEALTH
ACT
INTO THE FATAL ACCIDENT
AT STARS ENGRG PTE LTD'S WORKPLACE AT 32E TUAS AVE 11**

LIST OF EXHIBITS

18 November 2021

LIST OF EXHIBITS

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
Agreed Exhibits in Agreed Bundle of Exhibits				
3D scans of the workplace of Stars Engrg Pte Ltd (“Stars”) at 32E Tuas Avenue 11, Singapore 636854 (“Tuas Site”)				
S-1	25 February 2021	3D render of the Tuas Site as of 25 February 2021, prepared by SCDF (“SCDF’s 3D Scan”)	-	20 September 2021
Text messages & Call logs				
S-2	29 August 2019 – 23 February 2021	Selected WhatsApp messages between Chua Xing Da (“ Chua XD ”) and Sherry of Laizhou Keda Chemical Machinery Co., Ltd (“ Laizhou Keda ”), from 29 August 2019, 11:40am to 23 February 2021, 3:45pm, extracted from Chua XD’s mobile phone	CXD-22	20 September 2021
S-3	12 June 2020	WhatsApp messages between Chua XD and Imam on 12 June 2020 from 9:17am to 6:26pm, extracted from Chua XD’s mobile phone	IM-2	20 September 2021
S-4	12 June 2020 – 24 February 2021	WeChat messages between Chua XD and Sherry from Laizhou Keda from 12 June 2020, 12:44pm to 24 February 2021, 11:05am, extracted from Chua XD’s mobile phone	CXD-40	20 September 2021
S-5	16 June 2020 – 11 February 2021	WhatsApp messages between Chua XD and Sharon from Ming Hup Trading Pte. Ltd from 16 June 2020, 3:11pm to 11 February 2021, 10:21pm, extracted from Chua XD’s mobile phone	CXD-31	20 September 2021
S-6	8 August 2020	Screenshots from Chua XD’s mobile phone (taken on 23 June 2021) of his WhatsApp messages with Imam on 8 August 2020 from 12:27am to 4:23pm	CXD-60; IM-18	20 September 2021
S-7	8 August 2020	Screenshots from Moe’s mobile phone (taken on 24 June 2021) of his WhatsApp messages with Imam on 8 August 2020 from 9:32am to 9:59am	IM-25; LMT-18	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-8	28 August 2020	WhatsApp messages between Moe and Imam on 28 August 2020 from 9:08am to 4:05pm, extracted from Moe's mobile phone	IM-34; LMT-19	20 September 2021
S-9	28 August 2020	Screenshots from Chua XD's mobile phone (taken on 23 June 2021) of his WhatsApp messages with Imam on 28 August 2020 from 12:52pm to 5:59pm	IM-42	20 September 2021
S-10	21 September 2020	WhatsApp messages between Moe and Imam on 21 September 2020 from 9:55am to 9:57am, extracted from Moe's mobile phone	IM-43; LMT-27	20 September 2021
S-11	28-30 September 2020	WhatsApp messages between Moe and Imam from 28 September 2020, 10:25am to 30 September 2020, 8:01pm, extracted from Moe's mobile phone	IM-47; LMT-31	20 September 2021
S-12	1 October 2020	Screenshots from Mehedi's mobile phone (taken on 2 July 2021) of the photos sent by Mehedi in the Shield+Daily WhatsApp Chat on 1 October 2020 at 6:44pm	IM-49; MHD-21	20 September 2021
S-13	12 October 2020	Screenshots from Mehedi's mobile phone (taken on 2 July 2021) of his WhatsApp messages with Moe on 12 October 2020 from 8:51am to 10:05am	LMT-33; MHD-23	20 September 2021
S-14	8 January 2021	Screenshots from Chua XD's mobile phone (taken on 28 June 2021) of his WhatsApp messages with Moe on 8 January 2021 from 1:56pm to 1:58pm	CXD-75; LMT-36	20 September 2021
S-15	6-7 February 2021	WhatsApp messages in the "SHIELD+ TEAM" chat group (" Shield+ WhatsApp Chat ") on 6 and 7 February 2021, extracted from Marimuthu's mobile phone	CXD-77	20 September 2021
S-16	12 February 2021	Screenshots from Mehedi's mobile phone (taken on 2 July 2021) of his WhatsApp messages with Moe from 12 February 2021, 8:29am to 13 February 2021, 3:27pm	LMT-41; MHD-31	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-17	12 February 2021	WhatsApp messages between Chua XD and Marimuthu on 12 February 2021 from 4:52pm to 8:08pm, extracted from Marimuthu's mobile phone	CXD-79	20 September 2021
S-18	12 February 2021	Screenshots from Chua XD's mobile phone (taken on 23 June 2021) of the messages from the Shield+ WhatsApp Chat on 12 February 2021 from 4:56pm to 5:21pm	CSY-8; CXD-80; LMT-39; MHD-29	20 September 2021
S-19	12 February 2021	Screenshots from Chua XD's mobile phone (taken on 23 June 2021) of his WhatsApp messages with Moe on 12 February 2021 from 5:04pm to 7:26pm	CXD-81; LMT-40	20 September 2021
S-20	12 February 2021	Screenshots from Murugan's mobile phone (taken on 21 June 2021) of his WhatsApp chat messages with Chua XD on 12 February 2021 from 5:19pm to 7:27pm	CXD-82; PM-6	20 September 2021
S-21	12-13 February 2021	Screenshots from Mehedi's mobile phone (taken on 2 July 2021) of his WhatsApp messages with Chua XD from 12 February 2021, 5:19pm to 13 February 2021, 2:50pm	CXD-94; MHD-30; MMN-16	20 September 2021
S-22	12 February 2021	WhatsApp messages between Marimuthu and Moe on 12 February 2021 from 5:37pm to 7:33pm, extracted from Marimuthu's mobile phone	LMT-46	20 September 2021
S-23	13 February 2021	Screenshots from Chua XD's mobile phone (taken on 23 June 2021) of his WhatsApp messages with Moe on 13 February 2021 from 1:13pm to 3:19pm	CXD-93; LMT-47	20 September 2021
S-24	15 February 2021	Screenshot from Murugan's mobile phone (taken on 21 June 2021) of the WhatsApp chat messages from the Shield+ WhatsApp Chat on 15 February 2021 from 8:20pm to 8:22pm	PM-19	20 September 2021
S-25	15-17 February 2021	Screenshots from Chua XD's mobile phone (taken on 23 June 2021) of the messages from the Shield+ WhatsApp Chat from 15 February 2021, 8:20pm to 17 February 2021, 8:52pm	CXD-95; LMT-48; MHD-35; MMN-19	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-26	17 February 2021	Screenshot from Murugan's mobile phone (taken on 21 June 2021) of the WhatsApp chat messages from the Shield+ WhatsApp Chat on 17 February 2021 at 8:52pm	PM-20	20 September 2021
S-27	18 February 2021	Screenshots from Chua XD's mobile phone (taken on 24 June 2021) of his WhatsApp messages with Moe on 18 February 2021 from 12:17pm to 4:11pm	CXD-97; LMT-52	20 September 2021
S-28	18 February 2021	WhatsApp messages between Marimuthu and Moe on 18 February 2021 from 11:30pm to 11:31pm, extracted from Marimuthu's mobile phone	LMT-53	20 September 2021
S-29	24 February 2021	Screenshots from Nasim's mobile phone (taken on 9 July 2021) of the WhatsApp messages in the "Shield+Daily reporting gp" chat group (" Shield+Daily WhatsApp Chat ") on 24 February 2021 from 8:39am to 8:48am	MHD-41; MMN-24	20 September 2021
S-30	24 February 2021	WhatsApp messages between Marimuthu and Moe on 24 February 2021 from 8:40am to 12:09pm, extracted from Marimuthu's mobile phone	LMT-54	20 September 2021
S-31	24 February 2021	WhatsApp messages between Chua XD and Marimuthu on 24 February 2021 between 9:09am and 10:13am, extracted from Marimuthu's mobile phone	CXD-101	20 September 2021
S-32	24 February 2021	Screenshots from Chua XD's mobile phone (taken on 24 June 2021) of his WhatsApp messages with Moe on 24 February 2021 from 9:21am to 12:14pm	CXD-103; LMT-55	20 September 2021
S-33	24 February 2021	Call logs from Marimuthu's mobile phone on 24 February 2021	CXD-102	20 September 2021
S-34	21 June 2021	Screenshot from Murugan's mobile phone (taken on 21 June 2021) showing the full list of the members in the Shield+ WhatsApp Chat	PM-2	20 September 2021
S-35	23 June 2021	Screenshot from Chua XD's mobile phone (taken on 23 June 2021) showing the full list of the members in the Shield+ WhatsApp Chat	CSY-7	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
Photographs & Still Images				
S-36	6 April 2020	First photograph of the electrical components inside the control panel for the Mixer Machine, sent by Sherry of Laizhou Keda to Chua XD on 6 April 2020 at 4:40pm via WhatsApp (at S-2, IM#129); also forwarded by Chua XD to Imam on 12 June 2020 at 10:03am via WhatsApp (at S-3, IM#1099)	CXD-27; IM-6	20 September 2021
S-37	6 April 2020	Second photograph of the electrical components inside the control panel for the Mixer Machine, sent by Sherry of Laizhou Keda to Chua XD on 6 April 2020 at 4:40pm via WhatsApp (at S-2, IM#130); also forwarded by Chua XD to Imam on 12 June 2020 at 10:03am via WhatsApp (at S-3, IM#1100)	CXD-28; IM-7	20 September 2021
S-38	6 April 2020	Photograph of the motor junction box, sent by Sherry of Laizhou Keda to Chua XD on 6 April 2020 at 4:42pm via WhatsApp (at S-2, IM#131); also forwarded by Chua XD to Imam on 12 June 2020 at 10:30am via WhatsApp (at S-3, IM#1098)	CXD-26; IM-5	20 September 2021
S-39	14 April 2020	Photograph of the cabling works done for the Mixer Machine, sent by Imam to Chua on 14 April 2020 at 4:28pm via WhatsApp	CXD-14	20 September 2021
S-40	12 June 2020	Photograph of the Mixer Machine being installed on the Platform, sent by Imam to Chua XD on 12 June 2020 at 9:17am via WhatsApp (at S-3, IM#1095)	IM-3	20 September 2021
S-41	12 June 2020	Photograph of the Mixer Machine being installed on the Platform, sent by Imam to Chua XD on 12 June 2020 at 9:25am via WhatsApp (at S-3, IM#1096)	CXD-30; IM-4 (reverse image)	20 September 2021
S-42	12 June 2020	Photograph of the electrical components inside the control panel for the Mixer Machine, sent by Imam to Chua XD on 12 June 2020 at 10:32am (at S-3, IM#1101)	IM-9	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-43	12 June 2020	Photograph of the Mixer Machine's mixer compartment, sent by Imam to Chua XD on 12 June 2020 at 6:24pm via WhatsApp (at S-3, IM#1103)	IM-10	20 September 2021
S-44	12 June 2020	Photograph of the Mixer Machine's control panel, sent by Imam to Chua XD on 12 June 2020 at 6:24pm via WhatsApp (at S-3, IM#1106)	IM-11	20 September 2021
S-45	21 July 2020	Photograph showing the outdoor batten lights used at the Tuas Site workshop, sent by Imam to Chua XD on 21 July 2020 at 6:04pm via WhatsApp	CXD-15	20 September 2021
S-46	8 August 2020	Photograph of the blue funnel used to pour thermic oil into the Mixer Machine's oil jacket, sent by Imam to Chua XD on 8 August 2020 at 10:56am via WhatsApp (at S-6)	CXD-64; IM-22; LMT-8; MHD-6	20 September 2021
S-47	28 August 2020	Photograph of the Mixer Machine's heaters, sent by Imam to Moe on 28 August 2020 at 9:08am via WhatsApp (at S-8, IM#1568)	IM-35; LMT-20	20 September 2021
S-48	28 August 2020	Photograph of the ingredients being prepared to make fire clay, sent by Imam to Moe on 28 August 2020 at 9:14am via WhatsApp (at S-8, IM#1569)	LMT-21; IM-36	20 September 2021
S-49	28 August 2020	Photograph of the back of the Mixer Machine showing that all the heaters had been removed, sent by Imam to Moe on 28 August 2020 at 4:05pm via WhatsApp (at S-8, IM#1635)	LMT-26	20 September 2021
S-50	3 September 2020	Photograph of the Mixer Machine on the Platform at the Tuas Site workshop, sent by Imam to Chua XD on 3 September 2020 at 11:56am via WhatsApp	CXD-16; AL-1; HJ-1; LMT-4; MHD-1; MMN-3; MMY-1; RA-1	20 September 2021
S-51	3 September 2020	Photograph showing the extruder machine below the Platform, sent by Imam to Chua XD on 3 September 2020 at 11:56am via WhatsApp	CXD-17	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-52	28 September 2020	Photograph of the oil leak on the front bottom left corner of the Mixer Machine, sent by Imam to Moe on 28 September 2020 at 10:25am via WhatsApp (at S-11, IM#3568)	IM-48; LMT-32	20 September 2021
S-53	1 October 2020	Photograph of the six buckets of oil drained from the Mixer Machine's oil jacket on 1 October 2020, sent by Mehedi to the Shield+Daily WhatsApp Chat on 1 October 2020 at 6:44pm (at S-12)	MHD-20	20 September 2021
S-54	12 October 2020	Photograph of the Mixer Machine's control panel sent by Mehedi to Moe on 12 October 2020 at 8:51am via WhatsApp (at S-13)	MHD-22	20 September 2021
S-55	6 February 2021	Photographs (6) sent by Marimuthu to the Shield+WhatsApp Chat on 6 February 2021 at 7:09pm via WhatsApp (at S-15, IM#1)	CXD-78; LMT-45 (4 th photo)	20 September 2021
S-56	12 February 2021	Photograph of the Tuas Site workshop during the fire on 12 February 2021, sent by Mehedi to the Shield+WhatsApp Chat on 12 February 2021 at 4:56pm via WhatsApp (at S-18)	PM-3	20 September 2021
S-57	12 February 2021	Photograph of the Tuas Site workshop during the fire on 12 February 2021, sent by Mehedi to the Shield+WhatsApp Chat on 12 February 2021 at 4:57pm via WhatsApp (at S-18)	PM-4	20 September 2021
S-58	12 February 2021	Still image of the container bag and the hoist / pulley system used at the Tuas Site workshop, cropped from a photograph sent by Moe to Chua XD on 12 February 2021 at 5:35pm via WhatsApp	AL-4; CXD-37; HJ-6; IM-12; LMT-14; MHD-25; MMY-8; RA-3	20 September 2021
S-59	12 February 2021	Photograph of the back (bottom right corner) of the Mixer Machine showing the nine heaters inserted into the bottom of the Mixer Machine's oil jacket, sent by	CXD-85 (1 st photo); LMT-6; MHD-4;	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
		Murugan to Chua XD on 12 February 2021 at 6:10pm via WhatsApp (at S-20)	MMN-4; PM-9	
S-60	12 February 2021	Photograph of the front (bottom right corner) of the Mixer Machine, sent by Murugan to Chua XD on 12 February 2021 at 6:10pm via WhatsApp (at S-20)	CXD-85 (2 nd photo); PM-10	20 September 2021
S-61	12 February 2021	First photograph sent by Marimuthu to Chua XD on 12 February 2021 at 6:17pm via WhatsApp (at S-17, IM#3), showing the insulation on the front (right-side) of the Mixer Machine before the fire on 12 February 2021 (with aluminium foil and aluminium tape)	CXD-87 (1 st photo); PM-13	20 September 2021
S-62	12 February 2021	Second photograph sent by Marimuthu to Chua XD on 12 February 2021 at 6:17pm via WhatsApp (at S-17, IM#4)	CXD-87 (2 nd photo)	20 September 2021
S-63	12 February 2021	Third photograph sent by Marimuthu to Chua XD on 12 February 2021 at 6:17pm, showing the fire on the front bottom right corner of the Mixer Machine on 12 February 2021 via WhatsApp (at S-17, IM#5)	CXD-87 (3 rd photo); MHD-28	20 September 2021
S-64	12 February 2021	Photograph with green marking by Chua XD, sent by Chua XD to Murugan on 12 February 2021 at 6:32pm via WhatsApp (at S-20)	CXD-88	20 September 2021
S-65	13 February 2021	Photograph of the “old welding” on the bottom left front corner of the Mixer Machine, sent by Mehedi to Chua XD on 13 February 2021 at 1:49pm via WhatsApp (at S-21)	MHD-33; MMN-17	20 September 2021
S-66	13 February 2021	Photograph of the Mixer Machine sent by Mehedi to Moe on 13 February 2021 at 3:06pm via WhatsApp (at S-16), with Mehedi’s contemporaneous circling of the two corners which Nasim had ground on 13 February 2021	MHD-34; MMN-18	20 September 2021
S-67	15 February 2021	Photograph sent by Chua XD to Sherry of Laizhou Keda on 15 February 2021 at 11:59am via WeChat (at S-4, S/No 62)	CXD-99	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-68	16 February 2021	Photograph of the fire wrap, packaged for delivery in yellow bags, sent by Marimuthu to Moe on 16 February 2021 at 11:12am via WhatsApp	AL-8; HJ-10; LMT-16; MHD-27; MMY-10; RA-8	20 September 2021
S-69	17 February 2021	Photograph of the completed fire wrap sent by Mehedi to Moe on 17 February 2021 at 3:35pm via WhatsApp	AL-7; HJ-9; LMT-15; MHD-14; MMY-9; RA-7	20 September 2021
S-70	17 February 2021	First photograph of the new insulation on the Mixer Machine, sent by Marimuthu to the Shield+ WhatsApp Chat on 17 February 2021 at 8:52pm (at S-26)	CXD-96 (1 st photo); LMT-49; MHD-36; MMN-20; PM-21	20 September 2021
S-71	17 February 2021	Second photograph of the new insulation on the Mixer Machine, sent by Marimuthu to the Shield+ WhatsApp Chat on 17 February 2021 at 8:52pm (at S-26)	CXD-96 (2 nd photo); LMT-50; MHD-37; PM-22	20 September 2021
S-72	17 February 2021	Photograph of the Mixer Machine's heaters sent by Marimuthu to the Shield+ WhatsApp Chat on 17 February 2021 at 8:52pm (at S-26), showing the new insulation installed on the Mixer Machine	CXD-96 (3 rd photo); LMT-51; MHD-38; MMY-4; PM-23; AL-13	20 September 2021
S-73	24 February 2021	Photograph of the small fire on the Mixer Machine's heater on the morning of 24 February 2021, sent by Anis to the Shield+Daily WhatsApp Chat on 24 February 2021 at 8:39am via WhatsApp (at S-29); and forwarded by Marimuthu to Moe at 8:40am via WhatsApp (at S-30, IM#201)	LMT-56; MMN-21; MHD-42	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-74	24 February 2021	First photograph of the damaged heater, sent by Marimuthu to Moe on 24 February 2021 at 8:40am via WhatsApp (at S-30, IM#202)	LMT-57	20 September 2021
S-75	24 February 2021	Second photograph of the damaged heater, sent by Marimuthu to Moe on 24 February 2021 at 8:40am via WhatsApp (at S-30, IM#203)	LMT-58	20 September 2021
S-76	24 February 2021	Third photograph of the damaged heater, sent by Marimuthu to Moe on 24 February 2021 at 8:40am via WhatsApp (at S-30, IM#204)	LMT-59	20 September 2021
S-77	24 February 2021	Photograph of the new replacement heater, sent by Marimuthu to Moe on 24 February 2021 at 8:57am via WhatsApp (at S-30, IM#219)	LMT-61	20 September 2021
S-78	24 February 2021	First photograph of the burnt wiring connections of the damaged heater, sent by Marimuthu to Moe on 24 February 2021 at 9:04am via WhatsApp (at S-30, IM#225)	LMT-62	20 September 2021
S-79	24 February 2021	Second photograph of the burnt wiring connections of the damaged heater, sent by Marimuthu to Moe on 24 February 2021 at 9:04am via WhatsApp (at S-30, IM#226)	LMT-63	20 September 2021
S-80	24 February 2021	First photograph sent by Marimuthu to Chua XD on 24 February 2021 at 10:06am via WhatsApp (at S-31, IM#38)	CXD-104 (1 st photo)	20 September 2021
S-81	24 February 2021	Second photograph sent by Marimuthu to Chua XD on 24 February 2021 at 10:06am via WhatsApp (at S-31, IM#39)	CXD-104 (2 nd photo)	20 September 2021
S-82	24 February 2021	Photograph sent by Marimuthu to Chua XD on 24 February 2021 at 10:09am via WhatsApp (at S-31, IM#41)	CXD-105	20 September 2021
S-83	24 February 2021	Photograph taken by Marimuthu on 24 February 2021 at 11:13am showing that the wiring of the damaged	LMT-64; CXD-106	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
		Heater No. 2 had been taped together with green tape, extracted from Marimuthu's mobile phone		
S-84	24 February 2021 – 24 March 2021	CD-ROM containing 888 photographs taken by the Ministry of Manpower (“ MOM ”) in the course of investigations from 24 February 2021-24 March 2021	-	20 September 2021
S-85	24 February 2021	Photograph of an assembly table at the Tuas Site workshop, taken by MOM	HJ-8; MHD-2; MMN-6; MMY-2; RA-5	20 September 2021
S-86	24 February 2021	Photograph of the two roller machines at the Tuas Site workshop, taken by MOM	AL-5; CXD-41; HJ-7; MHD-13; MMY-5; RA-4	20 September 2021
S-87	24 February 2021	Photograph of debris scattered around the back lane of the Tuas Site workshop, taken by MOM	-	20 September 2021
S-88	24 February 2021	Photograph of the portion of the Tuas Site workshop's side wall adjoining Alif-Engineering Pte Ltd's (“ Alif-E ”) unit that had collapsed, taken by MOM	-	20 September 2021
S-89	24 February 2021	Photograph of the exhaust vent at the Tuas Site workshop, taken by MOM	AL-12; CXD-12 HJ-4; IM-17; LMT-43; MHD-17; MMN-9; MMY-6; PM-7; RA-11	20 September 2021
S-90	25 February 2021	Photograph of the area beside the assembly table that Hossain Jitu (“ Jitu ”) was working at on 24 February	HJ-15	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
		2021, showing various items placed near the exit, taken by MOM		
S-91	25 February 2021	Photograph of the louvre grill/cladding hanging from the third floor of the Tuas Site building, taken by Chua SY on 25 February 2021	CSY-9	20 September 2021
S-92	25 February 2021	Photograph of the wall fan at the Tuas Site workshop, taken by MOM	AL-10; CXD-43; HJ-3; IM-15; LMT-66; MHD-15; MMN-7; MMY-12; RA-9	20 September 2021
S-93	26 February 2021	Photograph of the standing fan at the Tuas Site workshop, taken by MOM	AL-11; CXD-44; HJ-2; IM-16; LMT-67; MHD-16; MMN-8; MMY-13; RA-10	20 September 2021
S-94	26 February 2021	Photograph of the closed back joint/pipe opening of the Mixer Machine, taken by MOM	LMT-13	20 September 2021
S-95	26 February 2021	Photograph of sacks of potato starch flour on the Platform, taken by MOM	AL-3; MHD-26	20 September 2021
S-96	1 March 2021	Photograph of the sacks of powder and other materials stored at the second level of the Tuas Site, taken by MOM	AL-2; HJ-5; MHD-9; MMY-3; RA-2	20 September 2021
S-97	23 March 2021	Photograph of the mid-sized dough blender/mixer at the Tuas Site workshop, taken by MOM	CXD-9; IM-1; LMT-1; MHD-12; MMN-5	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-98	23 March 2021	Photograph showing the indicator lights of the exhaust vent below the Platform, taken by MOM	CXD-13	20 September 2021
S-99	23 March 2021	Photograph of the blue air compressor gun, taken by MOM	MHD-18; MMN-10; RA-12	20 September 2021
S-100	23 March 2021	Photograph of damage to the front shutters of the Tuas Site workshop, taken by MOM	-	20 September 2021
S-101	31 May 2021	Photograph of damaged heater which was handed by Chua XD to MOM on 31 May 2021, taken by MOM	CXD-107	20 September 2021
S-102	15 June 2021	Photographs (3) of Zhao Jian Wang's ("Zhao") scarring and blisters taken by MOM on 15 June 2021	ZJW-4	20 September 2021
S-103	17 June 2021	Photographs (8) of Molla Md Yousuf's ("Yousuf") wounds and scars, taken by MOM on 17 June 2021	MMY-17	20 September 2021
S-104	18 June 2021	Photographs (7) of Ahmmed Lizon's ("Lizon") wounds and scars, taken by MOM on 18 June 2021	AL-15	20 September 2021
S-105	25 June 2021	Photographs (8) of Rahad Asfaquzzaman's ("Rahad") wounds and scars taken by MOM on 25 June 2021	RA-16	20 September 2021
S-106	30 June 2021	Photograph of the rotating blades in the Mixer Machine's mixer compartment, sent by Imam to Chua XD on 30 June 2020 at 2:39pm via WhatsApp	LMT-5; MHD-3	20 September 2021
S-107	1 July 2021	Photographs (13) of Jitu's wounds and scars, taken by MOM on 1 July 2021	HJ-16	20 September 2021
S-108	15 July 2021	Photographs (18) of Mehedi's wounds and scars, taken by MOM on 15 July 2021	MHD-46	20 September 2021
S-109	-	Photograph showing the control panel for the Mixer Machine, with labels added by MOM	CXD-39	20 September 2021
S-110	-	Photograph of the Mixer Machine, with Yousuf's circling of the area where he recalls seeing a crack in a photograph shown to him by a co-worker after 12 February 2021	MMY-7	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-111	-	Still image of the Mixer Machine's control panel, taken from a video dated 8 August 2020 extracted from Chua XD's mobile phone, with the red "Emergency Stop" button marked "X"	IM-24	20 September 2021
S-112	-	Still image of the two temperature reading screens on the Mixer Machine's control panel, taken from a video dated 8 August 2020 extracted from Chua XD's mobile phone	IM-14; LMT-12; MHD-11	20 September 2021
S-113	-	Photograph of the heater openings on the Mixer Machine's oil jacket, with one of the gaskets marked "X"	IM-41	20 September 2021
S-114	-	Still image extracted from the video (at timestamp 0.00.03) of the leak on the Mixer Machine sent by Mehedi to Moe on 12 October 2020 at 8.55am via WhatsApp (at S-13; S-158)), with Nasim's marking (in red) of the 3mm-long hairline crack on the Mixer Machine on 12 October 2020	MMN-14	20 September 2021
S-115	-	Still image extracted from the video (at timestamp 0.00.03) of the leak on the Mixer Machine sent by Mehedi to Moe on 12 October 2020 at 8:55am via WhatsApp (at S-13; S-158)), with Nasim's marking (in yellow) of his welding on the Mixer Machine on 12 October 2020	MMN-15	20 September 2021
S-116	-	Photograph of the front (bottom right corner) of the Mixer Machine with Murugan's orange circular markings of the oil stain he observed on 12 February 2021	PM-12	20 September 2021
S-117	-	Photograph of the underside of the Mixer Machine with Murugan's orange circular markings of the oil stain he observed on 12 February 2021	PM-16	20 September 2021
S-118	-	Photograph of the Mixer Machine's heaters, with Heater No. 1 marked "No. 1"	IM-23	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-119	-	Photograph of the Mixer Machine's heaters, with Heater No. 2 marked "No. 2"	LMT-60	20 September 2021
S-120	-	Still image of the Mixer Machine's control panel showing that the heaters were turned on (green buttons lit up), extracted from a video sent by Marimuthu in the Shield+ WhatsApp Chat on 18 February 2021 at 11:59am	LMT-10	20 September 2021
S-121	-	Still image of the Mixer Machine's control panel showing that the heaters were turned off (green buttons not lit up), extracted from a video sent by Marimuthu in the Shield+ WhatsApp Chat on 18 February 2021 at 11:59am	LMT-11	20 September 2021
S-122	-	Photograph of the isolator on the Platform taken by MOM, marked "X"	CXD-38; IM-8; MHD-10	20 September 2021
S-123	-	Photograph of the back and front joint/pipe openings on the Mixer Machine, marked "X" and "Y" respectively	CXD-63; IM-21; LMT-7; MHD-5	20 September 2021
S-124	-	Close-up image (from the photograph at S-123) of the plugged back joint/pipe opening on the Mixer Machine	MHD-7	20 September 2021
S-125	-	Photograph of the drain pipe at the bottom right corner of the front of the Mixer Machine, marked "Z"	LMT-9; MHD-8; MMN-12	20 September 2021
S-126	-	Photograph of the Emergency Main Switch Board and the Main Switch Board at the Tuas Site workshop taken by MOM, with labelling	CXD-11	20 September 2021
S-127	-	Photograph of the three heaters taken by MOM, with the heater flange marked "X"	CXD-65; LMT-37	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-128	-	Still image of the two assembly tables at the Tuas Site workshop, extracted from a 3D scan of the Tuas Site prepared by Envista Forensics (“ Envista’s 3D Scan ”)	AL-6	20 September 2021
S-129	-	Still image of the two assembly tables at the Tuas Site workshop extracted from Envista’s 3D Scan, with Mehedi’s marking of the table at which he was making fire wraps on the morning of 24 February 2021 as “X”	MHD-40	20 September 2021
S-130	-	Still image of the two assembly tables at the Tuas Site workshop extracted from Envista’s 3D Scan, with Jitu’s marking of the table at which he was making fire wraps on the morning of 24 February 2021 as “X”	HJ-12	20 September 2021
S-131	-	Still image of the two assembly tables at the Tuas Site workshop extracted from Envista’s 3D Scan, with Yousuf’s marking of the table at which he was making fire wraps on the morning of 24 February 2021 as “X”	MMY-14	20 September 2021
S-132	-	Still image of the two assembly tables at the Tuas Site workshop extracted from Envista’s 3D Scan, with Rahad’s marking of the table at which he was making fire wraps on the morning of 24 February 2021 as “X”	RA-13	20 September 2021
S-133	-	Screenshot from SCDF’s 3D Scan, with P3 Project Pte Ltd’s (“ P3 ”) Unit A and Unit B marked, and Zhao’s marking of his location at time of the accident marked “X”	ZJW-1	20 September 2021
S-134	-	Screenshot from SCDF’s 3D Scan, with P3’s Unit A and Unit B marked, and Miah Md Azam’s (“ Miah ”) marking of his location at time of the accident marked “X”	MMA-1	20 September 2021
S-135	-	Screenshot from SCDF’s 3D Scan, showing of P3’s Unit A in relation to Stars’ unit	MMA-2; ZJW-2	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-136	-	Photograph of damage to the glass windows on the back wall of P3's Unit A, obtained by MOM from P3 on 6 April 2021	MMA-3; ZJW-3	20 September 2021
S-137	-	Photograph of damage to the front shutters of the Tuas Site workshop		20 September 2021
Diagrams				
S-138	10 April 2020	Electrical line diagram for the Mixer Machine, sent by Sherry of Laizhou Keda to Chua XD on 10 April 2020 at 10:37am via WhatsApp (at S-2, IM#138)	CXD-29	20 September 2021
S-139	-	Diagram of the layout of the Tuas Site workshop prepared by Chua XD	CXD-19; LMT-3	20 September 2021
S-140	-	Diagram showing the layout of the workshop at the Tuas Site with the location of the equipment used during production marked and labelled, prepared by MOM	AL-9; HJ-11; MHD-39; MMY-11; RA-6	20 September 2021
S-141	-	Diagram showing the layout of the workshop at the Tuas Site with the location of the equipment used during production marked and labelled (at S-140), with Moe's amendment of the location of one of the roller machines (as at February 2021) marked	LMT-17	20 September 2021
S-142	-	Diagram showing the layout of the Tuas Site workshop (at S-140), with Jitu's marking of his location at the time of the explosion as "X" and labelling of Mehedi's location at the time of the explosion	HJ-14	20 September 2021
S-143	-	Diagram showing the layout of the Tuas Site workshop (at S-140), with Lizon's marking of his location at the time of the explosion as "X" and labelling of the respective locations of Shohel and Anis at the time of the explosion	AL-14	20 September 2021
S-144	-	Diagram showing the layout of the Tuas Site workshop (at S-140), with Mehedi's marking of his	MHD-45	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
		location at the time of the explosion as “X” and labelling of Jitu’s location at the time of the explosion		
S-145	-	Diagram showing the layout of the Tuas Site workshop (at S-140), with Yousuf’s marking of his location at the time of the explosion as “Y”	MMY-16	20 September 2021
S-146	-	Diagram showing the layout of the Tuas Site workshop (at S-140), with Rahad’s marking of his location at the time of the explosion as “X”	RA-14	20 September 2021
S-147	-	Diagram showing the layout of the Tuas Site workshop (at S-140), with Rahad’s labelling of the respective locations of Shohel, Jitu, Mehedi, Lizon and Anis just before the explosion occurred	RA-15	20 September 2021
S-148	-	Photograph showing Chua XD’s indications (a) in red markings, of the top of the cylinder, the half-height of the cylinder and the bottom of the cylinder (“cylinder” understood by Chua XD to refer to the oil jacket of the Mixer Machine); (b) in white markings, of the estimated level of oil in the oil jacket based on the dipstick check and the point in the oil jacket which the dipstick reached; and (c) of the location at which the dipstick is inserted	CXD-36	20 September 2021
Videos & Accompanying Transcripts				
S-149	12 June 2020	First video taken by Chua XD of Mixer Machine at the Tuas Site on 12 June 2020	CXD-5	20 September 2021
S-150	12 June 2020	Second video taken by Chua XD of Mixer Machine at the Tuas Site on 12 June 2020	CXD-6	20 September 2021
S-151	8 August 2020	Video of Nasim checking the oil level in the Mixer Machine’s oil jacket using a dipstick, sent by Imam to Chua XD on 8 August 2020 at 12:30am via WhatsApp (at S-6)	CXD-61; IM-19; MMN-11	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-152	-	Transcript of dialogue in the 8 August 2020, 12:30am video at S-151	CXD-61A; IM-19A; MMN-11A	20 September 2021
S-153	8 August 2020	First video of the Mixer Machine's control panel, sent by Imam to Chua XD on 8 August 2020 at 1:26pm via WhatsApp (at S-6)	CXD-70; IM-30	20 September 2021
S-154	8 August 2020	Second video of the Mixer Machine's control panel, sent by Imam to Chua XD on 8 August 2020 at 1:38pm via WhatsApp (at S-6)	CXD-71; IM-31	20 September 2021
S-155	-	Transcript of dialogue in the 8 August 2020, 1:38pm video at S-154	CXD 71A; IM-31A	20 September 2021
S-156	28 August 2020	Video of the 6 buckets of oil drained from the Mixer Machine's oil jacket, sent by Imam to Moe on 28 August 2020 at 1:32pm via WhatsApp (at S-8, IM#1608)	IM-40; LMT-25; MHD-19	20 September 2021
S-157	21 September 2020	Video showing smoke coming out from around the bottom of the oil jacket at the back of the Mixer Machine (near the heaters), sent by Imam to Moe on 21 September 2020 at 9:55am via WhatsApp (at S-10, IM#2878)	IM-44; LMT-28	20 September 2021
S-158	12 October 2020	Video of the leak on the front bottom left corner of the Mixer Machine, sent by Mehedi to Moe on 12 October 2020 at 8:55am via WhatsApp (at S-13)	CXD-74; LMT-34; MHD-24; MMN-13	20 September 2021
S-159	8 January 2021	Video of smoke coming out from the Mixer Machine's oil jacket, sent by Moe to Chua XD on 8 January 2021 at 1:57pm via WhatsApp (at S-14)	CXD-76; LMT-38	20 September 2021
S-160	12 February 2021	Video of the Tuas Site workshop during the fire on 12 February 2021, sent by Mehedi to the Shield+ WhatsApp Chat on 12 February 2021 at 4:59pm (at S-18)	CXD-83; LMT-42; MHD-32; PM-5	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-161	-	Transcript of dialogue in the 12 February 2021, 4:59pm video at S-160	CXD-83A; PM-5A	20 September 2021
S-162	12 February 2021	Video of the condition of the Tuas Site workshop, sent by Murugan to Chua XD on 12 February 2021 at 6:02pm via WhatsApp (at S-20)	CXD-84; PM-8	20 September 2021
S-163	12 February 2021	Video of the front (bottom right corner) of the Mixer Machine, sent by Murugan to Chua XD on 12 February 2021 at 6:10pm via WhatsApp (at S-20)	CXD-86; PM-11	20 September 2021
S-164	-	Transcript of dialogue in the 12 February 2021, 6:10pm video at S-163	CXD-86A; PM-11A	20 September 2021
S-165	12 February 2021	Video showing the condition of the insulation installed on the Mixer Machine sent by Murugan to Chua XD on 12 February 2021 at 6:40pm via WhatsApp (at S-20); also forwarded by Chua XD to Moe on 12 February 2021 at 6:40pm via WhatsApp (at S-19)	CXD-89; LMT-44; PM-14	20 September 2021
S-166	-	Transcript of dialogue in the 12 February 2021, 6:40pm video at S-165	CXD-89A; LMT-44A; PM-14A	20 September 2021
S-167	15 February 2021	Video sent by Chua XD to Sherry of Laizhou Keda on 15 February 2021 at 11:59am via WeChat (at S-4, S/No 61)	CXD-98	20 September 2021
S-168	24 February 2021	First video of the small fire on the morning of 24 February 2021, sent by Anis to the Shield+Daily WhatsApp Chat on 24 February 2021 at 8:48:33am (at S-29)	HJ-13; MHD-43; MMN-22	20 September 2021
S-169	24 February 2021	‘.tmp’ file of the first 24 February 2021, 8:48:33am video at S-168 (first 5 seconds only)	MMY-15	20 September 2021
S-170	24 February 2021	Second video of the small fire on the morning of 24 February 2021, sent by Anis to the Shield+Daily WhatsApp Chat on 24 February 2021 at 8:48:34am (at S-29)	MHD-44; MMN-23	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-171	24 February 2021	First video of the aftermath of the explosion, recorded by Htain Lynn (a member of the public) on 24 February 2021 at about 11:27am, and obtained by the Police	-	20 September 2021
S-172	24 February 2021	Second video of the aftermath of the explosion, recorded by Htain Lynn (a member of the public) on 24 February 2021 at about 11:27am, and obtained by MOM from social media	-	20 September 2021
S-173	24 February 2021	Third video of the aftermath of the explosion, recorded by Htain Lynn (a member of the public) on 24 February 2021 at about 11:34am, and obtained by the Police	-	20 September 2021
S-174	24 February 2021	Fourth video of the aftermath of the explosion, recorded by Htain Lynn (a member of the public) on 24 February 2021 at about 11:34am, and obtained by the Police	-	20 September 2021
S-175	24 February 2021	CCTV footage of the explosion on 24 February 2021, captured on Alif-E's CCTV Camera #1 (Level 3 lift lobby)	-	20 September 2021
S-176	24 February 2021	CCTV footage of the explosion on 24 February 2021, captured on Alif-E's CCTV Camera #2 (Level 3 rear common corridor)		20 September 2021
S-177	24 February 2021	CCTV footage of the explosion on 24 February 2021, captured on Alif-E's CCTV Camera #3 (Level 2 office – front facing)		20 September 2021
S-178	24 February 2021	CCTV footage of the explosion on 24 February 2021, captured on Alif-E's CCTV Camera #4 (Level 2 office – rear facing)		20 September 2021
S-179	24 February 2021	CCTV footage of the explosion on 24 February 2021, captured on Alif-E's CCTV Camera #5 (Level 1 front driveway)		20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-180	24 February 2021	CCTV footage of the explosion on 24 February 2021, captured on Alif-E's CCTV Camera #6 (Level 1 front driveway)		20 September 2021
S-181	24 February 2021	CCTV footage of the explosion on 24 February 2021, captured on Alif-E's CCTV Camera #7 (Level 1 interior storeroom)		20 September 2021
S-182	24 February 2021	CCTV footage of the explosion on 24 February 2021, captured on Alif-E's CCTV Camera #8 (Level 1 interior storeroom)		20 September 2021
Voice Messages & Accompanying Transcripts				
S-183	8 August 2020	Voice message sent by Imam to Chua XD on 8 August 2020 at 12:31am via WhatsApp (at S-6)	CXD-62; IM-20	20 September 2021
S-184	-	Transcript of the 8 August 2020, 12:31am voice message at S-183	CXD-62A; IM-20A	20 September 2021
S-185	8 August 2020	Voice message sent by Chua XD to Imam on 8 August 2020 at 10:47am via WhatsApp (at S-6)	CXD-66; IM-26	20 September 2021
S-186	-	Transcript of the 8 August 2020, 10:47am voice message at S-185	CXD-66A; IM-26A	20 September 2021
S-187	8 August 2020	Voice message sent by Imam to Chua XD on 8 August 2020 at 10:47am via WhatsApp (at S-6)	CXD-67; IM-27	20 September 2021
S-188	-	Transcript of the 8 August 2020, 10:47am voice message at S-187	CXD-67A; IM-27A	20 September 2021
S-189	8 August 2020	Voice message sent by Chua XD to Imam on 8 August 2020 at 10:55am via WhatsApp (at S-6)	CXD-68; IM-28	20 September 2021
S-190	-	Transcript of the 8 August 2020, 10:55am voice message at S-189	CXD-68A; IM-28A	20 September 2021
S-191	8 August 2020	Voice message sent by Imam to Chua XD on 8 August 2020 at 10:56am via WhatsApp (at S-6)	CXD-69; IM-29	20 September 2021
S-192	-	Transcript of the 8 August 2020, 10:56am voice message at S-191	CXD-69A; IM-29A	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-193	8 August 2020	First voice message sent by Imam to Chua XD on 8 August 2020 at 3:43pm via WhatsApp (at S-6)	CXD-72; IM-32	20 September 2021
S-194	-	Transcript of the first 8 August 2020, 3:43pm voice message at S-193	CXD-72A; IM-32A	20 September 2021
S-195	8 August 2020	Second voice message sent by Imam to Chua XD on 8 August 2020 at 3:43pm via WhatsApp (at S-6)	CXD-73; IM-33	20 September 2021
S-196	-	Transcript of the second 8 August 2020, 3:43pm voice message at S-195	CXD-73A; IM-33A	20 September 2021
S-197	28 August 2020	Voice message sent by Imam to Moe on 28 August 2020 at 9:14am	IM-37; LMT-22	20 September 2021
S-198	-	Transcript of the 28 August 2020, 9:14am voice message at S-197	IM-37A; LMT-22A	20 September 2021
S-199	28 August 2020	First voice message sent by Imam to Moe on 28 August 2020 at 11:39am via WhatsApp (at S-8, IM#1583)	IM-38; LMT-23	20 September 2021
S-200	-	Transcript of the first 28 August 2020, 11:39am voice message at S-199	IM-38A; LMT-23A	20 September 2021
S-201	28 August 2020	Second voice message sent by Imam to Moe on 28 August 2020 at 11:39am via WhatsApp (at S-8, IM#1584)	IM-39; LMT-24	20 September 2021
S-202	-	Transcript of the second 28 August, 11:39am voice message at S-201	IM-39A; LMT-24A	20 September 2021
S-203	21 September 2020	Voice message sent by Imam to Moe on 21 September 2020 at 9:55am via WhatsApp (at S-10, IM#2879)	IM-45; LMT-29	20 September 2021
S-204	-	Transcript of the 21 September 2020, 9:55am voice message at S-203	IM-45A; LMT-29A	20 September 2021
S-205	21 September 2020	Voice message sent by Moe to Imam on 21 September 2020 at 9:57am via WhatsApp (at S-10, IM#2880)	IM-46; LMT-30	20 September 2021
S-206	-	Transcript of the 21 September 2020, 9:57am voice message at S-205	IM-46A; LMT-30A	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-207	12 February 2021	Voice message sent by Murugan to Chua XD on 12 February 2021 at 7:13pm via WhatsApp (at S-20)	CXD-90; PM-15	20 September 2021
S-208	-	Transcript of the 12 February 2021, 7:13pm voice message at S-207	CXD-90A; PM-15A	20 September 2021
S-209	12 February 2021	Voice message sent by Murugan to Chua XD on 12 February 2021 at 7:24pm via WhatsApp (at S-20)	CXD-91; PM-17	20 September 2021
S-210	-	Transcript of the 12 February 2021, 7:24pm voice message at S-209	CXD-91A; PM-17A	20 September 2021
S-211	12 February 2021	Voice message sent by Murugan to Chua XD on 12 February 2021 at 7:25pm via WhatsApp (at S-20)	CXD-92; PM-18	20 September 2021
S-212	-	Transcript of the 12 February 2021, 7:25pm voice message at S-211	CXD-92A; PM-18A	20 September 2021
Autopsy, Toxicology & Medical Reports (including photographs)				
S-213	25 February 2021	Autopsy Report (Case Number: 21-000691-CR) dated 25 February 2021 in respect of Anis	-	20 September 2021
S-214	25 February 2021	Autopsy Report (Case Number: 21-000695-CR) dated 25 February 2021 in respect of Shohel	-	20 September 2021
S-215	25 February 2021	Autopsy Report (Case Number: 21-000696-CR) dated 25 February 2021 in respect of Marimuthu	-	20 September 2021
S-216	11 March 2021	Toxicology Report (Lab. No. 2103511-TX-001) dated 11 March 2021 in respect of Anis	-	20 September 2021
S-217	16 March 2021	Toxicology Report (Lab. No. 2103513-TX-001) dated 16 March 2021 in respect of Marimuthu	-	20 September 2021
S-218	25 March 2021	Toxicology Report (Lab. No. 2103512-TX-001) dated 25 March 2021 in respect of Shohel	-	20 September 2021
S-219	18 June 2021 – 2 July 2021	Medical Reports (MR/08664/2021) by Singapore General Hospital (“SGH”) dated 18 June, 21 June and 2 July 2021 in respect of Mehedi, with photographs (8) of Mehedi’s injuries	-	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-220	18 June 2021 – 3 July 2021	Medical Reports (MR/08675/2021) by SGH dated 18 June, 21 June and 3 July 2021 in respect of Lizon, with photographs (2) of Lizon’s injuries	-	20 September 2021
S-221	18 June 2021 – 3 July 2021	Medical Reports (MR/08678/2021) by SGH dated 18 June, 21 June and 3 July 2021 in respect of Yousuf, with photographs (5) of Yousuf’s injuries	-	20 September 2021
S-222	18 June 2021 – 3 July 2021	Medical Report (MR/08693/2021) by SGH dated 18 June, 23 June and 3 July 2021 in respect of Rahad, with photographs (2) of Rahad’s injuries	-	20 September 2021
S-223	21 June 2021 – 3 September 2021	Medical Reports (MR/08690/2021) by SGH dated 21 June, 5 July and 3 September 2021 in respect of Jitu	-	20 September 2021
S-224	21 June 2021	Medical Report (Ref: 265265) by Ng Teng Fong General Hospital (“NTFGH”) dated 21 June 2021 in respect of Miah	-	20 September 2021
S-225	28 June 2021	Medical Report (Ref: 265236) by NTFGH dated 28 June 2021 in respect of Zhao, with photographs (5) of Zhao’s injuries	-	20 September 2021
Files forensically extracted from mobile phones				
S-226	30 April 2021	Cover Report No. J/EP/0093/2021 in respect of Chua XD’s mobile phone, and the corresponding DVD-ROM marked J_EP_0093_2021	-	20 September 2021
S-227	30 April 2021	Cover Report No. J/EP/0097/2021 in respect of Marimuthu’s mobile phone, and the corresponding DVD-ROM marked J_EP_0097_2021	-	20 September 2021
S-228	20 May 2021	Cover Report No. J/EP/0109/2021 in respect of Moe’s mobile phone, and the corresponding CD-ROM marked J_EP_0109_2021	-	20 September 2021
S-229	16 June 2021	Addendum to Cover Report No. J/EP/0109/2021 in respect of Moe’s mobile phone, and the corresponding CD-ROM marked J_EP_0109_2021_Addendum	-	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-230	28 June 2021	Cover Report No. TCFB/2021/498 in respect of Mehedi's mobile phone, and the corresponding CD-ROM marked TCFB/2021/498	-	20 September 2021
S-231	11 August 2021	Addendum to Cover Report No. J/EP/0097/2021 in respect of the call logs from Marimuthu's mobile phone on 24 February 2021, and the corresponding CD-ROM marked J_EP_0097_2021_Addendum	-	20 September 2021
Other documents				
S-232	2015	Code of Practice on Workplace Safety and Health Risk Management, published by the Workplace Safety and Health Council (2015 edition)	CXD-46	20 September 2021
S-233	23 July 2015	MOM Circular on the Hazards and Controls of Combustible Dusts dated 23 July 2015	CXD-47	20 September 2021
S-234	29 July 2015	Welding certificate awarded to Nasim on 29 July 2015	MMN-1	20 September 2021
S-235	9 December 2016	Safety Data Sheet for Idemitsu Daphne Thermic 32-S oil	LSC-8	20 September 2021
S-236	10 May 2017	Material Safety Data Sheet for "Bentonite clay" from "shijiazhuang shengping materials co., ltd" (attached to email at S-252)	CXD-54	20 September 2021
S-237	25 October 2018	BizSAFE Risk Management Audit Report of Audit on Stars Engrg Pte Ltd dated 25 October 2018	CXD-2	20 September 2021
S-238	10 April 2019	Tenancy Agreement between Soon Hock Realty Pte Ltd and Stars Engrg Pte Ltd dated 10 April 2019	CXD-8	20 September 2021
S-239	June 2019	Attendance sheet and briefing materials from Stars' monthly safety briefing held in June 2019	CSY-4	20 September 2021
S-240	28 August 2019	Order Details document received by Chua XD from Laizhou Keda around 28 August 2019 in respect of the purchase of the Mixer Machine	CXD-20	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-241	3 September 2019	Email from Suntop Enterprise Pte Ltd to admin@shieldplus.com.sg dated 3 September 2019 at 12:07pm (attachment to this email at S-273)	CXD-48	20 September 2021
S-242	11 September 2019	Drawings with dimensions of the Mixer Machine (in colour), sent by Sherry of Laizhou Keda to Chua XD on 11 September 2019 at 10:04am via WhatsApp (at S-2, IM#35)	CXD-23; LMT-2 (greyscale)	20 September 2021
S-243	15 April 2020	Steel Deck Design Report calculation by DP Engineers dated 15 April 2020	CXD-18 (1 st document)	20 September 2021
S-244	15 April 2020	Sketch plan titled “Layout Plan and Information” and dated 15 April 2020, prepared by DP Engineers	CXD-18 (2 nd document); MMN-2	20 September 2021
S-245	June 2020 – January 2021	Maintenance checklists for the Mixer Machine for the months of June – December 2020, and January 2021	CXD-35	20 September 2021
S-246	16 June 2020	Invoice for purchase of 2 pails of Idemitsu Daphne Thermic 32-S oil dated 16 June 2020	LSC-1	20 September 2021
S-247	16 June 2020	Delivery order for purchase of 2 pails of Idemitsu Daphne Thermic 32-S oil dated 16 June 2020	CXD-32 (in colour); LSC-2 (greyscale)	20 September 2021
S-248	23 July 2020; 18 December 2020	3 Certificates of Conformity from Singapore Test Services for Shield+ Fire Wrap dated 23 July 2020, 18 December 2020 and 18 December 2020	CXD-10	20 September 2021
S-249	8 August 2020	Invoice for purchase of 4 pails of Idemitsu Daphne Thermic 32-S oil dated 8 August 2020	LSC-3	20 September 2021
S-250	8 August 2020	Delivery order for purchase of 4 pails of Idemitsu Daphne Thermic 32-S oil dated 8 August 2020	CXD-33; LSC-4	20 September 2021
S-251	October 2020	Attendance sheet and briefing materials from Stars’ monthly safety briefing held in October 2020	CSY-5	20 September 2021
S-252	23 October 2020	Email from info@sp-minerals.com to	CXD-55	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
		admin@shieldplus.com.sg attaching Material Safety Data Sheet for “Bentonite clay”, dated 23 October 2020 (attachment to this email at S-236)		
S-253	November 2020	Attendance sheet and briefing materials from Stars’ monthly safety briefing held in November 2020	CSY-6	20 September 2021
S-254	January 2021	Stars’ Organisational Chart (as of January 2021), prepared by Chua XD	CSY-2; CXD-3; LMT-35; PM-1; SS-1	20 September 2021
S-255	February 2021	Timesheets for Stars workers working at the Tuas Site for February 2021	CXD-42	20 September 2021
S-256	5 February 2021	Invoice for purchase of Idemitsu Daphne Thermic 32-S oil dated 5 February 2021	LSC-5	20 September 2021
S-257	5 February 2021	Delivery order for purchase of Idemitsu Daphne Thermic 32-S oil dated 5 February 2021	CXD-34; LSC-6	20 September 2021
S-258	20 February 2021	Quotation from Laizhou Keda to Shield+ for a new mixer machine dated 20 February 2021	CXD-100	20 September 2021
S-259	24 February 2021	First Information Report (Ref: J/20210224/0050) dated 24 February 2021 at 11:25:43am (redacted)	-	20 September 2021
S-260	1 March 2021	Stars’ ACRA Business Profile (generated on 1 March 2021)	CSY-1; CXD-1	20 September 2021
S-261	1 March 2021	Shield + Pte Ltd’s (“ Shield+ ”) ACRA Business Profile (generated on 1 March 2021)	CSY-3; CXD-7	20 September 2021
S-262	1 March 2021	Email from BirkAmidon to admin@shieldplus.com.sg dated 1 March 2021 (attachment to this email at S-274)	CXD-50	20 September 2021
S-263	12 July 2021	Printout from Alibaba.com showing information on the Mixer Machine and Laizhou Keda, obtained by MOM	CXD-21	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-264	-	Stars Engrg Pte Ltd's Safe Work Procedure for Manufacturing of Shield+ Fire Rated Wrap	CXD-56; IM-13; LMT-65	20 September 2021
S-265	-	Stars Engrg Pte Ltd's Safe Work Procedure for Installation of Conduit and Cable Supporting System (for project at River Valley Road)	CXD-57	20 September 2021
S-266	-	Stars Engrg Pte Ltd's Risk Assessment form for wrap manufacturing	CXD-58; LMT-68	20 September 2021
S-267	-	Stars Engrg Pte Ltd's Fall Protection Plan – Project Title: Shield Plus Operation at Tuas Factory	CXD-59; LMT-69	20 September 2021
S-268	-	Site Plan of Platinum@Pioneer showing location of the Tuas Site	CXD-4	20 September 2021
S-269	-	Ground floor plan of Platinum@Pioneer, with the Tuas Site workshop, Alif-E's unit and P3's units marked out (in red, green and blue respectively)	-	20 September 2021
S-270	-	Bill of Lading for the Mixer Machine (and its English translation)	CXD-24	20 September 2021
S-271	-	User Guide for the Mixer Machine	CXD-25	20 September 2021
S-272	-	Lubricant Product Information for “Daphne Thermic Oil Series” from Idemitsu Kosan Co.Ltd.	CXD-53; LSC-7	20 September 2021
S-273	-	Product Specification for “Native Potato Starch” from BirkAmidon with company stamp of Suntop Enterprise Pte Ltd (attachment to this email at S-241)	CXD-45	20 September 2021
S-274	-	Material Safety Data Sheet for “Potato Starch Superior” from BirkAmidon (attachment to this email at S-262)	CXD-49	20 September 2021
S-275	-	Chemical Safety Data Sheet for “potato starch” from Kimic Chemitech (S) Pte Ltd	CXD-51	20 September 2021
S-276	-	Safety Data Sheet for “Starch, from potato” from Sigma-Aldrich	CXD-52	20 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
Additional exhibits tendered by State Counsel at the hearing				
S-277	-	Photograph at IM-21 (S-123) with Imam’s marking in blue pen of where he thinks the dipstick inserted by Nasim on 7 August 2020 reached	-	20 September 2021
S-278	-	Photograph at IM-21 (S-123) with Nasim’s marking in red marker of where he thinks the dipstick he inserted on 7 August 2020 reached	-	22 September 2021
S-279	10 September 2021	Report titled “Failure Analysis of a Failed Mixer Machine retrieved from Unit 32E of Platinum @ Pioneer Building involved in a Fire Explosion Incident” prepared by Matcor Technology & Services Pte Ltd (“ Matcor ”) (“ Matcor’s report ”)	-	4 October 2021
S-279A	-	Curriculum Vitae (“ CV ”) of Robert Shandro, Principal Consultant, Matcor	-	4 October 2021
S-279B	-	CV of Ashley Ng Kwong Weng, Engineer, Matcor	-	4 October 2021
S-279C	-	CV of Lim Kie Yong, Operations Director, Matcor	-	4 October 2021
S-279D	-	CV of Naing Aung, Technician, Matcor	-	4 October 2021
S-279E	-	CV of Muhammad Hafiz bin Amzah, Technician, Matcor	-	4 October 2021
S-280	-	Page 58 of Matcor’s report, with Nasim’s markings on Figure 37 (photograph of the front of the Mixer Machine) in red marker of where he welded the two front corners of the Mixer Machine, and his markings in blue marker of where he welded the base plate onto the bottom of the Mixer Machine	-	22 September 2021
S-281	-	Page no. 69 of Matcor’s report (S-279), with Nasim’s markings on Figure 57 (photograph of the back of the Mixer Machine) in red marker of where he welded the back two corners of the mixer Machine, and his	-	22 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
		markings in blue marker of where he welded the base plate onto the bottom of the Mixer Machine		
S-282	-	Copy of the photograph at CXD-63 with Chua XD indication in black of half-height of the oil jacket, which is synonymous (to him) of the half-height of the cylinder	-	23 September 2021
S-283	13 September 2021	Report titled “Accident Investigation Report, Fire and Explosion at Stars Engrg Pte Ltd (32E, Tuas Avenue 11), prepared by Dr Shaik Mohamed Salim PhD, P.Eng. (SW-18), Principal Specialist Institute of Chemical and Engineering Sciences, A*STAR (“ Dr Salim’s Report ”)	-	5 October 2021
S-283A	4 October 2021	Addendum to Dr Salim’s Report (S-283), dated 4 October 2021	-	5 October 2021
S-283B	-	CV of Dr Shaik Mohamed Salim		5 October 2021
S-284	1 October 2020	Screenshots from Murugan’s mobile phone (taken on 29 September 2021) showing the full list of the members in the Shield+ WhatsApp Chat, and the photographs sent by Imam in the Shield+ WhatsApp Chat on 1 October 2020 at 7:02pm	-	30 September 2021
S-285	18 – 24 February 2021	Timesheets for Stars workers working at the Tuas Site past 7pm from 18 to 24 February 2021	-	1 October 2021
S-286	-	Photograph of the cross-section of Heater No. 2’s heating tube, provided by Matcor	-	4 October 2021
S-287	-	Close-up photograph of Heater No. 2’s heating tube, provided by Matcor	-	4 October 2021
S-288	14 September 2021	Fire Investigation Report dated 14 September 2021, prepared by SCDF	-	7 October 2021
S-288A	-	CV of MAJ Huang Weikang, Senior Fire Investigator with SCDF		7 October 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-289	4 October 2021	Report on Investigation Processes for the Inquiry Committee dated 4 October 2021, prepared by Lim Yin Yin Jaime, MOM lead investigator	-	5 October 2021
S-290	13 September 2021	Expert Opinion Report dated 13 September 2021, prepared by Emeritus Prof. Chew Yong Tian	-	7 October 2021
S-290A	-	CV of Emeritus Prof. Chew Yong Tian	-	7 October 2021
S-291	25 February 2021	Photograph showing the Mixer Machine's MCCB in the "on" state, taken by SCDF on 25 February 2021	-	7 October 2021
S-292	25 September 2021	Email from MOM investigation team (" Investigation Team ") to Laizhou Keda (Sherry Wang) on 25 September 2021 at 11:44pm, titled " <i>Request for Assistance from Laizhou Keda about Kneader Machine</i> ", with two attachments	-	15 October 2021
S-292A	25 September 2021	Attachment to S-292 titled " <i>Order details of Mixer Machine.jpg</i> "	-	15 October 2021
S-292B	25 September 2021	Attachment to S-292 titled " <i>Email List of Questions for Laizhou Keda.pdf</i> "	-	15 October 2021
S-293	14 October 2021	Email from Laizhou Keda (Sherry Wang) to Investigation Team on 14 October 2021 at 4:01pm, titled " <i>Re: RE: Request for Assistance from Laizhou Keda about Kneader Machine</i> ", with attachment and email chain	-	15 October 2021
S-293A	14 October 2021	Attachment to S-293 titled " <i>Keda response of the question list.pdf</i> "	-	15 October 2021
S-294	19 October 2021	Email from AGC to IC Secretariat and Rajah & Tann Singapore LLP (" R&T ") on 19 October 2021 at 7.58am, titled " <i>Inquiry into accident at Stars Engrg: Reply from LZKD</i> ", with three attachments	-	15 October 2021
S-294A	19 October 2021	Attachment to S-294 titled " <i>Email to LZKD (Sherry) dated 25 Sep 2021.pdf</i> "	-	15 October 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-294B	19 October 2021	Attachment to S-294 titled " <i>Email from LZKD (Sherry) dated 14 Oct 2021.pdf</i> "	-	15 October 2021
S-294C	19 October 2021	Attachment to S-294 titled " <i>Clarifications for LZKD - 19 Oct 2021.docx</i> "	-	15 October 2021
S-295	22 October 2021	Email from IC Secretariat to AGC and R&T on 22 October 2021 at 4:08pm, titled " <i>RE: Inquiry into accident at Stars E nrg: Reply from LZKD</i> ", with attachment and email chain	-	15 October 2021
S-295A	22 October 2021	Attachment to S-295 titled " <i>Clarifications for LZKD - 22 Oct 21 (final tracked version from IC.docx)</i> "	-	15 October 2021
S-296	22 October 2021	Email from R&T to AGC on 22 October 2021 at 4:08pm titled " <i>RE: Inquiry into accident at Stars Enrg: Reply from LZ KD</i> ", with attachment and email chain	-	15 October 2021
S-296A	22 October 2021	Attachment to S-296 titled " <i>2021.10.22 Stars - Clarifications to LZKD (ff).pdf</i> "	-	15 October 2021
S-297	23 October 2021	Email from Investigation Team to Laizhou Keda (Sherry Wang) on 23 October 2021 at 7:23pm, titled " <i>RE: RE: Request for Assistance from Laizhou Keda about Kneader Machine</i> ", with attachment	-	15 October 2021
S-297A	23 October 2021	Attachment to S-297 titled " <i>Follow-Up Questions (23 Oct 2021).pdf</i> "	-	15 October 2021
S-298	6 November 2021	Email from Laizhou Keda (Sherry Wang) to Investigation Team on 6 November 2021 at 3:32pm, titled " <i>Re: RE: RE: RE: Request for Assistance from Laizhou Keda about K neader Machine</i> ", with two attachments and email chain	-	15 October 2021
S-298A	6 November 2021	Attachment to S-298 titled " <i>Follow-Up Questions (23 Oct 2021).pdf</i> "	-	15 October 2021
S-298B	6 November 2021	CD-ROM containing attachment to S-298 titled " <i>testing video.mp4</i> "	-	15 October 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-299	10 November 2021	Report titled “Power Rating Calculation of New Heater” prepared by Matcor	-	15 October 2021
S-300	3 November 2021	Recommendations report prepared by Dr Salim dated 3 November 2021	-	15 October 2021
S-300A	15 November 2021	Slide deck from Dr Salim’s presentation of his recommendation report on 15 November 2021		15 October 2021
S-301	-	The Singapore Manufacturing Federation’s (“SMF”) inputs on the Explosion Incident at 32E Tuas Avenue 11	-	15 October 2021
S-301A	-	Background information on the SMF	-	15 October 2021
S-302	-	Written submissions to Inquiry Committee into the Explosion at 32E Tuas Avenue 11, prepared by the Institution of Engineers, Singapore (“IES”)	-	15 October 2021
S-302A	-	CV of Mr Felipe Ong, representative of IES	-	15 October 2021
S-303	-	Submission to the Inquiry Committee prepared by the Singapore Institution of Safety Officers (“SISO”)	-	15 October 2021
S-304	10 November 2021	Written Representation to the Inquiry Committee for the Fatal Accident at Stars Engrg Pte Ltd on 24 February 2021, prepared by SCDF	-	16 October 2021
S-305		Written submission prepared by the Workplace Safety and Health Council	-	16 October 2021
S-306		Written submission on recommendations prepared by MOM	-	16 October 2021
S-306A		Slide deck for Mr Silas Sng’s presentation of MOM’s written submission on recommendations on 16 November 2021	-	16 October 2021
S-307		Written representations prepared by the Singapore Food Agency	-	16 October 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Cross-reference to Witness Statement Exhibit (if applicable)	Admitted on
S-308		Written representations prepared by the Singapore Welding Society	-	16 October 2021
S-309		Written representations prepared by the Singapore National Employers Federation	-	16 October 2021
S-310		Written representations submitted by members of the public (consolidated)	-	16 October 2021
S-311	6 November 2021	Email from Laizhou Keda (Sherry Wang) to Investigation Team on 6 November 2021 at 4:05pm, titled " <i>List of the questions from Laizhou Keda</i> ", with attachment	-	16 October 2021
S-311A	6 November 2021	Attachment to S-311 titled " <i>List of the questions from Laizhou Keda .pdf</i> "	-	16 October 2021
Exhibit tendered by Stars at the hearing				
ST-1	15 September 2021	Report titled "Investigation into the Cause of the Explosion that occurred at 32 E Tuas Avenue 11, Singapore on 24 February 2021" dated 15 September 2021, prepared by D J Rose, BSc PhD CChem FRSC	-	6 October 2021

ANNEX H – LIST OF WITNESS STATEMENTS AND SUBMISSIONS

INQUIRY

**UNDER SECTION 26 OF THE WORKPLACE SAFETY AND HEALTH
ACT
INTO THE FATAL ACCIDENT
AT STARS ENGRG PTE LTD'S WORKPLACE AT 32E TUAS AVE 11**

LIST OF WITNESS STATEMENTS AND SUBMISSIONS

13 January 2022

LIST OF WITNESS STATEMENTS AND SUBMISSIONS

Exhibit Ref	Date (if applicable)	Document / Exhibit	Admitted on
Witness statements and submissions tendered by the State			
SS-1	20 September 2021	State Counsel’s Opening Statement	20 September 2021
SS-2	21 July 2021	Statement of Imam (SW-1) dated 21 July 2021	20 September 2021
SS-2A	-	Index to statement of Imam dated 21 July 2021 (SS-2), with cross-reference to exhibit markings in the Agreed Bundle (“AB”)	20 September 2021
SS-3	23 August 2021	Statement of Mehedi (SW-2) dated 23 August 2021 (redacted)	21 September 2021
SS-3A	-	Index to redacted statement of Mehedi dated 23 August 2021 (SS-3), with cross-reference to exhibit markings in the AB	21 September 2021
SS-4	12 August 2021	Statement of Nasim (SW-3) dated 12 August 2021	22 September 2021
SS-4A	-	Index to statement of Nasim dated 12 August 2021 (SS-4), with cross-reference to exhibit markings in the AB	22 September 2021
SS-5	24 August 2021	Statement of Murugan (SW-4) dated 24 August 2021	22 September 2021
SS-5A	-	Index to statement of Murugan dated 24 August 2021 (SS-5), with cross-reference to exhibit markings in the AB	22 September 2021
SS-6	27 August 2021	Statement of Chua XD (SW-5) dated 27 August 2021	23 September 2021
SS-6A	-	Index to statement of Chua XD dated 27 August 2021 (SS-6), with cross-reference to exhibit markings in the AB	23 September 2021
SS-7	3 August 2021	Statement of Moe (SW-12) dated 3 August 2021	29 September 2021
SS-7A	-	Index to statement of Moe dated 3 August 2021	29 September 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Admitted on
SS-8	-	Compilation of communications between Marimuthu, Chua XD and Moe on 24 February 2021 from 8:40am to 12:14pm	27 September 2021
SS-9	8 July 2021	Statement of Jitu (SW-6) dated 8 July 2021 (redacted)	28 September 2021
SS-9A	-	Index to redacted statement of Jitu dated 8 July 2021 (SS-9), with cross-reference to exhibit markings in the AB	28 September 2021
SS-10	23 June 2021	Statement of Yousuf (SW-7) dated 23 June 2021	28 September 2021
SS-10A	-	Index to statement of Yousuf dated 23 June 2021 (SS-10), with cross-reference to exhibit markings in the AB	28 September 2021
SS-11	29 June 2021	Statement of Rahad (SW-8) dated 29 June 2021	29 September 2021
SS-11A	-	Index to statement of Rahad dated 29 June 2021 (SS-11), with cross-reference to exhibit markings in the AB	29 September 2021
SS-12	23 June 2021	Statement of Lizon (SW-9) dated 23 June 2021	29 September 2021
SS-12A	-	Index to statement of Lizon dated 23 June 2021 (SS-12), with cross-reference to exhibit markings in the AB	29 September 2021
SS-13	15 June 2021	Statement of Miah (SW-10) dated 15 June 2021	29 September 2021
SS-13A	-	Index to statement of Miah dated 15 June 2021 (SS-13), with cross-reference to exhibit markings in the AB	29 September 2021
SS-14	15 June 2021	Statement of Zhao (SW-11) dated 15 June 2021	29 September 2021
SS-14A	-	Index to statement of Zhao dated 15 June 2021 (SS-14), with cross-reference to exhibit markings in the AB	29 September 2021
SS-15	16 June 2021	Statement of Sarkar Shibu (SW-13) dated 16 June 2021	1 October 2021

Exhibit Ref	Date (if applicable)	Document / Exhibit	Admitted on
SS-15A	-	Index to statement of Sarkar Shibu dated 16 June 2021 (SS-15), with cross-reference to exhibit markings in the AB	1 October 2021
SS-16	22 July 2021	Statement of Chua Shi Yong Desmond (SW-14) dated 22 July 2021	1 October 2021
SS-16A	-	Index to statement of Chua Shi Yong Desmond dated 22 July 2021 (SS-16), with cross-reference to exhibit markings in the AB	1 October 2021
SS-17	26 August 2021	Statement of Sharon Lee (SW-15) dated 26 August 2021	1 October 2021
SS-17A	-	Index to statement of Sharon Lee dated 26 August (SS-17), with cross-reference to exhibit markings in the AB	1 October 2021
SS-18	10 December 2021	Closing Submissions by State Counsel	15 December 2021
SS-19	15 December 2021	Outline of State Counsel's Oral Closing Submissions	15 December 2021
SS-19A	-	Jason Beer <i>QC</i> , <i>Public Inquiries</i> (2011), pages 231-234	15 December 2021
Submissions tendered by Stars			
STS-1	10 December 2021	Interested Party's Written Submissions to the Inquiry Committee	15 December 2021