

# OPUS 2

## INTERNATIONAL

Grenfell Tower Inquiry

Day 69

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1 Wednesday, 11 November 2020  
2 (10.00 am)  
3 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to  
4 today's hearing.  
5 Today we're going to start hearing evidence from  
6 witnesses for Celotex, who were the manufacturers of  
7 most of the insulation that was used in the  
8 refurbishment.  
9 Yes, Mr Millett .  
10 MR MILLETT: Mr Chairman, good morning. I'm now going to  
11 call Mr Jonathan Roome, please.  
12 SIR MARTIN MOORE-BICK: Thank you.  
13 MR JONATHAN ROOME (affirmed)  
14 SIR MARTIN MOORE-BICK: Thank you very much, Mr Roome.  
15 Would you like to sit down and make yourself  
16 comfortable.  
17 THE WITNESS: Thank you.  
18 SIR MARTIN MOORE-BICK: Right.  
19 Yes, Mr Millett .  
20 MR MILLETT: Mr Chairman, thank you.  
21 Questions from COUNSEL TO THE INQUIRY  
22 MR MILLETT: Mr Roome, good morning. Can I begin by  
23 thanking you very much for coming to the Inquiry today  
24 and giving us the evidence you're going to give us.  
25 If you have any difficulty understanding any of the

1

1 questions that I'm asking you, I'm very happy to repeat  
2 the question or put the question in a different way.  
3 If you need a break at any point, just let us know.  
4 We will be taking scheduled breaks mid-morning and  
5 mid-afternoon.  
6 Could you please also try and keep your voice up so  
7 that the person who sits to your immediate right, the  
8 transcriber, can get down your evidence.  
9 Now, you have made one statement dated  
10 28 September 2018, I think. Could I please show you  
11 that. It will be at {CEL00010031}. It should also be  
12 on the screen in front of you, as well as in the folder  
13 on your desk.  
14 Can you confirm that is your statement?  
15 A. There is nothing coming up on the screen, just to  
16 explain.  
17 SIR MARTIN MOORE-BICK: You haven't got it on your screen  
18 yet?  
19 A. No, there's nothing coming up on the screen.  
20 SIR MARTIN MOORE-BICK: Well, we must solve that.  
21 A. I can just see you, Mr Millett .  
22 MR MILLETT: That's not going to help you. Can we solve  
23 that problem?  
24 SIR MARTIN MOORE-BICK: We will see if we can solve that  
25 now.

2

1 A. Yes, it's up.  
2 MR MILLETT: Very good, thank you very much. If anything  
3 happens again with your screen, please let us know  
4 straight away and we'll solve it .  
5 A. I will do.  
6 Q. Is that your statement, looking at the first page?  
7 A. It seems to be, yes.  
8 Q. Yes, okay. Can I show you page 24 {CEL00010031/24},  
9 please. Is that your signature --  
10 A. It is, yes.  
11 Q. -- above the date and the name? It is .  
12 Have you read this witness statement recently?  
13 A. I have.  
14 Q. Are its contents true, can you confirm?  
15 A. They are.  
16 Q. Have you discussed your evidence with anybody before  
17 coming here today?  
18 A. No.  
19 Q. I will begin with some questions about your  
20 qualifications, if I may.  
21 Can I show you your statement at page 4  
22 {CEL00010031/4} and look at paragraphs 17 and 18 with  
23 you.  
24 At 17 you say you have five GCSEs in mathematics,  
25 English language, English literature, physics and

3

1 chemistry, and a BTEC National Diploma in business and  
2 finance from Brooklands College, and a CSCS,  
3 Construction Skills Certification Scheme, construction  
4 related occupation card, registration 02622511.  
5 You also set out your experience at paragraphs 19  
6 through to 22, and you say -- and I'm not going to read  
7 it all out to you -- in 1994 you joined  
8 Saville & Holdsworth as a client support executive.  
9 They were psychometric testers. In 1997 you joined  
10 GE Lighting as part of General Electric as a pricing  
11 specialist. If we go over the page to page 5  
12 {CEL00010031/5}, paragraph 21, we see that you then  
13 joined Great Eastern Trading in 2004 as a national  
14 account manager, looking after the company's account  
15 with B&Q. In March 2007, you joined Hilti as an account  
16 manager in the M&E, mechanical and electrical, division  
17 for the West London region, as you say there, and then  
18 after three years you became a project manager in the  
19 company for all client construction and engineering  
20 relationships on the Heathrow Airport campus. You  
21 explain a little bit more there about your experiences  
22 at Hilti .  
23 Am I right in thinking that, beyond your BTEC in  
24 business finance and your CSCS card, you have no  
25 technical qualifications?

4

1 A. That's correct.  
 2 Q. And you have no professional qualifications either?  
 3 A. No, that's correct.  
 4 Q. And you never worked as an architect?  
 5 A. No.  
 6 Q. Or a designer?  
 7 A. No.  
 8 Q. Or in a building control body?  
 9 A. No.  
 10 Q. Before you joined Celotex, had you ever done any  
 11 professional training on the Building Regulations?  
 12 A. No, I hadn't.  
 13 Q. So you didn't have any training either on Approved  
 14 Document B or the UK or European testing regimes for  
 15 materials?  
 16 A. No.  
 17 Q. Now, you joined Celotex in March 2014, I think, didn't  
 18 you?  
 19 A. That's correct.  
 20 Q. And prior to that, you had worked at Hilti since 2007,  
 21 as say at paragraph 22 in your statement.  
 22 A. That's correct.  
 23 Q. Now, Hilti is a company, is it, that provides technology  
 24 and services for the construction industry? Is that  
 25 right?

5

1 A. Yes, that's correct.  
 2 Q. From 2012, is it right that you worked as a sales  
 3 specialist in Hilti's building envelope division?  
 4 A. Correct.  
 5 Q. And you I think say that that was the design and build  
 6 of the exterior of a building.  
 7 A. Correct.  
 8 Q. That's what it involved, is it?  
 9 A. Yeah.  
 10 Q. Did that include working on projects with rainscreen  
 11 cladding?  
 12 A. It did.  
 13 Q. So do we take it from that that you had some knowledge  
 14 of cladding projects by the time you joined Celotex?  
 15 A. I did, yeah.  
 16 Q. Let's look at {CEL00010031/5} -- this is your  
 17 statement -- at paragraph 22, and the last sentence  
 18 there. You say that it was that experience, namely your  
 19 experience at Hilti's building envelope division, that  
 20 led you to join Celotex in March 2014. That's right, is  
 21 it?  
 22 A. That's part of the reason, yes.  
 23 Q. What was the other part?  
 24 A. I was looking for a new position and a different company  
 25 to work for. I'd decided that I wanted to leave Hilti

6

1 and experience a new job with better pay.  
 2 Q. Were you recruited specifically because of your  
 3 understanding of sales in relation to building envelope  
 4 systems?  
 5 A. No.  
 6 Q. When you joined Celotex, your job title, I think, was  
 7 major product/specification manager.  
 8 A. That's correct.  
 9 Q. Was that effectively a sales role?  
 10 A. Basically, yes.  
 11 Q. Right.  
 12 Now, we look at paragraph 27 of your statement on  
 13 the next page, please, page 6 {CEL00010031/6}. You  
 14 identify an exhibit, an email exchange there, and if we  
 15 look at paragraph 27, you say:  
 16 "My role at Celotex was to promote its insulation  
 17 products and services to key stakeholders such as  
 18 architects, developers, main contractors, installers and  
 19 consultants in London and the Home Counties."  
 20 Can we take it from that that the potential  
 21 customers for Celotex products that you were expecting  
 22 to deal with would include some highly qualified  
 23 professionals?  
 24 A. That's correct.  
 25 Q. Those professionals might well ask you difficult,

7

1 technical questions from time to time?  
 2 A. They would, yes.  
 3 Q. Was there a support system or resource within Celotex  
 4 that you could go to if you had trouble answering any  
 5 technical enquiries from potential customers, such as  
 6 architects or developers?  
 7 A. There was, yes.  
 8 Q. Who was that? Or what was it?  
 9 A. So the system was that there was a technical team within  
 10 Celotex who were basically desk-bound who would be  
 11 taking incoming calls or emails, any sort of enquiries,  
 12 namely, or mostly, significantly, the thermal  
 13 calculations requested, and if there was any other  
 14 further performance-led criteria that needed to be  
 15 answered, then that team would be the one that would  
 16 predominantly deal with those enquiries.  
 17 Q. I see. Who ran that desk? Who ran the technical team?  
 18 A. I think at the -- do you have a picture of my organogram  
 19 that you can bring up?  
 20 Q. Yes, we do.  
 21 A. It might be useful to have a look to refresh my memory.  
 22 Q. It's {CEL00012298}.  
 23 A. So if we look at the third column -- I don't know if you  
 24 can blow that up a bit more -- the head of technical for  
 25 Celotex was Rob Warren, and below him then there were

8

1 different areas. So the person who headed up the sort  
 2 of call centre team, the technical team, under  
 3 Rob Warren would have been Jamie Hayes, so he would have  
 4 been dealing with the day-to-day running of enquiries  
 5 that were coming through by email, by phone.  
 6 Q. Yes, and we can see Louise Garlic's name there and also  
 7 Jamie Hayes.  
 8 A. Jamie Hayes is the person I just referred to who was  
 9 looking after the technical team.  
 10 Q. Yes.  
 11 Now, you say that your role involved delivering CPD  
 12 presentations.  
 13 A. That's correct.  
 14 Q. What kinds of presentations did you give?  
 15 A. It would have been -- or it was, sorry, I should say,  
 16 a CPD which was all-encompassing to explain the role of  
 17 Celotex, the products that they offered, and the  
 18 services they offered, so things like the thermal  
 19 calculations, the products, where they could be used,  
 20 and also SAP and SBEM assessments, which was a separate  
 21 company which was under the Celotex banner who would be  
 22 able to work out the complete thermal performance of  
 23 a building.  
 24 Q. Did you give CPD presentations to architects habitually?  
 25 A. I did, yes.

9

1 Q. So you would go to their offices, would you, and  
 2 present?  
 3 A. When requested I would, yes.  
 4 Q. What was the commercial purpose of Celotex sending  
 5 somebody like you to make those sorts of presentations?  
 6 A. It was to engage with the architects at sort of the  
 7 beginning of the design process, as it were, not  
 8 necessarily on a particular project but just to  
 9 instigate a sort of an interest in the use of Celotex  
 10 products over one of their competitors.  
 11 Q. I see, so with an eye to them selecting Celotex --  
 12 A. Correct.  
 13 Q. -- instead of another competitor of yours?  
 14 A. Yes.  
 15 Q. I see.  
 16 Did you ever give presentations on fire performance  
 17 of any Celotex product?  
 18 A. I didn't, no.  
 19 Q. Did you ever give any CPD presentations involving  
 20 anything technical?  
 21 A. No, not -- there was just the one general CPD that  
 22 covered all of the products and the services.  
 23 Q. Did any of those presentations include the FR5000  
 24 product, before August 2014 when RS5000 was launched?  
 25 A. It would likely be one of the products that was in the

10

1 whole mix, so I would have gone through each of the  
 2 product and where that would have been relevant to be  
 3 used or potentially used on the building.  
 4 Q. Did you present, if that's the right word, where FR5000  
 5 could be used on a building?  
 6 A. It would -- I can't recall, but it would -- it's likely.  
 7 Q. What claims do you remember, in general, you would make  
 8 to those listening to your CPD presentations about where  
 9 FR5000 could be used?  
 10 A. I suppose before any above 18 metres or any reference to  
 11 the high-rise buildings, it would have just been  
 12 a generic --  
 13 Q. Right.  
 14 A. -- application on a wall of a building.  
 15 Q. Right. Did you ever say, "It can't be used above  
 16 18 metres"?  
 17 A. In those initial stages, no, that wasn't part of the  
 18 presentation.  
 19 Q. Did you ever give CPD presentations to other colleagues  
 20 of yours within Celotex?  
 21 A. No, the whole purpose of the CPD was to present to  
 22 professionals who needed to earn points towards their  
 23 professional development.  
 24 Q. I follow.  
 25 Did you ever give the CPD presentations to

11

1 building control officers?  
 2 A. Not that I can remember, no.  
 3 Q. Or approved inspectors?  
 4 A. No, I don't think so.  
 5 Q. What about local authorities more generally?  
 6 A. Not that I can remember, no.  
 7 Q. Right.  
 8 Can I then turn to another topic, which is the  
 9 properties of Celotex PIR products. I want to  
 10 understand your understanding of FR5000 and RS5000 at  
 11 the time of the Grenfell Tower project.  
 12 How much technical knowledge did you have at that  
 13 time in relation to the manufacturing of Celotex's  
 14 products?  
 15 A. Very little. I suppose the extent was to be shown  
 16 around the factory and given the bullet points as to the  
 17 performance of the material.  
 18 Q. You understood at the very least that Celotex FR5000 and  
 19 then latterly RS5000 were PIR boards, polyisocyanurate  
 20 boards?  
 21 A. Yes, I was aware of those.  
 22 Q. And that they were thermosetting insulants --  
 23 A. Correct.  
 24 Q. -- by definition?  
 25 A. Yes.

12

1 Q. Now, Ray Bailey of Harley said -- and I'll show you what  
2 he says in his statement. It's {HAR00010184/32},  
3 please. I just want to show you what he says at  
4 paragraph 126. This is under the question that he's  
5 been asked:

6 "How commonly used are: (i) these particular  
7 cladding panels; (ii) this type of insulation ..."

8 Et cetera, and I don't need anything else, and in  
9 paragraph 126 he says:

10 "The introduction of Part L, requiring the upgrade  
11 of insulation values, values, led to the development of  
12 rigid foam boards made from PIR or PUR, and these were  
13 aggressively marketed to the industry as a whole, in  
14 order to meet the Government's demands for energy  
15 conservation."

16 Do you agree with him that the need to meet thermal  
17 efficiency requirements was, at your time at Celotex,  
18 a major driver of the insulation market?

19 A. I think in all aspects of the application of insulation  
20 products it was a driver for the Government to save  
21 energy, basically, yeah, and the use of these types of  
22 products was one of the ways of retaining energy within  
23 the building.

24 Q. So thermal efficiency effectively means reducing the  
25 amount of heat transfer in and out of the building?

1 A. The amount of heat loss and the amount of energy and  
2 cost lost, yes.

3 Q. Heat loss or cold gain, if you like.

4 A. Yes, exactly.

5 Q. Is it fair to say that better insulation prevents heat  
6 transfer and, therefore, the better the insulation for  
7 that purpose, the better for marketing purposes?

8 A. That's true, yes.

9 Q. Were you aware at the time that the thermal performance  
10 was represented by something called a lambda value?

11 A. That's correct.

12 Q. Now, you may be aware the product that was originally  
13 specified for use on Grenfell Tower was FR5000. Did you  
14 know that?

15 A. I was made aware of that at some point, yes.

16 Q. At some point during your involvement with the  
17 Grenfell Tower project, so far as you were?

18 A. I think it was brought to my attention by Harley, yes.

19 Q. Right. Do you remember when?

20 A. I can't remember off the top of my head, but it may have  
21 been late 2014, potentially.

22 Q. Right. We'll look at some documents which might help  
23 your recollection in due course.

24 A. Okay. Thank you.

25 Q. Before I go there, can we look at {MAX00000216}, please.

1 This is the datasheet for Celotex FR5000, and it's  
2 issue 2. If you look at the top right-hand corner of  
3 this document, you can see that it's dated January 2012.  
4 So that's before you joined in 2014, as we know.

5 When you arrived at Celotex in March 2014, did you  
6 become familiar with this document?

7 A. I would have been able to reference it if I needed to  
8 look at particular data within it, yes.

9 Q. Did you, after you arrived, have an opportunity or  
10 a need to look at it in any detail in order to answer  
11 any questions that a customer might have posed to you?

12 A. I may have done, yes. I often used documents like these  
13 to refresh my memory and to be able to give over facts.

14 Q. Are you able to tell us who within Celotex compiled this  
15 document?

16 A. From experience, it would have been the product --  
17 between the product management and marketing  
18 departments, who were one, basically.

19 Q. Can we look at the first paragraph. It says, under  
20 "Introduction":

21 "Celotex FR5000 is our premium performance PIR  
22 solution."

23 Then there's rather a long sentence:

24 "Through ongoing product innovation and breakthrough  
25 design, FR5000 represents pioneering progression within

1 the PIR market offering an insulation board with ..."

2 Then you read down a little bit and it says:

3 "... Class 0 fire performance ..."

4 Do you see that?

5 A. I do.

6 Q. Then if you look at the third chunk of text down, there  
7 are six bullet points, underneath a sentence that says:  
8 "With FR5000, you are specifying an insulation board  
9 that ..."

10 Then it says:

11 "Has Class 0 fire performance throughout the entire  
12 product in accordance with BS 476."

13 Did you ever have occasion to look at those  
14 references to class 0 fire performance that I've just  
15 read to you in this document at the time?

16 A. Sorry, in what respect?

17 Q. Did you ever have a need to look at FR5000's fire  
18 performance and look at this document in order to check  
19 it?

20 A. I may have done if I was asked.

21 Q. What did you understand the significance of FR5000  
22 having class 0 fire performance to have been?

23 A. Just that it met with a particular British Standard.

24 Q. What did that signify to you?

25 A. That ... my understanding of these types of products or

1 this product was that class 0 represented a particular  
 2 two references in the BS 476 standard for -- I think  
 3 it's surface spread of flame and fire propagation, and  
 4 having those both passed would then relate to the  
 5 class 0 -- sorry, class 0, it was in the industry  
 6 referenced "class 0" quite often -- performance.  
 7 Q. What would be the benefit of a product having class 0  
 8 be, did you think?  
 9 A. I was told that it was a laboratory test and it was some  
 10 sort of resistance to fire .  
 11 Q. Did you know anything more than that?  
 12 A. No.  
 13 Q. Did you ever go and look at the tests on which this  
 14 claim was based?  
 15 A. No, I didn't. I wouldn't have had access to those sorts  
 16 of documents.  
 17 Q. You wouldn't have had access to them? Does that mean  
 18 you were barred access or you wouldn't have had access  
 19 easily?  
 20 A. I don't think anyone within the sales team would have  
 21 ever had access to any of the test data behind any of  
 22 these products.  
 23 Q. What if you were challenged by a knowledgeable customer  
 24 or architect or designer who actually asked for these  
 25 tests?

17

1 A. Well, I would pose the question to those that had access  
 2 to those documents and ask them to, you know, either  
 3 release those documents, if they would -- I don't think  
 4 they ever did -- because I was not party to those  
 5 documents.  
 6 Q. In the last two answers, you are giving me the  
 7 impression -- and please correct it if it's the wrong  
 8 impression, Mr Roome -- that the sales team was  
 9 essentially barred from actually seeing the test data;  
 10 in other words, that is something that you wouldn't be  
 11 allowed to see. Is that right?  
 12 A. Well, it's something we were never given. We were ...  
 13 it's only latterly, I suppose, in my tenure within  
 14 Celotex when I was posed those exact type of questions,  
 15 could I have access or could this specialist have access  
 16 to things like the fire testing documents, that I was  
 17 told that they were, I suppose -- I'm trying to think of  
 18 the word ... I can't think of the word, but they weren't  
 19 allowed out of the business, out of the custodians of  
 20 those documents.  
 21 Q. Right. But within Celotex, just to pin down the point  
 22 a little bit more, do I take it that there was  
 23 effectively a wall between the sales team and the  
 24 technical team, whereby the sales team would not be  
 25 allowed to have access to the technical data, the test

18

1 data?  
 2 A. Yes, we were only allowed -- we were only shown what we  
 3 were allowed to be shown.  
 4 Q. Looking at the fourth bullet point down, "Has Class 0  
 5 fire performance throughout the entire product in  
 6 accordance with BS 476", what did you understand at the  
 7 time, if anything, by the expression "Class 0 fire  
 8 performance throughout the entire product in accordance  
 9 with BS 476", focusing on the words "throughout the  
 10 entire product"?  
 11 A. I think it meant -- from my recollection, it meant that  
 12 the whole product -- so the product comprises of the  
 13 foam board but also of the aluminium -- what they call  
 14 the facer on either side, and as far as I can  
 15 understand, class 0 or 0 related to the full product or  
 16 all of the components combined.  
 17 Q. Did you?  
 18 Do you know whether FR5000 -- 5000 as opposed to  
 19 4000 -- was ever subjected to a BS 476 test of the core?  
 20 A. I wouldn't be able to tell you that.  
 21 Q. Right.  
 22 Did you know that FR5000 was not a material of  
 23 limited combustibility?  
 24 A. I knew that, yes.  
 25 Q. You knew that?

19

1 A. Yeah.  
 2 Q. Did you know that it had not passed a test which met  
 3 criteria under BR 135 using full-scale test data under  
 4 BS 8414?  
 5 A. I knew -- yes, I knew, once RS5000 -- that was the  
 6 reason that RS5000 was brought to the market.  
 7 Q. Indeed. Therefore, did you understand that FR5000  
 8 couldn't be used in external wall constructions on  
 9 buildings over 18 metres?  
 10 A. I did.  
 11 Q. Did you always know that after you joined Celotex?  
 12 A. I can't remember when exactly, but it was asked of us at  
 13 one point for a project and I passed that question to  
 14 the technical team, and they responded that FR5000 could  
 15 not be used in a building above 18 metres.  
 16 Q. Now, let's go to {CLG0000224/119}, please. I would  
 17 like just to show you this part of appendix A of  
 18 Approved Document B.  
 19 Now, Mr Roome, I'm going to proceed on the basis  
 20 that you're not familiar with this document, or at least  
 21 weren't familiar with it at the time you were at  
 22 Celotex; would that be fair?  
 23 A. It was a document that I was introduced to, so it was  
 24 one that I would have become more familiar with during  
 25 my time at Celotex.

20

1 Q. Thank you.  
 2 Let's look at this on the page, "Appendix A:  
 3 Performance of materials, products and structures",  
 4 note 2:  
 5 "Any test evidence used to substantiate the fire  
 6 resistance rating of a construction should be carefully  
 7 checked to ensure that it demonstrates compliance that  
 8 is adequate and applicable to the intended use. Small  
 9 differences in detail (such as fixing method, joints,  
 10 dimensions and the introduction of insulation materials  
 11 etc.) may significantly affect the rating."  
 12 Were you aware of that note within appendix A of ADB  
 13 when you joined Celotex or at any time thereafter when  
 14 you worked at Celotex?  
 15 A. I think latterly, after the launch of RS5000.  
 16 Q. Just to complete the tour of the document, can we go,  
 17 please, to page 122 {CLG00000224/122} and look at  
 18 paragraph 16 in the bottom left-hand corner. It says  
 19 there:  
 20 "Results of tests on proprietary materials are  
 21 frequently given in literature available from  
 22 manufacturers and trade associations.  
 23 "Any reference used to substantiate the surface  
 24 spread of flame rating of a material or product should  
 25 be carefully checked to ensure that it is suitable,

1 adequate and applicable to the construction to be used.  
 2 Small differences in detail, such as thickness,  
 3 substrate, colour, form, fixings, adhesive etc, may  
 4 significantly affect the rating."  
 5 Again, were you familiar with that provision in  
 6 Approved Document B?  
 7 A. I would have read this document at some point, again at  
 8 some point through my tenure within Celotex, most likely  
 9 after the launch of RS5000.  
 10 Q. Right.  
 11 Were you trained or equipped to answer any questions  
 12 from customers who did choose carefully to check the  
 13 test evidence supporting the claim for class 0 in the  
 14 FR5000 datasheet, for example?  
 15 A. I would only be able to respond to them with the  
 16 literature that I had available to me.  
 17 Q. What would you have done if an architect or designer or  
 18 a consultant had come to you with paragraph 16 that we  
 19 can see on the page there and said, "I want to carefully  
 20 check your reference which you're using to substantiate  
 21 your class 0 surface spread of flame claim"?  
 22 A. I would have forwarded that question directly to the  
 23 technical team to be answered.  
 24 Q. Yes, I see.  
 25 We have been looking very briefly at lambda values.

1 Now, we can see, if we can go back to the datasheet --  
 2 perhaps we don't need to -- that was marketed as having  
 3 a lambda value of 21, 0.021. Do you remember that?  
 4 A. I do, yes.  
 5 Q. Were you aware of how Celotex went about quantifying the  
 6 lambda value of its products in general?  
 7 A. When I joined the company I was -- there was  
 8 an introduction to the company, so I had things like  
 9 a factory tour, for instance, and that involved sort of  
 10 walking round with members within the factory to take  
 11 a look at the different production lines and also the  
 12 sort of -- I suppose the little testing area they had  
 13 where they sort of tried to show me the cribs in which  
 14 they performed the -- well, the class O/class 0 testing,  
 15 the BS 467, which they needed to take examples of each  
 16 of the products to validate, and one of which was the  
 17 lambda value. There was a way of testing the lambda  
 18 value.  
 19 I didn't really pay too much attention, I wouldn't  
 20 be able to tell you too much about the process, but  
 21 I knew that they did it in-house within the factory, and  
 22 they had to take spot-checks of each of the production  
 23 runs of the material.  
 24 Q. Right.  
 25 Can we go to {CEL00001200}, this is an email from

1 Jonathan Roper, or Jon Roper as he calls himself, to you  
 2 on 28 April 2014, and there are some attachments to it,  
 3 as you can see. He says:  
 4 "Jonathan,  
 5 "As promised, find attached the training  
 6 presentations we've gone through this morning as well as  
 7 BS 13165 (the standard all PIR manufacturers produce to)  
 8 and BS 8414-1 (the cladding fire test).  
 9 "Any questions, give me a shout."  
 10 Do you remember attending those training  
 11 presentations he's referring to?  
 12 A. Not specifically, but this might have been part of my --  
 13 or it would have been part of the sort of initial  
 14 training that was given to me, as would have been given  
 15 to anyone who started with the company.  
 16 Q. Was there any discussion during those presentations to  
 17 which he's referring of what came to be launched as  
 18 RS5000 later in the year?  
 19 A. I can't be sure.  
 20 Q. Let's look at {CEL00001201}, please. This is the first  
 21 of the attachments, the "CE Marking & Best in Class"  
 22 slides. If you look at that, it's entitled "Technical  
 23 Training", and if you look at the next page  
 24 {CEL00001201/2}, it says:  
 25 " CE Marking.

1 •" Best In Class.  
 2 •" Q&A."  
 3 With 45 minutes being allocated to best in class .  
 4 If you go to slide 25 {CEL00001201/25}, if we can,  
 5 there is a quiz. I don't know if you remember this  
 6 quiz. Do you remember this quiz?  
 7 A. Not --  
 8 Q. Right.  
 9 A. -- vividly , no.  
 10 Q. No, right .  
 11 Look at question 4. It says:  
 12 "Which Two Tests Must Be Passed To Obtain Class 0  
 13 Fire Rating?"  
 14 Do you see that?  
 15 A. I do.  
 16 Q. We can see the answer which is given on the next slide ,  
 17 which is page 26 {CEL00001201/26}, bullet point 4,  
 18 "BS 476 Part 6 & 7".  
 19 Does it follow that by this point -- this is late  
 20 April 2014 -- at the very latest , you were aware of what  
 21 class 0 was and what tests you had to pass in order to  
 22 obtain it ?  
 23 A. That would be correct, yes.  
 24 Q. Yes.  
 25 The slides then go on to address the history of the

25

1 Celotex FR5000 range, don't they? Do you remember that?  
 2 Let's look at them, if you're --  
 3 A. Yes, please.  
 4 Q. -- going to puzzle over it .  
 5 Slide 28 on page 28 {CEL00001201/28}, if we can pick  
 6 that up, "History of FR/CG", and it says at the top of  
 7 the page there:  
 8 "FR4000 Launched In April 2008."  
 9 With a lambda of 22 and class 0 fire performance.  
 10 "Strategy To Create Competitive Advantage With  
 11 Phenolic Solely On Fire ."  
 12 Just pausing there, did you understand that the  
 13 reason for the development of Celotex's FR range was to  
 14 compete with phenolic products on fire performance?  
 15 A. I don't recall that particular statement, no.  
 16 Q. Did you get the impression at this time, late  
 17 April 2014, that the development of PIR products was to  
 18 compete with Kingspan Kooltherm K15 in particular, as  
 19 a particular product?  
 20 A. Not particularly , no. I know Kooltherm as a range was  
 21 or is their highest performance range of boards, and  
 22 I can only deduce that the idea that Celotex were  
 23 launching the 5000 over the 4000 would mean that they  
 24 would bridge that thermal gap and make it more  
 25 competitive thermally.

26

1 Q. If we go to page 51 {CEL00001201/51}, we can see  
 2 slide 51, and that sets out a comparison there between  
 3 phenolic and FR5000. It says in the fourth bullet point  
 4 down, "Class 0 Throughout The Entire Product".  
 5 Was that a claim in relation to FR5000? It looks  
 6 like it was.  
 7 A. It looks like it , yes.  
 8 Q. Do you remember whether there was any elaboration of  
 9 that point during this training presentation?  
 10 A. I think it was something to do with the way that  
 11 Kingspan and their statement of class 0 or 0 didn't  
 12 apply to the full product, the complete product. But  
 13 I can't be sure exactly what element of it did not meet  
 14 that criteria .  
 15 Q. You refer to Kingspan in that answer, so do we take it  
 16 from that that the reference to phenolic in the title  
 17 banner, "Celotex FR5000 vs. Phenolic", should be read as  
 18 versus Kingspan K15?  
 19 A. I would say so, yes, because Kingspan were or are the  
 20 largest manufacturer of the phenolic type of insulation  
 21 boards in the country.  
 22 Q. Does the fourth bullet point down therefore tell us that  
 23 the view in Celotex at the time was that Kingspan K15  
 24 did not have class 0 throughout the entire product?  
 25 A. Well, I think the K range, not just K15, because FR5000

27

1 wasn't up against any particular product of Kingspan,  
 2 that would have been the RS5000 that came later. So the  
 3 K relates to Kooltherm, and that would have been that  
 4 range of boards, high-performance boards.  
 5 Q. And just to repeat the question, does that tell us that  
 6 the view in Celotex at the time was that the K range  
 7 sold by Kingspan did not have class 0 throughout the  
 8 entire product?  
 9 A. I think that's what was being put out there, yes.  
 10 Q. Was there any discussion at this presentation about what  
 11 "class 0 throughout the entire product" meant?  
 12 A. I can't be sure, but I think it was something to do with  
 13 the foam and the aluminium facers being the complete  
 14 package.  
 15 Q. Right.  
 16 A. So class 0 or class 0 related to the whole thing rather  
 17 than just the aluminium or just the foam, but I can't  
 18 remember which way round it was.  
 19 Q. Can we look at {CEL00001203}, please. This is one of  
 20 the other presentations that Jon Roper sent to you on  
 21 28 April which he attached, and this is about  
 22 third-party approvals, as you can see from the first  
 23 page.  
 24 Can we go to page 13 in that {CEL00001203/13},  
 25 please, which is the last slide in the deck. It says as

28



1 a title :

2 "What We Don't Have ...

3 •" LPCB.

4 •" FM Approval.

5 •" Above 18m Fire Test."

6 Now, do you remember this particular slide? Does it

7 ring a bell with you?

8 A. Not particularly , no.

9 Q. Do you remember whether you had any cause to ask

10 yourself: what does "Above 18m Fire Test" mean?

11 A. I think I may have known that term from being in

12 cladding or being sort of around cladding products

13 before that time when I was at Hilti , so that wouldn't

14 have been a new term to me.

15 Q. What did you think it meant?

16 A. Well, certain products of a certain nature or flammable

17 nature could not be used above a certain height in

18 a building.

19 Q. Just to try to tease out the point, did that mean that

20 Celotex didn't have a material of limited

21 combustibility?

22 A. Well, I don't think they ever had a product of limited

23 combustibility. It could never have been classified as

24 that.

25 Q. Right.

29

1 What would have been the test in the above-18-metre

2 fire test that you understood this slide to mean? Would

3 it be a test for limited combustibility or a test under

4 BS 8414?

5 A. It would have been a test under BS 8414.

6 Q. Right. And that would have been distinct from whether

7 a product had class 0, clearly?

8 A. Yeah, because class 0 or class 0 would not have

9 qualified a product to be used above 18 metres, if it

10 was an insulant.

11 Q. Yes, exactly. Just to be clear on this, it's right,

12 I think, that FR5000 had passed the tests to achieve

13 a class 0 classification but hadn't passed

14 an above-18-metre fire test?

15 A. Correct.

16 Q. In your experience as it stood at the time, was this

17 understanding -- in other words, that there was

18 a difference between class 0 and a test under 8414 --

19 one that was generally shared by your customers?

20 A. I think the professionals in that market was -- yeah,

21 the answer would have been yes.

22 Q. In general, at the time, was your experience that the

23 customers you were dealing with knew that, as

24 an insulation material, FR5000 either had to be

25 a material of limited combustibility or else had passed

30

1 a full-scale test under BS 8414 to BR 135 criteria in

2 order to be used above 18 metres?

3 A. I would hope they would, yes, but I can't be sure.

4 Q. Now, I'm going to ask you a few questions about Approved

5 Document B.

6 Were you aware in and from March 2014, when you

7 joined Celotex, that Approved Document B was part of the

8 Building Regulations?

9 A. I would have known, yes.

10 Q. Were you familiar with part B?

11 A. Not specifically , no.

12 Q. Were you familiar with the requirement in part B4 of the

13 Building Regulations themselves relating to external

14 flame spread?

15 A. Not until after the launch of the RS5000, when it became

16 far more important.

17 Q. Were you aware of the general principle under B4 that

18 the external walls of the building shall adequately

19 resist the spread of fire over the walls?

20 A. Not at that stage within my tenure at the company.

21 Q. When did you become aware during your tenure at the

22 company of that requirement?

23 A. This would have been after the launch of the RS5000 and

24 that sort of voyage of discovery of finding out a bit

25 more about the regulations , or about feedback from

31

1 potential customers.

2 Q. So you embarked, did you, on a voyage of discovery about

3 Approved Document B after the launch of RS5000?

4 A. It made me more aware of the document and my need to

5 sort of better understand that document just from the

6 questions that were being asked by certain customers.

7 Q. Did you go away and read the bits of Approved Document B

8 that you felt you needed to in order to be able to

9 address your customers' concerns?

10 A. I generally familiarised myself with parts of the

11 document that I was being referred to. I can't say that

12 I particularly understood everything within that

13 document implicitly, but I at least knew where to look

14 if I was directed.

15 Q. Did you at least glean this much from Approved

16 Document B when you did look at it: that there were

17 special requirements in relation to buildings above

18 18 metres so far as concerned the external wall

19 construction?

20 A. I did, yes.

21 Q. Now, we've seen from the 28 April email that we looked

22 at, at {CEL00001200} -- let's just go back to that --

23 that Mr Roper sent you BS 8414-1 as well as other

24 things, didn't he?

25 A. He did, yes.

32

1 Q. It's the last attachment.  
 2 Was that the first time that you became aware of  
 3 BS 8414-1 or, as he calls it, the cladding fire test?  
 4 A. It may have been, yes.  
 5 Q. Did you open the attachment and have a look at the test?  
 6 A. I would have thought I would have done, yes.  
 7 Q. When you say you would have done, is it because it was  
 8 your habit to open attachments to documents when you  
 9 were sent them?  
 10 A. Yeah, generally.  
 11 Q. Can we go to {CLG00000224/95}, please. I think, given  
 12 the answers you have given us just a moment ago, we can  
 13 take this quite quickly.  
 14 Here is section 12 of Approved Document B,  
 15 "Construction of external walls", and if you look at the  
 16 right-hand column under the heading "External wall  
 17 construction", you can see that it says at  
 18 paragraph 12.5:  
 19 "The external envelope of a building should not  
 20 provide a medium for fire spread if it is likely to be a  
 21 risk to health or safety. The use of combustible  
 22 materials in the cladding system and extensive cavities  
 23 may present such a risk in tall buildings."  
 24 Then it goes on:  
 25 "External walls should either meet the guidance

1 given in paragraphs 12.6 to 12.9 or meet the performance  
 2 criteria given in the BRE Report Fire performance of  
 3 external thermal insulation for walls of multi storey  
 4 buildings (BR 135) for cladding systems using full scale  
 5 test data from BS 8414-1:2002 or BS 8414-2:2005."  
 6 I don't think I need the rest of that.  
 7 Did you discover this paragraph or section of the  
 8 approved documents during your voyage of discovery after  
 9 August 2014, or do you think you looked at this before  
 10 that?  
 11 A. It's hard to tell, but ultimately Celotex did not have  
 12 a product that was usable above 18 metres, so at that  
 13 point of this document, this would have just confirmed  
 14 the case that -- the reasoning why the products like  
 15 FR5000 would not be used. So it's more likely that this  
 16 document -- I'd have become more familiar with this  
 17 document after the launch of the RS5000 product.  
 18 Q. I see.  
 19 Did you understand from this document -- and we can  
 20 turn the page {CLG00000224/96} -- that there were  
 21 essentially two routes to compliance if you were going  
 22 to put insulation on a building above 18 metres: either  
 23 it had to be a material of limited combustibility under  
 24 12.7, or else, as a separate route to compliance, it had  
 25 to meet the performance criteria in BR 135 by means of

1 successfully passing a full-scale test under BS 8414?  
 2 A. This would have been, I suppose, more relevant after --  
 3 or I would have been more knowledgeable after the launch  
 4 of RS5000, when it was more -- better defined that this  
 5 was the criteria that was needed for the use of RS5000.  
 6 Q. Right.  
 7 Prior to the launch, before the launch in  
 8 August 2014, can you give us an idea of what you  
 9 understood to be how an insulation material could comply  
 10 if it was going to be used above 18 metres?  
 11 A. I can't remember the timing of things, but at the time  
 12 prior to the launch of RS5000, I would have just been of  
 13 the mindset that Celotex did not have a product, so as  
 14 long as I -- for, sorry, high-rise buildings above  
 15 18 metres. So as long as I had this as a reference  
 16 document, I don't think I would have needed to have  
 17 understood, in the early part of my tenure within the  
 18 company, the rhymes and reasons why the product couldn't  
 19 be used.  
 20 Q. If we look at -- just for completeness, probably, rather  
 21 than anything else -- paragraph 12.7, you can see it  
 22 says:  
 23 "Insulation Materials/Products.  
 24 "In a building with a storey 18m or more above  
 25 ground level any insulation product, filler material

1 (not including gaskets, sealants and similar) etc. used  
 2 in the external wall construction should be of limited  
 3 combustibility (see appendix A)."  
 4 Were you aware of that requirement from March 2014,  
 5 or did you only become aware of that requirement after  
 6 the launch of RS5000 in August 2014, do you think?  
 7 A. It's hard to tell, but, I mean, up until the launch of  
 8 RS5000, there was no Celotex product for high-rise  
 9 buildings.  
 10 Q. At the very least, did you know that there was  
 11 a distinction between class 0 on the one hand and  
 12 limited combustibility on the other?  
 13 A. I knew that, yes.  
 14 Q. You knew that?  
 15 A. Yes.  
 16 Q. Can I then ask you to go to {CEP00057294}, please. This  
 17 is a guidance note produced by the BCA, the  
 18 Building Control Alliance, and it's entitled "BCA  
 19 Technical Guidance Note 18", and this is issue 0,  
 20 June 2014.  
 21 You say in your statement -- and I don't think there  
 22 is a need to look at it, it's page 17 {CEL00010031/17},  
 23 paragraph 57 -- that this document was brought to your  
 24 attention by your customers.  
 25 Just looking at it, and trying the best you can with

1 your memory, when do you think you first had that  
 2 technical guidance note brought to your attention?  
 3 A. I don't remember an exact date, but I would hazard  
 4 a guess that it would have been following the launch of  
 5 the RS5000 product.  
 6 Q. And in what context, do you remember?  
 7 A. In that it was a way of qualifying the product to be  
 8 used in buildings above 18 metres in a certain -- in one  
 9 of the ways that was described in this document.  
 10 Q. When you say a way of qualifying the product, what do  
 11 you mean?  
 12 A. Well, the route to compliance. So there was, I think,  
 13 three routes to compliance in this initial document, one  
 14 of which was to have non-combustible materials, which  
 15 Celotex did not have, and the other two were to have  
 16 a full-scale fire test, which they did once they'd  
 17 launched -- well, before they launched the BS -- sorry,  
 18 the RS5000 product, and the third one was to, I mean,  
 19 get a specialist, a fire specialist, basically, to look  
 20 at the performance of the building, to look at escape  
 21 mechanisms and other areas of the building to gauge  
 22 their knowledge of the risk of the building and look at  
 23 the suitability of products that way. But in  
 24 a nutshell, either use non-combustible, have a fire test  
 25 with that exact build-up or involve a specialist.

37

1 Q. Do we take it from that that nobody within Celotex  
 2 brought Technical Guidance Note 18, this document, to  
 3 your attention?  
 4 A. I don't think so, no.  
 5 Q. Were you surprised to discover its existence?  
 6 A. I don't know if "surprised" was the word, it was just --  
 7 I suppose I described it as a voyage of discovery for  
 8 myself. I was given certain information initially at  
 9 the launch of the product, and then certain other things  
 10 came to light whilst I was working for the company and  
 11 interacting with customers, or potential customers, who  
 12 were involved in this side of the market.  
 13 Q. Were you surprised to discover the existence of this  
 14 document from a potential customer as opposed to from  
 15 within Celotex itself?  
 16 A. I can't say the word is "surprised", but I would have  
 17 thought, if a company is launching a product, and the  
 18 timing of this document of June of the preceding year,  
 19 they may or should have known about this document,  
 20 maybe.  
 21 Q. Right.  
 22 If we look at page 1 under "Key Issues", it has  
 23 a set of bullet points in the third paragraph down, and  
 24 says:  
 25 "A Surface Spread of Flame Classification does not

38

1 infer any resistance to combustibility, it is solely  
 2 a measure of the spread of flame across the surface."  
 3 I think you say you knew that.  
 4 Then it says in the first bullet point:  
 5 "Thermosetting insulants (rigid polyurethane foam  
 6 boards) do not meet the limited combustibility  
 7 requirements of AD B2 Table A7 and so should not be  
 8 accepted as meeting AD B2 paragraph 12.7. However, if  
 9 they are included as part of a cladding system being  
 10 tested to BR135 & BS8414, the complete assembly may  
 11 ultimately prove to be acceptable."  
 12 Now, did you understand when you saw this document  
 13 at least that FR5000, and indeed any other PIR products,  
 14 were not materials of limited combustibility?  
 15 A. I did, yes.  
 16 Q. You told us that before. And that that meant that, at  
 17 least from this point onwards, when you saw this  
 18 document if no other, the only way you could use a PIR  
 19 product in a building above 18 metres in height was as  
 20 part of a system that had successfully passed the  
 21 BS 8414 test and met the BR 135 criteria?  
 22 A. Correct.  
 23 Q. I then want to turn to class 0 again. If we can just go  
 24 back to Approved Document B at {CLG00000224/95}, I just  
 25 want to show you page 95 over to 96 and then also

39

1 diagram 40.  
 2 At the very foot of 95 there is a heading that says  
 3 "External surfaces" and you can see at 12.6:  
 4 "The external surfaces of walls should meet the  
 5 provisions in Diagram 40."  
 6 You see that.  
 7 If we look at diagram 40, that's on page 97  
 8 {CLG00000224/97}, and if you look at that, and look at  
 9 "e. ANY BUILDING", you can see that diagram there, and  
 10 you can see that, in a nutshell, there is  
 11 a qualification for external surfaces for buildings over  
 12 18 metres that the material should have class 0  
 13 national class, or class B-s3, d2 or better European  
 14 class. Do you see that?  
 15 A. I can see that.  
 16 Q. Did you know that at the time -- I say "at the time";  
 17 from March or April 2014, or is that something you came  
 18 to learn later?  
 19 A. I think that specific information was something that was  
 20 brought to light either during the launch of RS5000 or  
 21 afterwards.  
 22 Q. Yes.  
 23 Now, can I ask you to look at what Mr Ray Bailey  
 24 told the Inquiry in his oral evidence. Can we go to the  
 25 transcript for his evidence at {Day33/10}, please, which

40

1 is 9 September 2020. If we look at that together,  
2 I probably ought to start at line 1, where it's put to  
3 him that:

4 "Question: It's clear from this technical note  
5 [Technical Guidance Note 18] that class 0 and limited  
6 combustibility were different. Did you understand that  
7 they were different at the time?

8 "Answer: Yes.

9 "Question: Did you understand at the time that they  
10 weren't interchangeable concepts?

11 "Answer: Actually, they are.

12 "Question: They're interchangeable, are they?

13 "Answer: Well, if you look at table 8 in  
14 appendix A, it actually says class 0, and then the  
15 European equivalent -- which is the UK class 0 -- is  
16 described as non-combustible, limited combustibility or  
17 a composite that complies with section 13b. So class 0  
18 covers all of those three conditions."

19 Then if you go on in the same transcript to page 12  
20 and look at lines 12 to 15 {Day33/12:12-15}, he says  
21 there:

22 "No. Sorry, let me just rephrase. If it's class 0  
23 for surface spread of flame, it's on the outside; if  
24 it's throughout, I took that to mean it was of limited  
25 combustibility."

41

1 Now, without characterising his evidence in any way,  
2 do you understand what he's saying in both of the  
3 passages I've read to you?

4 A. The only thing I can deduce is that he's confused  
5 between a British Standard and a European Standard.

6 Q. What about a confusion between class 0 and limited  
7 combustibility and their interchangeability?

8 A. It's not a statement that can be made.

9 Q. Were you aware that this sort of confusion existed in  
10 the market with which you were dealing at the time you  
11 were at Celotex?

12 A. Not that particularly, but the longer I spent within the  
13 company, the longer -- or the more it seemed that some  
14 people were unsure of what could or couldn't be used on  
15 buildings above 18 metres.

16 Q. Did that surprise you?

17 A. Well, it did, considering the people that I was talking  
18 to, or the vast amount of people I was talking to, were  
19 specialists in this arena.

20 Q. Were you aware that some customers at the least in the  
21 United Kingdom market in and after 2014 thought that  
22 class 0 meant limited combustibility?

23 A. I can't say that for sure.

24 Q. Did you ever get the sense that Celotex was effectively  
25 seeking to capitalise on the confusion between the two

42

1 in the market that might have existed?

2 A. No, I don't think that was their intention, no.

3 Q. I then want to go to RS5000 and ask you some questions  
4 about the development of that product.

5 Can we go back to your witness statement, please, at  
6 page 2 {CEL00010031/2}. You say in paragraph 7 on that  
7 page that you were not involved in the creation and  
8 testing of RS5000. You say that in the first sentence:

9 "I was not involved in the production of the  
10 marketing material. I did not have any input into its  
11 contents. I do not know who created the product, how it  
12 was physically different from the other products and  
13 I did not have any involvement in or knowledge of the  
14 testing of the product apart from seeing abbreviated  
15 versions of the BR 135 test report ..."

16 When did you first become aware that RS5000 was  
17 being readied for launch?

18 A. I suppose in the weeks preceding the actual launch.

19 Q. We've seen Mr Roper's email of 28 April 2014 which  
20 referred to the BS 8414 test. Can we take it from that  
21 that you were aware by that point, so late April 2014,  
22 that Celotex was seeking to develop an insulation  
23 product that could be marketed for use above 18 metres?

24 A. I can't be sure of the date, but that might have been,  
25 yeah, around the time.

43

1 Q. Okay.

2 If we continue in your statement to the next  
3 paragraph, you say:

4 "My knowledge of the RS5000 product was based on the  
5 internal presentation on 5 August 2014 and the marketing  
6 material given to me."

7 If we look at paragraph 29 on page 7  
8 {CEL00010031/7}, under the heading "RS5000", you give  
9 some more detail there about the launch. In the second  
10 line you date it as 5 August 2014, and in the fourth  
11 line from the bottom of that paragraph you say:

12 "The launch of RS5000 was seen as a big development  
13 for Celotex. Jon Roper gave a presentation giving an  
14 overview of Approved Document B and BR 135 and then gave  
15 a presentation on the launch of RS5000. Lizzie Seaton  
16 then presented the marketing communications plan for the  
17 product."

18 I've shown you that.

19 Were you aware, as at August 2014, that there had  
20 been a BS 8414 test carried out in February 2014 in  
21 which RS5000 had failed?

22 A. I wasn't privy to that knowledge, no.

23 MR MILLET: Mr Chairman, I'm just anxious not to ask the  
24 next question --

25 SIR MARTIN MOORE-BICK: I was about to interrupt you,

44

1 Mr Millett .  
 2 Today, as you and everyone else knows, is  
 3 Armistice Day, and together with the courts and other  
 4 public bodies, we shall observe two minutes' silence in  
 5 memory of those who died in two World Wars and, indeed,  
 6 in other conflicts around the globe. So I invite you to  
 7 join me in standing to observe the two-minute silence.  
 8 (Two-minute silence)  
 9 SIR MARTIN MOORE-BICK: Thank you very much.  
 10 Yes, Mr Millett .  
 11 MR MILLETT: Thank you, Mr Chairman.  
 12 Mr Roome, my last question to you, and your last  
 13 answer, was that you were not aware, as at August 2014,  
 14 that there had been a BS 8414 test for RS5000 in the  
 15 February of that year that had failed .  
 16 My next question is: did you later become aware of  
 17 that fact?  
 18 A. I did, much later, yes. At some point in 2015. I can't  
 19 remember the exact date.  
 20 Q. What were the circumstances in which you became aware in  
 21 2015 of the 2014 test failure?  
 22 A. I think what it was was that one of my customers had  
 23 questioned the edition or the BR 135 document or the  
 24 BS 8414 test, because somewhere along it it says  
 25 revision 2 or edition 2, something like that, and they

1 questioned why this was a second document as opposed to  
 2 the first , of which I didn't know, so I started asking  
 3 questions.  
 4 Q. Who told you, do you remember, that there had originally  
 5 been an earlier test, a first test of RS5000, which had  
 6 failed?  
 7 A. I think it may have been Jonathan Roper.  
 8 Q. Did you discuss any reasons for the failure with him?  
 9 A. I don't think it was elaborated on, no, just that it did  
 10 not pass and they had to do a second test.  
 11 Q. Do you understand why it didn't pass?  
 12 A. I can only deduce that it failed one of the criteria to  
 13 allow it to pass, either through the heat and the  
 14 thermocouples or flame seen out of the top of the test  
 15 rig.  
 16 Q. You say you can only deduce; does that mean that you  
 17 didn't actually have a detailed discussion with anybody  
 18 at Celotex about precisely why the test had been failed?  
 19 A. No, I can only deduce from the facts of how a test would  
 20 fail .  
 21 Q. Right.  
 22 I take it you did know that a successful test of  
 23 RS5000 had been carried out in May 2014?  
 24 A. Yes, because that allowed Celotex to launch the RS5000  
 25 product.

1 Q. Yes, and you weren't, I think, involved with that test,  
 2 as you have told us in your statement. You weren't  
 3 involved in the testing.  
 4 A. No, I wasn't.  
 5 Q. Were you involved in any way in the design of the system  
 6 build-up that was used for testing?  
 7 A. No.  
 8 Q. Let's turning to the presentation, then, in August 2014.  
 9 Can we go to {CELO0009709}, please. This is the  
 10 agenda for the launch presentation on 5 August 2014, as  
 11 you can see from the heading, "Celotex RS5000 Launch -  
 12 5th August 14". Time: 9 o'clock in the morning until  
 13 1 o'clock, Tuesday, 5 August 14. Attending: Jon Roper,  
 14 Paul Evans, Lizzie Seaton, and below that Paul Reid,  
 15 Chris Nicholls, northern and southern sales team.  
 16 Do I take it you were present because you were part  
 17 of the southern sales team?  
 18 A. That's correct.  
 19 Q. We can see from the agenda that there was, as the first  
 20 item on it:  
 21 "Approved Document B and BR 135 Overview: JR."  
 22 JR is not you; it's Jon Roper, isn't it?  
 23 A. That's correct.  
 24 Q. You share the same initials --  
 25 A. Yes.

1 Q. -- and that can be confusing. All right, that's  
 2 Jon Roper.  
 3 Then there was a 45-minute presentation of RS5000,  
 4 also by Jon Roper; yes?  
 5 A. That's correct.  
 6 Q. Yes.  
 7 Now, can we go to {CELO0008668}, please, next. This  
 8 is a 59-page slideshow entitled "Celotex RS5000 Launch  
 9 05-08-14".  
 10 Do you remember that this slideshow accompanied the  
 11 launch presentation?  
 12 A. It must have been the one, yes.  
 13 Q. Do you remember being shown a long slideshow?  
 14 A. Yes, I would have been shown the documents.  
 15 Q. Can you remember who ran through the slides? Who spoke  
 16 to the slides?  
 17 A. I think it was Jon Roper.  
 18 Q. Now, let's look at it in detail .  
 19 Page 3 {CELO0008668/3}, first of all . It says,  
 20 "Above 18m", and am I right in thinking -- and that's  
 21 the only thing on that page -- this was the pithy focus  
 22 of this whole exercise, looking at the use of RS5000  
 23 above 18 metres?  
 24 A. This was the reason for the product to be launched, yes.  
 25 Q. Right. That's another way of putting the same point.

1 Can we then look at page 4 {CEL00008668/4}. We can  
2 see here that the presentation addresses the legislative  
3 background. We've got Approved Document B on the left,  
4 BS 8414-2 in the middle, and then BR 135 on the right,  
5 so that everyone in the room, presumably, could see what  
6 was being discussed.

7 Was there a detailed discussion about that  
8 legislative background by Mr Roper, do you remember?  
9 Did he explain BS 8414 and BR 135 in any detail?

10 A. I can't recall.

11 Q. Did he go through the requirements of the approved  
12 documents, do you think? Do you remember?

13 A. I think it's likely he would have gone over the salient  
14 points in each that were relevant to the product.

15 Q. Can we then go to page 7 {CEL00008668/7}, please, a few  
16 slides on, and we can see here a table which sets out  
17 national classes and Euroclasses. We can see that there  
18 are three columns: "Risk Category", "British Standard"  
19 and "Euroclass".

20 Do you know where the risk category on this slide  
21 was derived from?

22 A. I don't.

23 Q. Was it suggested that this was an official  
24 classification of risk?

25 A. I couldn't tell you.

49

1 Q. Do you remember whether it was just presented as  
2 an approximate rough guide?

3 A. I don't know what was behind those -- that terminology.

4 Q. Are you aware that this risk categorisation has no basis  
5 at all in any guidance in England and Wales?

6 A. I don't.

7 Q. Did the suggestion on this slide that class 0 is low  
8 risk influence your understanding about class 0?

9 A. I -- no.

10 Q. Did anyone tell you that the first line was about  
11 combustibility and the tests there are for  
12 non-combustibility or limited combustibility, BS 476-4,  
13 BS 476-11, but the rest from class 0 down was about  
14 surface spread of flame?

15 A. I don't recall the information there.

16 Q. On the face of the document, it looks like there's  
17 a confusion, even within this slide. The first line is  
18 about non or limited combustibility, whether  
19 Euroclass A1 or A2, but from low, medium, high,  
20 very high risk categories, you're talking about class 0,  
21 1, 2 and worse than class 3, which is not the same as  
22 combustibility, is it?

23 A. It doesn't look like it, no.

24 Q. So there is confusion inherent in this slide itself. Do  
25 you accept that?

50

1 A. It seems to be, yes.

2 Q. On the next slide at page 8 {CEL00008668/8} we have  
3 section 12.5 of ADB, we've looked at that already, and  
4 then it goes on to address BR 135, and if you go to  
5 page 16 {CEL00008668/16}, if we can see that, this is  
6 annex B of BR 135, where the performance criteria and  
7 classification are identified.

8 Did you understand that this was a reference to  
9 annex B of BR 135 when it was presented to you?

10 A. It's the, yeah, test criteria.

11 Q. If you look at the right-hand side, you can see that  
12 there is an extract from the text which starts:

13 "The classification applies only to the system ..."

14 Do you see that?

15 A. I do.

16 Q. I will read it to you:

17 "The classification applies only to the system as  
18 tested and detailed in the classification report. The  
19 classification report can only cover the details of the  
20 system as tested, it cannot state what is not covered.  
21 When specifying or checking a system it is important to  
22 check that the classification documents cover the  
23 end-use application."

24 There is an arrow that points to that paragraph, and  
25 in red it says "System Classification".

51

1 This suggests that this presentation highlighted the  
2 fact that BR 135 only applied to the system and not to  
3 its individual components; is that fair?

4 A. That's fair.

5 Q. Is that your takeaway or recollection of what this part  
6 of this presentation was telling you?

7 A. It is.

8 Q. And you understood that at the time, did you, clearly?

9 A. I did, yes.

10 Q. Would you agree that this presentation, so far as I've  
11 shown it to you this morning, sets out the various  
12 routes to compliance with Approved Document B in some  
13 detail?

14 A. It does, yes.

15 Q. If we go to page 25 {CEL00008668/25} we can see  
16 slide 25. It says here:

17 "Celotex RS5000 Key Properties."

18 Then in the penultimate bullet point, it says:

19 "Suitable For Use in Buildings Above 18m In Height."

20 If we go to the next slide, 26 {CEL00008668/26}, it  
21 says, "Product Proposition", that's the banner:

22 "The First [in red] PIR Board To Successfully Meet  
23 The Performance Criteria In BR 135 [also in red] For  
24 Insulated Rainscreen Cladding Systems, Therefore  
25 Acceptable For Use In Buildings Above 18m [also in red]

52

1 In Height.”  
 2 Do you accept, sitting here, that the words  
 3 “therefore acceptable for use in buildings above 18m in  
 4 height” suggest that it’s generally suitable for use  
 5 above 18 metres?  
 6 A. Yes.  
 7 Q. In other words, because it’s passed the test, it can be  
 8 used in any rainscreen cladding above 18 metres?  
 9 A. It could be read that way, yes.  
 10 Q. Let’s go back a little bit in the slideshow, please, to  
 11 pages 11 to 14, slides 11 to 14, and I’m just going to  
 12 take these quickly.  
 13 On page 11 {CEL00008668/11} we can see “Fire Spread  
 14 In Building Envelopes”, and there we have  
 15 Knowsley Heights, 1991; and if we turn the next page on  
 16 {CEL00008668/12}, Basingstoke, 1992; and the next one on  
 17 {CEL00008668/13}, this is Irvine in 1999, with  
 18 a fatality and a Parliamentary Inquiry; and then in the  
 19 last one at {CEL00008668/14}, we can see Dubai 2012.  
 20 Do you remember what you were told about each of  
 21 those fires or all of them together?  
 22 A. I think it was only in relation to why it was important  
 23 to have a BS 8414 test and what could go wrong if that  
 24 wasn’t followed.  
 25 Q. I see. So this was, as it were, a warning from history?

53

1 A. I think that was the idea, yes.  
 2 Q. Did you know about any of these fires before this  
 3 presentation?  
 4 A. I can’t be sure. I may have known about one or two, but  
 5 I wouldn’t have known about the, you know, reasons  
 6 behind the fire or the materials used, no.  
 7 Q. Do you remember, when you say about one or two, any  
 8 discussion, market intelligence, what people were saying  
 9 in the cladding industry generally about these fires or  
 10 any of them?  
 11 A. Not at this point, no.  
 12 Q. Did there come a point when you did hear information,  
 13 market intelligence of that nature?  
 14 A. I may have heard things sort of later, sort of within my  
 15 tenure at Celotex.  
 16 Q. What sort of things?  
 17 A. Well, just a general sort of view about materials being  
 18 used, insulants, panels. I mean, some of those fires,  
 19 I think, were glazed systems. It wasn’t just a risk  
 20 from insulants, for instance.  
 21 Q. Was there any discussion, either at this presentation or  
 22 at any time, in fact, to the effect that these fires  
 23 were well known to Celotex’s customer base?  
 24 A. I can’t be sure.  
 25 Q. Looking at the Dubai slide, which is on the screen in

54

1 front of us, here we can see an image of the fire at  
 2 Tamweel Tower, but in fact did you know that there were  
 3 actually other fires, a spate of fires, in Dubai or the  
 4 UAE in the period 2012 to 2013?  
 5 A. I wasn’t aware, no.  
 6 Q. Was there any discussion about what materials were used  
 7 in the Dubai fire on the exterior of the building?  
 8 A. No.  
 9 Q. There were also Dubai fires in 2015 and 2016 which  
 10 I think were covered in some depth by industry  
 11 publications at the time, such as The Address and  
 12 The Torch. Were you aware of those?  
 13 A. I was aware of those, yes.  
 14 Q. Were you aware that in those fires the external cladding  
 15 had ignited and caused flame spread up the exterior of  
 16 the building?  
 17 A. I don’t remember the exact details, but I remember it  
 18 being in the press, you know, this was a good few years  
 19 after I’d left the company.  
 20 Q. Was there any discussion at the time of this  
 21 presentation about the use of polyethylene as a core for  
 22 aluminium composite panels or other metal composite  
 23 panels?  
 24 A. Nothing that I recall, no.  
 25 Q. Were you in general aware of the danger presented by

55

1 aluminium composite material with a polyethylene core?  
 2 A. Not specifically, no.  
 3 Q. Was there any discussion at this presentation about  
 4 whether aluminium composite panels with a polyethylene  
 5 core could be used as part of a system incorporating  
 6 RS5000?  
 7 A. I don’t think it was mentioned, no.  
 8 MR MILLETT: Mr Chairman, we’re still in the slides.  
 9 I probably have about five minutes or so, maybe a little  
 10 bit more, on this slideshow before we turn to  
 11 a different topic.  
 12 SIR MARTIN MOORE-BICK: Would you like to finish this topic?  
 13 MR MILLETT: That would be very helpful.  
 14 SIR MARTIN MOORE-BICK: Mr Roome, are you happy to carry on  
 15 for another ten minutes before we have a break?  
 16 THE WITNESS: Of course, yes.  
 17 SIR MARTIN MOORE-BICK: Thank you.  
 18 MR MILLETT: Can we then turn to slide 19 {CEL00008668/19}  
 19 in this slide pack, please. This is the product range,  
 20 “5000’ Range Features”, and you can see an arrow with  
 21 dots which increase in size from “Approvals” to  
 22 “Thermal”.  
 23 Do the dots which grow in size indicate their  
 24 relative importance in some way?  
 25 A. I can’t be sure, I didn’t write this slide.

56

1 Q. No. Was there any discussion, then, on this slide about  
2 each of these topics?

3 A. There's potentially a discussion about each of these  
4 topics, but whether or not they grew in relevance,  
5 I couldn't tell you.

6 Q. What do we take from the fact that "Fire" is in the  
7 middle? It's above or larger than "Approvals" and  
8 "Environmental", but smaller than or below "Emissivity"  
9 and "Thermal".

10 A. I couldn't tell you why that was placed as it was.

11 Q. Did you take the impression away from the presentation  
12 that thermal performance was more important than  
13 fire safety, looking at this slide in particular?

14 A. I wouldn't have deduced that, no.

15 Q. Can we go to slide 27 in this deck, please, page 27  
16 {CELO0008668/27}. This is a diagram of a system. Did  
17 you understand what this was?

18 A. Yes.

19 Q. What was it?

20 A. It's the section through a wall, as if you're standing  
21 at the edge of a wall and looking at each of the  
22 components that made up a wall, as if you cut a slice  
23 through it.

24 Q. And it says "Celotex & BR 135". Perhaps we can blow it  
25 up a little bit more.

57

1 Did you understand that this was the system that had  
2 passed the BS 8414 test in May 2014?

3 A. I think this image may have been taken from the test  
4 report.

5 Q. Was there any discussion at the presentation about what  
6 this image did represent?

7 A. I think it must have been discussed, yes, as to the  
8 build-up, so how it was used in the actual fire test  
9 that was carried out.

10 Q. Now, let's just look at it a little bit more closely.  
11 It identifies the helping hand bracket, and then if one  
12 casts the eye down a little bit more, there is  
13 a 12-millimetre Marley Eternit Natura panel as the  
14 rainscreen.

15 Just pausing there, that's a cementitious fibre  
16 board, isn't it, or was?

17 A. Yes, it's -- well, as far as my knowledge allows me to  
18 know, it's a decorative panel that's used in cladding.

19 Q. Below that there is reference to a 12-millimetre  
20 magnesium oxide board that would sit behind the  
21 insulation, towards or on the concrete wall, and then  
22 a Simco system, and then an aluminium continuous rail,  
23 and then you can see 100-millimetre Celotex RS5000  
24 insulation.

25 So did you understand at this presentation that that

58

1 was the build-up of the individual components and their  
2 dimensions that had passed the BS 8414 test in May 2014?

3 A. That's correct, because that was the information that  
4 was also provided in all of the literature, the  
5 breakdown of the build-up.

6 Q. It was, and we will come to that.

7 Can I ask you then to go to {CELO0010027/35}. This  
8 is the witness statement of Dean O'Sullivan, who is the  
9 chief executive officer of Celotex. I would like you to  
10 look with me, please, at paragraph 118.5 on that page,  
11 just below halfway down. I'll read it to you. He says:  
12 "In the course of work following the Grenfell Tower  
13 fire, information came to light which suggests that  
14 there were differences between the system as tested and  
15 that as described in the BRE Reports and the Celotex  
16 product literature for RS5000. In particular, I now  
17 understand that the system on which the test was  
18 conducted in May 2014 included another component, in  
19 addition to the components described in the previous  
20 sub-paragraph. At certain levels in the tested system  
21 (namely adjacent to the Lamatherm fire barrier at  
22 'Level 2' and at the top of the rig), the outer cladding  
23 panel was an 8mm Marley Eternit cladding panel; and at  
24 those levels only, there was immediately behind this  
25 panel, a 6mm magnesium oxide board. 12mm Marley Eternit

59

1 cladding panels were used on the remainder of the rig."

2 Were you aware at the time of the August  
3 presentation that an additional layer of 6 millimetres  
4 of magnesium oxide had been used at the thermocouples  
5 and at the total of the rig when tested in May 2014?

6 A. I was not, no.

7 Q. So just going back, then, to slide 27 in light of that  
8 answer, if we can -- that's {CELO0008668/27} -- looking  
9 at the diagram of the test as presented to you, can we  
10 take it that you weren't told, indeed nobody was told at  
11 that presentation, about the use of the 6 millimetres of  
12 magnesium oxide that had been referred to, as we've  
13 seen, by Mr O'Sullivan in his witness statement?

14 A. We had not been told any of that, no.

15 Q. And ditto in relation to the 8 millimetres of  
16 Marley Eternit board at the thermocouples?

17 A. Correct, we were just literally shown the documentation  
18 that you see before you.

19 Q. Were you ever told subsequently during your time at  
20 Celotex that the rig actually tested by the BRE had  
21 a 6-millimetre magnesium oxide board behind  
22 8 millimetres of Marley Eternit panel at the  
23 thermocouples and at the top of the rig?

24 A. I didn't know any of this whilst I was with Celotex, no.

25 Q. Had you ever come across a cladding system in real life

60



1 which had incorporated a 12-millimetre magnesium oxide  
 2 substrate?  
 3 A. On which face?  
 4 Q. On the place you see it in the diagram there.  
 5 A. At the back of the insulation?  
 6 Q. Yes.  
 7 A. Yeah. It's what's known as a sheathing board, so --  
 8 Q. Sheathing board?  
 9 A. -- you have your metal Metsec or steel frame system  
 10 spanning between the slabs, the concrete floors, and  
 11 then that might be filled with insulation on a modern  
 12 build, and then you close that exterior cavity with  
 13 a sheathing board, and magnesium oxide was one of those  
 14 types of products.  
 15 Q. Had you ever come across the use of a fibre cement  
 16 rainscreen panel as the rainscreen panel?  
 17 A. Not -- no, it was just one of many panels that were on  
 18 the market. I can't tell you implicitly that I had come  
 19 across those types of panels before.  
 20 MR MILLETT: Right.  
 21 Mr Chairman, that's a convenient moment from the  
 22 perspective of my questioning.  
 23 SIR MARTIN MOORE-BICK: Good.  
 24 We will have a short break now, Mr Roome. We will  
 25 come back at 11.40, and I'm going to say this every time

61

1 you leave the room: please don't talk to anyone about  
 2 your evidence or anything related to it while you're out  
 3 of the room.  
 4 THE WITNESS: Okay.  
 5 SIR MARTIN MOORE-BICK: Thank you very much.  
 6 Would you like to go with the usher, please, and we  
 7 will see you at 11.40.  
 8 THE WITNESS: Thank you.  
 9 (Pause)  
 10 SIR MARTIN MOORE-BICK: Thank you. 11.40, please.  
 11 (11.25 am)  
 12 (A short break)  
 13 (11.40 am)  
 14 SIR MARTIN MOORE-BICK: All right, Mr Roome, ready to carry  
 15 on?  
 16 THE WITNESS: Yes, thank you.  
 17 SIR MARTIN MOORE-BICK: Thank you.  
 18 Yes, Mr Millett.  
 19 MR MILLETT: Thank you, Mr Chairman.  
 20 Mr Roome, can I ask you to go, please, to  
 21 {CEL00003422}. I'm going to turn to the topic of the  
 22 BR 135 investigation.  
 23 Now, this document here is your month-end report of  
 24 November 2014. I would like you to look, please, at  
 25 slide 4 in that document {CEL00003422/4}.

62

1 That is entitled "CPDs/Architect Activity -  
 2 Overview". Underneath "Other Activity", you can see in  
 3 the second bullet point it says:  
 4 "BRE - RS5000 Testing and BS8414/BR135  
 5 Investigation."  
 6 What does the "BS8414/BR135 Investigation" mean or  
 7 refer to there?  
 8 A. I think if it's the meeting I can recall, it was with  
 9 Stephen Howard from the BRE. So Debbie had arranged  
 10 a meeting, Debbie Berger, who was the product manager  
 11 who took over from Jonathan Roper later, later down the  
 12 line, to really -- and I tagged along because it was  
 13 a meeting to look at the best way to find out how that  
 14 product could be further developed or further tested to  
 15 meet the questions that were coming out from the market.  
 16 Q. I follow. This is, you say, a meeting with  
 17 Stephen Howard from the BRE. Was that in early  
 18 November 2014?  
 19 A. I can't recall the exact date.  
 20 Q. We will come to some documents later.  
 21 A. Okay.  
 22 Q. But in general terms, is it the one that originated from  
 23 your attendance at the CWCT general meeting in October?  
 24 A. Possibly. There was only ever one meeting that  
 25 I attended at the BRE.

63

1 Q. Right.  
 2 While we're on that slide, can you just explain the  
 3 last bullet point, "RIBA - Gorilla Tactics Event"?  
 4 A. The RIBA, the Royal Institute of British Architecture,  
 5 they had an event called the guerilla tactics event.  
 6 Apologies, I can't remember exactly what that entailed.  
 7 Q. Right. Okay. Leaving aside the spelling of  
 8 "gorilla" --  
 9 A. Apologies.  
 10 Q. -- I'm assuming it's a reference to the kind of guerilla  
 11 that wages war rather than anything else -- does one get  
 12 the impression from that that there was some kind of  
 13 discussion about an aggressive marketing strategy  
 14 alongside the RIBA?  
 15 A. No, I don't think so. I think it was just an event that  
 16 I may have attended or was going to -- intended to  
 17 attend.  
 18 Q. Can we then turn to the marketing of RS5000.  
 19 Go to {RBK00059351}, please. This is a document  
 20 produced by the British Standards Institute entitled  
 21 "Don't be a flaming liability, Memo to manufacturers",  
 22 and we think that it dates back to the late 1980s, but  
 23 it was certainly doing the rounds in RBKC's  
 24 building control department at the end of 2013,  
 25 Mr Roome.

64

1 Just looking at it, it's a fairly memorable  
 2 document. Is it a document that you think you have ever  
 3 seen before?  
 4 A. I can't recall seeing that image or that document, no.  
 5 Q. Just look at the detail of it briefly, then, on page 1.  
 6 If you look at the left-hand column in the first  
 7 paragraph there, it says that:  
 8 "Any information regarding the fire characteristics  
 9 of the materials, products, structures or systems must  
 10 be clear, accurate and adequate."  
 11 Do you accept that principle?  
 12 A. Yeah, I would agree.  
 13 Q. Was it a principle that was part of Celotex's culture at  
 14 the time you were there, do you think?  
 15 A. I couldn't comment.  
 16 Q. Well, you could comment.  
 17 A. I could comment.  
 18 Q. I would like you to.  
 19 A. Okay. At least on the surface, that would follow, yeah.  
 20 Q. It would follow on the surface as a matter of logic.  
 21 It's certainly desirable. Did it happen? Was it  
 22 a principle within Celotex that its marketing  
 23 information relating to the characteristics of  
 24 materials, products, structures or systems should be  
 25 clear, accurate and adequate?

1 A. I had no reason to question otherwise.  
 2 Q. Right.  
 3 At the bottom of the right-hand column on the same  
 4 page, you can see that it says:  
 5 "A little knowledge is a dangerous thing - seek  
 6 expert advice on how to present information on fire  
 7 performance."  
 8 To your knowledge, did Celotex ever seek advice  
 9 about how it should present its information about fire  
 10 performance?  
 11 A. I couldn't tell you.  
 12 Q. I said "to your knowledge", so that's a no, you don't  
 13 know?  
 14 A. That's a no.  
 15 Q. Right.  
 16 Can we go to page 4 {RBK00059351/4}, then. Page 4  
 17 sets out some points to bear in mind when writing about  
 18 fire characteristics, we see that, and in the first  
 19 paragraph it says:  
 20 "Do not use terminology which:  
 21 •" makes a claim which cannot be substantiated.  
 22 •" may give a misleading impression of  
 23 performance ..."  
 24 Were you aware as a marketing or salesperson that  
 25 that was an important principle when writing about fire

1 characteristics?  
 2 A. Yes. About any characteristics, I'd say.  
 3 Q. Looking at the right-hand column, paragraph 4:  
 4 "Avoid coining brand or trade names which may  
 5 misleadingly imply fire safety."  
 6 Were you aware that that was something which was  
 7 important to keep in mind when writing marketing  
 8 literature?  
 9 A. I don't know.  
 10 Q. What about 5:  
 11 "Avoid vague implications that the material complies  
 12 with British Standards, Building Regulations, etc."  
 13 Again, was that a principle that you were alive to  
 14 as essentially a prohibition when writing marketing  
 15 literature?  
 16 A. I've never had to write marketing literature, or --  
 17 Q. Or when presenting the product to the public.  
 18 A. Well, yeah, I would -- I mean, myself personally,  
 19 I would always promote or present the facts that were  
 20 available to me.  
 21 Q. I take it from your last answer that these precepts were  
 22 never discussed within Celotex when it came to how to  
 23 present RS5000 to the UK construction market?  
 24 A. If they were, it was not something that I was privy to.  
 25 Q. Can we go to back to the agenda, then, to the 5 August

1 presentation. This is at {CEL00009709}. There it is,  
 2 and you can see that there is, as a fourth item down,  
 3 after the coffee break, a "Marketing Communications  
 4 Plan" to be presented by LS. Who was LS?  
 5 A. That would have been Lizzie Seaton.  
 6 Q. Lizzie Seaton, yes. And Lizzie Seaton's role at the  
 7 time I think has been explained by other Celotex witness  
 8 statements, but could you just tell us what it was?  
 9 A. She was part of the marketing team. And maybe at that  
 10 time she may have headed up the marketing team under  
 11 Paul Evans.  
 12 Q. Can we then go to {CEL00008668/38} again, please, which  
 13 is the launch presentation slides. This is a slide  
 14 called "Creative Concept". What did that mean?  
 15 A. I think these were the images that would be used in  
 16 advertising within trade journals.  
 17 Q. I see.  
 18 You can see that it's based around the tag line  
 19 "achieving new heights", do you see? "Celotex.  
 20 Reaching new heights"; yes?  
 21 A. Yes.  
 22 Q. Is that a reference to the fact that RS5000 was being  
 23 marketed for the above-18-metre market?  
 24 A. I think that's correct, yes.  
 25 Q. Indeed, it's right that it actually emphasises, I think,

1 above-18-metre applications, if you look at the text at  
 2 the top right-hand corner of the slide.  
 3 A. Yes.  
 4 Q. And it's a first for PIR.  
 5 A. Correct.  
 6 Q. We don't see any caveats in there, do we?  
 7 A. No.  
 8 Q. When it says in the second bullet point there "Above 18m  
 9 applications" plural, was that really right? Because  
 10 in fact it could only have one application, namely  
 11 within the system tested.  
 12 A. That's correct.  
 13 Q. So, actually, "Above 18m applications" in the plural  
 14 would have been misleading, or was misleading, wasn't  
 15 it, if presented to potential customers?  
 16 A. I suppose at that specific time, that's correct.  
 17 Q. Was there any discussion about that point?  
 18 A. Not that I'm aware of, no.  
 19 Q. Was the marketing strategy for RS5000 essentially to  
 20 emphasise, as its selling hook, if you like, that it  
 21 could be used above 18 metres?  
 22 A. I think that's the predominant reason why that  
 23 particular product was created and marketed.  
 24 Q. If we move on to page 40 {CEL00008668/40}, two slides  
 25 on, as part of the general section "Marketing Support",

69

1 within the slideshow, this makes a reference to case  
 2 studies here. Do you see the third bullet point down?  
 3 A. Yes.  
 4 Q. What was that about? What did that indicate?  
 5 A. I think that would have been a reference to particular  
 6 products -- projects, sorry, where the product had been  
 7 used or would be used. But at that time, I don't think  
 8 there were any case studies that I knew of.  
 9 Q. Presumably because RS5000 hadn't been used yet because  
 10 it hadn't been launched yet.  
 11 A. Exactly.  
 12 Q. So the idea was that there would later be case studies?  
 13 A. I think that's what that means.  
 14 Q. What would those case studies involve?  
 15 A. A lot of the time within Celotex there was often a sort  
 16 of one-page almost like a flyer, as it were, which would  
 17 just explain the project, the application and a bit of  
 18 information about the project.  
 19 Q. When you say a flyer, you mean a piece of paper which  
 20 would tell customers about past projects in which RS5000  
 21 had been used or was being planned?  
 22 A. Correct.  
 23 Q. Right.  
 24 What would be studied within a case study?  
 25 A. I couldn't tell you off the top of my head, but it would

70

1 just generally be a few facts about the project, the  
 2 product and the application.  
 3 Q. Was there any discussion at this launch presentation  
 4 about what those case studies would actually involve?  
 5 A. Not at that time, no. There had been preceding case  
 6 studies with other Celotex products.  
 7 Q. Would that include FR5000?  
 8 A. It may have done. I can't recall the exact details.  
 9 Q. Right.  
 10 If we go on to page 57 in this slide pack  
 11 {CEL00008668/57}, this slide is headed "Route To  
 12 Market", and we can see that there are two little  
 13 lightbulbs in a cloud and a balloon in the middle, and  
 14 on the left-hand side we can see underneath the  
 15 technical drawing there, "PULL e.g Architects,  
 16 Contractors, Installers", and on the right-hand side,  
 17 underneath the SIG Insulation brand logo, "PUSH e.g  
 18 Distributors, Merchants".  
 19 Pausing with the logo of SIG, was SIG a major  
 20 distributor for Celotex?  
 21 A. It was one of a few major distributors of Celotex and  
 22 other insulation products and other construction  
 23 products.  
 24 Q. Did the marketing strategy rely in part on getting  
 25 distributors to push RS5000?

71

1 A. I think it was -- I mean, I don't know, I didn't have  
 2 and deal with the strategy at all, but I can only  
 3 imagine that it was something to do with them stocking  
 4 the product, for instance.  
 5 Q. Was there any discussion about what incentives Celotex  
 6 would give to distributors such as SIG?  
 7 A. I think -- I'm not sure if it's part of this  
 8 presentation, but there was a ... there was some sort of  
 9 competition to do with -- you would win a balloon ride  
 10 for X amount of people if you had bought the material or  
 11 distributed or stocked the material. It may be later in  
 12 this presentation as part of the marketing pack.  
 13 Q. That would be a generic incentive for all distributors.  
 14 Was there a plan to give specific distributors specific  
 15 incentives?  
 16 A. Not that I know of, no.  
 17 Q. On the left-hand side, it looks like you wanted to get  
 18 architects and other professionals to specify RS5000 as  
 19 a pull factor; would that be fair?  
 20 A. I think that's a general marketing idea of the product.  
 21 Q. If we go to page 32 {CEL00008668/32}, back a little bit  
 22 in the slide pack, you can see that the heading of this  
 23 slide is "Celotex Rainscreen Cladding Solutions". Below  
 24 18 metres you can see RS5000, above 18 metres RS5000,  
 25 and 4000 not above 18 metres, as you can see there.

72

1 In the last bullet point, it says:  
 2 "Incurred Substantial Development Costs."  
 3 Is that a reference to the development costs of  
 4 RS5000 itself? It looks like it. Can you confirm?  
 5 A. I can't confirm, but it might be deduced that that is  
 6 the case.  
 7 Q. Did you get the sense that the sales team was under  
 8 pressure to achieve sales of RS5000 in order to recoup  
 9 those development costs?  
 10 A. No.  
 11 Q. Were you ever instructed to offer discounts to customers  
 12 to achieve sales?  
 13 A. No.  
 14 Q. Were you ever rewarded on the basis of how many  
 15 successful sales you made of RS5000?  
 16 A. No.  
 17 Q. Was there a particular bonus for selling RS5000 that you  
 18 would expect or anyone in the sales team would expect?  
 19 A. Not that I can remember, no.  
 20 Q. Right.  
 21 Can I then turn to the question of market knowledge.  
 22 Can we go to {CEL00003543}, please. This is an email  
 23 from you to Debbie Berger and Paul Evans on  
 24 11 February 2015. The subject: "RS5000 Spin  
 25 Presentation":

73

1 "Hi Debs/Paul,  
 2 "Please find slides that you can consider for use in  
 3 the SPIN meeting on Friday.  
 4 "I have tried to keep it as simplified as possible.  
 5 "Let me know how you get on."  
 6 Now, SPIN has capital letters. What does it stand  
 7 for?  
 8 A. It was an acronym, Celotex had a lot of acronyms, and  
 9 this was some sort of management tier group that met --  
 10 I don't know if it's every Friday or every month.  
 11 I don't know what -- they were looking at maybe  
 12 development of products generally or marketing or what  
 13 have you, but it was not something I was involved in  
 14 directly.  
 15 Q. You refer to the slides there. They are at  
 16 {CEL00003544}, just to show you what they are, and  
 17 they're entitled "RS5000 Market Analysis". Just go to  
 18 the first page {CEL00003544/2} to refresh your memory of  
 19 the document. It says:  
 20 "I see the market for RS5000 being split into three  
 21 defined potential customer tiers."  
 22 Now, before we look at the document a little bit  
 23 further, had these slides that you were sending  
 24 Debbie Berger and Paul Evans been prepared by you alone?  
 25 A. They had, yes.

74

1 Q. When do you think you prepared them?  
 2 A. I can't be sure. I mean, I think the email -- did it  
 3 say February 2015?  
 4 Q. 11 February.  
 5 A. So it would have been, yeah, leading up to that.  
 6 Q. What caused or prompted you to produce these slides?  
 7 A. I think it was due to the feedback that I was getting  
 8 from specialists, contractors, architects, and the  
 9 questions that they were raising, regular sort of  
 10 repetitive questions that were coming up, and I wanted  
 11 to put it into some sort of format. Because I was in  
 12 London, it seemed to be a lot of the major contractors  
 13 and the major specialists and major architects were  
 14 involved in high-rise buildings, so I wanted to distill  
 15 the information and present it in a form that I could  
 16 give to the management to explain what I saw was needed  
 17 with the product.  
 18 Q. Right. So you made these slides off your own bat?  
 19 A. Yes, I did.  
 20 Q. You weren't asked to do it by Jon Roper, for example?  
 21 A. No.  
 22 Q. Right.  
 23 Can we then look at the slides in a little bit more  
 24 detail.  
 25 I've shown you page 2. You say, "I see the market

75

1 for RS5000 being split". That was your personal view,  
 2 was it?  
 3 A. That was my personal view, yes.  
 4 Q. Over the next three slides, we can see them, there are  
 5 three defined potential customer tiers, and you have  
 6 given them a traffic light colouring, haven't you? Red,  
 7 "No Use", tier 1 {CEL00003544/3}. We will flip to  
 8 slide 2 {CEL00003544/4}, which is amber -- is this  
 9 right? -- "Limited use", and then the third slide or  
 10 third tier, page 5 {CEL00003544/5}, green, "Use",  
 11 tier 3; yes?  
 12 A. Yes.  
 13 Q. We will go back to these.  
 14 Just looking at slide 3, then, which is tier 1  
 15 {CEL00003544/3}, let's look at that together a little  
 16 more closely. You say there, "Tier 1 - No Use", and you  
 17 can see the view is:  
 18 "Only use non or limited combustibility insulation  
 19 products using guidance set out in Approved Document B  
 20 of the Building Regs."  
 21 Reason:  
 22 • "Easiest route to compliance."  
 23 • "Not happy with current test data on 'Combustible'  
 24 insulation products (PIR/Phenolic) having enough  
 25 satisfactory evidence of performance in broad spread of

76

1 applications . (Field of Application tests )."  
 2 Then influencer:  
 3 •" Client  
 4 •" Insurer  
 5 •" Building Control  
 6 •" Specialist Consultant."  
 7 Now, just looking at the reason list , in the second  
 8 bullet point you identify one of them as their  
 9 unhappiness with current test data having evidence of  
 10 performance in broad spread of applications .  
 11 Does that mean that this particular part of the  
 12 market was refusing to use or would refuse to use RS5000  
 13 because there wasn't enough satisfactory evidence of  
 14 performance in a broad spread of applications , in other  
 15 words applications beyond the very test in which it had  
 16 been proved to pass?  
 17 A. That's correct, there was only a singular test at that  
 18 point, and this is literally just feedback from  
 19 questions I was being asked or statements that were  
 20 being made, that some people wanted to see a wider  
 21 spread of tested applications .  
 22 Q. So, as you said before, this is how you saw the market  
 23 at that time?  
 24 A. That's correct, yes.  
 25 Q. Looking at influencer, you have identified as the fourth

1 bullet point "Specialist Consultant". Was that  
 2 a reference to specialist fire consultants or specialist  
 3 façade consultants?  
 4 A. All-encompassing, basically, yes.  
 5 Q. Building control, did you understand that there were  
 6 building control officers who were not happy with the  
 7 available test data?  
 8 A. I can't be specific to any one particular  
 9 building control body, but yes.  
 10 Q. Indeed.  
 11 If we can then turn to slide 4 {CEL00003544/4},  
 12 tier 2, the amber tier, "Limited use", view:  
 13 "Consider use of 'Combustible' insulation ."  
 14 Reason:  
 15 •" Cost.  
 16 •" Restricted Wall Space.  
 17 •" Happy that they have enough test data to satisfy  
 18 influencers ."  
 19 And then influencer:  
 20 •" Main Contractor  
 21 •" Sub Contractor  
 22 •" Building Control  
 23 •" Specialist Consultant."  
 24 Looking at the list of customers who would consider  
 25 use of combustible insulation, does that mean they might

1 sometimes use it and might sometimes not?  
 2 A. If the application was correct, so potentially if the  
 3 building was below 18 metres, for instance .  
 4 Q. You can see under the list of influencers that it still  
 5 includes specialist consultants, but there is no insurer  
 6 there referred to .  
 7 A. No.  
 8 Q. Is there a significance in that?  
 9 A. Not that I can remember, no.  
 10 Q. Does it tell us that insurers, if they had any part in  
 11 the decision-making process as to what should go on the  
 12 building, would generally take a very negative view of  
 13 RS5000?  
 14 A. I don't think that was the case, no.  
 15 Q. How can you account for the absence of insurers then in  
 16 that list ?  
 17 A. I can't give you a reason, unfortunately.  
 18 Q. We see the appearance of subcontractors in that list .  
 19 Although they weren't in the red list , they do appear in  
 20 the orange list . Does that tell us that subcontractors  
 21 tend to be a little bit more amenable to using RS5000?  
 22 A. I don't think so, I think it was more to do with them  
 23 being on sort of low-rise buildings, below 18 metres,  
 24 because this document wasn't just for above 18 metres in  
 25 particular .

1 Q. Then if you go to slide 5 {CEL00003544/5}, tier 3, it's  
 2 green, "Tier 3 - Use". View:  
 3 "Always use 'combustible' insulation ."  
 4 Reason:  
 5 •" Cost.  
 6 •" 18m restriction not relevant (Below 18m)  
 7 •" Not aware of 18m restriction .  
 8 •" Always use 'Combustible' insulation materials .  
 9 •" Restricted Wall Space."  
 10 Influencer:  
 11 •" Main Contractor.  
 12 •" Sub Contractor.  
 13 •" Building Control."  
 14 Now, Mr Roome, you said a moment ago the document  
 15 was not just for 18 metres in particular , but the  
 16 traffic light system was very strongly focused on the  
 17 above 18 metres/below 18 metres usage, wasn't it?  
 18 A. It was referenced, yes.  
 19 Q. Well, it's more than referenced; it's a critical factor ,  
 20 isn't it ?  
 21 A. Yes.  
 22 Q. If we look at tier 3, customers who always use  
 23 combustible insulation , under reasons, you list as one  
 24 reason, "Not aware of 18m restriction ".  
 25 Were you aware from your survey at this time that

1 there were customers out there using or who might use  
 2 RS5000 above 18 metres because they didn't know about  
 3 the restrictions on use above 18 metres?  
 4 A. I can't give you any specific reference, but it seemed  
 5 to be that some -- and this is just market intelligence,  
 6 not specifically using the RS product, but preceding  
 7 that, things like, you know, the Kingspan-type  
 8 products -- there seemed to be contractors out there  
 9 that had been using these types of products for ten-odd  
 10 years.  
 11 Q. Right.  
 12 The influencers now, as we can see, are main  
 13 contractor, subcontractor, building control, but no  
 14 reference to specialist consultant advising them.  
 15 Do we take it from that list that the less their  
 16 technical knowledge and expertise, the more likely that  
 17 you would be able to sell RS5000?  
 18 A. I don't think it was a real sort of reference to sales,  
 19 it was just more to do with, you know, my understanding  
 20 of the market, because the later slides show my views  
 21 about what investment the company needed to make to help  
 22 strengthen the product in the marketplace.  
 23 Q. If there is a single thing one can derive from these  
 24 three slides, these three tiers, is it this: the more  
 25 ignorant of the restrictions above 18 metres and the

81

1 less equipped to ask difficult technical questions, the  
 2 more likely it was that you would be able to achieve  
 3 sales of RS5000?  
 4 A. I wouldn't have put it like that, no.  
 5 Q. How would you put it?  
 6 A. This was my view of the market and this was my  
 7 understanding. It wasn't any sort of sales tool or  
 8 targeting, it was just my understanding of who was out  
 9 there.  
 10 Q. Did you not see at the time a connection between green,  
 11 "Use", and lack of awareness of the 18-metre restriction  
 12 and the absence of a specialist consultant? Did you not  
 13 see a connection between the two?  
 14 A. Not really, no.  
 15 Q. It's an obvious connection to make, isn't it, with  
 16 respect?  
 17 A. Well, I mean, it could have -- I could have put all of  
 18 the influencers in each of those three tiers quite  
 19 easily. I don't know why I used them in that respect or  
 20 like that, laid it out like that.  
 21 Q. One of the other reasons in the middle column in that  
 22 green column there is cost.  
 23 Were you aware of cost as a driver for the  
 24 likelihood that RS5000 would be used?  
 25 A. Not in particular, it's just cost generally, which was

82

1 a consideration for those types of products, because  
 2 being thermally more efficient, they needed less of the  
 3 material compared to a non-combustible solution. So by  
 4 having something like mineral wool in there as opposed  
 5 to a PIR/phenolic type board, it meant that it was  
 6 a wider system, a deeper system, as it were, and would  
 7 therefore need -- it would lead to a heavier weight on  
 8 the façade and it would have knock-on effects to the  
 9 cost of the structure as well supporting.  
 10 Q. So what was the relevance of cost as the reason for use?  
 11 A. Because it was a lighter, more thermally efficient  
 12 system, these types of products.  
 13 Q. That's not cost, that's performance. What was the  
 14 relevance of cost to the likelihood of use?  
 15 A. Well, because cost -- it's linked to performance,  
 16 because of the application, because if you use  
 17 a thinner, more thermally efficient board, then you have  
 18 a less weighty system, which then requires fixings and  
 19 materials to support that system of less -- I suppose it  
 20 would be less robust, so therefore less cost. Generally  
 21 the whole thing would be less costly.  
 22 Q. I see.  
 23 If we look at the next slide on page 6  
 24 {CEL0003544/6}, we can see some project examples.  
 25 Project examples in tier 2 and tier 3 are RS5000. We

83

1 see, clearly, no RS5000 in tier 1. We do see mineral  
 2 wool. We see RS5000 in tier 2 and we also see it in  
 3 tier 3.  
 4 Do you remember which projects RS5000 was being used  
 5 on in tier 2?  
 6 A. I can't recall, no.  
 7 Q. What about tier 3? This is February 2015, remember.  
 8 A. Only the one that I've detailed there, which was  
 9 a low-rise building.  
 10 Q. Was that Arsenal Youth Academy?  
 11 A. That's correct.  
 12 Q. I see. It is that single project, then, as a single  
 13 project, so Arsenal Youth Academy being built by  
 14 Century Facades using RS5000?  
 15 A. That's correct, yeah.  
 16 Q. Right.  
 17 If we go to slide 7 {CEL0003544/7}, which is the  
 18 next page, please, we can see you set out next steps,  
 19 which are "Do Nothing" in red, "Medium Investment" in  
 20 yellow, and "Large Investment" in green. Do you see  
 21 that?  
 22 A. I do.  
 23 Q. You identify a risk under "Do Nothing", but in fact it's  
 24 referred to in all three columns, that a change in the  
 25 market may outlaw use of combustible insulation in

84

1 façades above 18 metres. Do you see that?  
 2 A. I do, yes.  
 3 Q. Did you have any specific basis for considering that as  
 4 a risk?  
 5 A. I think it's only from people who were giving me  
 6 feedback of those who only used non-combustible  
 7 materials.  
 8 Q. If we look at the final slide, slide 9 {CEL00003544/9},  
 9 you can see you set out a personal view there. Again,  
 10 that's your personal view.  
 11 Was that to support your view that there should be  
 12 medium investment in developing RS5000?  
 13 A. As a salesperson, it was my view that to be able to  
 14 support the sale of this type of product in the  
 15 marketplace, these were the things that people were  
 16 asking for, and I was expecting the company to invest in  
 17 the development or the further development of the  
 18 product to get different certification, which I outline  
 19 here, to make it a product that was more readily  
 20 saleable by myself and my colleagues within the sales  
 21 team.  
 22 Q. I think that's a long way of saying yes, you wanted --  
 23 A. Apologies.  
 24 Q. -- medium investment, which corresponded to the middle  
 25 column in the slide before?

1 A. Yes.  
 2 Q. Let's just look at your reasons. You say:  
 3 "I think we should at least invest in a BBA."  
 4 Is that a BBA certificate?  
 5 A. That's correct.  
 6 Q. Is the BBA certificate, from your experience, a key that  
 7 unlocks the market?  
 8 A. It's one of the significant documents, yes.  
 9 Q. Then you say:  
 10 "If we do not have a BBA the only proof that RS5000  
 11 has gone through the BS8414 testing is to show evidence  
 12 (Face to face with influencer with the BRE test  
 13 report)."  
 14 Now, this is February 2015. Was showing evidence  
 15 face-to-face with an influencer with the BRE test report  
 16 a problem, did you think at that time?  
 17 A. Well, it's something I could not do because I did not  
 18 have the test report.  
 19 Q. Did you not?  
 20 A. No. Not the one -- the all-encompassing one that  
 21 I later found that was what was being requested.  
 22 Q. Did you think at the time you had made this slideshow,  
 23 11 February 2015, that you needed the full, as it turns  
 24 out, 33-page BRE test report in order to be able to have  
 25 the discussion with the influencer?

1 A. I thought so. I didn't quite understand that initially,  
 2 when the product was launched, there was -- I don't know  
 3 if you're going to present this, but there were  
 4 different versions of the report: there was a truncated  
 5 version, a four-page one, which just literally distilled  
 6 the information about the build-up and the test and the  
 7 signatory behind the test; there was a 12-page version,  
 8 which had a bit more information about images of the  
 9 build-ups; and then I latter found out, after I'd left  
 10 the company, that there had actually been a full report  
 11 with photographs of the crib and before and after  
 12 photographs, which enlightened me as to the test,  
 13 basically, and how it was built, which you've alluded to  
 14 with the extra material that had been added.  
 15 Q. Yes. We will come to those three different documents  
 16 later on in your evidence, but just on this document at  
 17 the moment, it looks from the second bullet point that  
 18 you are telling Debbie Berger and Paul Evans that, in  
 19 the absence of a BBA certificate, you would have to show  
 20 evidence face-to-face with an influencer with the BRE  
 21 test report, which would either be the 12-page version  
 22 or the four-page version, and that would be a problem.  
 23 It looks from this as if that would be a problem or  
 24 undesirable. Is that fair?  
 25 A. Well, undesirable for me, because I don't have the

1 information to hand. I wanted confidence that I could  
 2 give to the specifier.  
 3 Q. I see. So the problem from a sales perspective is  
 4 getting into technical details you might not be able to  
 5 explain or stand by?  
 6 A. Yes, I could -- you could put it like that, yes.  
 7 Q. Can we look at the penultimate bullet point. You say:  
 8 "In London, I am seeing my fair share of high rise  
 9 projects. Almost all of the larger developments that  
 10 I am involved with have specialist consultants and  
 11 influencers who are highly knowledgeable of the AD-B and  
 12 fire regs above 18m."  
 13 Just pausing on that, does that tell us, or were you  
 14 telling Debbie Berger and Paul Evans, that customer  
 15 expertise was a barrier to market entry which needed  
 16 investment?  
 17 A. Yeah, I'd say yes.  
 18 Q. Now, at the time -- and we're going to come to this in  
 19 some more detail later, Mr Roome -- did you consider  
 20 that that consideration applied to Grenfell Tower from  
 21 your dealings on the project to date?  
 22 A. Not implicitly, no.  
 23 Q. No.  
 24 Looking at the last bullet point:  
 25 "If we are not prepared to validate the use of

1 RS5000 on projects (as one of our competitors is doing)  
 2 it is inevitable that we will not be able to play in the  
 3 market of most of the larger developers in London on  
 4 18m+ High Rise Facades.”  
 5 The reason for that is, it seems -- is this  
 6 right? -- that those projects had knowledgeable  
 7 specialist consultants who wouldn't accept RS5000?  
 8 A. It's because of the lack of the range of testing or the  
 9 certification. At that point, when the product was  
 10 launched, it did not have any further certification  
 11 other than one -- that one particular test report, and  
 12 the -- most of the clients I was dealing with in London  
 13 were looking for that extra information, as it were.  
 14 Q. And that wasn't a problem, though, that you were  
 15 encountering on smaller projects; is that right?  
 16 A. Well, on low-rise projects it wasn't an issue --  
 17 Q. No, but you're dealing with high-rise projects here.  
 18 A. Some of the high-rise -- I was giving all the  
 19 information I had to people, and they were processing it  
 20 and involving specialists if they needed to.  
 21 Q. Was Celotex in effect relying on the lack of expert  
 22 knowledge or technical expertise within the industry to  
 23 achieve specifications?  
 24 A. I don't think that was the case, no.  
 25 Q. Now, let's look at {CEL00001096}. This is a further

1 presentation that you sent on 1 May to various  
 2 colleagues, including Mr Roper, I think. Is this  
 3 a document that you prepared?  
 4 A. Is this the one titled "RS5000 Market Analysis" on the  
 5 screen?  
 6 Q. Yes.  
 7 A. I need to see the ... sorry, it's gone blank.  
 8 SIR MARTIN MOORE-BICK: Yes, it will come back, don't worry.  
 9 A. Okay.  
 10 (Pause)  
 11 MR MILLETT: Yes, this is the email from you to a number of  
 12 people at Celotex, including Jon Roper. Do you see?  
 13 A. Yes.  
 14 Q. The subject is "Region Meeting - RS5000 Presentation",  
 15 and you say:  
 16 "Hi Team,  
 17 "Please find attached my presentation relating to  
 18 RS5000, the competition and introduction to the BS8414  
 19 testing.  
 20 "If you have any questions or if you find that you  
 21 need advice please let me know."  
 22 Let's look at that presentation. That is at  
 23 {CEL00001097}, and it's entitled "RS5000 Product  
 24 Training". Is that the slideshow that you attached to  
 25 this email?

1 A. That's correct, yes.  
 2 Q. If we look on, it says at page 12 {CEL00001097/12},  
 3 "BS8414", and then sets out the summary of the  
 4 classification for a BS 8414-2 system; do you see that?  
 5 A. I do, yes.  
 6 Q. And external fire spread and internal fire spread are  
 7 there identified.  
 8 If you look at page 14 {CEL00001097/14}, slide 14,  
 9 we can see the guidance set out in BCA Technical  
 10 Guidance Note 18, issue 0, from June 2014 that you and  
 11 I looked at earlier on this morning.  
 12 A. Yes.  
 13 Q. Can we take it from that that, by this time -- this is  
 14 1 May 2015 -- you were well aware of the above-18-metre  
 15 requirements and the details about the tests?  
 16 A. I was, yes.  
 17 Q. If we go to page 18 {CEL00001097/18} in that, if we can  
 18 see slide 18, here again we see that within this slide  
 19 deck is your 11 February slide deck that you had  
 20 originally sent to Debbie Berger and Paul Evans --  
 21 A. That's correct.  
 22 Q. -- with the three tiers. Do you see that?  
 23 A. Yes.  
 24 Q. If we look on, we can see page 19, tier 1; page 20,  
 25 tier 2; page 21, tier 3. Then if we look on to page 22,

1 there are some project examples, we had those before.  
 2 If we look on again to page 23, we don't see -- in fact,  
 3 that's the end of the slide, there is no page 23.  
 4 My point to put to you is that we don't see your  
 5 personal view or the next steps that you had originally  
 6 included in your slides.  
 7 A. No.  
 8 Q. Do you know why that is? Why did you take those out?  
 9 A. I think it was common knowledge about what my opinion  
 10 was, and that last slide was really for the management  
 11 team, to explain to them the investment that they needed  
 12 to make. This was more of a presentation to my  
 13 colleagues in the southern sales team, really about  
 14 a bit more information that I'd sort of put together  
 15 myself in layman terms, almost, about the testing  
 16 procedure and the way in which I saw the market, exactly  
 17 the same as before.  
 18 My team were well aware -- well, my team; the team  
 19 that I was within were quite well aware of what I wanted  
 20 or what I would like to be seen to be done within the  
 21 company to invest further within that product.  
 22 Q. What your colleagues didn't get was your views in the  
 23 last slide we saw which justified your argument, if  
 24 I can put it that way, for a medium investment,  
 25 including the difficulty with presenting BS 8414 test



1 results to influencers , and the last two bullet points  
 2 on that slide we saw?  
 3 A. But we'd already spoken about that. You know, we were  
 4 quite a cohesive team, and it was quite well known about  
 5 my views.  
 6 Q. So can we take it that people like Jon Roper would have  
 7 been familiar with the views that you had been  
 8 expressing in that slide , even though you hadn't  
 9 included it in this slide deck?  
 10 A. Yes, sorry, by that stage Jon Roper was in the southern  
 11 sales team, so he had transitioned across, and then  
 12 Debbie Berger had back-filled his position in product  
 13 management. So any questions that would have come to  
 14 light , I had Jon Roper there from the sort of  
 15 technical/product management standpoint, although he was  
 16 now in a different position within sales .  
 17 Q. Now, turning then to the question of marketing  
 18 materials, can we go to paragraph 6 of your witness  
 19 statement {CEL00010031/2}, please, and you see that you  
 20 say there, and this is back to the 5 August meeting:  
 21 "At the meeting I was provided with the RS5000  
 22 marketing material to pass to potential customers. This  
 23 meeting was the first time I had been provided with  
 24 details about the product. However, I was aware a few  
 25 weeks earlier that a new product was in the offing ."

1 I think you were provided, weren't you, on that  
 2 occasion with the compliance guide and the specification  
 3 guide, among other documents; is that right?  
 4 A. Correct, there was, I think, about four or five  
 5 documents that were initially released from the  
 6 marketing team.  
 7 Q. Indeed, and they have been listed in your statement and  
 8 indeed elsewhere. Let's just look at the compliance  
 9 guide first , please, {CEL00000012/2}. You can see what  
 10 the guide says. At the very top of the page, next to  
 11 the pink box, it says:  
 12 "This document provides guidance on complying with  
 13 Approved Document B2 (AD B2) for external wall cladding  
 14 systems fixed to steel frame or masonry constructions.  
 15 It provides a step by step guide to an alternative route  
 16 to compliance for AD B2 through meeting the performance  
 17 criteria set out in BR 135 through testing to  
 18 BS 8414-1:2002 or BS 8414-2:2005."  
 19 I'm assuming that this document was given to you at  
 20 the marketing launch, at the launch meeting on 5 August.  
 21 Had you seen it before that time?  
 22 A. I had not, no.  
 23 Q. Did you get an opportunity at that meeting to read this  
 24 document thoroughly or these documents as a suite?  
 25 A. No, we were presented with them after the fact . I think

1 when we -- I can't remember exactly whether it was  
 2 before or after the meeting, but not enough for us to  
 3 digest the data within it . It was presented to us as  
 4 part of that launch presentation that you showed us  
 5 earlier .  
 6 Q. When we look at the words "step by step guide to  
 7 an alternative route to compliance", did you understand  
 8 when you saw this document, whether it was at the  
 9 meeting or later , that it was an alternative to  
 10 satisfying the combustibility requirements in  
 11 section 12.7 and table A7 of Approved Document B?  
 12 A. I think that was what was covered in the meeting, yes.  
 13 Q. I was going to ask you that: there was discussion in the  
 14 meeting about that, was there?  
 15 A. I can't be absolutely sure, but I'm pretty sure, yeah.  
 16 Q. Just so we're not in any doubt about it , you were clear  
 17 in your mind at this point, seeing this document, that  
 18 RS5000 would not provide a linear route to compliance,  
 19 ie that it was not a material of limited combustibility?  
 20 A. Correct, yes.  
 21 Q. If we look at page 3 {CEL00000012/3} in the far  
 22 right-hand column of that document, it says there,  
 23 underneath the three little bullet arrows:  
 24 "The classification applies only to the system as  
 25 tested and detailed in the classification report. The

1 classification report can only cover the details of the  
 2 system as tested. It cannot state what is not covered.  
 3 When specifying or checking a system it is important to  
 4 check that the classification documents cover the  
 5 end-use application ."  
 6 Then if you turn on to page 4 {CEL00000012/4}, in  
 7 the middle column, we can see the system that was  
 8 actually tested, and there is the diagram or drawing we  
 9 looked at before, which was contained in the slideshow  
 10 presented by Jon Roper at the launch meeting, I think,  
 11 as you told us. Again, there is no mention in there of  
 12 an additional layer of 6 millimetres of magnesium oxide,  
 13 is there?  
 14 A. Correct.  
 15 Q. There is no mention in there of a layer or level of  
 16 8-millimetre Marley Eternit Natura cementitious fibre  
 17 board as the cladding material.  
 18 A. Correct.  
 19 Q. Again, I'm assuming that you didn't twig that they were  
 20 in there because you didn't know, no one had discussed  
 21 it?  
 22 A. I had no reason to think that that was not what was  
 23 shown.  
 24 Q. Do you remember any discussion between you and Jon Roper  
 25 or Paul Evans or anybody else you dealt with which led

1 you to think that this was indeed the system as  
2 constructed? In other words, did they actually tell you  
3 anything in addition to the documents that we've seen  
4 which would have led you to think that the test rig as  
5 identified in figure 4 on this page was the test rig  
6 that was tested?

7 A. No. I had no other conversations. This was what was  
8 presented to all of the sales teams, myself and my  
9 colleagues.

10 Q. Now, can we turn to {CEL00000013}. This is the  
11 specification guide, and the questions I'm about to ask  
12 you are pretty similar to those I have been asking you  
13 for the last few minutes, but let's just go through the  
14 document.

15 If we look at page 5 {CEL00000013/5} of this  
16 document, we can see, under the heading "Building above  
17 18 metres" -- this is just below the left-hand pink box  
18 that says:

19 "Celotex RS5000 has been successfully tested to  
20 BS 8414-2:2005 (Fire performance of external cladding  
21 systems)."

22 Then under "Building above 18 metres", it says:

23 "Celotex RS5000 has been successfully tested to  
24 BS 8414-2:2005 ... meets the criteria set out in BR 135  
25 and is therefore acceptable for use in buildings above

97

1 18 metres in height."

2 It goes on to clarify in the third paragraph,  
3 right-hand column, that:

4 "The fire performance and classification report for  
5 Celotex RS5000 only relates to the components detailed  
6 above. Any changes to the components listed will need  
7 to be considered by the building designer."

8 Is it fair to say that this explicitly warns the  
9 customer who looks at this document and reads it that  
10 RS5000 can only be used as part of the system as tested?

11 A. Correct.

12 Q. And you understood that at the time --

13 A. I did, yes.

14 Q. -- presumably?

15 Now, let's look at the components that formed part  
16 of the test according to this document.

17 Middle column again, or left-hand column, if you  
18 like:

19 "The system tested to BS 8414-2:2005 was as follows:  
20 •" 12mm fibre cement panels [the Marley Eternit]  
21 •" Supporting aluminium brackets and vertical rails  
22 •" 100mm Celotex RS5000  
23 •" 12mm non-combustible sheathing board  
24 •" 100mm SFS system  
25 •" 2 x 12.5mm plasterboard."

98

1 Again, there's no reference there to an additional  
2 6 millimetres of magnesium oxide or 8 millimetres of  
3 Marley fibre cement panels at the thermocouples, is  
4 there?

5 A. Correct.

6 Q. So the system described here and the components  
7 described in this list was not in fact the system  
8 actually tested, was it?

9 A. It seems not to have been, no.

10 Q. This is a thoroughly misleading document, isn't it, even  
11 if one did read it thoroughly?

12 A. It turns out, correct, yes.

13 Q. Did you realise that at the time?

14 A. No, it wasn't until much later, when I was asked to  
15 attend a meeting with the lawyers for Celotex a couple  
16 of years ago with Linklaters, that I was finally shown  
17 the full test report.

18 Q. Did you consider at the time that there was a risk that  
19 the claim that RS5000 meets the criteria set out in  
20 BR 135 and is therefore acceptable for use in buildings  
21 above 18 metres might lead a reader to believe that it  
22 was suitable generally in combination with any system?

23 A. I didn't have any reason to believe that that was the  
24 case, no.

25 Q. Well, let me just press you a little bit on that.

99

1 When it says, as we've seen, "and is therefore  
2 acceptable for use in buildings above 18 metres",  
3 I showed you that terminology in the slideshow and  
4 I thought you had accepted that that meant that there  
5 would be a risk that a reader might think that, because  
6 it had passed the test, it could be used generally in  
7 buildings above 18 metres in height. That is also so,  
8 is it not, in respect of this marketing literature?

9 A. Looking at it now with hindsight, yes.

10 Q. Yes.

11 Now, Mr Hyett has considered these documents, he is  
12 one of the experts who has been enlisted to assist  
13 the Inquiry, and his opinion is that the claim that  
14 RS5000 is acceptable for use in buildings above  
15 18 metres in height is an erroneous claim; I think you  
16 accept that?

17 A. Yes.

18 Q. Yes.

19 Now, in addition to the specification guide and the  
20 compliance guide which we've looked at, Celotex also  
21 produced a datasheet for RS5000, didn't it?

22 A. It did, yes.

23 Q. We can look at that. That's at {CEL00007961}. Can we  
24 look at that, please.

25 Was this a document that you received as one which

100

1 was intended you should send out as your marketing  
 2 effort or part of your marketing effort?  
 3 A. I think this was one of the documents that was part of  
 4 the pack that we were given at the launch of the  
 5 product, yes.  
 6 Q. Right. Let's just look at the pink banner at the top of  
 7 page 1:  
 8 "Celotex RS5000.  
 9 "Premium Rainscreen Cladding Board.  
 10 "(suitable for buildings above 18 metres in  
 11 height)."  
 12 Let's turn to the next page, please {CEL00007961/2}.  
 13 Same pink banner, same wording. Note the words in  
 14 brackets, "suitable for buildings above 18 metres in  
 15 height".  
 16 Next page, please {CEL00007961/3}. Same banner,  
 17 same wording again. Do you see that?  
 18 A. I do.  
 19 Q. That's the last page of that document.  
 20 So we can see this banner, "suitable for buildings  
 21 above 18 metres in height", is repeated on the top of  
 22 every single page of this datasheet; yes?  
 23 A. Yes.  
 24 Q. I think it's right to say this is the shortest datasheet  
 25 or shortest piece of marketing material that the

101

1 marketing team had in relation to RS5000.  
 2 A. It may have been, yes.  
 3 Q. In fact, it's correct, isn't it, that RS5000 was not  
 4 suitable for buildings over 18 metres unless it formed  
 5 part of the exact system tested under BR 135?  
 6 A. Correct.  
 7 Q. Therefore, do you accept that those words at the top of  
 8 those pages in the banner were apt to lead the reader to  
 9 think that Celotex RS5000 was suitable for use in all  
 10 buildings over 18 metres in height?  
 11 A. That would be the case -- could be the case, yes.  
 12 Q. Again, a thoroughly misleading wording; do you accept  
 13 that?  
 14 A. It's not -- yeah, it's not accurate.  
 15 Q. It's misleading.  
 16 A. It could be construed as misleading, yes.  
 17 Q. Well, it is misleading because it doesn't contain the  
 18 caveat.  
 19 A. Yes.  
 20 Q. Thank you.  
 21 Again, this is a point we've revisited now, I think,  
 22 a number of times, but just on this document, if you go  
 23 to page 1 {CEL00007961/1}, please, under "Introduction",  
 24 we can see the now familiar wording after the reference  
 25 to the test. In the fourth line, it says:

102

1 "... the first PIR insulation board to meet the  
 2 performance criteria in BR 135 for insulated rainscreen  
 3 cladding systems and therefore is acceptable for use in  
 4 buildings above 18 metres in height."  
 5 That wording is repeated in the second bullet point  
 6 just a little bit lower down, under the words:  
 7 "With Celotex RS5000 you are specifying  
 8 an insulation board that ..."  
 9 Do you see that?  
 10 A. I do.  
 11 Q. Again, the same question: do you accept that that  
 12 wording is potentially misleading because it might lead  
 13 a reader to think that, simply because it had passed  
 14 a test, it is suitable for any building above 18 metres  
 15 in height?  
 16 A. Yes, potentially.  
 17 Q. Yes.  
 18 Let's look at {CEL00007961}, please --  
 19 SIR MARTIN MOORE-BICK: Well, it's actually worse than that,  
 20 in the end, isn't it, because if we go back to page 3  
 21 {CEL00007961/3}, which deals with certification, I think  
 22 there it gives us some details about the system tested  
 23 which are just not correct.  
 24 A. In relation to what is now known?  
 25 SIR MARTIN MOORE-BICK: Yes.

103

1 A. I agree.  
 2 SIR MARTIN MOORE-BICK: It is not a correct description of  
 3 the system that was tested.  
 4 A. I agree, yes.  
 5 SIR MARTIN MOORE-BICK: Right, thank you.  
 6 MR MILLETT: Yes. That was my next question.  
 7 SIR MARTIN MOORE-BICK: Sorry again.  
 8 MR MILLETT: No. Just to follow up and finalise that,  
 9 that's because it doesn't mention the 6 millimetres  
 10 magnesium oxide?  
 11 A. Correct.  
 12 Q. In fact, taken as a suite, would you say that the  
 13 Celotex marketing materials you were given were  
 14 misleading about RS5000 and its use, suitability and  
 15 safety above 18 metres?  
 16 A. It looks so, yes.  
 17 Q. Thank you.  
 18 Now, I would like to look with you at some examples  
 19 of marketing communications, if we can. Can we go to  
 20 {CEL00000407}. This is a press release, and it was  
 21 prepared, we think, for the launch of RS5000.  
 22 Are you familiar with this document, Mr Roome, do  
 23 you think?  
 24 A. I'm not familiar, but I knew of its existence.  
 25 Q. Who wrote it, do you think?

104

1 A. I should imagine it's the product management and  
2 marketing team.  
3 Q. Right.  
4 It's entitled:  
5 "Celotex. Reaching New Heights.  
6 "Celotex launch premium performance PIR solution for  
7 rainscreen cladding."  
8 So that's the catchline or the strapline.  
9 Then in the second paragraph, it says:  
10 "The latest addition to the '5000' series product  
11 range, Celotex RS5000 has successfully tested to  
12 BS 8414-2:2005, meets the criteria set out in BR 135,  
13 and therefore is acceptable for use in buildings above  
14 18 metres in height."  
15 Just looking at that, am I right in assuming,  
16 I think, that you weren't involved in wording this  
17 document?  
18 A. That's correct.  
19 Q. Did you see it at the time, do you think?  
20 A. Sorry, did I?  
21 Q. Did you see it at the time?  
22 A. I must have done.  
23 Q. Did you use it? Did you use it to market RS5000?  
24 A. Not from my recollection, no. I think it's more --  
25 I would have sent out the marketing literature that we'd

105

1 looked at previously.  
2 Q. If we look at the last paragraph -- I've shown you the  
3 second one and the by now almost mantric wording,  
4 "therefore acceptable for use". Looking at the last  
5 paragraph, it says, and this is in quotation marks:  
6 "'Celotex RS5000 is the first PIR board to  
7 successfully test to BS 8414 making it acceptable for  
8 use in buildings above 18 metres in height,' said Jon  
9 Roper, Product Manager for Celotex."  
10 Just pausing there, that quotation, when he says  
11 "making it acceptable for use in buildings above  
12 18 metres in height", that's misleading, isn't it,  
13 because it tends to suggest that, because it has passed  
14 the BS 8414 test, it's acceptable for use in any  
15 building above 18 metres in height?  
16 A. Looking at that now, yes.  
17 Q. Yes. Then he goes on:  
18 "'As a company, we are always looking to innovate  
19 and develop solutions for new applications. RS5000 will  
20 allow contractors, architects and specifiers to use  
21 premium performance PIR in externally cladded walls for  
22 the first time in high-rise constructions."  
23 That is a misleadingly general claim, because what  
24 is missing is the extremely important caveat that it can  
25 only be used if it is used in exactly the same external

106

1 wall construction as that which had passed the BS 8414  
2 test.  
3 A. Correct.  
4 Q. Yes.  
5 Did you have any concerns at the time about these  
6 claims made in these marketing materials and in this  
7 press release?  
8 A. Not at the time, no.  
9 Q. Can we look at {INQ00014100}. Thank you. This is  
10 an article from Specification Online, as we can see from  
11 the very top of the document. It looks like it's dated  
12 Tuesday, 22 March 2016.  
13 Do you know what caused this to be put out?  
14 A. I've no idea. Had I left the company by then, that  
15 date?  
16 Q. Yes.  
17 A. I'm pretty sure I had, hadn't I?  
18 Q. I don't think you were actually there at this time. So  
19 you can't help us with this document?  
20 A. I can't, no.  
21 Q. Well, perhaps it's a document best left for others,  
22 then.  
23 Can we then look at {CEL00001382}. This is an email  
24 sent by Jonathan Roper to you on 29 September 2014 as  
25 well as to others within Celotex. It says:

107

1 "All,  
2 "Please find below our standard response on queries  
3 regarding RS5000 & BBA certification.  
4 "Any questions, please call."  
5 Do you see that?  
6 A. I do.  
7 Q. He sets out a longish text below. You see that.  
8 Do you remember being asked by customers about the  
9 kinds of things which had led to this standard response?  
10 A. I can't remember exact questions, but maybe this was put  
11 together because I and my colleagues had started to give  
12 feedback to the product management team about questions  
13 that were being raised.  
14 Q. Right.  
15 Now, this is a month or so, perhaps just a little  
16 under two months, after the launch, wasn't it, end of  
17 September 2014?  
18 A. Yes.  
19 Q. You can see that Jon Roper is saying that it's  
20 a response on queries regarding RS5000 and BBA  
21 certification.  
22 Were customers coming to you and expressing concern  
23 that RS5000 did not have a BBA certificate?  
24 A. I think that was one of the documents that was being  
25 asked for, yes.

108

1 Q. Being asked for; were they expressing concern that  
 2 RS5000 didn't have such a certificate and that they were  
 3 encountering problems as a result of not being able to  
 4 produce it?  
 5 A. I think it was because of the -- my recollection of the  
 6 events was that the BBA was one of the recognised  
 7 documents that some insurers were looking for, for  
 8 materials going on to buildings generally, and because  
 9 the product was so new and the timeline of the  
 10 development of this particular product, they hadn't got  
 11 a BBA at the time. I don't even know if they had a BBA  
 12 at all by the end of my tenure within the company.  
 13 I don't think they did.  
 14 Q. Right.  
 15 Let's look down at the standard response. We can  
 16 see the first paragraph, which repeats pretty much  
 17 verbatim what we've seen in the datasheet and in the  
 18 specification guide and the compliance guide, and we've  
 19 got the mantra "therefore complies with the requirements  
 20 of ADB for buildings that exceed 18 metres in height",  
 21 that's in there, so that was part of the standard  
 22 response.  
 23 Then there is a reference in the second paragraph to  
 24 the NHBC requirements. Do you see that there?  
 25 A. I do, yes.

1 Q. And then in the third paragraph it says:  
 2 "Celotex RS5000 has current certification from the  
 3 Building Research Establishment (BRE) confirming the  
 4 product has met the criteria set out in BR 135 and  
 5 therefore is acceptable in rainscreen cladding systems  
 6 above 18 metres in height."  
 7 Again, for the same reason that you have given  
 8 before, do you accept that that is a thoroughly  
 9 misleading response, if it were given to a customer who  
 10 asked?  
 11 A. Looking at that now, yes.  
 12 Q. Yes.  
 13 Now, coming back to the second paragraph, NHBC  
 14 standards, there is a reference there to chapter 6.9;  
 15 were you familiar with the NHBC standards at the time?  
 16 A. No, not at all of them, it was only this particular  
 17 reference that was -- or, sorry, this particular chapter  
 18 that was brought to light at some point, again within my  
 19 tenure at Celotex, after the launch of RS5000, that  
 20 I think -- I don't know if it was just me but, you know,  
 21 customers or potential clients were bringing this to my  
 22 attention, at least.  
 23 Q. Right. This is end of September 2014. Are you saying  
 24 that you at the time -- and I know you were only one of  
 25 a number of recipients of this document -- you

1 personally at the time weren't aware of the NHBC  
 2 standards relating to curtain walling and cladding?  
 3 A. I wasn't, no.  
 4 Q. Okay, let me see if I can pinpoint the timing, then. If  
 5 we can go to {CEL00001040}, please. We will come back  
 6 to this email in just a moment. This is an email from  
 7 you dated 22 October 2014, so about three weeks after  
 8 the email we have been looking at, to Debbie Berger and  
 9 Paul Evans:  
 10 "Hi Team,  
 11 "If any of you find yourself in conversations  
 12 regarding a need for a BBA certificate for use of RS5000  
 13 on NHBC jobs you may want to be made aware of the  
 14 following."  
 15 Then you set out the guidance at chapter 6.9. Do  
 16 you see it there?  
 17 A. I do, yes.  
 18 Q. Then if you go over the page to page 2 {CEL00001040/2},  
 19 the email continues. At the top of the page, first  
 20 bullet point:  
 21 "I have attached a copy of the NHBC Chapter 6  
 22 Guidance on Curtain Wall & Cladding."  
 23 Then you say:  
 24 "RS5000 is not classed as a whole system but neither  
 25 would any other individual component. As far as I know,

1 no one company manufactures a complete rainscreen  
 2 system.  
 3 "I hope that you can you (sic) reference to this  
 4 document to help counter the argument for the need of  
 5 a BBA for RS5000 on NHBC projects."  
 6 So this is three weeks after the email you've seen.  
 7 When do you think you first became aware of the NHBC  
 8 standard that you're now sending to Debbie Berger and  
 9 Paul Evans on 22 October 2014?  
 10 A. I can't be sure.  
 11 Q. Was it between those two dates, 29 September and  
 12 22 October, do you think?  
 13 A. I would imagine it must have been, yes.  
 14 Q. Right. And you were wanting them to refer to the NHBC  
 15 guide to counter the argument for the need for a BBA.  
 16 Why was that?  
 17 A. I think it was just to understand what the NHBC were  
 18 looking for, and what documents that they would accept,  
 19 either a BBA or a test report, but the option that they  
 20 could have used either. So really for me it was a --  
 21 for me including this document, sending it to those  
 22 people, it was to really say to them, "Look, this is the  
 23 importance of the likes of having a BBA", for instance,  
 24 but I was led to -- not led to believe; I thought that  
 25 it might be, with the test reports, a way of appeasing

1 the NHBC on schemes where that build-up was being used.  
 2 Q. You knew very well, at least by that time, that it was  
 3 a system test, not a product test.  
 4 A. Correct, yes.  
 5 Q. And we get that from your last paragraph but one.  
 6 Can we then go back to Jon Roper's email of  
 7 29 September that we were looking at before, which is at  
 8 {CELO0001382}, and in the third paragraph there -- and  
 9 I've shown you this, I'll show it to you again -- it  
 10 says:  
 11 "Celotex RS5000 has current certification from the  
 12 Building Research Establishment (BRE) confirming the  
 13 product has met the criteria set out in BR 135 and  
 14 therefore is acceptable ..."  
 15 It says "the product has met the criteria", not the  
 16 system.  
 17 Is it the case that you and your colleagues in the  
 18 marketing team were effectively being told --  
 19 A. In the sales team.  
 20 Q. In the sales team -- were effectively being told to  
 21 provide a response as standard that the product has met  
 22 the criteria, not the system?  
 23 A. I didn't pick up on the wording of that in particular.  
 24 It looks like it was a statement that we could use,  
 25 literally copy and paste, in response to any queries we

113

1 were getting.  
 2 Q. Indeed, and such a response would be thoroughly  
 3 misleading, because the RS5000 product was never tested,  
 4 was it? A system which incorporated that product was  
 5 tested and passed the BR 135 criteria.  
 6 A. Correct, yes.  
 7 Q. So, again, is this another example of misleading  
 8 marketing?  
 9 A. With hindsight, it could be construed as such, yes.  
 10 Q. Yes. You have told me "with hindsight" now a number of  
 11 times. Can you explain why it didn't occur to you at  
 12 the time that this was misleading marketing literature,  
 13 taken as a whole, given the impressions that you accept  
 14 today, sitting here, it gave?  
 15 A. I think with the knowledge that I've gleaned since,  
 16 because I'm still in the same market, I was still,  
 17 I suppose, new to the whole world of insulation, and  
 18 I was building up my knowledge as I went, and I was  
 19 relying on, you know, the specialists within the  
 20 business, ie the product management and the marketing  
 21 team, to give me and my colleagues guidance as to how to  
 22 respond to professionals in the industry requesting  
 23 certain information.  
 24 Q. Do you know if you ever gave this response as standard  
 25 to any customer who asked about BBA certification for

114

1 RS5000?  
 2 A. I may have done, as a sort of a copy and paste exercise,  
 3 but I can't give you individual examples.  
 4 Q. Did you ever come across any customer or potential  
 5 customer who was proposing to use or install  
 6 a rainscreen cladding exactly the same as that which had  
 7 been tested, or at least according to the marketing  
 8 literature had been tested?  
 9 A. Not to my knowledge, no.  
 10 Q. No.  
 11 Can we then go on in time to {CELO0001058}. Now,  
 12 this is an email chain in October 2014, and runs to  
 13 January 2015.  
 14 Can we go to page 3 {CELO0001058/3}, please, to  
 15 begin with. This is an email from you to Debbie Berger  
 16 on 20 October 2014, so two days before you sent her the  
 17 NHBC document, as we've seen before, and you say,  
 18 "Hi Debs" -- can you see that? It's on page 3, second  
 19 email down.  
 20 A. I can, yes.  
 21 Q. "Hi Debs,  
 22 "I think we have although we have a product we are  
 23 lacking a 3rd party approval for the SFS Inner -  
 24 Brickwork Outer application.  
 25 "Kingspan K12 have a BBA for this application and we

115

1 don't seem to be able to offer anything other than  
 2 a carefully worded email.  
 3 "Is this something that we are looking to address in  
 4 the New Year?"  
 5 It doesn't get picked up again until the top of the  
 6 page, you can see that, when you ask Paul Evans to put  
 7 it on his radar. Do you see that?  
 8 A. I do, yes.  
 9 Q. Do you remember if this was in relation to RS5000?  
 10 A. No, I can't be sure.  
 11 Q. You can see that you say:  
 12 "Kingspan K12 have a BBA for this application and we  
 13 don't seem to be able to offer anything other than  
 14 a carefully worded email."  
 15 When you say "carefully worded", what was that  
 16 email? What did you say in it?  
 17 A. Well, I don't think I said anything. I don't know.  
 18 I think I was looking for some sort of support from the  
 19 product management/marketing team to give me guidance  
 20 for a product, or that we didn't have a product at the  
 21 time.  
 22 Q. Was the problem that you were identifying that  
 23 Kingspan K12 -- or it's K15, perhaps -- had a BBA and  
 24 you didn't have one, and instead had to write an email  
 25 which was carefully worded?

116

1 A. No, I think -- I mean, the Kooltherm, the K that is  
2 referenced there, the Kooltherm range, there was  
3 different products for different applications, and the  
4 K12 -- I think just reading the subject matter there, it  
5 says brickwork outer, SFS inner.  
6 Q. I follow. So in fact it's not a mistake for K15; it is  
7 actually a different product?  
8 A. Potentially, yeah, I think that's likely.  
9 Q. Right.  
10 A. We may or Celotex may not have had a product for that  
11 application.  
12 Q. I follow.  
13 Does this then tell us, at least in general terms,  
14 that if you don't have a BBA, you have to produce  
15 carefully worded marketing material or assurances to get  
16 around the problem?  
17 A. Well, I think it's looking for evidence, people are  
18 looking for evidence, full stop, yes.  
19 Q. Yes, and a carefully worded email wouldn't be evidence,  
20 and that's why you were putting it on Debbie Berger's  
21 radar?  
22 A. Yes.  
23 Q. Yes.  
24 Can we go to {CEL00001065}, please. This is later  
25 in time, this is February 2015, and I just want to show

117

1 you an email chain in that month, and start at the  
2 bottom of the email chain, if we can, and go to page 6  
3 {CEL00001065/6}, I think is what we're after. You can  
4 see that it begins on 6 February with an email from  
5 Chris Clarke, who is a technical co-ordinator at MCIAT,  
6 and the subject is "London Dock External Wall detail",  
7 do you see that?  
8 A. I do.  
9 Q. It comes to you and copied to others within  
10 St George Plc, who I think are the main contractor.  
11 If you look at the third paragraph down, he says:  
12 "The final thing we require is agreement of the  
13 insulation manufacturer that the detail we are proposing  
14 does not pose any risk over what has been tested."  
15 It's a bit vague, that, so we will try to find out a  
16 bit more about what it's about, because you I think  
17 respond.  
18 If you go up to page 5 {CEL00001065/5}, you see that  
19 you write to Paul Evans internally, copied to  
20 Jonathan Roper and Debbie Berger, and you say:  
21 "Hi Paul,  
22 "What are we prepared to say in relation to the use  
23 of RS5000 on the London Dock Project for St. George.  
24 "This a huge job that will be ongoing for 10 years  
25 on the former News International site in Wapping."

118

1 Do you see that?  
2 A. I do.  
3 Q. That's 9 February, three days later.  
4 Then looking up the chain, Debbie Berger comes back  
5 to you the same day, much, much later the same day:  
6 "Hi Jonathan  
7 "Have you had an answer on this yet?"  
8 Presumably an answer from Paul Evans, and if we go  
9 up the chain again, we come to page 4 {CEL00001065/4},  
10 and you go back to her and say:  
11 "Nothing as yet and I need to get an answer back  
12 soon please."  
13 And we go up the chain again, please, to page 3  
14 {CEL00001065/3}, and we have an email from you to  
15 Debbie Berger. Do you see that?  
16 A. I do.  
17 Q. You set out the differences there between the system  
18 there and the one that's tested, and you say:  
19 "The inner build up matches ours up to the sheathing  
20 board.  
21 "The only elements that are different are that the  
22 exterior panels are stone and metal cassettes which seem  
23 to be butted up against one another.  
24 "Someone needs to make a call what we advise or we  
25 will have to walk away from the job and just be happy

119

1 selling the product to others.  
2 "The problem that I have here is that most of the  
3 large rainscreen jobs in London are being scrutinised by  
4 specialists. Kingspan obviously want to hang onto as  
5 much of this business as possible so are writing their  
6 ' letters '."  
7 Do you see that?  
8 A. I do.  
9 Q. Does that tell us that Celotex at least considered  
10 providing advice about suitability on certain projects,  
11 such as this one?  
12 A. I think that's the question I was asking, really, what  
13 would we do, or what would Celotex do, I should say, in  
14 relation to a response, ie I was seeking guidance.  
15 Q. About whether you should give advice and, if so, what  
16 advice you should give, or whether you should walk away?  
17 A. Yeah, not the advice that I should give, but the advice  
18 that the company would give, or we just face facts and  
19 walk away from this type of business.  
20 Q. You say "this type of business"; can you be specific?  
21 A. Well, where we're being asked to provide evidence or  
22 I suppose desktop studies or something to appease people  
23 who are looking for a build-up that was not as was  
24 tested.  
25 Q. By specialists in that last paragraph, do you mean

120

1 fire engineers or façade consultants?  
 2 A. Yeah, anyone who would be qualified to give such  
 3 evidence.  
 4 Q. Yes, and by "letters" in quotation marks, what are you  
 5 referring to there?  
 6 A. I think at the time Kingspan were writing some sort of  
 7 letter per project to -- I'm not sure if it was to  
 8 underwrite the use of the product, but it was something  
 9 to do with the -- give the contractor some sort of  
 10 assurance that that build-up that had been used on that  
 11 particular project would be -- I don't know if  
 12 acceptable or close to one of the tests that they had  
 13 already performed. That was the sort of -- my sort of  
 14 understanding of that.  
 15 MR MILLETT: I see.  
 16 Now, can we just go on up the page -- Mr Chairman,  
 17 I think I will finish this email run off, if that's  
 18 convenient.  
 19 SIR MARTIN MOORE-BICK: Yes, of course.  
 20 MR MILLETT: If we can go up the page to the bottom of  
 21 page 2, Debbie Berger writes back to you on 10 February,  
 22 and then I'm flipping back to page 3, she says:  
 23 "In your opinion Jonathan and I won't hold you to  
 24 this but do you think RS is ready for major projects?  
 25 "What do you mean by 'specialists'?"

121

1 So she has asked the question.  
 2 "I wish I could help you more in getting the product  
 3 on these projects. It must be so frustrating to have to  
 4 walk away from these opportunities."  
 5 Do you see that?  
 6 A. I do.  
 7 Q. Then if you go to your response to her back on page 2  
 8 {CEL00001065/2}, please, the same day, 10 February 2015,  
 9 you say:  
 10 "Just to keep you both in the loop I have a meeting  
 11 with the Fire Consultant for the project this Thursday.  
 12 "In the meeting he will review our test report and  
 13 look to establish what WE need to be prepared to say to  
 14 appease the NHBC. I can't repeat what I was told about  
 15 the NHBC in this email but just to say that they aren't  
 16 particularly helpful in resolving the ongoing  
 17 conversation regarding the use of 'Combustible'  
 18 materials."  
 19 What was that about? When I say "that", what were  
 20 you told by the NHBC?  
 21 A. Well, I don't think I directly was told anything from  
 22 the NHBC, this was just feedback from -- sorry, I'm just  
 23 reading back through it again.  
 24 Q. Yes, perhaps I'll rephrase my question. Perhaps  
 25 I wasn't entirely accurate.

122

1 In the first sentence you are told that the  
 2 fire consultant will "review our test report and look to  
 3 establish what WE need to be prepared to say to appease  
 4 the NHBC". What is it that you thought at the time the  
 5 NHBC was concerned about?  
 6 A. Well, I just think the NHBC had a view that they wanted  
 7 certification for the product in different build-ups,  
 8 and this particular situation was one that we didn't  
 9 have a test for, and -- I mean, looking back at it now,  
 10 the NHBC were -- I don't think they were being helpful,  
 11 ie from a commercial team wanting to push things  
 12 forward, as in the contractor, but looking at this now,  
 13 the NHBC were perfectly within their rights to require  
 14 further evidence or testing data.  
 15 Q. Was the concern, as you understood it, from the NHBC's  
 16 side that they were not happy that 8414 tests were being  
 17 used for wider applications?  
 18 A. I couldn't tell you.  
 19 Q. Right.  
 20 Finally on this email, if we go to the top of the  
 21 chain {CEL00001065/1}, this is Debbie Berger coming back  
 22 to you, even later on 10 February 2015, and she asks for  
 23 a list of major projects where you have presented RS5000  
 24 in the last few months and it wasn't specified. She  
 25 says:

123

1 "I'm keen to learn from you, as you are close to the  
 2 specification process and probably have the most face to  
 3 face experience of RS and major projects and so your  
 4 opinion is really valuable in building up an honest  
 5 picture of barriers to RS.  
 6 "For each of these projects can you tell me who are  
 7 'the specialists' that decided RS5000 was non-compliant.  
 8 I am preparing a presentation for SPINN this Friday  
 9 where RS5000 will be subject to a rigorous discussion.  
 10 "Regarding the NHBC, I would kindly ask you to not  
 11 pursue that line of enquiry at this stage. We have  
 12 received another letter from the NHBC only today which  
 13 will be discussed at SPINN so we are fully aware of what  
 14 they are saying about RS5000. On a positive note, they  
 15 have indicated they would like to work with us."  
 16 What did you take from that letter or that email?  
 17 A. Well, there's two parts there, really: there's Debbie  
 18 requesting me for more feedback about the projects and  
 19 that -- where people didn't want to choose to use the  
 20 material, and to understand who the specialists were who  
 21 were blocking the use or not accepting, I suppose, the  
 22 test data that was available.  
 23 Then the third part is the NHBC, and apparently  
 24 there's a letter there, but I wasn't privy to what was  
 25 in that letter to the management team at Celotex.

124



1 Q. And why, to the best of your understanding, were the  
2 specialists not accepting the test data?  
3 A. I think it was mainly because -- going back to the case  
4 that the Celotex RS5000 only had a singular test,  
5 physical test, and at that stage the NHBC in particular  
6 weren't happy that that was enough proof or enough  
7 evidence to be used with other systems or extrapolate  
8 the data for other build-ups.  
9 MR MILLETT: Yes, thank you.  
10 Mr Chairman, is that a convenient moment?  
11 SIR MARTIN MOORE-BICK: Yes, I think it is.  
12 Mr Roome, we will break now for everyone to get some  
13 lunch. We will come back at 2.05, please. Again, as  
14 I say, no talking to anyone about your evidence or  
15 anything relating to it over the break.  
16 THE WITNESS: Okay.  
17 SIR MARTIN MOORE-BICK: All right? Thank you very much, if  
18 you would like to go with the usher, please.  
19 (Pause)  
20 Thank you. 2.05, please.  
21 (1.07 pm)  
22 (The short adjournment)  
23 (2.07 pm)  
24 SIR MARTIN MOORE-BICK: Right, Mr Roome, ready to carry on?  
25 THE WITNESS: I am, yes, thank you.

125

1 SIR MARTIN MOORE-BICK: Thank you very much.  
2 Yes, Mr Millett.  
3 MR MILLETT: Thank you, Mr Chairman.  
4 Mr Roome, can I ask you, please, to go to  
5 {CEL00001069}. This is a month-end report from  
6 February 2015 which I think you wrote, didn't you?  
7 A. Yes.  
8 Q. It has your name on it.  
9 A. Yeah.  
10 Q. Can we go to page 5 {CEL00001069/5}. We can see here  
11 what you're doing with the St George London Dock project  
12 which we were discussing before the lunch break, and on  
13 page 5 it says, "Major Project/Contractor Activity -  
14 Overview", and there are four projects there, the last  
15 of which is the St George London Dock:  
16 "Meeting with specialist fire consultant H+H to look  
17 at how to specify the RS5000 product in the façade.  
18 Awaiting redraw of section detail to show exact build-up  
19 before comment."  
20 Now, this is obviously for customers who wanted  
21 that.  
22 Is it right that for such customers, like St George  
23 at London Dock, you would engage on precise differences  
24 between the system tested and the proposed cladding  
25 system for the project?

126

1 A. Yes, if we were asked for that information, yes.  
2 Q. Is it right that Harley, turning to Grenfell, never  
3 engaged you on that issue?  
4 A. No, they didn't.  
5 Q. And you didn't insist on seeing the exact build-up at  
6 Grenfell Tower in order to advise them as to whether  
7 RS5000 was suitable?  
8 A. I didn't, no.  
9 Q. We will come back to Grenfell later on.  
10 Can we then go back to the discussion about Kingspan  
11 letters, {CEL00001066}, please. I would like to go to  
12 the second email down on page 1, please, and over to  
13 page 2 that you see there. This is an email from you to  
14 Paul Evans, Debbie Berger and Richard Milward, copied to  
15 Jon Roper, and it's about the London Dock, St George,  
16 Berkeley Group:  
17 "Hi Team,  
18 "Feedback from meeting with H+H Fire on Thursday.  
19 We were reviewing the façade details for the St.  
20 George London Dock Project. We all feel that we (Me &  
21 H+H) need to review the section drawings as they need to  
22 be amended. I will follow-up with all parties next week  
23 in a joint meeting and report back.  
24 "Interesting conversations around how the NHBC &  
25 Kingspan are viewing the issues of 18m."

127

1 Do you see that?  
2 A. I do.  
3 Q. Then you give further information in the second  
4 paragraph on the next page {CEL00001066/2}, under the  
5 heading "Kingspan", if we can just flip over to that.  
6 You say there:  
7 "Kingspan.  
8 "Had been offering their 'Professional Opinion'  
9 letters for each project. I have had a look at one of  
10 these letters and the only sentence that had anything of  
11 relevance was 'It is in our opinion that K15 would be  
12 fit for purpose if installed onto a non-combustible  
13 substrate with fire barriers at 3.5m.' All the  
14 remainder of the letter referred to their previous  
15 testing and in my opinion was just padding.  
16 "As far as H+H are understanding the situation even  
17 a letter confirming acceptance by the manufacturer is no  
18 guarantee of acceptance by the NHBC.  
19 "H+H suggested that if we were to perform further  
20 testing and there was an issue with cost or being able  
21 to book tests in a timely fashion we might want to  
22 investigate approaching Chiltern Fire to see if they are  
23 able to perform a BS8414 test or even investigate  
24 European tests houses.  
25 "Hope that this info is useful."

128

1 Focusing on what you say about the professional  
 2 opinion letters , first of all you say you have had  
 3 a look at one of these letters . Who gave you that? Was  
 4 that H+H?  
 5 A. I can't say, it might have been.  
 6 Q. Do you know how else you could have come across  
 7 a Kingspan professional opinion letter unless it was  
 8 from a potential customer?  
 9 A. I can only imagine it would have been from a customer,  
 10 yeah.  
 11 Q. Right. You say the only sentence that said anything of  
 12 relevance was, "It is in our opinion that K15 would be  
 13 fit for purpose". It's a pretty bald statement, that.  
 14 But was that your understanding at the time, that  
 15 Kingspan were providing these assurances in those terms  
 16 to potential customers such as St Georges at  
 17 London Dock?  
 18 A. I think that was the idea of these letters , as they were  
 19 called, yes.  
 20 Q. Did Celotex ever adopt a similar practice?  
 21 A. Not that I know, no.  
 22 Q. Did you consider adopting a similar practice?  
 23 A. I personally didn't, no. This was just something that  
 24 was brought to my attention of what was happening in the  
 25 industry and, as you can see here, I was putting it into

129

1 writing and then sending it back up the chain of command  
 2 to the team or the management team within Celotex.  
 3 Q. It's clear from this that at this stage you understood,  
 4 is this right, that there was at the very least serious  
 5 uncertainty about whether RS5000 could safely be used  
 6 above 18 metres, other than in the exact system as  
 7 tested?  
 8 A. It was just reinforcing the view, my view, was that the  
 9 stakeholders needed more physical testing or desktop  
 10 studies.  
 11 Q. So you are saying that your concern at the time was that  
 12 the one test that had been passed by RS5000 in the May  
 13 of 2014 was insufficient for stakeholders, as you call  
 14 them, and they wanted more tests?  
 15 A. That's it, yes. I mean, all of these emails that you're  
 16 presenting to me, that I wrote, are collating  
 17 information from the market of what people are  
 18 expecting, what potential customers or clients or  
 19 specialists are expecting to have to potentially  
 20 consider the use of the RS5000 material in their  
 21 projects.  
 22 Q. Was another aspect of that that you were having  
 23 resistance from customers because you couldn't give them  
 24 an assurance that RS5000 could be used in a different  
 25 cladding system?

130

1 A. That's true, yes.  
 2 Q. Were you concerned that Kingspan were able to keep  
 3 successfully offering K15, which was a phenolic product,  
 4 for use above 18 metres, simply on the basis of these  
 5 letters that you refer to, professional opinion letters?  
 6 A. I don't -- I think the main thing with Kingspan is that  
 7 the product had been around for I think it was around  
 8 ten years, and so they had performed a lot more physical  
 9 tests. The professional opinion letters , I don't know  
 10 if that had any gravity with the specialists . I don't  
 11 think it did, and this is what I was basically putting  
 12 out there in my email to the management team.  
 13 Q. Right.  
 14 Can we then go to a different topic, which is  
 15 marketing concerns. Can we start with {CEL00001026},  
 16 please. This is an email from you to Fiona,  
 17 fiona@whiteink.co.uk. I don't know if she has  
 18 a surname. Perhaps you don't remember it. Do you?  
 19 A. I don't, I'm afraid, no.  
 20 Q. It's dated 25 September 2014, so back to the end of  
 21 September 2014:  
 22 "Fiona,  
 23 "Further to my first email please find below our  
 24 response to your query on the decision to test to  
 25 BS 8414-2 as opposed to BS 8414-1."

131

1 And then you set out the relevant part of  
 2 section 12 -- 12.5, it is -- in ADB. Do you see that?  
 3 A. I do.  
 4 Q. Your response is set out below that citation there.  
 5 Can you recall if she explained why she was asking  
 6 the question she was asking?  
 7 A. I can't, no, I'm afraid.  
 8 Q. You were clearly getting questions about the basis on  
 9 which you had done the test, though, weren't you, by  
 10 this stage?  
 11 A. I was, yes.  
 12 Q. Your response that we see in the next paragraph down  
 13 after the quotation says, in the fourth line from the  
 14 end:  
 15 "Having consulted with the BRE, they acknowledge  
 16 that Part 2 is the more stringent of the two tests as  
 17 a steel frame structure is less resistant to fire than  
 18 a brick or block masonry construction. Building control  
 19 reaffirm this view and advised that testing worst case  
 20 to Part 2 would allow scope for constructions using  
 21 Celotex onto masonry."  
 22 Now, had you actually consulted with the BRE about  
 23 that point?  
 24 A. I myself personally hadn't, no, but this section may  
 25 have been lifted from Jon Roper's response that we

132

1 looked at earlier .  
 2 Q. Indeed, and I was going to ask you that. Can we look  
 3 back at that, which is {CEL00001027}. This is the email  
 4 from Jon Roper at 16.59, which we saw before, to which  
 5 you respond, "Thanks Mate" at 17.14. Do you see that?  
 6 A. I do.  
 7 Q. You can see below the pink quotation in the second email  
 8 down that we have exactly the same text. So did you  
 9 just cut and paste from Jon Roper's email your response  
 10 into your email to Fiona at White Ink?  
 11 A. It looks like I did, yes.  
 12 Q. So the consultation with BRE and building control is him  
 13 rather than you consulting with the BRE?  
 14 A. That's correct.  
 15 Q. That's what you're telling us.  
 16 Do you know who at the BRE was consulted?  
 17 A. I don't, no.  
 18 Q. Or anyone at building control, you don't know who?  
 19 A. No, I don't.  
 20 Q. Did you yourself believe at the time that you could  
 21 extrapolate between the two tests in this way or  
 22 extrapolate from one to the other?  
 23 A. I was led to believe that having the part 2 test, which  
 24 was against the metal wall, was -- I wouldn't say  
 25 better, but it was, I suppose, more indicative of modern

133

1 construction methods and more relevant than the part 1,  
 2 which was a test against a solid wall.  
 3 Q. Was your view that, if it passed a part 2 test, which  
 4 was on a steel structure or system, it would therefore  
 5 pass a part 1 test, which was on a masonry system?  
 6 A. That's what I was led to believe.  
 7 Q. Right. You were led to believe, what, just by looking  
 8 at Jon Roper's email or anything independently of that?  
 9 A. By -- I think it was from the presentation that was  
 10 given to us in the launch of the product by the team,  
 11 the marketing team.  
 12 Q. So Jon Roper, essentially?  
 13 A. Yes.  
 14 Q. Right.  
 15 Can I ask you to go to your statement, please, at  
 16 paragraph 55 on page 17 {CEL000010031/17}. You say  
 17 there, and this is at a time mark just before the next  
 18 paragraph, January 2015:  
 19 "I continued to push Celotex management to commit to  
 20 further investment in testing or desktop studies to  
 21 demonstrate the RS5000 product as being suitable for use  
 22 in a wider range of cladding systems, as Kingspan were  
 23 doing with K15."  
 24 Why did you feel that it was necessary to push  
 25 Celotex management to commit further investment?

134

1 A. Well, I think this is shown in my presentation, my  
 2 market analysis presentation, to explain the investment  
 3 and why the investment was needed. It was to -- if we  
 4 were to compete with Kingspan, who had I think ten years  
 5 in that particular field with their K15 product, that to  
 6 achieve the specifications, I suppose, that K15 was  
 7 being used for, Celotex would have to put that  
 8 investment in to at least catch up with the amount of  
 9 testing that Kingspan had done with their product.  
 10 Q. How soon after the launch in August 2014 did it become  
 11 apparent to you that this further investment in testing  
 12 and desktop studies was going to be needed in order for  
 13 you to be able to sell RS5000 in a wider range of  
 14 cladding systems, as Kingspan were doing with K15?  
 15 A. I can't give you a particular date, but it was something  
 16 that built up over time.  
 17 Q. But over how much time? Was this by the end of October,  
 18 September, or into the New Year?  
 19 A. I mean, just looking at the next item, 56, this was sort  
 20 of a follow-up to that with --  
 21 Q. So within weeks after the launch, can we take it that it  
 22 had become apparent to you that the single test wasn't  
 23 going to do it, wasn't going to let you sell RS5000 to  
 24 the breadth of market that you had hoped?  
 25 A. I would hazard a guess, if I was pushed, that it would

135

1 be I suppose within the first three/four months --  
 2 Q. All right.  
 3 A. -- after the launch of the product.  
 4 Q. And your impression, as we get from that paragraph, was,  
 5 was it, that Kingspan had invested in testing and  
 6 desktop studies, and therefore were able to market K15  
 7 into a wider range of cladding systems than you were  
 8 able to do with RS5000 with its one test?  
 9 A. That's correct.  
 10 Q. Yes, I see. Was that because of the feedback you had  
 11 had from customers?  
 12 A. That's right, yes.  
 13 Q. Yes.  
 14 Can we look at {CEL00001057/3}, please. This is  
 15 an email you sent to Paul Evans on 14 January. We  
 16 probably have to go to the bottom of page 2,  
 17 I apologise. We can see you send this email to  
 18 Paul Evans on 14 January, copied to a large number of  
 19 executives within Celotex, including Rob Warren, who was  
 20 head of technical, and Jon Roper, and Debbie Berger too.  
 21 The subject is, "Greenwich Wharf - Kooltherm K15",  
 22 "Importance: High".  
 23 Can we go over, please, to page 3. It says:  
 24 "Team,  
 25 "It seems from the email trail below involving

136

1 Kingspan and their K15 product that our honeymoon period  
 2 with RS5000 is over.  
 3 "We have been sent an email (inadvertently) with an  
 4 email trail between Durkan (Developer), Kingspan and  
 5 Squire & Partners (Architect).  
 6 "Kingspan are purporting to have passed BS8414:2 and  
 7 most interestingly they used a Cement Particle board of  
 8 12mm thick in the process.  
 9 "I know from another project (Enderby Wharf,  
 10 Greenwich peninsula) with Barratts where they will be  
 11 using K15 against CP board which is far cheaper than an  
 12 A1/A2 Euroclass board.  
 13 "As far as I can tell from reading though Approved  
 14 Document B there is nothing that specifically states  
 15 that a non-combustible sheathing board must be used,  
 16 although this is probably up to interpretation.  
 17 "I will be in contact with the architect to discuss  
 18 RS5000 but it is worth reading through the email trail  
 19 to see what Kingspan are claiming in the current market  
 20 place."  
 21 You see that?  
 22 A. I do.  
 23 Q. Now, was your view there that the honeymoon period with  
 24 RS5000 was over based on this email trail, or is this  
 25 something that you were coming to learn gradually before

1 this time, mid-January 2015?  
 2 A. No, I think this was the first proof, because --  
 3 Q. Right.  
 4 A. -- Kingspan, up to that point, had only had a part 1  
 5 test completed, and this is why the Celotex RS5000, with  
 6 its part 2 test, which was, when it was launched --  
 7 I don't know if it was a breakthrough, but it's  
 8 something that the Kingspan product didn't have at the  
 9 time. So by the time we had, I suppose, written  
 10 confirmation that Kingspan had achieved part 2, I, as  
 11 you can see from here, forward this information directly  
 12 up the chain of command again to the management team.  
 13 Q. Very good.  
 14 Let's look down the chain a bit. If we go to page 5  
 15 {CEL00001057/5}, we can see here an email at the very  
 16 bottom of page 5 from Adam Heath at Kingspan to  
 17 Matthew Colledge and Dave Cummins, who were at NHBC, it  
 18 seems, and he says:  
 19 "Dear Matthew/Dave,  
 20 "As a gesture of good faith I have attached a copy  
 21 of our most recent test to BS 8414-2. In this test we  
 22 used 80mm thick Kooltherm K15 behind a terracotta  
 23 rainscreen. This test report shows that the tested  
 24 system has met the core criteria of BR 135."  
 25 Then goes on to say:

1 "... continuing with the testing regime to further  
 2 expand the scope for insulation thickness and cladding  
 3 finish."  
 4 Then goes on to say after that:  
 5 "We must stress that this report is only for use  
 6 with this project and must not be circulated outside of  
 7 Squire and Partners or the NHBC. The reason for this is  
 8 because this report requires some minor adjusting of the  
 9 text for commercial reasons. Please note any such  
 10 amendments will not affect the result of the test. The  
 11 sheathing board used in the test was actually 12mm  
 12 thick, and this will be reflected in the revision of the  
 13 report."  
 14 Then there is a reiteration of the requirement not  
 15 to pass it on to anybody else.  
 16 Then it comes to, as a response, just a fire test  
 17 report. Then Squire and Partners send that to Celotex,  
 18 it seems. We don't need to get into why they thought it  
 19 appropriate to breach the confidence. Perhaps that  
 20 doesn't matter.  
 21 Then he says:  
 22 "Please could you provide confirmation and a BS135  
 23 compliance certificate for the Celotex RS5000  
 24 insulation. This is an urgent requirement for Building  
 25 control. We look forward to your response."

1 A. Sorry, excuse me --  
 2 SIR MARTIN MOORE-BICK: I'm not sure we can follow this,  
 3 Mr Millett.  
 4 Have you got that on the screen?  
 5 A. No, I haven't.  
 6 MR MILLETT: I'm so sorry, you're quite right. I'm on  
 7 page 4 {CEL00001057/4}.  
 8 SIR MARTIN MOORE-BICK: Ah, well, we're not. We are now,  
 9 aren't we? Yes.  
 10 A. Okay.  
 11 MR MILLETT: That's the email I was referring to, you see  
 12 Matthew Colledge of Squire and Partners sending it to  
 13 Celotex. I'm so sorry, I was running a bit ahead of you  
 14 and not paying attention.  
 15 A. I've got that now, thank you.  
 16 Q. "Dear Sir/Madam,  
 17 "Following our conversation regarding building  
 18 control requirements for Rainscreen insulation BR135  
 19 certification please see below."  
 20 There is then a request for information and a BS 135  
 21 compliance certificate for the Celotex RS5000  
 22 insulation:  
 23 "This is an urgent requirement for Building control.  
 24 We look forward to your response."  
 25 So it's that that prompts your email, isn't it?

1 A. Yeah. It doesn't seem that I was copied on that.  
 2 I don't think there was any attachment to that email, by  
 3 the looks of it, but my name isn't on that email.  
 4 Q. No. What then seems to happen, if you look up to page 3  
 5 {CEL00001057/3}, you get this email string, at the  
 6 bottom of the page, from "Celotex, Technical" to  
 7 Debbie Berger, copied to you.  
 8 A. Oh, okay. Yeah.  
 9 Q. That's how you get it, and that is what then prompts,  
 10 I think, your response, which is the email trail below.  
 11 A. Right.  
 12 Q. I'm so sorry, I wanted to make sure you saw it all.  
 13 Was it the discovery, as I think you have confirmed  
 14 in fact, of the fact that Kingspan had now done  
 15 an 8414-2 test that had prompted your remark that the  
 16 honeymoon period was now over?  
 17 A. Yes, that's right, yes.  
 18 Q. That explains that.  
 19 Did you take the view that further tests now needed  
 20 to be carried out on RS5000 more on the need to compete  
 21 with Kingspan rather than the need to comply with the  
 22 Building Regulations?  
 23 A. I think, looking back on it, it was -- they were hand in  
 24 hand, really.  
 25 Q. Right. Can you just explain a little bit more about

141

1 what you mean by that?  
 2 A. Well, to make the product more acceptable, it needed to  
 3 be run through further testing.  
 4 Q. Yes.  
 5 A. And that, in hand, would have allowed building control  
 6 to make informed decisions about its use.  
 7 Q. Did you discuss with Debbie Berger or anyone else in  
 8 management at Celotex the fact that buyers of RS5000  
 9 couldn't comply with the Building Regulations if they  
 10 weren't provided with further RS5000 test results which  
 11 you thought needed investing in?  
 12 A. I don't know if I had specific conversations, but these  
 13 conversations were being had by email anyway.  
 14 Q. It's a fact, I think you will accept, that there was no  
 15 further testing ever carried out on RS5000, was there?  
 16 A. Not in my time at the company, no.  
 17 Q. Why was that?  
 18 A. I couldn't tell you, I'm afraid.  
 19 Q. Were you ever given any explanation by anybody as to why  
 20 there was no further test carried out, despite your  
 21 protestations that there should be?  
 22 A. No, I was never given a reason.  
 23 Q. Did you ever ask for one?  
 24 A. I can't remember. I think, I mean, looking at those  
 25 emails, I was asking for investment, but I was never

142

1 provided a reason, I'm afraid.  
 2 Q. By this stage, mid-January 2015, did the feedback that  
 3 you were getting from the market about the difficulties  
 4 of complying with the Building Regulations simply  
 5 because of the single test lead you to have concerns  
 6 that RS5000 might be unsafe on high-rise buildings,  
 7 buildings over 18 metres?  
 8 A. It was not concerns, no.  
 9 Q. You say, "It was not concerns".  
 10 A. Sorry.  
 11 Q. That means you had no concerns about safety; is that  
 12 right?  
 13 A. No, I had no concerns over safety. It was a product  
 14 that had been tested as much -- that I knew, and that  
 15 was the evidence that I was given, although in limited  
 16 form, in the four- and 12-page document, so I had no  
 17 reason to believe it was, you know, a risky product as  
 18 such.  
 19 Q. Back to the subject of further testing, then, can I ask  
 20 you to look at {CEL00001042}, please. This is an email  
 21 from you to Andrew Jones, and I think you need to go  
 22 down to page 3 {CEL00001042/3} to start with, please.  
 23 Yes, that's right. The title is "Celotex RS5000 - BRE  
 24 Testing - 190 Strand", and it's from you to Andrew Jones  
 25 on 14 November 2014. Do you see that?

143

1 A. I do.  
 2 Q. If we go to the email in the first paragraph,  
 3 paragraph 1, you can see it's divided into paragraph 2,  
 4 you say:  
 5 "I met with Steve Howard from the BRE last Tuesday  
 6 to discuss the option of further testing of our RS5000  
 7 product for BS8414 and choice of materials.  
 8 "One thing that Steve mentioned was that he would  
 9 like to understand better the decision making process  
 10 for designing a façade system. He is privy to  
 11 manufacturers tests at the BRE but would like  
 12 clarification from the other side of the fence.  
 13 "Would you be interested in arranging to speak with  
 14 Steve? This would certainly help with our future  
 15 discussions when deciding what we should test."  
 16 You see that?  
 17 Then if you go to the next paragraph at the bottom  
 18 of page 3 and over on to page 4, it says:  
 19 "We are currently looking into expanding our test  
 20 data next year and would like to understand from you the  
 21 materials that you think that we should look to test for  
 22 BS8414."  
 23 Then over the page {CEL00001042/4}:  
 24 "We understand that further testing should involve:  
 25 • non-combustible Sheathing Board for BS8414:2

144

1 •" Realistic Thinnest & Thickest Insulation Solution  
 2 •" Cladding Panels (Class 0 or Euroclass A1/A2)  
 3 "The biggest area for interpretation are the  
 4 cladding panels because even if they have Class 0 there  
 5 is no guarantee that they will perform well in the  
 6 BS8414:2 test.  
 7 "Your input here would be highly valuable.  
 8 "Finally, we never got down to speaking about  
 9 190 Strand. Are you around over the next couple of  
 10 weeks at St. Edward to run through the current specs?  
 11 "Have a good weekend and speak soon."  
 12 Just the first point, to get it out of the way,  
 13 Mr Roome, the project at 190 Strand, was that relevant  
 14 to the rest of the email or is it just a follow-up  
 15 separate point?  
 16 A. I think it was because I knew that Andrew had been  
 17 attending that particular project for St Edward and that  
 18 would -- I think he had a temporary base there, that was  
 19 the only reason.  
 20 Q. If we go back to the earlier part of the email, on  
 21 page 3 {CEL00001042/3}, you say in the first line there,  
 22 in the first paragraph:  
 23 "I met with Steve Howard from the BRE last  
 24 Tuesday ..."  
 25 Do you see that?

1 A. I do.  
 2 Q. Do you remember that meeting?  
 3 A. Yes, that was the meeting, I think, that Debbie Berger  
 4 had arranged and I attended with her.  
 5 Q. I see. We will I think come later to how that meeting  
 6 came to be arranged, but did Mr Howard give you any  
 7 advice in relation to the design of further tests?  
 8 A. I don't think he did, no, at the time.  
 9 Q. You say you discussed the option of further testing;  
 10 what did you discuss in that respect with Mr Howard, do  
 11 you remember?  
 12 A. I think it was to better understand from the respect of  
 13 BRE as to what routes Celotex, I suppose, could go down  
 14 to perform further testing or further -- I say further,  
 15 there was no desktop studies at that stage, but the  
 16 other options that the BRE could help Celotex with.  
 17 Q. Who was at that meeting? Was Debbie Berger there?  
 18 A. Yes, Debbie and Stephen and myself.  
 19 Q. I see.  
 20 It looks as if by this point at least, so late  
 21 November 2014, you were aware that further testing would  
 22 be needed to make sure that RS5000 could be used with  
 23 class 0 or Euroclass A1 or 2 cladding panels; is that  
 24 fair?  
 25 A. I think this was the direction that was -- I wouldn't

1 say obvious to people outside the industry, but obvious  
 2 within Celotex that a broader spectrum of panels was  
 3 going to be one of the options which is shown on the --  
 4 I think the second page of this .  
 5 Q. I see. The third bullet point. We can go over to that,  
 6 over to the second page {CEL00001042/4}. You can see  
 7 the third bullet point, "Cladding Panels (Class 0 or  
 8 Euroclass ..."  
 9 Was that because customers were actually asking you  
 10 whether it was safe to use RS5000 with cladding panels  
 11 which were rated class 0 or Euroclass A1 or 2 as opposed  
 12 to the Marley Eternit Natura rainscreen you had used in  
 13 the test?  
 14 A. I don't think the word "safe" had come up, it was really  
 15 just the --  
 16 Q. All right, permissible.  
 17 A. Permissible, yeah, that's a word that could be used,  
 18 because Approved Document B talks about panels being  
 19 class 0 -- sorry, class 0 or Euroclass A1/A2 above  
 20 18 metres.  
 21 Q. Just to repeat the question, because we might have got  
 22 tangled up on the word "safe". Let me try it again.  
 23 By this time, were you getting concerns from  
 24 customers, or requests from customers, as to whether it  
 25 was permissible for them to use class 0 or A1/A2

1 rainscreen panels with RS5000 given that the rainscreen  
 2 panel in the test was a cementitious fibre board?  
 3 A. I think I must have been, yes.  
 4 Q. Is it right that until such a test was done, namely one  
 5 incorporating a class 0 or Euroclass A1 or A2 cladding  
 6 panel, you realised there was no fire safety test which  
 7 any system incorporating class 0 or Euroclass A panels  
 8 had passed?  
 9 A. There was no test, BS 8414 test, at that time with  
 10 anything other than that Marley Eternit board.  
 11 Q. Yes.  
 12 A. And that route to compliance.  
 13 Q. Yes. So that in a nutshell meant that you couldn't  
 14 market RS5000 to a customer or any customers who wanted  
 15 to use or were planning to use anything other than the  
 16 Marley Eternit Natura rainscreen cladding board?  
 17 A. Unless there was a specialist involved, a fire safety  
 18 specialist, who was following one of the guidance  
 19 criteria in the BCA guidance.  
 20 Q. And you wanted further testing with a class 0 or A1 or  
 21 A2 panel in order to expand your potential market?  
 22 A. That's basically correct, yes.  
 23 Q. Yes, thank you.  
 24 Could you go to page 1 of this email run  
 25 {CEL00001042/1}, please, and I would like to look with

1 you at the email halfway down that page from you to  
 2 Paul Evans and Debbie Berger on 28 November 2014 at  
 3 10.52. Same title, "Celotex RS5000 - BRE Testing -  
 4 190 Strand", and you say:  
 5 "Hi Paul/Debbie,  
 6 "I have spoken to Total Façade Solutions about  
 7 potentially giving us guidance as how to move forward  
 8 with RS5000 (Testing etc.)  
 9 "We would need to employ them directly.  
 10 "Andy Jones is one of the most knowledgeable people  
 11 in the façade industry and advises the likes of the  
 12 Berkeley Group as to what products comply.  
 13 "Please let me know if you would be willing to  
 14 employ them as a consultant, even if it is only for one  
 15 day."  
 16 If we go to page 1 at the top, Paul Evans comes back  
 17 to you a few days later, 1 December 2014:  
 18 "Let's discuss as part of our plans for 2015 when we  
 19 meet on the 19th."  
 20 Do you know what happened to that proposal, the  
 21 proposal to retain the advice of Andy Jones?  
 22 A. As far as I -- my knowledge, he was never employed to  
 23 give guidance.  
 24 Q. Did you ever push it? Did you push it with Paul Evans?  
 25 A. I mean, I didn't have any sway within Celotex, I was

149

1 just a salesperson and, you know, I was providing this  
 2 information to try and give my best guidance from the  
 3 feedback I was getting, and I can only -- I must ... it  
 4 must be that I was told no, that option wasn't available  
 5 or wasn't going to be considered.  
 6 Q. Can we go to {CEL00003439}. This is an email chain  
 7 between you and Roger Taylor at Hadley Steel Framing,  
 8 and on 22 December, second email down, you send him  
 9 an email saying:  
 10 "Hi Roger,  
 11 "I have had confirmation that we can get you the  
 12 boards to the test centre for around 11am on the 5th.  
 13 "If I don't speak to you before have a great  
 14 Christmas ..."  
 15 Then he comes back to you the same day basically  
 16 thanking you.  
 17 Do you remember why Hadley Steel Framing were  
 18 carrying out tests on RS5000 boards?  
 19 A. Yes, this was a company who make metal steel framing,  
 20 Metsec-type framing systems, and they had something  
 21 called a head of wall test, which I hadn't been privy to  
 22 before, but they'd run a particular fire test, it wasn't  
 23 a sort of an 8414, but it was a particular fire test  
 24 that they'd run with a previous Celotex product, and  
 25 they wanted to replicate the test with the newer

150

1 product.  
 2 The relationship there was from my second sales  
 3 manager, after Ian Wakelin left, Richard Milward, who  
 4 was my then sales manager for the south, and he had had  
 5 a pre sort of relationship with Hadley prior to him  
 6 joining Celotex. So that's how that came about.  
 7 Q. I see. So this wasn't subjecting RS5000 to a recognised  
 8 BR test?  
 9 A. It was a recognised test, but it wasn't the 8414 test.  
 10 Q. What test was it, do you know?  
 11 A. I can't recall, I am afraid.  
 12 Q. Can we go on to {CEL00003451}. This is an email on  
 13 8 January 2015 which follows the test, it seems, and  
 14 here we see Roger Taylor emailing you and  
 15 Richard Milward and Debbie Berger, and he says in the  
 16 first line:  
 17 "... can we put the performance of the RS5000 board  
 18 at the top of our agenda for our meeting on 27th.  
 19 "I have just come back from our first fire test  
 20 using the RS5000 board and the results are not good."  
 21 Then he goes on to say:  
 22 "We were doing a load bearing wall test with 2 No  
 23 layers of 15mm FireLine, which I expected to achieve a  
 24 comfortable 90 minute result, if not a 120 minute  
 25 result."

151

1 Then he goes on and explains what happened in the  
 2 test.  
 3 Three paragraphs up from the end, he said:  
 4 "To put this in perspective, our previous test using  
 5 GA4000 achieved 83 minutes with 2 layers of SoundBloc  
 6 (not FireLine) and failed through the expected manner of  
 7 the boards giving way and the fire then reaching the  
 8 back of the insulation. Or in other words, the GA4000  
 9 performed better in the fire condition than the RS5000!  
 10 "The result of this is we are now £6k out of pocket  
 11 as the test did not give us the result that we were  
 12 looking for, even though the elements which were  
 13 providing the fire protection were still performing  
 14 when the insulation combusted.  
 15 "Please can you consider the above and give me any  
 16 feedback, otherwise we will have no alternative but to  
 17 continue to recommend the Kingspan K15 board in  
 18 situations over 18m."  
 19 You can see in the last line there that he is  
 20 referring to having no alternative other than to  
 21 continue to recommend K15 above 18 metres.  
 22 Is it right that the reason they were carrying out  
 23 testing was to look at the suitability of use of RS5000  
 24 above 18 metres in the context of the test they were  
 25 carrying out?

152

1 A. I don't know if it was specifically above 18 metres.  
 2 I don't think that test was specifically for the  
 3 18-metre criteria. It's a different type of test.  
 4 Q. I think in fact the test was a test under the BS 476-21,  
 5 load-bearing wall.  
 6 A. Right.  
 7 Q. Do you remember that? Does that ring a bell with you?  
 8 A. Not specifically, but I'm aware of it.  
 9 Q. Right.  
 10 Do you know what relevance the test had to fire  
 11 performance and 18 metres?  
 12 A. I don't, no.  
 13 Q. It's clear from the last paragraph there that Mr Taylor  
 14 clearly thought that because it, RS5000, had failed the  
 15 test they were carrying out, they would have to go to  
 16 Kingspan K15 for use over 18 metres. What did that tell  
 17 you?  
 18 A. Well, it tells me, looking at it now, that it would be  
 19 for each wall up to and over 18 metres.  
 20 Q. Did it tell you also that yet again K15 were going to  
 21 dominate in the over 18 market because of problems that  
 22 RS5000 was encountering in testing regimes?  
 23 A. I'm not sure. I can't say that I knew -- I don't know  
 24 if they had tested their system with Kingspan at that  
 25 time.

153

1 Q. Might there have been a degree of confusion here about  
 2 the use of K15 over 18 metres given the test they were  
 3 carrying out?  
 4 A. I don't know, I'm afraid.  
 5 Q. You can't help me, all right.  
 6 In the first line, as we've seen, he refers to  
 7 an agenda for the meeting on the 27th; do you know  
 8 whether that meeting took place?  
 9 A. I don't, no. I mean, if it did, I've got no record of  
 10 it, so I may not have been in attendance.  
 11 Q. Did you discuss this test or Mr Taylor's email with  
 12 Debbie Berger or Paul Evans or Richard Milward?  
 13 A. I think -- well, I'm pretty sure I would have done, yes.  
 14 Q. What was the upshot, do you remember?  
 15 A. I think that Richard and Debbie took the lead on this  
 16 and took it forward, and I'm pretty sure that it was  
 17 re-tested and it passed on the second attempt. But  
 18 I can't be absolutely sure of that.  
 19 Q. Right.  
 20 Can we go to {CEL00003481/2}, please, in that email  
 21 run, and I would like to look with you at the email at  
 22 the bottom of the page. This is an email from  
 23 Debbie Berger to you and Richard Milward dated  
 24 15 January 2015 about the meeting with Hadley on  
 25 27 January, at Hadleigh.

154

1 "Are we still going to meet with a façade consultant  
 2 and Steve Howard from the BRE to better understand fire  
 3 performance of a range of facades and testing options?"  
 4 You respond the same day, if you look up the page,  
 5 please:  
 6 "The façade consultant would need to be appointed  
 7 and paid for. I thought I had mentioned this to you and  
 8 Paul Evans last year?"  
 9 Did the meeting with the façade consultant and  
 10 Steve Howard, as Debbie Berger expresses it in her email  
 11 to which you are responding here, take place at all?  
 12 A. I don't think so, no.  
 13 Q. Again, why is that, do you know?  
 14 A. Well, I think it says it there, because they weren't  
 15 going to pay for a façade consultant.  
 16 Q. Right. Did you get a response?  
 17 A. I don't know. Is there any further response --  
 18 Q. There is. The response you get from Debbie Berger the  
 19 same day, if you go up to page 1 {CEL00003481/1}, is:  
 20 "Yes but then Xmas got in the way .... [smiley face]"  
 21 "We should probably meet up to discuss plan of  
 22 action, you me and Richard.  
 23 "Personally I think we could learn a lot from a  
 24 façade engineer/consultant and BRE input. Help better  
 25 inform our design decisions."

155

1 Then at the top, Debbie Berger writes the same day:  
 2 "When are you guys next in the office or I can come  
 3 to where you are?"  
 4 So that's I think how the matter was left in the  
 5 middle of January.  
 6 Do you remember whether the meeting took place at  
 7 Hadleigh on the 27th with Roger Taylor to discuss the  
 8 result of his test?  
 9 A. If it did, I wasn't there.  
 10 Q. Right.  
 11 Do you know what happened to this proposal to talk  
 12 to a façade engineer and BRE, where it was left off in  
 13 the middle of January 2015?  
 14 A. No, again, I can't help you with that, I'm afraid.  
 15 Q. Now, at this point, mid-Jan 2015, is it fair to say,  
 16 summarising where we've got to, that you and others  
 17 within Celotex had become aware that more testing had to  
 18 be done to enable RS5000 to be used in any system  
 19 different from the one that was tested in May 2014?  
 20 A. Yes.  
 21 Q. And until such tests and certifications were received,  
 22 you would struggle to compete with K15 in the market for  
 23 high-rise buildings?  
 24 A. Correct.  
 25 Q. Thank you.

156



1 Can I then turn to your relationship and dealings  
2 with Harley.  
3 Can we start with {CEL00009874}. This is  
4 a Salesforce entry, and it's quite difficult to read so  
5 I'm going to ask for it to be blown up as large as  
6 possible. We can see that it relates to Merit House, if  
7 you look at the right-hand side of it, and it's assigned  
8 to Mark Willoughby, with a due date of 10 June 2014.  
9 Can you see that?  
10 A. I can.  
11 Q. The entry under "Comments" says:  
12 "Ben called to ask if we had an alternative to  
13 Kingspan K15.  
14 "Project is over 18m so could not help at this time.  
15 "Needed product on site in 2 weeks.  
16 "Let me know that they have just been awarded two  
17 new overclad projects in London in Autumn.  
18 "Once we have 18m fire test inform Ben and Team so  
19 we can win spec."  
20 Now, is this a record of a call that you think you  
21 had with Ben Bailey of Harley?  
22 A. Yes, I think this is something that needs to be cleared  
23 up. The records of Celotex with the "Assigned To"  
24 field, this chap Mark Willoughby seems to be a current  
25 employee, and I think what happens with the database is

157

1 that, for each person that is assigned that role, their  
2 name would appear. So I can only imagine that this  
3 would be a record that I might have put in, in my time  
4 at Celotex, and the licence, as it were, that I was  
5 allocated within Celotex has now been allocated to  
6 Mark Willoughby. So this is likely why  
7 Mark Willoughby's name is on a lot of these documents.  
8 Q. Yes, thank you. That's clarified that for those looking  
9 at the document.  
10 My question, just looking at it, is: do you recall  
11 this conversation with Ben Bailey of Harleys at this  
12 time, 10 June 2014?  
13 A. Not specifically, but my memory's not brilliant and this  
14 is why I write things down when they happen, so I've got  
15 a record of them.  
16 Q. Right, okay.  
17 Did you know Ben Bailey at this time, June 2014?  
18 A. I did, yes.  
19 Q. How did you know him?  
20 A. He was an employee of Harley, Harley Curtain Walling,  
21 and the son of the owner.  
22 Q. When did you first come across him?  
23 A. I don't know when he started with the company, but I got  
24 to know Harley from my time at Hilti.  
25 Q. Yes.

158

1 A. And so it would have been any time from Hilti to Celotex  
2 I would have met him.  
3 Q. We can see that this conversation is assigned to  
4 Merit House as the project, if you look at the top  
5 right-hand corner, and that you have recorded in the  
6 conversation "Project is over 18m so could not help at  
7 this time". Was that a reference to the Merit House  
8 project being over 18 metres?  
9 A. I would imagine so, yes.  
10 Q. You can see, as I've shown you, it goes on to say, "Once  
11 we have 18m fire test inform Ben and Team", you see?  
12 A. Yes.  
13 Q. So you must have been aware by this time, June 2014,  
14 that Celotex was working on developing a product that  
15 could be used above 18 metres?  
16 A. I must have known by then, yes.  
17 Q. So that's a good two months before the actual launch, or  
18 about two months before the actual launch, wasn't it?  
19 A. It must have been at that time common knowledge then  
20 between the salesforce that something was in production  
21 or in development.  
22 Q. Do you know why Ben Bailey was asking you if you had  
23 an alternative to Kingspan K15?  
24 A. Maybe because I'd had a relationship with the company  
25 previously and they knew I was at an insulation company,

159

1 and they'd asked me that specific question.  
2 Q. Did you tell Mr Bailey that you were developing  
3 an insulation product as an alternative to Kingspan K15  
4 that could be used above 18 metres?  
5 A. I can't recall.  
6 Q. As at this date, did you know that the test had actually  
7 happened?  
8 A. I didn't, no.  
9 Q. Because it had happened on 2 May 2014. You didn't know  
10 that that had happened?  
11 A. No, I just knew that behind the scenes the product was  
12 being developed.  
13 Q. Right.  
14 Going back to the record, it also says that  
15 Ben Bailey told you -- or it says, "Let me know that  
16 they have just been awarded two new overclad projects in  
17 London in Autumn". Was one of those Grenfell Tower?  
18 A. I can't be certain.  
19 Q. Did he mention Grenfell Tower, do you think, at the  
20 time?  
21 A. If he did, I didn't write it there.  
22 Q. Can we then go to {CEL00009877}. If we could just blow  
23 that up as large as possible as well, please. This is  
24 also assigned to Mark Willoughby, but I assume it's  
25 yours. It also relates to Merit House, if you look at

160

1 the right-hand side, and it says "Ben Bailey", and the  
 2 activity type is technical assistance, if you look in  
 3 the left-hand column there:  
 4 "Task Topic: 18m Fire Test.  
 5 "Due Date: 31/08/2014.  
 6 "Comments: Update Harley [Curtain Wall] on 18m  
 7 Fire Test to close 2 overlaid projects raised by  
 8 Ben Bailey on last call."  
 9 Then underneath that it says:  
 10 "System Information.  
 11 "Created By: Mark Willoughby 10/06/2014."  
 12 Can you just help me with what this record is?  
 13 (Pause)  
 14 A. It may be a reference to giving Harley some sort of  
 15 information that the product was due for release at some  
 16 point in time.  
 17 Q. Yes, it looks very much like it's a reminder to yourself  
 18 to update Harley by or on 31 August 2014 about the  
 19 18-metre fire test; would that be right?  
 20 A. I don't know if it's a phone call that I've had with him  
 21 or a reminder. I can't be certain.  
 22 Q. Underneath the reference to Mark Willoughby in the  
 23 second line on the left-hand side it says "Celotex Task  
 24 Type: Phone Advice". Does that help you?  
 25 A. Unless it was a telephone conversation I'd had with Ben

161

1 just giving him an update on when the release date of  
 2 the RS5000 would be.  
 3 Q. There is a date in the bottom right-hand corner, "Last  
 4 Modified By: Mark Willoughby 18/07/2014", does that  
 5 help?  
 6 A. No, it doesn't.  
 7 Q. Right.  
 8 Is it fair to say that, at this time -- and we can  
 9 pick a range of dates between 10 June 2014 and  
 10 31 August 2014 -- you saw Harley as a potential target  
 11 or customer for sales of RS5000?  
 12 A. They were -- yeah, they were one of many customers  
 13 involved in that market.  
 14 Q. Yes.  
 15 Can we look at {CEL00009875}, please, this is  
 16 another Salesforce entry. Again, can we blow up that as  
 17 large as we can. Again, it's Merit House on the  
 18 right-hand side, as you can see. Underneath that,  
 19 "Name: Ben Bailey". On the left-hand side  
 20 "Mark Willoughby":  
 21 "Celotex Task Type: Report.  
 22 "Activity Type: Rainscreen Contractor.  
 23 "Task Topic: 18m Fire Test.  
 24 "Due Date: 18/07/2014."  
 25 Then it says underneath that:

162

1 "Met Ben on the Merit House project to discuss  
 2 current demands on site and future projects.  
 3 "Have had to use Kingspan K15 as we do not currently  
 4 have a product.  
 5 "Have [two] new projects that they are on the verge  
 6 of winning to start later this year.  
 7 "Grenfell Tower, White City.  
 8 "Telford Office.  
 9 "They have also taken on two more designers in the  
 10 office.  
 11 "Follow-up in office once we have a K15 solution."  
 12 Do you see that?  
 13 A. Yes, I do.  
 14 Q. Is it your understanding that competing with  
 15 Kingspan K15 was the driving force behind the element of  
 16 RS5000, at least according to this record?  
 17 A. I think it's quite clear that Celotex wanted a piece of  
 18 that market, yes.  
 19 Q. Thank you. And that market, as you refer to it, saw  
 20 RS5000, or you would want it to see RS5000, as  
 21 an equivalent if not better product than K15?  
 22 A. That's correct, yes.  
 23 Q. Now, here we do see Grenfell Tower referred to as one of  
 24 the two projects that "they are on the verge of winning  
 25 to start later this year".

163

1 Do you remember what information Ben Bailey gave you  
 2 at that meeting about the Grenfell Tower project?  
 3 A. I don't. No, I don't. I mean, he just named two  
 4 projects. It would have been a site meeting, so I don't  
 5 think he would have had -- he would have been  
 6 concentrating on that particular project he was on,  
 7 Merit House, which is listed there.  
 8 Q. So a site meeting at Merit House?  
 9 A. Yeah.  
 10 Q. Not Grenfell, of course.  
 11 A. Yeah.  
 12 Q. Do you remember whether he told you that Celotex FR5000  
 13 had originally been specified as the insulation material  
 14 for use at Grenfell Tower?  
 15 A. I don't think so, no.  
 16 Q. Did he tell you it was a project over 18 metres in  
 17 height?  
 18 A. I can't recall, no.  
 19 Q. What at this stage did you know, if anything, about the  
 20 cladding system proposed for Grenfell Tower?  
 21 A. I think at this point nothing.  
 22 Q. Now, if we go to your witness statement at page 3  
 23 {CEL00010031/3}, can we look at paragraph 11. You say  
 24 there:  
 25 "Following the meeting on 5 August 2014 I started

164

1 emailing the marketing material to my contacts ... One  
 2 of the people I emailed was a designer called  
 3 Ben Sharman at Harley Curtain Wall Ltd ... a company  
 4 that designed and installed cladding systems for  
 5 construction projects. I was contacted by one of Ben's  
 6 colleagues, Daniel Anketell-Jones, a design manager,  
 7 a few weeks later in connection with the refurbishment  
 8 at Grenfell Tower. I had received some further  
 9 marketing material for RS5000 and sent to Daniel all the  
 10 marketing material I had at that time."  
 11 Let's just take that in stages.  
 12 Just in relation to the emailing to Ben Sharman, can  
 13 we look at that email, please, at {CEL00001237}. This  
 14 is the email you send Ben Sharman on 6 August 2014,  
 15 subject: "Celotex RS5000 Rainscreen Insulation Launch".  
 16 Now, the date, 6 August, is the day after the  
 17 launch, isn't it?  
 18 A. That's correct.  
 19 Q. On 5 August. You can see the attachments you send him.  
 20 You send him the product comparison matrix premium and  
 21 core, the rainscreen cladding compliance guide, the  
 22 product datasheet and the rainscreen cladding datasheet.  
 23 Do you see that?  
 24 A. I do.  
 25 Q. "Hi Ben,

165

1 "Good to speak to you again."  
 2 Pausing there, had you spoken to him in the past?  
 3 Did you know him?  
 4 A. Yes, I think I've made that clear.  
 5 Q. How did you know him, do you think?  
 6 A. Ben?  
 7 Q. Ben Sharman.  
 8 A. Oh, sorry, Ben Sharman. It's because he was present in  
 9 the office of Harley. It was quite a small office.  
 10 Q. You go on:  
 11 "I have the pleasure of informing you as of  
 12 yesterday we have now launched the first PIR Board To  
 13 Successfully Meet The Performance Criteria In BR 135 For  
 14 Insulated Rainscreen Cladding Systems, Therefore  
 15 Acceptable For Use In Buildings Above 18m In Height.  
 16 "I would like to come into the office when everyone  
 17 is around to present formally the new product.  
 18 "In the meantime if you would like me to run any  
 19 U-Value calculations please let me know."  
 20 That's what you say.  
 21 Why did you send this email to Ben Sharman and not  
 22 Ben Bailey, given your previous note that you would  
 23 inform Ben and the team once Celotex had a suitable  
 24 product?  
 25 A. It's possibly because Ben was in the design side of the

166

1 company -- sorry, Ben Sharman was on the design side of  
 2 the company, rather than Ben Bailey, who was on the sort  
 3 of on-site delivery side of things.  
 4 Q. I see.  
 5 Did you actually have a conversation with Mr Sharman  
 6 following which you sent him this email?  
 7 A. I can't recall.  
 8 Q. Was the text of the email underneath the words "Good to  
 9 speak to you again", which starts "I have the pleasure  
 10 of informing you", was that the standard initial email  
 11 you sent out to all your customers?  
 12 A. Yes, it was, yes.  
 13 Q. Now, the wording looks, from the capitals that are used  
 14 in every word in the description of the product, to be  
 15 the title to a document. Was it the title to  
 16 a document?  
 17 A. Yeah, I think it -- yes, sorry, I think it might be  
 18 another example of my sort of copy and paste technique.  
 19 Q. I see.  
 20 Now, your email shows the attachments, and we'll  
 21 come to those again, but looking at the wording in your  
 22 email, and I think we have been over this ground  
 23 a number of times this morning, Mr Roome, do you accept  
 24 that it's not correct that meeting the BR 135 criteria  
 25 means that a product is therefore generally acceptable

167

1 for use on buildings above 18 metres?  
 2 A. It's not, I suppose, specific enough, it doesn't show  
 3 any caveats there, but it's the term or the phrase that  
 4 the marketing team had put out.  
 5 Q. Right. And you adopted it unquestioningly?  
 6 A. I did, yes.  
 7 Q. Would you accept that such a description of the product  
 8 is potentially misleading because it doesn't contain the  
 9 caveat?  
 10 A. Potentially, yes.  
 11 Q. Yes. Can we look at {CEL00001381}, please. I'll come  
 12 back to this email to Ben Sharman in a moment, I just  
 13 want to take a diversion and look at a different  
 14 document, which is this one.  
 15 This is an email run in September 2014, so a month  
 16 on or so, six weeks on, and if we go to page 3  
 17 {CEL00001381/3}, to start with, we can see that here you  
 18 are sending a lady called Claire Ryan the same text.  
 19 You say:  
 20 "Dear Claire,  
 21 "I have been passed your details by Dawn in the  
 22 office."  
 23 Then you can see that the same cut and paste  
 24 paragraph we saw in the email to Ben Sharman of  
 25 6 August, and you say:

168

1 "I have attached a number of relevant documents that  
 2 give details of RS5000."  
 3 That is sent to Claire Ryan.  
 4 Now, Claire Ryan was at Sotech, wasn't she? Do you  
 5 remember?  
 6 A. I don't remember, no.  
 7 Q. I think we can work it out, so bear with me.  
 8 She then forwards that on to Michael Egginton and  
 9 John Egginton as you see just above the "FYI". It comes  
 10 from Graham Todd, in fact, but it goes up the chain to  
 11 the Eggintons.  
 12 SIR MARTIN MOORE-BICK: We can't see that, Mr Millett.  
 13 MR MILLETT: Well, we can --  
 14 SIR MARTIN MOORE-BICK: We might now.  
 15 A. Here we go, yes.  
 16 MR MILLETT: You can.  
 17 Graham Todd to the Eggintons, and then if we go to  
 18 the bottom of page 2 {CELO0001381/2}, we can see that  
 19 Michael Egginton sends it back to you saying "Can we  
 20 please have the supporting documents" -- I don't need to  
 21 go back again to that -- but if you look further up  
 22 page 2:  
 23 "Dear Michael,  
 24 "Here are all of the supporting documents for you.  
 25 "If you have any questions relating to RS5000 please

169

1 don't hesitate to call."  
 2 Looking at Michael Egginton's email address, as you  
 3 can see from the foot of page 2, he is at Sotech, isn't  
 4 he?  
 5 A. Yes, he is.  
 6 Q. And you knew Sotech from your customer base, did you?  
 7 A. I knew of them. They -- yeah, they weren't part of my  
 8 direct contacts as such.  
 9 Q. Right.  
 10 Now, if we continue on with the email string to the  
 11 middle of page 2, if we go up, please, we can see that  
 12 Michael Egginton comes back to you on 15 September,  
 13 subject, "Re: Celotex RS5000 Rainscreen Insulation Board  
 14 for use above 18m", and he asks you a question, and the  
 15 question was:  
 16 "Are you saying you are warranting ventilated  
 17 aluminium systems over 18m with this product?  
 18 "Your original email and advertorial."  
 19 Do you see that?  
 20 A. I do.  
 21 Q. You then pass that up to Paul Evans, if you look up to  
 22 page 1 {CELO0001381/1}. At the foot of page 1, you say  
 23 to Paul Evans same day:  
 24 "Hi Paul,  
 25 "What reply should I give here?"

170

1 Pausing there, does that show us that you knew you  
 2 were not warranting the use of RS5000 with ventilated  
 3 aluminium systems over 18 metres, but were reluctant to  
 4 tell him so without clearing it up with management  
 5 first?  
 6 A. Well, I think it shows that I was unsure as to the  
 7 answer and the relevance of the test that had been  
 8 performed with the RS5000 as to the types of panels that  
 9 Sotech make or distribute.  
 10 Q. Well, were you unsure of the answer? You knew from your  
 11 own marketing literature that the RS5000 could only be  
 12 used with the exact same components as had been used in  
 13 the BRE test in May 2014.  
 14 A. The test in particular, yes.  
 15 Q. So you couldn't possibly be warranting its use within  
 16 a ventilated aluminium system?  
 17 A. I personally couldn't, no, but I didn't know if Paul --  
 18 or, sorry, the management team were looking to develop  
 19 further tests with those types of products, so I didn't  
 20 want to sort of cut him down immediately -- well, not  
 21 cut him down, but, you know, make a reply without having  
 22 some sort of management input, because I didn't know  
 23 what was going on behind the scenes.  
 24 Q. What management input could there be, given that the  
 25 simple answer to a simple question from Mr Egginton was

171

1 no, no you're not warranting its use with anything other  
 2 than the components which were used in the test?  
 3 A. But at that specific time, that's correct, but I wasn't  
 4 sure what might have been going on behind the scenes  
 5 with the management developing the product or future  
 6 testing, potentially.  
 7 Q. I see.  
 8 Let's look up the page, then, to page 1 where we see  
 9 Paul Evans' response to you of the same day, a little  
 10 bit later on:  
 11 "Hi Jonathan  
 12 "As part of the development work for RS we met and  
 13 spoke with Sotech. Jon Roper knows Michael Egginton and  
 14 is happy to discuss with him in more detail should you  
 15 wish.  
 16 "Once you are back from holiday, please let me Jon  
 17 or I know how you wish to progress with this."  
 18 Now, we can see that response, and the suggestion of  
 19 speaking to Sotech.  
 20 Did anyone ever speak to Sotech in response to  
 21 Mr Egginton's question, do you know?  
 22 A. Yes, eventually. I can't be sure of the date, but  
 23 myself and Jon Roper, because he was product manager and  
 24 he also had prior relationship with Sotech, we went to  
 25 visit the team at Sotech.

172

1 Q. What was the upshot of that meeting?  
 2 A. I can't be 100% sure, but we -- I can't be 100% sure.  
 3 Q. Can I suggest to you that, whatever it was, it certainly  
 4 wasn't that you could freely use RS5000 with ventilated  
 5 aluminium rainscreens, was it?  
 6 A. No, that would not have been the case.  
 7 Q. No. So, in the end, did Mr Egginton ever get the answer  
 8 to the question he was asking?  
 9 A. Not implicitly, no.  
 10 Q. No, or explicitly?  
 11 A. No.  
 12 Q. Can we then go back to the email to Ben Sharman at  
 13 {CEL00001237}, please. You say in that email in the  
 14 third line that you would like to come into the office  
 15 when everyone is around to present formally the new  
 16 product. Did that ever happen?  
 17 A. I don't think I ever managed to have a formal  
 18 presentation to the team as a whole, no.  
 19 Q. Can I show you what Mr Anketell-Jones says in his  
 20 statement. This is at {HAR00010149/6}, please,  
 21 paragraph 23:  
 22 "In relation to the use of Celotex I do remember a  
 23 representative of Celotex visiting Harley's offices  
 24 a number of times to discuss the Celotex product.  
 25 I cannot remember exactly what he said but I do remember

173

1 that part of the Celotex sales pitch was that Celotex  
 2 could be used on buildings over 18 metres tall. I also  
 3 remember the bright pink Celotex brochures which were  
 4 handed out."  
 5 Did this include you formally presenting the new  
 6 product?  
 7 A. It would have been me, yes.  
 8 Q. Do you remember who was present on that occasion or  
 9 those occasions?  
 10 A. I don't, no.  
 11 Q. Now, Mr Anketell-Jones in his oral evidence said that  
 12 you were in Harley's offices every couple of weeks and  
 13 perhaps 30 times a year. That's {Day36/77:6-9}.  
 14 I don't think we need to go to it. Do you agree?  
 15 A. I don't know the frequency, but being in sales, I was  
 16 always talking to customers or potential customers,  
 17 either in business developments, you know, with people  
 18 I had not met previously, or regular relationships,  
 19 someone like Harley who I knew quite well, to keep  
 20 an understanding of which projects were on, on the  
 21 periphery, and, you know, keep my own knowledge of  
 22 potential projects, so I had a good understanding of  
 23 potential pipelines, I suppose.  
 24 Q. As at August 2014, at the time of the RS5000 launch, do  
 25 you remember roughly how many projects Celotex had

174

1 current with Harley?  
 2 A. Maybe two, I think.  
 3 Q. Were they both high-rise projects?  
 4 A. I don't think so, no.  
 5 Q. Was either of them a high-rise project?  
 6 A. I don't think so, no.  
 7 Q. So was the position that, although you only had two  
 8 projects with them at that time, you were hoping for  
 9 more projects from Harley and that's why you kept  
 10 visiting them?  
 11 A. I think that's the idea, yes.  
 12 Q. Yes, I mean, after all you are in marketing -- sales,  
 13 rather.  
 14 A. I'm in sales, yes, so --  
 15 Q. So that's your job, I suppose.  
 16 A. It is, yes.  
 17 Q. Can we then go to Mr Ray Bailey's witness statement,  
 18 {HAR00010184/8}, please. At paragraph 31 on page 8, he  
 19 says this, and he is talking about the NBS  
 20 specification:  
 21 "Harley's assumption would be that the products  
 22 specified are suitable for the project. However, if  
 23 Harley had any concerns that any product was not  
 24 suitable we would have raised an objection. Equally,  
 25 had there been a product or material that Harley was

175

1 unfamiliar with in the NBS specification, then enquiries  
 2 would have been made, including contacting the  
 3 manufacturer and, if necessary, asking them to  
 4 demonstrate that their product was suitable for  
 5 a project. In this case, by way of example, enquiries  
 6 were made with Celotex, a product Harley had not used  
 7 before [and he refers to the NBS specification at H92  
 8 there]. Celotex informed us that the relevant product  
 9 was in fact the 'RS' (Rainscreen) product rather than  
 10 the 'FR' (Flat Roof) product which had been specified."  
 11 Now, we can't find any documents which reflect that  
 12 discussion that he recalls here.  
 13 Do you recall any such discussion?  
 14 A. I don't, no.  
 15 Q. You don't know or you don't, no?  
 16 A. I don't, no. Yes.  
 17 Q. If it's not you, can you help us with where Mr Bailey or  
 18 with whom Mr Bailey might have obtained that  
 19 information?  
 20 A. I suppose if it wasn't a conversation with myself, who  
 21 held sort of a good relationship with Harley, then the  
 22 only other point of contact would have been the  
 23 technical team back in the office on the main contact  
 24 number.  
 25 Q. Right.

176

1 While we're on this paragraph, and the reference to  
 2 FR being "flat roof", was Mr Bailey correct that FR  
 3 stood for "flat roof"?

4 A. I can't remember exactly what those initials meant.  
 5 Q. Right.

6 Going back to Mr Anketell-Jones' statement, if we  
 7 can, this is at {HAR00010149/6}, please, and look at  
 8 paragraph 23. We looked at this a moment ago. He says  
 9 there:

10 "I cannot remember exactly what he said [that's the  
 11 representative] but I do remember that part of the  
 12 Celotex sales pitch was that Celotex could be used on  
 13 buildings over 18 metres tall."

14 Now, that is consistent, isn't it, his recollection  
 15 of what was said, with the communications strategy we  
 16 looked at earlier, isn't it?

17 A. That's correct.

18 Q. Did your sales pitch mention the fact that the test for  
 19 use over 18 metres was confined to the tested  
 20 configuration?

21 A. I can't be sure, but going from the documents, I would  
 22 have talked them through the documents as they were  
 23 presented.

24 Q. Do you remember discussing the specification guide and  
 25 compliance guide with Mr Anketell-Jones?

177

1 A. I can't be certain. I know that we had some email  
 2 conversations and I sent him all the details that I had  
 3 on the product or any test literature that I had  
 4 available to myself -- to myself; to give to Dan and any  
 5 other person within the office. But I can't remember  
 6 having a specific conversation explaining the way it was  
 7 tested.

8 Q. He is referring to two things in this paragraph: he is  
 9 referring to a sales pitch and the bright pink Celotex  
 10 brochures.

11 Do you remember pitching RS5000 to him?

12 A. I mean, if you call a sales pitch a conversation, that's  
 13 maybe what happened. I mean, if he's got recollection  
 14 of the bright pink brochures, it's either because  
 15 I physically had them to hand and I gave them to him and  
 16 I showed them to him, or he opened the email  
 17 attachments, which again would have shown exactly the  
 18 same but in a pdf format.

19 Q. Do you remember ever saying to Mr Anketell-Jones during  
 20 a conversation, or showing Mr Anketell-Jones physically,  
 21 the caveat that RS5000 could only be used over 18 metres  
 22 in a rainscreen cladding system which corresponded  
 23 exactly to the system as tested?

24 A. I can't remember specifically saying that to him, no.  
 25 Q. Do you remember specifically drawing his attention to

178

1 that caveat in the compliance guide and the  
 2 specification guide?

3 A. I can't be certain, no.

4 Q. Given the importance of that caveat, was it not  
 5 important to you to make sure that Mr Anketell-Jones was  
 6 thoroughly familiar with it and therefore thoroughly  
 7 familiar with the limited use to which RS5000 could be  
 8 put above 18 metres?

9 A. It would have been important, yes.

10 Q. You say it would have been important, I think we can  
 11 agree that, but did it occur to you at the time as  
 12 sufficiently important to point it out to him expressly  
 13 so that he really understood it?

14 A. No, it didn't.

15 Q. Why is that?

16 A. I'm not sure. It was all there in the information.  
 17 I was dealing with a specialist in that field, and I was  
 18 expecting -- I suppose expecting the knowledge to be  
 19 there to disseminate the information that I was giving  
 20 him and others within the team.

21 Q. Was there a sense in which you perhaps didn't  
 22 strenuously strive to draw attention to the caveat in  
 23 the hope that he might not pick it up and therefore fall  
 24 into what you later categorised as a green "Use"  
 25 category of customer?

179

1 A. That wouldn't have been my intention, no.

2 Q. Was it part of your thinking?

3 A. No.

4 MR MILLETT: Mr Chairman, is that a convenient moment?

5 SIR MARTIN MOORE-BICK: Yes, I think it is. Thank you very  
 6 much.

7 We will have a short break now, Mr Roome. We will  
 8 come back at 3.35 and resume then.

9 No talking to anyone about your evidence while  
 10 you're out of the room.

11 THE WITNESS: Of course.

12 SIR MARTIN MOORE-BICK: Thank you very much. Would you like  
 13 to go with the usher.

14 (Pause)

15 Thank you, 3.35, please.

16 (3.21 pm)

17 (A short break)

18 (3.35 pm)

19 SIR MARTIN MOORE-BICK: All right, Mr Roome, happy to carry  
 20 on?

21 THE WITNESS: Thank you.

22 SIR MARTIN MOORE-BICK: Thank you very much.

23 Yes, Mr Millett.

24 MR MILLETT: Thank you.

25 Mr Roome, can we go on with your early contacts with

180

1 Harley as the next topic.  
 2 We have already looked at the Salesforce entries  
 3 that show that, by July 2014, Ben Bailey had mentioned  
 4 Grenfell Tower to you.  
 5 Can we then look at {CEL00009876}, please. This is  
 6 another entry from the Salesforce database. Again, can  
 7 we please have it enlarged as much as possible.  
 8 Let's just look at it a little bit more carefully.  
 9 Merit House is what it relates to. "Name:  
 10 Daniel Anketell-Jones". Then on the left-hand side,  
 11 it's again assigned to Mark Willoughby:  
 12 "Celotex Task Type: Report.  
 13 "Activity Type: Rainscreen Contractor.  
 14 "Task Topic: 18m Rain Screen Product.  
 15 "Due date: 11/08/2014."  
 16 Just for more dates, at the bottom it seems that  
 17 it's created on 18 July 2014, and last modified on  
 18 13 October 2014. Let's take the date of the last  
 19 modification as the relevant date.  
 20 Let's look at the comment:  
 21 "Met Dan at the CWCT Members Meeting.  
 22 "Things have been especially busy recently as they  
 23 have issues with one of their designers getting things  
 24 wrong, costing them money. Tim Bennett has now left and  
 25 gone back to Prater.

181

1 "As RS was not launched at the time we have missed  
 2 the boat with Merit House.  
 3 "Agreed to meet up later in October to update on  
 4 projects and look at future specs."  
 5 Do you remember this discussion with Dan at the CWCT  
 6 members' meeting?  
 7 A. I remember attending the CWCT meeting, and I think Dan  
 8 was there, like quite a few people that were in that  
 9 industry.  
 10 Q. Do you remember having this discussion along these lines  
 11 as recorded in this entry with Daniel Anketell-Jones at  
 12 the CWCT members' meeting?  
 13 A. I can only say it's my entry, so I must have had that  
 14 conversation.  
 15 Q. Again.  
 16 Can we then look at the meeting and the slides that  
 17 you sent round afterwards.  
 18 First of all, can we go to {CEL00001255}, please.  
 19 This is an email that you sent on 21 October 2014 as  
 20 a round-robin within Celotex. Do you see?  
 21 A. I do.  
 22 Q. Its subject is "CWCT AGM and Members' Meeting (RS5000)":  
 23 "Hi Team,  
 24 "As some of you may know I recently attended the  
 25 CWCT Members Meeting up in London. The CWCT is the

182

1 Centre for Window & Cladding Technology based at Bath  
 2 University and is seen by the industry as the leaders in  
 3 guidance for what is accepted in the construction of  
 4 Rainscreen & Curtain Wall Builds."  
 5 Then you attach a list of attendees, as you say in  
 6 the third paragraph.  
 7 Then in the fourth paragraph, you say this:  
 8 "The day was a mix of opinion and fact (And a lot of  
 9 the opinion was pretty one-sided - The use of  
 10 non-combustible materials ONLY)!. A lot of people that  
 11 I spoke to afterwards disagreed with a lot of what was  
 12 said.  
 13 "The most useful presentations were from;  
 14 "Dr. Sarah Colwell.  
 15 "Business Group Manager, Fire Suppression.  
 16 "BRE Global."  
 17 "Co-Author of BR135 and a lead in the field of fire  
 18 and façade technology. (Presentation Attached) N.B.  
 19 Ignore the typo on a couple of slides ..."  
 20 SIR MARTIN MOORE-BICK: Sorry, we're off the page, as far as  
 21 we're concerned.  
 22 MR MILLETT: Sorry, I thought it was going to come.  
 23 SIR MARTIN MOORE-BICK: It probably will, but it hasn't done  
 24 yet. There we are.  
 25 MR MILLETT: Just below the bold:

183

1 "Co-Author of BR135 and a lead in the field of fire  
 2 and façade technology. (Presentation Attached) N.B.  
 3 Ignore the typo on a couple of slides mentioned BS8141  
 4 it should read BS8414.  
 5 "Debbie Berger and I will be meeting with Sarah and  
 6 a colleague on the 4th November to discuss how we can  
 7 better tailor our RS5000 approach in this market. As we  
 8 have nearly all found out the whole issue around BS8414  
 9 is far more complex than we first thought."  
 10 Then there is a link, LinkedIn for Hugh McNamara at  
 11 Arup in Edinburgh.  
 12 Now, first of all, can I just ask you about the  
 13 fourth line, when you say in brackets there "a lot of  
 14 the opinion was pretty one-sided - The use of  
 15 non-combustible materials ONLY". Does that tell us that  
 16 the direction of travel, the thrust of the views at the  
 17 meeting, was in general that you could only use  
 18 non-combustible insulation above 18 metres, or is that  
 19 something else?  
 20 A. No, I think what it was was there was a number of  
 21 different presentations, I can't be exactly sure about  
 22 all of them, but Dr Sarah Colwell presented her slides  
 23 on the BR 135, the route to compliance using the full  
 24 test, BS 8414 test, but there were some other  
 25 presentations by other people sort of putting doubts

184

1 about, you know, using non -- sorry, combustible  
 2 products on high-rise buildings. But, as I said there,  
 3 a lot of people I spoke to afterwards disagreed with  
 4 a lot of what was said because, you know, going back to  
 5 the point about having to use a lot thicker material of  
 6 non-combustible material to reach the modern insulation  
 7 guidelines that were being given out, and basically  
 8 saying it was sort of unrealistic to think that  
 9 non-combustible materials were the only solution going  
 10 forward.  
 11 Q. Right.  
 12 At this point, this is October 2014, had you heard  
 13 of or were you familiar with CWCT's Technical Note  
 14 Number 73, which they'd published in March 2011? Was  
 15 that something you were familiar with?  
 16 A. Can I take a look at it?  
 17 Q. Yes, absolutely. It's at {CWCT0000019},  
 18 Technical Note 73. If you look at the bottom of the  
 19 page, page 1, it says March 2011. Then go up to the top  
 20 of the page. Is that a familiar document?  
 21 A. I recognise the logo. I can't say that I remember  
 22 that --  
 23 Q. Right.  
 24 A. -- specifically .  
 25 Q. Let me show you two things in it specifically and see if

185

1 you remember them from the time.  
 2 Can you go to page 6 {CWCT0000019/6}. We can see  
 3 a title on that page, which says "Use of combustible  
 4 material" in the left-hand column, and if you look at  
 5 the second paragraph, it says:  
 6 "To satisfy the recommendations in AD B, insulation  
 7 and filler materials in walls of a building with a floor  
 8 more than 18m above ground level are required to be of  
 9 limited combustibility."  
 10 If you go down three paragraphs on, it says, just  
 11 above "Alternative approaches":  
 12 "The only commonly used insulation material that  
 13 will satisfy the definition of limited combustibility is  
 14 mineral wool. It is sometimes argued that thermoset  
 15 insulation materials with non-combustible facings may be  
 16 regarded as satisfying the requirement, noting that  
 17 their decomposition in fire will release smoke."  
 18 As at October 2014, so some three and a half years  
 19 on from the date of the publication of this guidance,  
 20 were you aware of either or both of these statements  
 21 made by CWCT that I've just read to you?  
 22 A. I can't be sure, no.  
 23 Q. Right.  
 24 Can we then go back to your email at {CEL00001255}.  
 25 You say in the middle there that the most useful

186

1 presentations were from Sarah Colwell at the BRE, and  
 2 that hers was one of the most useful. Why was that?  
 3 A. Because the -- we looked at a slide or one of my  
 4 presentations earlier to the sales meeting, and the good  
 5 thing about Dr Sarah Colwell's presentation was that it  
 6 gave a step-by-step introduction to the testing regime  
 7 and the pass sort of criteria to BR 135 with images.  
 8 It's a lot easier for me to understand, and I thought it  
 9 would be easier, as a good presentation to forward on to  
 10 the team internally.  
 11 Q. You go on in the last part of the email, as we've seen,  
 12 to say that you and Debbie Berger would be meeting  
 13 Sarah Colwell and a colleague on 4 November to, as you  
 14 put it, "discuss how we can better tailor our RS5000  
 15 approach in this market".  
 16 I think you did have such a meeting, didn't you, on  
 17 that date?  
 18 A. We did have a meeting, but I don't think  
 19 Dr Sarah Colwell could attend in the end.  
 20 Q. Was it Stephen Howard of the BRE who attended instead?  
 21 A. It was, yes.  
 22 Q. Yes, that's the meeting you referred to earlier in your  
 23 evidence this morning.  
 24 A. Yes.  
 25 Q. Did you think at the time that it was appropriate that

187

1 the BRE, which was a testing house, should be advising  
 2 Celotex as to how better to market RS5000?  
 3 A. I didn't have a view on that, no.  
 4 Q. Did you think at the time that it was part of the BRE's  
 5 role to advise manufacturers for whom it had done tests  
 6 as to how to tailor their marketing approach?  
 7 A. I did not, no.  
 8 Q. You didn't think that it was part of their role?  
 9 A. I didn't question that, no.  
 10 Q. Right.  
 11 As we've seen, you say:  
 12 "As we have nearly all found out the whole issue  
 13 around BS8414 is far more complex than we first  
 14 thought."  
 15 When you say "nearly all found out", that's quite  
 16 a qualification. Who were the people who hadn't found  
 17 out that the issue around 8414 was more complicated than  
 18 you had first thought?  
 19 A. I don't know as to who I would be referring. Maybe it  
 20 was the team within Celotex, possibly.  
 21 Q. I see.  
 22 In what way was the whole issue around BS 8414 far  
 23 more complex than you had first thought?  
 24 A. I think I meant by that the different route to  
 25 compliance, about the variability, I suppose, of the

188



1 different materials involved. Yeah, and the different  
 2 routes to compliance, how it wasn't sort of a linear  
 3 route, as such. Other than having a non-combustible  
 4 material, there was other options that could be used.  
 5 Q. You had originally clearly understood that there were  
 6 two routes to compliance: the linear route and the  
 7 BS 8414 route. What was complex about that?  
 8 A. Well, no, it was that there were things like desktop  
 9 studies and I think it's holistic fire solutions that  
 10 are available by specialists. Now, I don't know if that  
 11 was at that particular point, but there wasn't just one  
 12 route.  
 13 Q. No, that's correct, but you're saying here that there is  
 14 an issue around 8414, which is one of the four routes to  
 15 compliance. What was the issue around 8414 that was far  
 16 more complex than we first thought?  
 17 A. Possibly that it was -- the testing. There was -- we  
 18 couldn't or Celotex could not be reliant on just the one  
 19 test.  
 20 Q. So you had discovered -- is this right? -- that 8414 did  
 21 not produce a one-size-fits-all test, and in fact it was  
 22 a one-size-fits-one test?  
 23 A. Seemingly, yes.  
 24 Q. Yes.  
 25 Now, we'll come back to this meeting later, I think,

1 but can we go back to your contact with Harley in  
 2 relation to Grenfell Tower and look at Ray Bailey's  
 3 witness statement, {HAR00010184/29}, please, and I would  
 4 like to go to paragraph 113 in that, please.  
 5 Now, he says there, about seven lines up from the  
 6 end of the paragraph:  
 7 "In addition ..."  
 8 Do you see that?  
 9 A. Yes.  
 10 Q. "... a representative of Celotex, Jonathan Roome, also  
 11 attended Harley's offices to talk with Harley staff  
 12 about the benefits of the RS5000 product specifically  
 13 for the Grenfell Project."  
 14 Do you recall such a meeting?  
 15 A. I can remember having a meeting or meetings generally at  
 16 Harley. I don't know to which meeting he's referencing  
 17 there.  
 18 Q. Do you remember going to Harley's offices and talking to  
 19 Harley staff about the benefits of RS5000 specifically  
 20 for the Grenfell Tower project?  
 21 A. I think I'd spoke ... I must have -- I'd spoken to the  
 22 people at Harley generally at the launch of the product,  
 23 and I have a feeling I spoke to -- it may have been  
 24 Mark Stapley or Dan Anketell-Jones following that  
 25 launch, when they highlighted that they had a potential

1 use for the product on the Grenfell project.  
 2 Q. And did you tell them that RS5000 would bring benefits  
 3 specifically for the Grenfell Tower project?  
 4 A. I don't think I would have said something like that, no.  
 5 Q. When you did present RS5000 to Harley, did you discover,  
 6 either at this meeting or the meetings you had with  
 7 Mark Stapley or Daniel Anketell-Jones, that  
 8 Grenfell Tower was a building above 18 metres in height?  
 9 A. Yes, I was aware.  
 10 Q. Did you tell Harley that RS5000 was suitable for  
 11 Grenfell Tower, being a building in excess of 18 metres  
 12 in height?  
 13 A. I don't think I would have said that specifically, no.  
 14 Q. Did Harley ever ask specifically whether RS5000 could be  
 15 used above 18 metres?  
 16 A. I don't know if they would have asked that specifically,  
 17 but that's what was presented to them in the literature  
 18 that I would have sent to them.  
 19 Q. As a result of you sending them that literature, did  
 20 anybody at Harley ever ask you for further information  
 21 relating to the BS 8414 test that is described in the  
 22 marketing literature?  
 23 A. I think further down the line Dan had requested further  
 24 information about a BS 476 test that Celotex had, and  
 25 more information, but I can't recall if that was

1 directly just for Grenfell or for -- I think he  
 2 mentioned it was to do with a client request.  
 3 Q. Is that the headache email, "I have a headache for you"?  
 4 A. I think that's the one.  
 5 Q. We will come to that.  
 6 A. Yes.  
 7 Q. Apart from that, leave that on one side, in relation to  
 8 Grenfell specifically, did anybody at Harley ever ask  
 9 you for further information relating to the BS 8414 test  
 10 over and above that described in the marketing  
 11 literature?  
 12 A. I don't think so, no.  
 13 Q. Did you ever volunteer the information about what  
 14 precisely had been tested beyond what was in the  
 15 marketing literature?  
 16 A. I think I'd already sent them all the documents that  
 17 I had to hand, including the four-page test document  
 18 that I had available.  
 19 Q. Can we then look at {CEL00000555}, and I would like to  
 20 look at the second email down on that page, which is in  
 21 front of you, at 9.54, from you to Paul Lake,  
 22 17 November 2014:  
 23 "Morning Paul,  
 24 "Please find the list of Must Win Projects.  
 25 Apologies there was a little confusion at our end!

1 "Look forward to seeing you tomorrow.  
 2 "Kind Regards."  
 3 Do you see that?  
 4 A. I do.  
 5 Q. Then a minute later, I think, just about a minute later,  
 6 you send him the file .  
 7 A. Correct.  
 8 Q. Which I think you had not attached, as often happens.  
 9 A. That's correct.  
 10 Q. First of all, who is Paul Lake?  
 11 A. He -- from his email, he worked for another Saint-Gobain  
 12 company, so Saint-Gobain was the umbrella company who  
 13 owned the likes of Celotex. So Paul was, I think, the  
 14 managing director of Ecophon, which is another business,  
 15 and he headed up a meeting that was run I think monthly,  
 16 where different -- members of different businesses  
 17 attended and shared knowledge about projects where  
 18 different Saint-Gobain products could be used. So the  
 19 must-win file was an ongoing document that had been  
 20 running for some time where people would put in the  
 21 information about the projects that they were working  
 22 on.  
 23 Q. Could we go to {CELO0000556}, please. Is this the  
 24 spreadsheet that you attached?  
 25 A. It seems to be, yes.

193

1 Q. If you look at it, the first entry is Grenfell Tower,  
 2 isn't it?  
 3 A. It is.  
 4 Q. So clearly by November 2014, Grenfell Tower was  
 5 a must-win project.  
 6 What did "must-win" mean in this context?  
 7 A. I think it was just a reference to the larger projects,  
 8 just the project file had always been called must-win  
 9 projects.  
 10 Q. What qualified it for a must-win project? Was it the  
 11 size of the order value or the proximity of the delivery  
 12 date or what?  
 13 A. Yes, I think it was really the order value, or potential  
 14 order value, I should say.  
 15 Q. What approach would Celotex take to a must-win project  
 16 which qualified as such as opposed to one which was  
 17 a mustn't-win project, if you like, or one which was of  
 18 less importance?  
 19 A. I don't think there was any differentiation for my part.  
 20 I kept -- I tried to keep an eye on all projects.  
 21 Q. Why weren't all projects must-win projects, another way  
 22 of putting the question?  
 23 A. Well, because of their potential order value, I suppose.  
 24 Q. We can see that Grenfell Tower here is number 1, it's  
 25 the first entry in the list, but it's not the largest in

194

1 terms of order value. Why is that? Why is it number 1?  
 2 A. It may have been the one that I'd been -- it may have  
 3 been the newest project. I can't tell from that, how  
 4 that document was sorted.  
 5 Q. I was going to ask you, because it doesn't look as if  
 6 it's been compiled in any particular order. It's  
 7 certainly not in order value order, and nor does it  
 8 appear to be in delivery date order.  
 9 A. No.  
 10 Q. So do you know why the order exists in that way that  
 11 these projects are set out in?  
 12 A. I can't --  
 13 Q. Why are they listed in that way?  
 14 A. I can't be certain, I'm afraid.  
 15 Q. Right.  
 16 We can see it was number 1 in here. Does that mean  
 17 it was the number 1 must-win project, or it was the most  
 18 recent addition to the existing list, or some other  
 19 reason?  
 20 A. It may have been the most recent entry, yes, if there's  
 21 no -- I can't be sure because there's no date against  
 22 the time or the date it was put into that file .  
 23 Q. Given that it was a must-win project and, on the face of  
 24 it, appears as number 1 in the list of must-win  
 25 projects, were you under specific pressure as a sales

195

1 executive to secure the project for Celotex?  
 2 A. No.  
 3 Q. Given that it was a must-win project, it must have been  
 4 of priority at least to you to secure it as opposed to  
 5 other projects?  
 6 A. Not particularly . There's no way that I could influence  
 7 the purchasing of a material.  
 8 Q. What purpose did a must-win list have?  
 9 A. It was a way of sharing information between the  
 10 Saint-Gobain businesses, because if there was potential  
 11 for other products from other manufacturers under the  
 12 Saint-Gobain banner to be involved, then this was a way  
 13 of being able to see which projects were being worked on  
 14 by different businesses.  
 15 Q. I can understand that it would be useful to share  
 16 information about projects so that other parts of the  
 17 business might also have an interest in it, but it's  
 18 really the must-win aspect I'm interested in.  
 19 What was the point of having a list of must-win  
 20 projects as opposed to all projects?  
 21 A. Well, as I said, this was to do with the size or the  
 22 potential income from the project, so only the larger  
 23 projects were put into this file, which ultimately went  
 24 into -- I think it went into some sort of master file  
 25 which was accessible from each of the businesses.

196

1 Q. Given that this was a must-win project because of its  
 2 size, I would suggest to you that, given that you're  
 3 a salesman, your role was to influence the purchasing of  
 4 products on that project in order to be able to bring it  
 5 home?  
 6 A. I could only influence them with the information that  
 7 I had available to give them.  
 8 Q. Yes. What I'm suggesting to you is that because it was  
 9 a must-win project, there was particular pressure on you  
 10 to win it.  
 11 A. I don't think there was any undue pressure, no.  
 12 Q. I wasn't suggesting undue pressure necessarily, just  
 13 some pressure.  
 14 A. It never felt that way. My role was a salesperson, and  
 15 I was selling products. Whether I felt pressure --  
 16 I don't think I do feel pressure from selling products.  
 17 I mean, I've had projects in the past which -- I think  
 18 Waylands House, there was an email about Waylands House,  
 19 where I had to walk-away from the project. It would  
 20 have been nice to secure that with Harley, but at the  
 21 time there was no suitable product.  
 22 Q. It would have, from a salesman's perspective, been  
 23 undesirable to walk away from a must-win project, or at  
 24 least more undesirable than walking away from any other  
 25 kind of project; is that fair?

197

1 A. You could say that, yes.  
 2 Q. Can we look at {CEL00011960}. Here is an email from you  
 3 to Daniel Anketell-Jones on 27 August 2014, subject:  
 4 "Grenfell Tower, Hammersmith - RS5000 data",  
 5 attachments: "Rainscreen.zip":  
 6 "Hi Dan,  
 7 "Good to speak to you again (as always)  
 8 "For now here is all of the info that I have on the  
 9 RS5000 Rainscreen product for use over 18m.  
 10 "When you have a moment please can you send me  
 11 across some drawings and an idea of who you would look  
 12 to use for the supplychain.  
 13 "Speak again in a couple of weeks.  
 14 "P.S. ... Has the Waylands House ship sailed?"  
 15 I think the answer to that last question was: yes,  
 16 it had.  
 17 Do you remember having a conversation with  
 18 Daniel Anketell-Jones, as you refer to in the first line  
 19 of that email?  
 20 A. I must have done, yes.  
 21 Q. When you said "as always", was that because you  
 22 frequently had conversations with Daniel Anketell-Jones?  
 23 A. Well, it's someone within Harley, a customer I knew  
 24 well, and someone I had formed a relationship with from  
 25 supplying them other materials whilst at Hilti prior to

198

1 me coming to Celotex.  
 2 Q. I'm just trying to piece together the timing a little  
 3 bit. Given the subject line is "Grenfell Tower,  
 4 Hammersmith", is it safe to assume or take from that  
 5 that you had already discussed Grenfell Tower with  
 6 Harley by or before 27 August 2014?  
 7 A. I may have done. It may have been Ben at Merit House  
 8 when I had that site meeting who had mentioned it, it  
 9 was on the cards as a future potential project.  
 10 Q. Do you think that you had had your visit to the office  
 11 which had been referred to by Ray Bailey in his witness  
 12 statement we saw earlier by that time?  
 13 A. I mean, looking at the date of that email, at the end of  
 14 August, and I think the launch was at the beginning of  
 15 that month, then it may have been that I'd managed to  
 16 speak with some members of the team about the product  
 17 before Dan then -- or this conversation with Dan.  
 18 Q. In that conversation, did you have a conversation about  
 19 RS5000 specifically?  
 20 A. It looks as such, yes.  
 21 Q. Did you tell him that he would need to order RS5000 as  
 22 opposed to the FR5000 specified in the  
 23 NBS specification?  
 24 A. I can't be sure.  
 25 Q. Did you discuss the differences between FR5000 and

199

1 RS5000?  
 2 A. Again, I can't be sure.  
 3 Q. Did you tell Mr Anketell-Jones that RS5000 was suitable  
 4 for use above 18 metres?  
 5 A. I might have done, because that was the only product  
 6 available that would have suited that application.  
 7 Q. Again, did you explain or tell him about any of the  
 8 caveats that we've discussed, in other words it was only  
 9 compliant with Approved Document B for use above  
 10 18 metres if the whole system was exactly the same as  
 11 that which had been tested?  
 12 A. I can't be sure.  
 13 Q. If you didn't tell him that, is there a reason why you  
 14 didn't?  
 15 A. Well, the information was in the documents, in every one  
 16 of the documents that I sent to him.  
 17 Q. Yes. But given the importance of the caveat, is there  
 18 a reason why you didn't see fit to bring it home to him  
 19 specifically in the conversation?  
 20 A. No.  
 21 Q. Is this an occasion on which you just let him do his  
 22 best with the documents rather than alerting him  
 23 specifically to the caveat and saying, "Look, Dan, I've  
 24 got to tell you, you can't use RS5000 unless it's in  
 25 exactly the same rainscreen system, you do understand

200

1 that, don't you?" Do I take it you didn't tell him  
 2 that?  
 3 A. Not specifically, no, because I was dealing with  
 4 a specialist and a specialist company who -- this is  
 5 their bread and butter, this is what they do.  
 6 Q. Do I take it from that that in this conversation you're  
 7 referring to here, he never asked you about what the  
 8 cladding system that had been tested was so he could  
 9 compare it with what was going on the building?  
 10 A. I can't recall the specifics, unfortunately, of the  
 11 conversation.  
 12 Q. The zip file you attached, take it from me, comprised  
 13 five documents: the product comparison sheet, the LABC  
 14 certificate and registered details drawing and document  
 15 list, the BRE Global classification report -- I say  
 16 "the"; a version of it -- the rainscreen cladding  
 17 compliance guide and the rainscreen cladding  
 18 specification guide.  
 19 Now, we have already discussed the compliance guide  
 20 and the specification guide. Can we then turn to the  
 21 LABC documents.  
 22 First, what did you understand the role of the LABC  
 23 to have been?  
 24 A. Well, the certificate I understood to be a third-party  
 25 endorsement of the product.

201

1 Q. Now, let's go then to {CELO0001017}, sticking with the  
 2 LABC documents, and let's see how that comes about.  
 3 This is an email of 29 August 2014 at the bottom of the  
 4 page from Jon Roper to the UK Celotex sales team and  
 5 marketing and tech department, and the subject, do you  
 6 see, is "LABC Registered Detail Approval -  
 7 Celotex RS5000":  
 8 "All,  
 9 "Please find attached our LABC registered detail  
 10 certificates for Celotex RS5000."  
 11 Pausing there, you will note that the date is  
 12 two days after you had sent the email to  
 13 Daniel Anketell-Jones.  
 14 Did you have the LABC certificate two days before  
 15 this email came around, do you think?  
 16 A. Was that in my -- sorry, was that attachment --  
 17 Q. It was. It was part of the zip file attachment.  
 18 A. That I sent to Dan?  
 19 Q. Yes.  
 20 A. I must have done, then, yes.  
 21 Q. Right.  
 22 Do I take it from the fact that it goes to the sales  
 23 team that you would have received this email?  
 24 A. Yes, that's correct.  
 25 Q. Mr Roper says in the, I suppose, third paragraph, just

202

1 at the very bottom of the page:  
 2 "These certificates confirm that Celotex RS5000 is  
 3 applicable for use in rainscreen cladding applications  
 4 below and above 18 metres in height. It confirms that  
 5 we have successfully tested to BS 8414-2:2005, meet the  
 6 criteria set out in BR 135 and is therefore applicable  
 7 for buildings with a storey height greater than  
 8 18 metres."  
 9 Did you understand that to have been the Celotex  
 10 sales line as to what the LABC certificate said or  
 11 meant?  
 12 A. I think, yeah, it follows that way.  
 13 Q. Did you tell Dan Anketell-Jones at any point, whether  
 14 two days before or after this, that the LABC certificate  
 15 confirmed that Celotex RS5000 was applicable for  
 16 buildings higher than 18 metres?  
 17 A. Again, I don't think I did. I literally just bundled  
 18 any piece of information that I had, any certificate,  
 19 any document that I was provided with, and sent that  
 20 out.  
 21 Q. When you received Mr Roper's email on 29 August, and you  
 22 could see in that last sentence in that paragraph at the  
 23 foot of the page where it says "is therefore applicable  
 24 for buildings with a storey height greater than  
 25 18 metres", did it not occur to you that his summary of

203

1 what the certificates confirmed couldn't be correct?  
 2 A. I didn't see that, no.  
 3 Q. Because it can't be correct, can it? The certificate  
 4 can't confirm that just because the test of 8414-2 had  
 5 been passed, RS5000 was applicable for all buildings  
 6 with a storey height greater than 18 metres; that would  
 7 be thoroughly misleading, wouldn't it?  
 8 A. That wouldn't be correct, no.  
 9 Q. Well, it would be misleading, wouldn't it?  
 10 A. Yes.  
 11 Q. It didn't occur to you at the time that such  
 12 a description of the product, if that was what the  
 13 certificate said, would be misleading?  
 14 A. No, it didn't occur to me.  
 15 Q. Can we look at the certificate itself. This is  
 16 {CELO0000009}. This is the LABC's registered details  
 17 drawing and document list, and we can see, just taking  
 18 it slowly together, it says "RS5000 PIR insulation  
 19 board", and then:  
 20 "Supporting Documentation Reference Numbers: Celotex  
 21 18 metre product quality production extract."  
 22 And five down from that you see:  
 23 "BRE report 14th July 2014 indicate Class 0 spread  
 24 of flame.  
 25 "Typical illustration for rain screen cladding.

204

1 "BRE letter 17th June 2014 RE BS 8414 Test.  
 2 "BRE letter 17th November 2011 RE Class 0 testing.  
 3 "BRE Global Test report number 295255 issue 2 dated  
 4 11th August 2014."  
 5 Then it goes on:  
 6 "Limitations of use: For use in rainscreen wall  
 7 construction including above 18 metres height. The  
 8 required thickness of board for a particular  
 9 construction must be established with the use of the  
 10 Celotex online calculator."  
 11 Did you see this certificate when it was sent to you  
 12 by Mr Roper on 29 August? Did you look at it?  
 13 A. I must have done, yes.  
 14 Q. When you read "Limitations of use", did you understand  
 15 that -- well, what did you understand the limitations of  
 16 use to be there or mean?  
 17 A. It's ... well, I mean, looking at this document now,  
 18 it's not particularly clear. The first line states that  
 19 it can be used in wall construction including above  
 20 18 metres height, and the second one is more about --  
 21 I think this is alluding to the thickness of the  
 22 material needs to be assessed by way of -- I think the  
 23 online calculator, there was a quite basic thermal  
 24 calculator that was on their website which could be used  
 25 to ascertain the thickness of material. But to get

205

1 anything specific, I think the clients, potential  
 2 clients, had to go to the technical team and make  
 3 an enquiry for them to do a full insulation U-value  
 4 calculation.  
 5 Q. So the second sentence under the limitations of use was  
 6 about U-values. The first sentence, "For use in  
 7 rainscreen wall construction including above 18 metres  
 8 height", is hardly a limitation on use at all, is it?  
 9 A. No, not at all.  
 10 Q. So when you saw this, did it not cross your mind to ask  
 11 yourself the question: what does that mean? How could  
 12 that possibly be correct?  
 13 A. I didn't at the time, no.  
 14 Q. Did you understand or think that there was a risk that  
 15 anyone reading this could look at it and think that it  
 16 was acceptable to use RS5000 in any building above  
 17 18 metres?  
 18 A. I didn't, no.  
 19 Q. Then under "Advice Notes", it says:  
 20 "Celotex RS5000 can be used with a variety of  
 21 cladding systems (including masonry or rainscreen  
 22 systems) and can be fixed back to a structural steel  
 23 frame with a sheathing board or direct back to masonry.  
 24 "Celotex RS5000 has successfully tested to BS 8414:2  
 25 2005, meets the criteria set out in BR 135 and therefore

206

1 is acceptable for use in buildings with storeys above  
 2 18m in height (subject to the board being fixed to a  
 3 non-combustible substrate) alternative compliance to  
 4 AD B.  
 5 "The product has been tested and achieves a 'Class 0'  
 6 spread of flame."  
 7 Now, I've read it all to you, but just looking at  
 8 the first part of that part of the advice notes, "RS5000  
 9 can be used with a variety of cladding systems", well,  
 10 that's incorrect, isn't it, so far as it concerns use  
 11 above 18 metres?  
 12 A. Looking at that now, yes.  
 13 Q. Yes. Then it goes on in the fourth line:  
 14 "... RS5000 has successfully tested to BS 8414:2  
 15 2005, meets the criteria in BR 135 ..."  
 16 And then this:  
 17 "... and therefore is acceptable for use in  
 18 buildings with storeys above 18m in height ..."  
 19 Pausing there, again, that's the same misleading  
 20 mantra as we've seen in Celotex's marketing literature,  
 21 isn't it?  
 22 A. It seems to be, yes.  
 23 Q. Do you know how LABC got that text and agreed to put it  
 24 into their certificate?  
 25 A. Unfortunately not, no, I was not involved in this.

207

1 Q. Then you see in the brackets there is a caveat:  
 2 "... (subject to the board being fixed to  
 3 a non-combustible substrate) ..."  
 4 That's misleading because that suggests that that's  
 5 the only caveat, which it wasn't, was it?  
 6 A. No, it wasn't.  
 7 Q. "... alternative compliance to AD B."  
 8 What does that mean, at the end of that sentence?  
 9 A. The part which says "alternative compliance to AD B"?  
 10 Q. Yes.  
 11 A. I would imagine that means it's an alternative or way  
 12 that the board can be used with the non-linear route.  
 13 Q. Yes.  
 14 Did you understand, looking at the advice notes,  
 15 that at least in the respects I have put to you, this  
 16 was a thoroughly misleading text?  
 17 A. Again, looking at this now, I would agree with you, yes.  
 18 Q. But you didn't think it was misleading at the time, is  
 19 that what you are telling us?  
 20 A. I don't think I had reviewed it in that much detail,  
 21 knowing what I know now as to what I knew back then.  
 22 Q. Turning to the BRE report that you sent to  
 23 Daniel Anketell-Jones on 27 August, let's look and see  
 24 it, it's {CEL00011965}.  
 25 This is, on its first page -- and I would like to

208

1 look at this carefully with you -- a document that says:  
 2 "BRE Global Test Report.  
 3 " Classification report in accordance with the  
 4 requirements of BR 135:2013 Annex B.  
 5 "Prepared for: Celotex Insulation Ltd.  
 6 "Date: 11 August 2014.  
 7 "Report Number: 295255 Issue: 2"  
 8 I should show you, it's a four-page document, or it  
 9 runs over four pages, I should say.  
 10 Do you remember sending this document as a four-page  
 11 document to Mr Anketell-Jones?  
 12 A. Not specifically, but I think this four-page document  
 13 was the only one that was available to myself and my  
 14 colleagues in the sales team to disperse between  
 15 customers.  
 16 Q. Were you aware at that time, late August 2014, that  
 17 in fact the classification report 295255 issue 2 ran  
 18 over some 12 pages?  
 19 A. At that time, no.  
 20 Q. Let's just look at it together. {CELO0002133}. What  
 21 I would like to do, if we can, please, is to have this  
 22 document in one part of the screen and the four-page  
 23 version at {CELO0011965} on the left-hand side of the  
 24 screen, if that's possible.  
 25 (Pause)

209

1 Now, just so we're clear, the first page of these  
 2 two documents are identical, aren't they? We can see  
 3 that they're both dated 11 August and they're both  
 4 numbered 295255 issue 2. Yes?  
 5 A. They seem to be, yes.  
 6 Q. Yes.  
 7 Now, if we scroll down or look down to the bottom of  
 8 the page -- it probably doesn't work on page 1, but  
 9 let's go to page 2 of both documents. We can see at the  
 10 bottom of the second page, or page 2 of the document on  
 11 the right-hand side, the 12-page document, that it's  
 12 1 of 11 pages. Do you see that?  
 13 A. I do, yes.  
 14 Q. But we don't see precisely what's on the second page of  
 15 the four-page version, but we can see that it's  
 16 a different page, can't we?  
 17 A. It looks to be a different page, yes.  
 18 Q. Let's just follow, then, and turn the pages of the one  
 19 on the right-hand side {CELO0002133}, first of all.  
 20 Just slowly turn the pages of the one on the right-hand  
 21 side up to page 11. You can see that there is part 1,  
 22 section 2, which runs over the page to page 3, 5, and  
 23 then you can see "System as tested" on page 6, and then  
 24 page 7, if you go to that, is a "Construction of the  
 25 System showing key layers of the cladding system", and

210

1 then page 8 is "Construction of the System", page 9 is  
 2 "Construction of the System showing the internal corner  
 3 details", 10 is the "Construction of the System showing  
 4 the fire break layout", and 11 is the test reports in  
 5 support of classification, with the observations at the  
 6 bottom, which I'll come to later, and then at page 12,  
 7 which will be page 11 of 11 of the document internally,  
 8 we see some signatures over R Jones and T Baker. Do you  
 9 see that?  
 10 A. I do, yes.  
 11 Q. Let's now do the same exercise with the version on the  
 12 left {CELO0011965}. We started already with page 1. We  
 13 don't need to go back to it; it's identical. Page 2 is  
 14 now the same as -- if we can go back to page 3, perhaps,  
 15 of the one on the right {CELO0002133/3}. We flipped  
 16 over. Never mind.  
 17 Let's take it easily, just stick with the one on the  
 18 left. Go back to page 2 {CELO0011965/2}, if we can.  
 19 You can see that you got "Details of classified  
 20 product", do you see?  
 21 A. Yes.  
 22 Q. 2.1, 2.2 and then 2.2.2 you get the cladding system  
 23 described there, and then if you go over the page to  
 24 page 3, you jump straight to section 4, "Test reports".  
 25 So there's clearly something missing. Section 3 for

211

1 a start is missing, as is the rest of 2.2.  
 2 If we go to page 4 on the right-hand side document  
 3 {CELO0002133/4}, we can see how 2.2 actually finishes.  
 4 At the bottom of page 4 we can see the first part of  
 5 2.2.2, cladding system, and if you turn the page to  
 6 page 5, you can see it goes over the page, it has  
 7 a 2.2.3 and a 2.2.4. Do you see that?  
 8 A. I do, yes.  
 9 Q. Those are missing, aren't they, from the four-page  
 10 version, because it jumps straight from section 2.2.2,  
 11 skips over section 3 altogether and goes to section 4.  
 12 Do you see that?  
 13 A. I see that, yes.  
 14 Q. If we go to the signature page, let's compare the  
 15 signature pages, page 5 of the version on the left  
 16 {CELO0011965/4} and page 12 of the version on the right  
 17 {CELO0002133/12}. That's the same page, at least to the  
 18 naked eye, isn't it?  
 19 A. It seems to be, yes.  
 20 Q. Did you detect at the time that there was a shadow  
 21 around the signatures --  
 22 A. No, I didn't, no.  
 23 Q. -- on the left-hand side?  
 24 Now, we've asked to see the original of the  
 25 four-page document so that we can work out how it was

212

1 put together.  
 2 Do you remember, when you sent the four-page  
 3 document to Mr Anketell-Jones on 27 August, whether you  
 4 noticed that it was only a partial document and that  
 5 parts of it had been filleted?  
 6 A. I can't say I did, no.  
 7 Q. Did you not look at it thoroughly before you sent it to  
 8 Mr Anketell-Jones?  
 9 A. I didn't, no.  
 10 Q. Did Mr Anketell-Jones not come back to you and say,  
 11 "Where is the rest of the classification report?"  
 12 A. He didn't, no.  
 13 Q. I think it would follow that the answer is no, but  
 14 I must ask you anyway: do you know who had filleted the  
 15 classification report down from a 12-page report to  
 16 a four-page report?  
 17 A. I don't, no.  
 18 Q. Do you know why? Presumably not.  
 19 A. No. It was -- it must have come from the product  
 20 management team, I would imagine.  
 21 Q. Well, we have done a bit of digging, let's see how far  
 22 we go.  
 23 Can we go to {CEL00009725}, please. This is  
 24 an email from Lizzie Seaton, whose name has come up this  
 25 morning, I think. She is in market communications,

213

1 isn't she?  
 2 A. That's correct.  
 3 Q. On 15 August, ten days or so after the launch, to you  
 4 and to Jon Roper:  
 5 "Hi Jonathan,  
 6 "As requested by Jon, please find attached the  
 7 classification report for RS5000."  
 8 The Jon here I'm assuming must be Jonathan Roper;  
 9 yes?  
 10 A. Correct, yes.  
 11 Q. Do you know what he had requested?  
 12 A. I don't know if this was the four-page or the 12-page  
 13 report or something different. It's not clear.  
 14 Q. We've looked at it and you can take it from me that it's  
 15 the four-page filleted version.  
 16 A. Okay.  
 17 Q. If need be, we can find the actual attachment, but  
 18 I think it's what I was showing you, in fact.  
 19 A. Okay.  
 20 Q. So we can double check that if necessary overnight, but  
 21 take it from me that it's the four-page version.  
 22 When you received that from Lizzie Seaton, did you  
 23 not notice that it was a filleted or abridged version of  
 24 a longer document?  
 25 A. At that time, no.

214

1 Q. Did you read it? Did you look at it?  
 2 A. I looked through it, yes, at some point. I don't know  
 3 if it was right at that moment, but --  
 4 Q. But you didn't notice that it didn't have a section 3?  
 5 A. I didn't, no.  
 6 Q. Can we go to {CEL00009728}, please, your response to  
 7 Lizzie Seaton on the same day, 15 August 2014:  
 8 "Thanks Lizzie.  
 9 "I will speak to one of the façade consultants to  
 10 see if this is what they need.  
 11 "I'll get back to you."  
 12 What did you mean by that?  
 13 A. So this must have been a request from a consultant,  
 14 a façade consultant, to ask me for the test document, so  
 15 this is probably what prompted me to ask maybe Jon or  
 16 Lizzie for that particular document that I could then  
 17 send to them.  
 18 Q. Was the façade consultant Daniel Anketell-Jones or  
 19 someone else at Harley, or was it on a different  
 20 project, do you think?  
 21 A. I would imagine if I had called them a façade consultant  
 22 then it would have been a specialist maybe, a façade  
 23 consultant rather than a contractor.  
 24 Q. Did you speak to one of the façade consultants and ask  
 25 them whether this four-page document was what they

215

1 needed?  
 2 A. It would have likely happened, yes.  
 3 Q. And did they not come back to you and say, "It's  
 4 an incomplete document, can I please have the rest?"  
 5 A. I think at some stage that must have happened because  
 6 then the 12-page document came to light at some point.  
 7 Q. You're right.  
 8 A. But I can't remember exactly who would have highlighted  
 9 that the -- because I wasn't knowledgeable of these  
 10 types of documents, unfortunately.  
 11 Q. Right, I see.  
 12 You're right about that, and we're going to see that  
 13 now, but at this time, mid-August, did this façade  
 14 consultant or any façade consultant come back to you and  
 15 say, "You have sent me an incomplete document, can  
 16 I please have the full document?"  
 17 A. I can't recall, unfortunately, without knowing who that  
 18 person was, I couldn't ...  
 19 Q. Can we then move on to {CEL00001377}. This is an email  
 20 that you received from Anthony Harris, halfway down  
 21 page 1, dated 29 August 2014, and just note the date.  
 22 This is two days after you send the four-page version  
 23 that you had received from Lizzie Seaton to  
 24 Daniel Anketell-Jones at Harley.  
 25 Anthony Harris, he is a Celotex area sales manager,

216

1 isn't he?

2 A. He was a colleague of mine, yes.

3 Q. In your group, south?

4 A. He was, yes.

5 Q. Yes:

6 "Good afternoon Guys,

7 "As per the email from Robbie Taylor below, we are  
8 trying to secure a 6000m2 RS5000 for a large Vinci  
9 Construction project in Stratford, the engineers need  
10 the full test report as the BRE Global Test Report  
11 295255 Issue 2 you sent me has some pages missing it  
12 jumps from points 2.2.2 to 4 and within this is the  
13 information the engineers want to see.

14 "Can you also comment on the other point Robbie has  
15 sent regarding reference to test report 295369 as they  
16 are also wanting this information!"

17 If we want to look at it, the email he is sending on  
18 from Robbie Taylor is just below that. I don't think  
19 it's necessary to look at it. We can briefly look at it  
20 just so you're clear of the context. He says in that at  
21 the foot of page 1:

22 "Anthony,

23 "Thanks for the documentation however it has been  
24 highlighted by the Project Engineers that this is  
25 actually not the BS 8414-2 test report."

217

1 Then if you go to page 2 {CEL00001377/2}, just to  
2 finish this email off, he says in the second paragraph:

3 "... noted that the version of the BRE Global Test  
4 Report 295255 Issue 2 seems to have some pages missing  
5 from the centre of the document."

6 So that's the background and that's why  
7 Anthony Harris is sending this message.

8 Can we go back then to page 1 {CEL00001377/1} and  
9 see his email, which comes to you and to Jon Roper, as  
10 I've shown you.

11 Was it at that point when you realised that the  
12 four-page document wasn't in fact the full  
13 classification report?

14 A. That's highly likely, yes.

15 Q. Then Jon Roper sends on the full version of the BR 135  
16 classification report, as you see from the top of the  
17 page, 29 August 2014; do you see that?

18 A. Yes.

19 Q. He says:

20 "As discussed, there is a full 45 page version of  
21 test report 295255 but the salient information is  
22 replicated in the BR 135 classification."

23 So you must have realised at that point that those  
24 pages were missing.

25 Did you ask Mr Roper why it was that only

218

1 a four-page version had been sent to you in the middle  
2 of August and not the full version?

3 A. I didn't, no.

4 Q. Why is that?

5 A. I can't tell you why, unfortunately. Sorry.

6 Q. Did you go back to Daniel Anketell-Jones straight away  
7 or really at all and say, "I'm very sorry I sent you  
8 only a partial report, here is the rest of it" or "Here  
9 is the full version of it"?

10 A. I don't think I did, no, because as part of the -- no,  
11 I didn't.

12 Q. Do you know why that is?

13 A. I can't think, no.

14 MR MILLETT: Mr Chairman, we are, I think, mid-topic, and  
15 I do have some way to go with this witness, I'm afraid,  
16 but that might be a convenient moment.

17 SIR MARTIN MOORE-BICK: Yes. It's been quite a long day and  
18 I think the witness --

19 MR MILLETT: It has.

20 SIR MARTIN MOORE-BICK: You probably feel you have done  
21 enough for one day, do you?

22 THE WITNESS: Mm. Well --

23 SIR MARTIN MOORE-BICK: No, no, but, I mean --

24 THE WITNESS: There's a lot to come.

25 SIR MARTIN MOORE-BICK: There is a bit more to come and it

219

1 will last longer, I think, than we might expect, so  
2 I think we will stop there.

3 I'm afraid it means we'll have to ask you to come  
4 back again tomorrow for some more questions, but I'm  
5 told you have been warned about that.

6 THE WITNESS: Yes, I have, yes.

7 SIR MARTIN MOORE-BICK: And you are able to make the  
8 arrangements to do that?

9 THE WITNESS: I can.

10 SIR MARTIN MOORE-BICK: Thank you.

11 In that case, we will stop there and resume at  
12 10 o'clock tomorrow morning, please.

13 Again, please don't talk to anyone about your  
14 evidence or anything relating to it overnight.

15 All right?

16 THE WITNESS: Will do.

17 SIR MARTIN MOORE-BICK: Thank you very much indeed.

18 Would you like to go with the usher, she will look  
19 after you.

20 THE WITNESS: Thank you.

21 SIR MARTIN MOORE-BICK: Thank you.

(Pause)

23 Right, Mr Millett, thank you very much. 10 o'clock  
24 tomorrow, then.

25 MR MILLETT: Thank you, Mr Chairman.

220



1 SIR MARTIN MOORE-BICK: Thank you. 223  
 2 (4.35 pm)

3 (The hearing adjourned until 10 am  
 4 on Thursday, 12 November 2020)

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221

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 2 INDEX  
 3 MR JONATHAN ROOME (affirmed) .....1  
 4 Questions from COUNSEL TO THE INQUIRY .....1

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

222

<p><b>A</b></p> <p>a1 (5) 50:19 146:23 147:11 148:5,20</p> <p>a1a2 (4) 137:12 145:2 147:19,25</p> <p>a2 (3) 50:19 148:5,21</p> <p>a7 (2) 39:7 95:11</p> <p>abbreviated (1) 43:14</p> <p>able (26) 9:22 15:7,13,14 19:20 22:15 23:20 32:8 81:17 82:2 85:13 86:24 88:4 89:2 109:3 116:1,13 128:20,23 131:2 135:13 136:6,8 196:13 197:4 220:7</p> <p>above (88) 3:11 11:10,15 20:15 29:5,10,17 30:9 31:2 32:17 34:12,22 35:10,14,24 37:8 39:19 42:15 43:23 48:20,23 52:19,25 53:3,5,8 57:7 69:8,13,21 72:24,25 79:24 80:17 81:2,3,25 85:1 88:12 97:16,22,25 98:6 99:21 100:2,7,14 101:10,14,21 103:4,14 104:15 105:13 106:8,11,15 110:6 130:6 131:4 147:19 152:15,21,24 153:1 159:15 160:4 166:15 168:1 169:9 170:14 179:8 184:18 186:8,11 191:8,15 192:10 200:4,9 203:4 205:7,19 206:7,16 207:1,11,18</p> <p>above18metre (5) 30:1,14 68:23 69:1 91:14</p> <p>abridged (1) 214:23</p> <p>absence (3) 79:15 82:12 87:19</p> <p>absolutely (3) 95:15 154:18 185:17</p> <p>academy (2) 84:10,13</p> <p>accept (14) 50:25 53:2 65:11 89:7 100:16 102:7,12 103:11 110:8 112:18 114:13 142:14 167:23 168:7</p> <p>acceptable (22) 39:11 52:25 53:3 97:25 99:20 100:2,14 103:3 105:13 106:4,7,11,14 110:5 113:14 121:12 142:2 166:15 167:25 206:16 207:1,17</p> <p>acceptance (2) 128:17,18</p> <p>accepted (3) 39:8 100:4 183:3</p> <p>accepting (2) 124:21 125:2</p> <p>access (9) 17:15,17,18,21 18:1,15,15,25 accessible (1) 196:25</p>	<p>accompanied (1) 48:10</p> <p>accordance (4) 16:12 19:6,8 209:3</p> <p>according (3) 98:16 115:7 163:16</p> <p>account (4) 4:14,14,15 79:15</p> <p>accurate (4) 65:10,25 102:14 122:25</p> <p>achieve (7) 30:12 73:8,12 82:2 89:23 135:6 151:23</p> <p>achieved (2) 138:10 152:5</p> <p>achieves (1) 207:5</p> <p>achieving (1) 68:19</p> <p>acknowledge (1) 132:15</p> <p>acronym (1) 74:8</p> <p>acronyms (1) 74:8</p> <p>across (9) 39:2 60:25 61:15,19 93:11 115:4 129:6 158:22 198:11</p> <p>action (1) 155:22</p> <p>activity (6) 63:1,2 126:13 161:2 162:22 181:13</p> <p>actual (5) 43:18 58:8 159:17,18 214:17</p> <p>actually (24) 17:24 18:9 41:11,14 46:17 55:3 60:20 68:25 69:13 71:4 87:10 96:8 97:2 99:8 103:19 107:18 117:7 132:22 139:11 147:9 160:6 167:5 212:3 217:25</p> <p>ad (8) 39:7,8 94:13,16 186:6 207:4 208:7,9</p> <p>adam (1) 138:16</p> <p>adb (5) 21:12 51:3 88:11 109:20 132:2</p> <p>added (1) 87:14</p> <p>addition (6) 59:19 97:3 100:19 105:10 190:7 195:18</p> <p>additional (3) 60:3 96:12 99:1</p> <p>address (6) 25:25 32:9 51:4 55:11 116:3 170:2</p> <p>addresses (1) 49:2</p> <p>adequate (4) 21:8 22:1 65:10,25</p> <p>adequately (1) 31:18</p> <p>adhesive (1) 22:3</p> <p>adjacent (1) 59:21</p> <p>adjourned (1) 221:3</p> <p>adjournment (1) 125:22</p> <p>adjusting (1) 139:8</p> <p>adopt (1) 129:20</p> <p>adopted (1) 168:5</p> <p>adopting (1) 129:22</p> <p>advantage (1) 26:10</p> <p>advertising (1) 68:16</p> <p>adventorial (1) 170:18</p> <p>advice (14) 66:6,8 90:21 120:10,15,16,17,17 146:7 149:21 161:24 206:19 207:8 208:14</p> <p>advise (3) 119:24 127:6 188:5</p> <p>advised (1) 132:19</p> <p>advises (1) 149:11</p>	<p>advising (2) 81:14 188:1</p> <p>affect (3) 21:11 22:4 139:10</p> <p>affirmed (2) 1:13 222:3</p> <p>afraid (10) 131:19 132:7 142:18 143:1 151:11 154:4 156:14 195:14 219:15 220:3</p> <p>after (41) 4:14,18 9:9 15:9 20:11 21:15 22:9 31:15,23 32:3 34:8,17 35:2,3 36:5 42:21 55:19 68:3 87:9,11 94:25 95:2 102:24 108:16 110:19 111:7 112:6 118:3 132:13 135:10,21 136:3 139:4 151:3 165:16 175:12 202:12 203:14 214:3 216:22 220:19</p> <p>afternoon (1) 217:6</p> <p>afterwards (4) 40:21 182:17 183:11 185:3</p> <p>again (51) 3:3 22:5,7 39:23 67:13 68:12 85:9 91:18 92:2 96:11,19 98:17 99:1 101:17 102:12,21 103:11 104:7 110:7,18 113:9 114:7 116:5 119:9,13 122:23 125:13 138:12 147:22 153:20 155:13 156:14 162:16,17 166:1 167:9,21 169:21 178:17 181:6,11 182:15 198:7,13 200:2,7 203:17 207:19 208:17 220:4,13</p> <p>against (6) 28:1 119:23 133:24 134:2 137:11 195:21</p> <p>agenda (5) 47:10,19 67:25 151:18 154:7</p> <p>aggressive (1) 64:13</p> <p>aggressively (1) 13:13</p> <p>agm (1) 182:22</p> <p>ago (4) 33:12 80:14 99:16 177:8</p> <p>agree (8) 13:16 52:10 65:12 104:1,4 174:14 179:11 208:17</p> <p>agreed (2) 182:3 207:23</p> <p>agreement (1) 118:12</p> <p>ah (1) 140:8</p> <p>ahead (1) 140:13</p> <p>airport (1) 4:20</p> <p>alerting (1) 200:22</p> <p>alive (1) 67:13</p> <p>all-encompassing (3) 9:16 78:4 86:20</p> <p>alliance (1) 36:18</p> <p>allocated (3) 25:3 158:5,5</p> <p>allow (3) 46:13 106:20 132:20</p> <p>allowed (7) 18:11,19,25 19:2,3 46:24 142:5</p> <p>allows (1) 58:17</p> <p>alluded (1) 87:13</p> <p>alluding (1) 205:21</p> <p>almost (4) 70:16 88:9 92:15 106:3</p>	<p>alone (1) 74:24</p> <p>along (3) 45:24 63:12 182:10</p> <p>alongside (1) 64:14</p> <p>already (8) 51:3 93:3 121:13 181:2 192:16 199:5 201:19 211:12</p> <p>also (27) 2:6,11 4:5 9:6,20 19:13 23:11 39:25 48:4 52:23,25 55:9 59:4 84:2 100:7,20 153:20 160:14,24,25 163:9 172:24 174:2 190:10 196:17 217:14,16</p> <p>alternative (13) 94:15 95:7,9 152:16,20 157:12 159:23 160:3 186:11 207:3 208:7,9,11</p> <p>although (6) 79:19 93:15 115:22 137:16 143:15 175:7</p> <p>altogether (1) 212:11</p> <p>aluminium (12) 19:13 28:13,17 55:22 56:1,4 58:22 98:21 170:17 171:3,16 173:5</p> <p>always (10) 20:11 67:19 80:3,8,22 106:18 174:16 194:8 198:7,21</p> <p>amber (2) 76:8 78:12</p> <p>amenable (1) 79:21</p> <p>amended (1) 127:22</p> <p>amendments (1) 139:10</p> <p>among (1) 94:3</p> <p>amount (6) 13:25 14:1,1 42:18 72:10 135:8</p> <p>analysis (3) 74:17 90:4 135:2</p> <p>andrew (3) 143:21,24 145:16</p> <p>andy (2) 149:10,21</p> <p>anketelljones (26) 165:6 173:19 174:11 177:6,25 178:19,20 179:5 181:10 182:11 190:24 191:7 198:3,18,22 200:3 202:13 203:13 208:23 209:11 213:3,8,10 215:18 216:24 219:6</p> <p>annex (3) 51:6,9 209:4</p> <p>another (16) 10:13 12:8 48:25 56:15 59:18 114:7 119:23 124:12 130:22 137:9 162:16 167:18 181:6 193:11,14 194:21</p> <p>answer (20) 15:10 22:11 25:16 27:15 30:21 41:8,11,13 45:13 60:8 67:21 119:7,8,11 171:7,10,25 173:7 198:15 213:13</p> <p>answered (2) 8:15 22:23</p> <p>answering (1) 8:4</p> <p>answers (2) 18:6 33:12</p> <p>anthony (4) 216:20,25 217:22 218:7</p> <p>anxious (1) 44:23</p> <p>anybody (7) 3:16 46:17 96:25 139:15 142:19 191:20 192:8</p> <p>anyone (13) 17:20 24:15 50:10 62:1 73:18 121:2 125:14 133:18 142:7 172:20 180:9 206:15 220:13</p> <p>anything (23) 3:2 10:20 13:8 17:11 19:7 35:21 62:2 64:11 97:3 116:1,13,17 122:21 125:15 128:10 129:11 134:8 148:10,15 164:19 172:1 206:1 220:14</p> <p>anyway (2) 142:13 213:14</p> <p>apart (2) 43:14 192:7</p> <p>apologies (4) 64:6,9 85:23 192:25</p> <p>apologise (1) 136:17</p> <p>apparent (2) 135:11,22</p> <p>apparently (1) 124:23</p> <p>appear (3) 79:19 158:2 195:8</p> <p>appearance (1) 79:18</p> <p>appears (1) 195:24</p> <p>appease (3) 120:22 122:14 123:3</p> <p>appeasing (1) 112:25</p> <p>appendix (5) 20:17 21:2,12 36:3 41:14</p> <p>applicable (7) 21:8 22:1 203:3,6,15,23 204:5</p> <p>application (15) 11:14 13:19 51:23 69:10 70:17 71:2 77:1 79:2 83:16 96:5 115:24,25 116:12 117:11 200:6</p> <p>applications (12) 69:1,9,13 77:1,10,14,15,21 106:19 117:3 123:17 203:3</p> <p>applied (2) 52:2 88:20</p> <p>applies (3) 51:13,17 95:24</p> <p>apply (1) 27:12</p> <p>appointed (1) 155:6</p> <p>approach (4) 184:7 187:15 188:6 194:15</p> <p>approaches (1) 186:11</p> <p>approaching (1) 128:22</p> <p>appropriate (2) 139:19 187:25</p> <p>approval (3) 29:4 115:23 202:6</p> <p>approvals (3) 28:22 56:21 57:7</p> <p>approved (23) 5:13 12:3 20:18 22:6 31:4,7 32:3,7,15 33:14 34:8 39:24 44:14 47:21 49:3,11 52:12 76:19 94:13 95:11 137:13 147:18 200:9</p> <p>approximate (1) 50:2</p> <p>april (9) 24:2 25:20 26:8,17 28:21 32:21 40:17 43:19,21</p> <p>apt (1) 102:8</p> <p>architect (5) 5:4 17:24 22:17 137:5,17</p>	<p>architects (9) 7:18 8:6 9:24 10:6 71:15 72:18 75:8,13 106:20</p> <p>architecture (1) 64:4</p> <p>area (3) 23:12 145:3 216:25</p> <p>areas (2) 9:1 37:21</p> <p>arena (1) 42:19</p> <p>arent (4) 122:15 140:9 210:2 212:9</p> <p>argued (1) 186:14</p> <p>argument (3) 92:23 112:4,15</p> <p>armistice (1) 45:3</p> <p>around (21) 12:16 29:12 43:25 45:6 68:18 117:16 127:24 131:7,7 145:9 150:12 166:17 173:15 184:8 188:13,17,22 189:14,15 202:15 212:21</p> <p>arranged (3) 63:9 146:4,6</p> <p>arrangements (1) 220:8</p> <p>arranging (1) 144:13</p> <p>arrived (2) 15:5,9</p> <p>arrow (2) 51:24 56:20</p> <p>arrows (1) 95:23</p> <p>arsenal (2) 84:10,13</p> <p>article (1) 107:10</p> <p>arup (1) 184:11</p> <p>ascertain (1) 205:25</p> <p>aside (1) 64:7</p> <p>ask (34) 7:25 18:2 29:9 31:4 36:16 40:23 43:3 44:23 59:7 62:20 82:1 95:13 97:11 116:6 124:10 126:4 133:2 134:15 142:23 143:19 157:5,12 184:12 191:14,20 192:8 195:5 206:10 213:14 215:14,15,24 218:25 220:3</p> <p>asked (20) 13:5 16:20 17:24 20:12 32:6 75:20 77:19 99:14 108:8,25 109:1 110:10 114:25 120:21 122:1 127:1 160:1 191:16 201:7 212:24</p> <p>asking (12) 2:1 46:2 85:16 97:12 120:12 132:5,6 142:25 147:9 159:22 173:8 176:3 201:7 212:24</p> <p>asks (2) 123:22 170:14</p> <p>aspect (2) 130:22 196:18</p> <p>aspects (1) 13:19</p> <p>assembly (1) 39:10</p> <p>assessed (1) 205:22</p> <p>assessments (1) 9:20</p> <p>assigned (6) 157:7,23 158:1 159:3 160:24 181:11</p> <p>assist (1) 100:12</p> <p>assistance (1) 161:2</p> <p>associations (1) 21:22</p> <p>assume (2) 160:24 199:4</p> <p>assuming (5) 64:10 94:19 96:19 105:15</p>	<p>214:8</p> <p>assumption (1) 175:21</p> <p>assurance (2) 121:10 130:24</p> <p>assurances (2) 117:15 129:15</p> <p>attach (1) 183:5</p> <p>attached (14) 24:5 28:21 90:17,24 111:21 138:20 169:1 183:18 184:2 193:8,24 201:12 202:9 214:6</p> <p>attachment (6) 33:1,5 141:2 202:16,17 214:17</p> <p>attachments (7) 24:2,21 33:8 165:19 167:20 178:17 198:5</p> <p>attempt (1) 154:17</p> <p>attend (3) 64:17 99:15 187:19</p> <p>attendance (2) 63:23 154:10</p> <p>attended (7) 63:25 64:16 146:4 182:24 187:20 190:11 193:17</p> <p>attendees (1) 183:5</p> <p>attending (4) 24:10 47:13 145:17 182:7</p> <p>attention (10) 14:18 23:19 36:24 37:2 38:3 110:22 129:24 140:14 178:25 179:22</p> <p>august (42) 10:24 34:9 35:8 36:6 44:5,10,19 45:13 47:8,10,12,13 60:2 67:25 93:20 94:20 135:10 161:18 162:10 164:25 165:14,16,19 168:25 174:24 198:3 199:6,14 202:3 203:21 205:4,12 208:23 209:6,16 210:3 213:3 214:3 215:7 216:21 218:17 219:2</p> <p>authorities (1) 12:5</p> <p>autumn (2) 157:17 160:17</p> <p>available (12) 21:21 22:16 67:20 78:7 124:22 150:4 178:4 189:10 192:18 197:7 200:6 209:13</p> <p>avoid (2) 67:4,11</p> <p>awaiting (1) 126:18</p> <p>awarded (2) 157:16 160:16</p> <p>aware (51) 12:21 14:9,12,15 21:12 23:5 25:20 31:6,17,21 32:4 33:2 36:4,5 42:9,20 43:16,21 44:19 45:13,16,20 50:4 55:5,12,13,14,25 60:2 66:24 67:6 69:18 80:7,24,25 82:23 91:14 92:18,19 93:24 111:1,13 112:7 124:13 146:21 153:8 156:17 159:13 186:20 191:9 209:16</p> <p>awareness (1) 82:11</p> <p>away (10) 3:4 32:7</p>
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57:11 119:25  
120:16,19 122:4  
197:23,24 219:6

**B**

**b (27)** 5:14 20:18 22:6  
31:5,7,10 32:3,7,16  
33:14 39:24 44:14  
47:21 49:3 51:6,9  
52:12 76:19 95:11  
137:14 147:18 186:6  
200:9 207:4 208:7,9  
209:4  
**b2 (5)** 39:7,8  
94:13,13,16  
**b4 (2)** 31:12,17  
**back (70)** 23:1 32:22  
39:24 43:5 53:10 60:7  
61:5,25 64:22 67:25  
72:21 76:13 90:8  
93:20 103:20 110:13  
111:5 113:6  
119:4,10,11 121:21,22  
122:7,23 123:9,21  
125:3,13 127:9,10,23  
130:1 131:20 133:3  
141:23 143:19 145:20  
149:16 150:15 151:19  
152:8 160:14 168:12  
169:19,21 170:12  
172:16 173:12 176:23  
177:6 180:8 181:25  
185:4 186:24 189:25  
190:1 206:22,23  
208:21 211:13,14,18  
213:10 215:11  
216:3,14 218:8 219:6  
220:4  
**backfilled (1)** 93:12  
**background (3)** 49:3,8  
218:6  
**bailey (19)** 13:1 40:23  
157:21 158:11,17  
159:22 160:2,15  
161:1,8 162:19 164:1  
166:22 167:2  
176:17,18 177:2 181:3  
199:11  
**baileys (2)** 175:17 190:2  
**baker (1)** 211:8  
**bald (1)** 129:13  
**balloon (2)** 71:13 72:9  
**banner (9)** 9:21 27:17  
52:21 101:6,13,16,20  
102:8 196:12  
**barratts (1)** 137:10  
**barred (2)** 17:18 18:9  
**barrier (2)** 59:21 88:15  
**barriers (2)** 124:5  
128:13  
**base (3)** 54:23 145:18  
170:6  
**based (5)** 17:14 44:4  
68:18 137:24 183:1  
**basic (1)** 205:23  
**basically (11)** 7:10 8:10  
13:21 15:18 37:19  
78:4 87:13 131:11  
148:22 150:15 185:7  
**basingstoke (1)** 53:16  
**basis (6)** 20:19 50:4  
73:14 85:3 131:4  
132:8

**bat (1)** 75:18  
**bath (1)** 183:1  
**bba (21)** 86:3,4,6,10  
87:19 108:3,20,23  
109:6,11,11 111:12  
112:5,15,19,23 114:25  
115:25 116:12,23  
117:14  
**bca (4)** 36:17,18 91:9  
**bear (2)** 66:17 169:7  
**bearing (1)** 151:22  
**became (5)** 4:18 31:15  
33:2 45:20 112:7  
**become (10)** 15:6 20:24  
31:21 34:16 36:5  
43:16 45:16 135:10,22  
156:17  
**before (45)** 3:16 5:10  
10:24 11:10 14:25  
15:4 29:13 34:9 35:7  
37:17 39:16 54:2  
56:10,15 60:18 61:19  
65:3 74:22 77:22  
85:25 87:11 92:1,17  
94:21 95:2 96:9 110:8  
113:7 115:16,17  
126:12,19 133:4  
134:17 137:25  
150:13,22 159:17,18  
176:7 199:6,17 202:14  
203:14 213:7  
**begin (3)** 1:22 3:19  
115:15  
**beginning (2)** 10:7  
199:14  
**begins (1)** 118:4  
**behind (12)** 17:21 50:3  
54:6 58:20 59:24  
60:21 87:7 138:22  
160:11 163:15 171:23  
172:4  
**being (51)** 25:3 28:9,13  
29:11,12 32:6,11 39:9  
43:17 48:13 49:6  
54:17 55:18 68:22  
70:21 74:20 76:1  
77:19,20 79:23 83:2  
84:4,13 86:21  
108:8,13,24 109:1,3  
113:1,18,20 120:3,21  
123:10,16 128:20  
134:21 135:7 142:13  
147:18 159:8 160:12  
174:15 177:2 185:7  
191:11 196:13,13  
207:2 208:2  
**believe (8)** 99:21,23  
112:24 133:20,23  
134:6,7 143:17  
**bell (2)** 29:7 153:7  
**below (22)** 8:25 47:14  
57:8 58:19 59:11  
72:23 79:3,23 80:6  
97:17 108:2,7 131:23  
132:4 133:7 136:25  
140:19 141:10 183:25  
203:4 217:7,18  
**ben (32)** 157:12,18,21  
158:11,17 159:11,22  
160:15 161:1,8,25  
162:19 163:1 164:1  
165:3,12,14,25

166:6,7,8,21,22,23,25  
167:1,2 168:12,24  
173:12 181:3 199:7  
**benefit (1)** 17:7  
**benefits (3)** 190:12,19  
191:2  
**bennett (1)** 181:24  
**bens (1)** 165:5  
**berger (30)** 63:10 73:23  
74:24 87:18 88:14  
91:20 93:12 111:8  
112:8 115:15 118:20  
119:4,15 121:21  
123:21 127:14 136:20  
141:7 142:7 146:3,17  
149:2 151:15  
154:12,23 155:10,18  
156:1 184:5 187:12  
**bergers (1)** 117:20  
**berkeley (2)** 127:16  
149:12  
**best (9)** 24:21 25:1,3  
36:25 63:13 107:21  
125:1 150:2 200:22  
**better (17)** 7:1 14:5,6,7  
32:5 35:4 40:13  
133:25 144:9 146:12  
152:9 155:2,24 163:21  
184:7 187:14 188:2  
**between (24)** 15:17  
18:23 27:2 30:18  
36:11 42:5,6,25 59:14  
61:10 82:10,13 96:24  
112:11 119:17 126:24  
133:21 137:4 150:7  
159:20 162:9 196:9  
199:25 209:14  
**beyond (3)** 4:23 77:15  
192:14  
**big (1)** 44:12  
**biggest (1)** 145:3  
**bit (29)** 4:21 8:24 16:2  
18:22 31:24 53:10  
56:10 57:25 58:10,12  
70:17 72:21 74:22  
75:23 79:21 87:8  
92:14 99:25 103:6  
118:15,16 138:14  
140:13 141:25 172:10  
181:8 199:3 213:21  
219:25  
**bits (1)** 32:7  
**blank (1)** 90:7  
**block (1)** 132:18  
**blocking (1)** 124:21  
**blow (4)** 8:24 57:24  
160:22 162:16  
**blown (1)** 157:5  
**board (41)** 16:1,8 19:13  
52:22 58:16,20 59:25  
60:16,21 61:7,8,13  
83:5,17 96:17 98:23  
101:9 103:1,8 106:6  
119:20 137:7,11,12,15  
139:11 144:25  
148:2,10,16 151:17,20  
152:17 166:12 170:13  
204:19 205:8 206:23  
207:2 208:2,12  
**boards (11)** 12:19,20  
13:12 26:21 27:21  
28:4,4 39:6 150:12,18  
152:7

**boat (1)** 182:2  
**bodies (1)** 45:4  
**body (2)** 5:8 78:9  
**bold (1)** 183:25  
**bonus (3)** 73:17  
**book (1)** 128:21  
**both (8)** 17:4 42:2  
122:10 175:3 186:20  
210:3,3,9  
**bottom (20)** 21:18  
44:11 66:3 118:2  
121:20 136:16 138:16  
141:6 144:17 154:22  
162:3 169:18 181:16  
185:18 202:3 203:1  
210:7,10 211:6 212:4  
**bought (1)** 72:10  
**box (2)** 94:11 97:17  
**bq (1)** 4:15  
**br (39)** 20:3 31:1  
34:4,25 39:21 43:15  
44:14 45:23 47:21  
49:4,9 51:4,6,9  
52:2,23 57:24 62:22  
94:17 97:24 99:20  
102:5 103:2 105:12  
110:4 113:13 114:5  
138:24 151:8 166:13  
167:24 184:23 187:7  
203:6 206:25 207:15  
209:4 218:15,22  
**br135 (4)** 39:10 140:18  
183:17 184:1  
**bracket (1)** 58:11  
**brackets (4)** 98:21  
101:14 184:13 208:1  
**brand (2)** 67:4 71:17  
**bre (42)** 34:2 59:15  
60:20 63:4,9,17,25  
86:12,15,24 87:20  
110:3 113:12  
132:15,22  
133:12,13,16 143:23  
144:5,11 145:23  
146:13,16 149:3  
155:2,24 156:12  
171:13 183:16  
187:1,20 188:1 201:15  
204:23 205:1,2,3  
208:22 209:2 217:10  
218:3  
**breach (1)** 139:19  
**bread (1)** 201:5  
**breadth (1)** 135:24  
**break (11)** 2:3 56:15  
61:24 62:12 68:3  
125:12,15 126:12  
180:7,17 211:4  
**breakdown (1)** 59:5  
**breaks (1)** 2:4  
**breakthrough (2)** 15:24  
138:7  
**bres (1)** 188:4  
**brick (1)** 132:18  
**brickwork (2)** 115:24  
117:5  
**bridge (1)** 26:24  
**briefly (3)** 22:25 65:5  
217:19  
**bright (3)** 174:3  
178:9,14  
**brilliant (1)** 158:13  
**bring (4)** 8:19 191:2

197:4 200:18  
**bringing (1)** 110:21  
**british (6)** 16:23 42:5  
49:18 64:4,20 67:12  
**broad (3)** 76:25  
77:10,14  
**broader (1)** 147:2  
**brochures (3)** 174:3  
178:10,14  
**brooklands (1)** 4:2  
**brought (8)** 14:18 20:6  
36:23 37:2 38:2 40:20  
110:18 129:24  
**bs (59)** 16:12 17:2  
19:6,9,19 20:4 23:15  
24:7,8 25:18 30:4,5  
31:1 32:23 33:3 34:5,5  
35:1 37:17 39:21  
43:20 44:20 45:14,24  
49:4,9 50:12,13 53:23  
58:2 59:2 91:4 92:25  
94:18,18 97:20,24  
98:19 105:12 106:7,14  
107:1 131:25,25  
138:21 140:20 148:9  
153:4 184:24 188:22  
189:7 191:21,24 192:9  
193:5 205:1 206:24  
207:14 217:25  
**bs135 (1)** 139:22  
**bs3 (1)** 40:13  
**bs8141 (1)** 184:3  
**bs8414 (10)** 39:10  
86:11 90:18 91:3  
128:23 144:7,22  
184:4,8 188:13  
**bs84142 (3)** 137:6  
144:25 145:6  
**bs8414br135 (2)** 63:4,6  
**btec (2)** 4:1,23  
**build (3)** 6:5 61:12  
119:19  
**building (67)** 5:8,11  
6:3,6,19 7:3 9:23  
11:3,5,14 12:1  
13:23,25 20:15 29:18  
31:8,13,18 33:19  
34:22 35:24 36:18  
37:20,21,22 39:19  
40:9 53:14 55:7,16  
64:24 67:12 76:20  
77:5 78:5,6,9,22  
79:3,12 80:13 81:13  
84:9 97:16,22 98:7  
103:14 106:15 110:3  
113:12 114:18 124:4  
132:18 133:12,18  
139:24 140:17,23  
141:22 142:5,9 143:4  
186:7 191:8,11 201:9  
206:16  
**buildings (45)** 11:11  
20:9 32:17 33:23 34:4  
35:14 36:9 37:8 40:11  
42:15 52:19,25 53:3  
75:14 79:23 97:25  
99:20 100:2,7,14  
101:10,14,20 102:4,10  
103:4 105:13 106:8,11  
109:8,20 143:6,7  
156:23 166:15 168:1  
174:2 177:13 185:2  
203:7,16,24 204:5

207:1,18  
**builds (1)** 183:4  
**buildup (11)** 37:25 47:6  
58:8 59:1,5 87:6 113:1  
120:23 121:10 126:18  
127:5  
**buildups (3)** 87:9 123:7  
125:8  
**built (3)** 84:13 87:13  
135:16  
**bullet (25)** 12:16 16:7  
19:4 25:17 27:3,22  
38:23 39:4 52:18 63:3  
64:3 69:8 70:2 73:1  
77:8 78:1 87:17  
88:7,24 93:1 95:23  
103:5 111:20 147:5,7  
**bundled (1)** 203:17  
**business (11)** 4:1,24  
18:19 114:20  
120:5,19,20 174:17  
183:15 193:14 196:17  
**businesses (4)** 193:16  
196:10,14,25  
**busy (1)** 181:22  
**butted (1)** 119:23  
**butter (1)** 201:5  
**buyers (1)** 142:8

**C**

**calculation (1)** 206:4  
**calculations (3)** 8:13  
9:19 166:19  
**calculator (3)**  
205:10,23,24  
**call (11)** 1:11 9:2 19:13  
108:4 119:24 130:13  
157:20 161:8,20 170:1  
178:12  
**called (10)** 14:10 64:5  
68:14 129:19 150:21  
157:12 165:2 168:18  
194:8 215:21  
**calls (3)** 8:11 24:1 33:3  
**came (10)** 24:17 28:2  
38:10 40:17 59:13  
67:22 146:6 151:6  
202:15 216:6  
**campus (1)** 4:20  
**cannot (5)** 51:20 66:21  
96:2 173:25 177:10  
**cant (86)** 11:6,15 14:20  
18:18 20:12 24:19  
27:13 28:12,17 31:3  
32:11 35:11 38:16  
42:23 43:24 45:18  
49:10 54:4,24 56:25  
61:18 63:19 64:6 65:4  
71:8 73:5 75:2 78:8  
79:17 81:4 84:6  
95:1,15 107:19,20  
108:10 112:10 115:3  
116:10 122:14 129:5  
132:7 135:15 142:24  
151:11 153:23  
154:5,18 156:14  
160:5,18 161:21  
164:18 167:7 169:12  
172:22 173:2,2 176:11  
177:4,21 178:1,5,24  
179:3 184:21 185:21  
186:22 191:25  
195:3,12,14,21 199:24

200:2,12,24 201:10  
204:3,4 210:16 213:6  
216:8,17 219:5,13  
**capital (1)** 74:6  
**capitalise (1)** 42:25  
**capitals (1)** 167:13  
**card (2)** 4:4,24  
**cards (1)** 199:9  
**carefully (12)** 21:6,25  
22:12,19  
116:2,14,15,25  
117:15,19 181:8 209:1  
**carried (6)** 44:20 46:23  
58:9 141:20 142:15,20  
**carry (4)** 56:14 62:14  
125:24 180:19  
**carrying (5)** 150:18  
152:22,25 153:15  
154:3  
**cassettes (1)** 119:22  
**casts (1)** 58:12  
**catch (1)** 135:8  
**catchline (1)** 105:8  
**categories (1)** 50:20  
**categorisation (1)** 50:4  
**categorised (1)** 179:24  
**category (3)** 49:18,20  
179:25  
**cause (1)** 29:9  
**caused (3)** 55:15 75:6  
107:13  
**caveat (11)** 102:18  
106:24 168:9 178:21  
179:1,4,22 200:17,23  
208:1,5  
**caveats (3)** 69:6 168:3  
200:8  
**cavities (1)** 33:22  
**cavity (1)** 61:12  
**ce (2)** 24:21,25  
**cel00000009 (1)** 204:16  
**cel000000122 (1)** 94:9  
**cel000000123 (1)** 95:21  
**cel000000124 (1)** 96:6  
**cel00000013 (1)** 97:10  
**cel000000135 (1)** 97:15  
**cel000000407 (1)** 104:20  
**cel000000555 (1)** 192:19  
**cel000000556 (1)** 193:23  
**cel00001017 (1)** 202:1  
**cel00001026 (1)** 131:15  
**cel00001027 (1)** 133:3  
**cel00001040 (1)** 111:5  
**cel000010402 (1)**  
111:18  
**cel00001042 (1)** 143:20  
**cel000010421 (1)**  
148:25  
**cel000010423 (2)**  
143:22 145:21  
**cel000010424 (2)**  
144:23 147:6  
**cel000010573 (2)**  
136:14 141:5  
**cel000010574 (1)** 140:7  
**cel000010575 (1)**  
138:15  
**cel00001058 (1)** 115:11  
**cel000010583 (1)**  
115:14  
**cel00001065 (1)** 117:24  
**cel000010651 (1)**  
123:21

cel000010652 (1) 122:8	103:18	11:20 12:9,18 13:17	cetera (1) 13:8	41:5,14,15,17,22	combination (1) 99:22	competing (1) 163:14
cel000010653 (1) 119:14	cel000079611 (1) 102:23	15:1,5,14,21 18:14,21	chain (12) 115:12	42:6,22	combined (1) 19:16	competition (2) 72:9
cel000010654 (1) 119:9	cel000079612 (1) 101:12	20:11,22,25 21:13,14	118:1,2 119:4,9,13	50:7,8,13,20,21	combusted (1) 152:14	90:18
cel000010655 (1) 118:18	cel000079613 (1) 101:16	22:8 23:5 26:1,22	123:21 130:1	145:2,4 146:23	combustibility (25) 19:23 29:21,23	competitive (2) 26:10,25
cel000010656 (1) 118:3	cel00008668 (1) 48:7	27:17,23 28:6 29:20	138:12,14 150:6	147:7,11,19,19,25	30:3,25 34:23 36:3,12	competitor (1) 10:13
cel00001066 (1) 127:11	cel0000866811 (1) 53:13	31:7 34:11 35:13 36:8	169:10	148:5,7,20 204:23	39:1,6,14 41:6,16,25	competitors (2) 10:10
cel000010662 (1) 128:4	cel0000866812 (1) 53:16	37:15 38:1,15	chairman (13) 1:10,20	205:2 207:5	42:7,22	89:1
cel00001069 (1) 126:5	cel0000866813 (1) 53:17	42:11,24 43:22 44:13	44:23 45:11 56:8	classed (1) 111:24	50:11,12,18,22 76:18	compiled (2) 15:14
cel000010695 (1) 126:10	cel0000866814 (1) 53:19	46:18,24 47:11 48:8	61:21 62:19 121:16	classes (1) 49:17	95:10,19 186:9,13	195:6
cel00001096 (1) 89:25	cel0000866815 (1) 53:16	52:17 54:15 57:24	125:10 126:3 180:4	classification (26) 30:13	combustible (12) 33:21	complete (6) 9:22 21:16
cel00001097 (1) 90:23	cel0000866816 (1) 51:5	58:23 59:9,15	219:14 220:25	38:25 49:24	76:23 78:13,25	27:12 28:13 39:10
cel0000109712 (1) 91:2	cel0000866817 (1) 56:18	60:20,24 65:22 66:8	challenged (1) 17:23	51:7,13,17,18,19,22,25	80:3,8,23 84:25	112:1
cel0000109714 (1) 91:8	cel0000866818 (1) 52:20	67:22 68:7,19 70:15	change (1) 84:24	91:4 95:24,25 96:1,4	122:17 185:1 186:3,15	completed (1) 138:5
cel0000109718 (1) 91:17	cel0000866819 (1) 52:15	71:6,20,21 72:5,23	changes (1) 98:6	98:4 201:15 209:3,17	140:10 22:18 54:12	completeness (1) 35:20
cel00001200 (2) 23:25	cel0000866820 (1) 52:15	74:8 89:21 90:12	chap (1) 157:24	211:5 213:11,15 214:7	59:6 60:25	complex (5) 184:9
32:22	cel0000866825 (1) 52:20	97:19,23 98:5,22	chapter (4) 110:14,17	218:13,16,22	61:15,18,25 63:20	188:13,23 189:7,16
cel00001201 (1) 24:20	cel0000866826 (1) 57:16 60:8	99:15 100:20 101:8	111:15,21	classified (2) 29:23	87:15 88:18 90:8	compliance (30) 21:7
cel000012012 (1) 24:24	cel0000866827 (2) 57:16 60:8	102:9 103:7 104:13	characterising (1) 42:1	211:19	93:13 111:5 115:4	52:12 76:22 94:2,8,16
cel0000120125 (1) 25:4	cel0000866828 (1) 72:21	105:5,6,11 106:6,9	characteristics (5) 65:8,23 66:18 67:1,2	clear (13) 30:11 41:4	119:9 125:13 127:9	34:21,24 37:12,13
cel0000120126 (1) 25:17	cel0000866829 (1) 72:21	107:25 110:2,19	cheaper (1) 137:11	65:10,25 95:16 130:3	129:6 146:5 147:14	95:7,18 100:20 109:18
cel0000120128 (1) 26:5	cel0000866830 (1) 72:21	113:11 117:10	check (6) 16:18	153:13 163:17 166:4	151:19 156:2 158:22	139:23 140:21 148:12
cel0000120151 (1) 27:1	cel0000866831 (1) 72:21	120:9,13 124:25 125:4	checked (2) 21:7,25	205:18 210:1 214:13	166:16 167:21 168:11	165:21 177:25 179:1
cel00001203 (1) 28:19	cel0000866832 (1) 72:21	129:20 130:2 132:21	checking (2) 51:21 96:3	217:20	173:14 180:8 183:22	184:23 188:25
cel0000120313 (1) 28:24	cel0000866833 (1) 72:21	134:19,25 135:7	chemistry (1) 4:1	cleared (1) 157:22	189:25 192:5 211:6	189:2,6,15 201:17,19
cel00001237 (2) 165:13	cel0000866838 (1) 68:12	136:19 138:5	chief (1) 59:9	clearing (1) 171:4	213:10,19,24 216:3,14	207:3 208:7,9
173:13	cel000086684 (1) 69:24	139:17,23 140:13,21	chiltern (1) 128:22	clearly (8) 30:7 52:8	219:24,25 220:3	compliant (1) 200:9
cel00001255 (2) 182:18	cel0000866840 (1) 69:24	141:6 142:8 143:23	choice (1) 144:7	84:1 132:8 153:14	169:9 170:12 202:2	complicated (1) 188:17
186:24	cel0000866857 (1) 71:11	146:13,16 147:2	choose (2) 22:12 124:19	189:5 194:4 211:25	218:9	complies (3) 41:17
cel00001377 (1) 216:19	cel0000866858 (1) 49:15	149:3,25 150:24 151:6	christ (2) 47:15 118:5	clg00000224119 (1) 20:16	218:9	67:11 109:19
cel000013771 (1) 218:8	cel000086688 (1) 51:2	156:17 157:23 158:4,5	christmas (1) 150:14	clg00000224122 (1) 21:17	comfortable (2) 1:16	142:9 149:12
cel00001381 (1) 168:11	cel000086688 (1) 51:2	159:1,14 161:23	chunk (1) 16:6	clg0000022495 (2) 33:11 39:24	151:24	complying (2) 94:12
cel000013811 (1) 170:22	cel000086688 (1) 51:2	162:21 163:17 164:12	circulated (1) 139:6	clg0000022496 (1) 34:20	coming (12) 1:23	143:4
cel000013812 (1) 169:18	cel000086688 (1) 51:2	165:15 166:23 170:13	circumstances (1) 45:20	clg0000022497 (1) 40:8	2:15,19 3:17 9:5 63:15	component (2) 59:18
cel000013813 (1) 168:17	cel00009709 (2) 47:9	173:22,23,24	citation (1) 132:4	client (4) 4:8,19 77:3	75:10 108:22 110:13	111:25
cel00001382 (2) 107:23	68:1	174:1,1,3,25 176:6,8	city (1) 163:7	192:2	123:21 137:25 199:1	components (11) 19:16
113:8	cel00009725 (1) 213:23	177:12,12 178:9	clad (1) 106:21	clients (5) 89:12 110:21	command (2) 130:1	52:3 57:22 59:1,19
cel00002133 (2) 209:20	cel00009728 (1) 215:6	181:12 182:20	cladding (60) 6:11,14	130:18 206:1,2	138:12	98:5,6,15 99:6 171:12
210:19	cel00009874 (1) 157:3	188:2,20 189:18	13:7 24:8 29:12,12	close (4) 61:12 121:12	comment (6) 65:15,16,17 126:19	172:2
cel0000213312 (1) 212:17	cel00009875 (1) 162:15	190:10 191:24 193:13	33:3,22 34:4 39:9	124:1 161:7	181:20 217:14	55:22,22 56:1,4
cel000021333 (1) 211:15	cel00009876 (1) 181:5	194:15 196:1 199:1	52:24 53:8 54:9 55:14	closely (2) 58:10 76:16	comments (2) 157:11	comprised (1) 201:12
cel000021334 (1) 212:3	cel00009877 (1) 160:22	202:4,7,10 203:2,9,15	58:18 59:22,23	cloud (1) 71:13	161:6	comprises (1) 19:12
cel00003422 (1) 62:21	cel0001002735 (1) 59:7	206:20,24 209:5	60:1,25 72:23 94:13	coauthor (2) 183:17	commercial (3) 10:4	concept (1) 68:14
cel000034224 (1) 62:25	cel00010031 (1) 2:11	216:25	96:17 97:20 101:9	184:1	123:11 139:9	concepts (1) 41:10
cel00003439 (1) 150:6	cel0001003117 (2) 36:22 134:16	celotexs (5) 12:13 26:13	103:3 105:7 110:5	cohesive (1) 93:4	commit (2) 134:19,25	concern (4) 108:22
cel00003451 (1) 151:12	cel000100312 (2) 43:6	54:23 65:13 207:20	111:2,22 115:6 126:24	coining (1) 67:4	common (2) 92:9	109:1 123:15 130:11
cel000034811 (1) 155:19	cel0001003124 (1) 3:8	204:20 205:10	130:25 134:22 135:14	cold (1) 14:3	159:19	concerned (4) 32:18
cel000034812 (1) 154:20	cel000100313 (1) 164:23	206:20,24 209:5	136:7 139:2 145:2,4	collating (1) 130:16	commonly (2) 13:6	123:5 131:2 183:21
cel00003543 (1) 73:22	cel000100314 (1) 3:22	216:25	146:23 147:7,10	colleague (3) 184:6	186:12	concerns (11) 32:9
cel00003544 (1) 74:18	cel000100315 (2) 4:12	centre (4) 9:2 150:12	148:5,16 164:20	187:13 217:2	communications (5) 44:16 68:3 104:19	107:5 131:15
cel000035442 (1) 74:18	6:16	183:1 218:5	165:4,21,22 166:14	colleagues (11) 11:19	177:15 213:25	143:5,8,9,11,13
76:7,15	cel000100316 (1) 7:13	century (1) 84:14	178:22 183:1	85:20 90:2 92:13,22	company (34) 4:19 5:23	147:23 175:23 207:10
cel000035444 (2) 76:8	cel000100317 (1) 44:8	cep00057294 (1) 36:16	201:8,16,17 203:3	97:9 108:11 113:17	6:24 9:21 23:7,8 24:15	concrete (2) 58:21
78:11	cel000100318 (1) 198:2	certain (15) 29:16,16,17 32:6 37:8	204:25 206:21 207:9	114:21 165:6 209:14	31:20,22 35:18	61:10
cel000035445 (2) 76:10	cel000100319 (3) 208:24	38:8,9 59:20 114:23	210:25 211:22 212:5	colleged (2) 138:17	38:10,17 42:13 55:19	condition (1) 152:9
80:1	209:23 211:12	120:10 160:18 161:21	claiming (1) 137:19	140:12	81:21 85:16 87:10	conditions (1) 41:18
cel000035447 (1) 84:17	cel0001003124 (1) 3:8	178:1 179:3 195:14	claims (2) 11:7 107:6	colle (1) 4:2	92:21 106:18 107:14	conducted (1) 59:18
cel000035449 (1) 85:8	cel000100313 (1) 164:23	certificate (19) 86:4,6	claire (4) 168:18,20	colour (1) 22:3	109:12 112:2 120:18	confidence (2) 88:1
cel00007961 (2) 100:23	cel000100315 (1) 211:18	87:19 108:23 109:2	169:3,4	colouring (1) 76:6	142:16 150:19 158:23	139:19
	cel000100316 (1) 212:16	111:12 139:23 140:21	clarification (1) 144:12	column (15) 8:23 33:16	159:24,25 165:3	configuration (1) 177:20
	cel00012298 (1) 8:22	201:14,24 202:14	clarified (1) 158:8	65:6 66:3 67:3	167:1,2 193:12,12	confined (1) 177:19
	cel00035446 (1) 83:24	204:3,13,15 205:11	clarify (1) 98:2	82:21,22 85:25 95:22	201:4	confirm (6) 2:14 3:14
	cel00079613 (1) 103:21	207:24	clarke (1) 118:5	96:7 98:3,17,17 161:3	212:14	73:4,5 203:2 204:4
	celotex (171) 1:6	certificates (3) 202:10	class (65) 16:3,11,14,22	186:4	compared (1) 83:3	confirmation (3) 138:10
	5:10,17 6:14,20	203:2 204:1	17:1,5,5,6,7 19:4,7,15	columns (2) 49:18	comparison (3) 27:2	139:22 150:11
	7:6,16,21 8:3,10,25	certification (12) 4:3	22:13,21 23:14 24:21	84:24	165:20 201:13	confirmed (4) 34:13
	9:17,21 10:4,9,11,17	85:18 89:9,10 103:21	25:1,3,12,21 26:9	colwell (5) 183:14	competete (5) 26:14,18	141:13 203:15 204:1
		108:3,21 110:2 113:11	27:4,11,24	184:22 187:1,13,19	135:4 141:20 156:22	confirming (3) 110:3
		114:25 123:7 140:19	28:7,11,16,16	colwells (1) 187:5		113:12 128:17
		certifications (1) 156:21	30:7,8,8,13,18 36:11			
			39:23 40:12,13,13,14			

**confirms (1)** 203:4  
**conflicts (1)** 45:6  
**confused (1)** 42:4  
**confusing (1)** 48:1  
**confusion (7)** 42:6,9,25  
 50:17,24 154:1 192:25  
**connection (4)**  
 82:10,13,15 165:7  
**conservation (1)** 13:15  
**consider (8)** 74:2  
 78:13,24 88:19 99:18  
 129:22 130:20 152:15  
**consideration (2)** 83:1  
 88:20  
**considered (4)** 98:7  
 100:11 120:9 150:5  
**considering (2)** 42:17  
 85:3  
**consistent (1)** 177:14  
**constructed (1)** 97:2  
**construction (26)**  
 4:3,3,19 5:24 21:6  
 22:1 32:19 33:15,17  
 36:2 67:23 71:22  
 107:1 132:18 134:1  
 165:5 183:3  
 205:7,9,19 206:7  
 210:24 211:1,2,3  
 217:9  
**constructions (4)** 20:8  
 94:14 106:22 132:20  
**construed (2)** 102:16  
 114:9  
**consultant (21)** 22:18  
 77:6 78:1,23 81:14  
 82:12 122:11 123:2  
 126:16 149:14  
 155:1,6,9,15  
 215:13,14,18,21,23  
 216:14,14  
**consultants (9)** 7:19  
 78:2,3 79:5 88:10 89:7  
 121:1 215:9,24  
**consultation (1)** 133:12  
**consulted (3)** 132:15,22  
 133:16  
**consulting (1)** 133:13  
**contact (4)** 137:17  
 176:22,23 190:1  
**contacted (1)** 165:5  
**contacting (1)** 176:2  
**contacts (3)** 165:1  
 170:8 180:25  
**contain (2)** 102:17  
 168:8  
**contained (1)** 96:9  
**contents (2)** 3:14 43:11  
**context (4)** 37:6 152:24  
 194:6 217:20  
**continue (4)** 44:2  
 152:17,21 170:10  
**continued (1)** 134:19  
**continues (1)** 111:19  
**continuing (1)** 139:1  
**continuous (1)** 58:22  
**contractor (11)**  
 78:20,21 80:11,12  
 81:13 118:10 121:9  
 123:12 162:22 181:13  
 215:23  
**contractors (6)** 7:18  
 71:16 75:8,12 81:8  
 106:20

**control (18)** 5:8 12:1  
 36:18 64:24 77:5  
 78:5,6,9,22 80:13  
 81:13 132:18  
 133:12,18 139:25  
 140:18,23 142:5  
**convenient (5)** 61:21  
 121:18 125:10 180:4  
 219:16  
**conversation (19)**  
 122:17 140:17 158:11  
 142:12,13 178:2  
 159:3,6 161:25 167:5  
 176:20 178:6,12,20  
 182:14 198:17  
 199:17,18,18 200:19  
 201:6,11  
**conversations (7)** 97:7  
 111:11 127:24  
 142:12,13 178:2  
 198:22  
**coordinator (1)** 118:5  
**copied (6)** 118:9,19  
 127:14 136:18 141:1,7  
**copy (5)** 111:21 113:25  
 115:2 138:20 167:18  
**core (6)** 19:19 55:21  
 56:1,5 138:24 165:21  
**corner (6)** 15:2 21:18  
 69:2 159:5 162:3  
 211:2  
**correct (71)** 5:1,3,19,22  
 6:1,4,7 7:8,24 9:13  
 10:12 12:23 14:11  
 18:7 25:23 30:15  
 39:22 47:18,23 48:5  
 59:3 60:17 68:24  
 69:5,12,16 70:22  
 77:17,24 79:2  
 84:11,15 86:5 91:1,21  
 94:4 95:20 96:14,18  
 98:11 99:5,12 102:3,6  
 103:23 104:2,11  
 105:18 107:3 113:4  
 114:6 133:14 136:9  
 148:22 156:24 163:22  
 165:18 167:24 172:3  
 177:2,17 189:13  
 193:7,9 202:24  
 204:1,3,8 206:12  
 214:2,10  
**corresponded (2)** 85:24  
 178:22  
**cost (13)** 14:2 78:15  
 80:5 82:22,23,25  
 83:9,10,13,14,15,20  
 128:20  
**costing (1)** 181:24  
**costly (1)** 83:21  
**costs (3)** 73:2,3,9  
**couldnt (19)** 20:8 35:18  
 42:14 49:25 57:5,10  
 65:15 66:11 70:25  
 123:18 130:23  
 142:9,18 148:13  
 171:15,17 189:18  
 204:1 216:18  
**counsel (2)** 1:21 222:4  
**counter (2)** 112:4,15  
**counties (1)** 7:19  
**country (1)** 27:21  
**couple (6)** 99:15 145:9  
 174:12 183:19 184:3  
 198:13

**course (6)** 14:23 56:16  
 59:12 121:19 164:10  
 180:11  
**courts (1)** 45:3  
**cover (4)** 51:19,22  
 96:1,4  
**covered (5)** 10:22 51:20  
 55:10 95:12 96:2  
**covers (1)** 41:18  
**cp (1)** 137:11  
**cpd (9)** 9:11,16,24  
 10:19,21  
 11:8,19,21,25  
**cpdsarchitect (1)** 63:1  
**create (1)** 26:10  
**created (4)** 43:11 69:23  
 161:11 181:17  
**creation (1)** 43:7  
**creative (1)** 68:14  
**crib (1)** 87:11  
**cribs (1)** 23:13  
**criteria (31)** 8:14 20:3  
 27:14 31:1 34:2,25  
 35:5 39:21 46:12  
 51:6,10 52:23 94:17  
 97:24 99:19 103:2  
 105:12 110:4  
 113:13,15,22 114:5  
 138:24 148:19 153:3  
 166:13 167:24 187:7  
 203:6 206:25 207:15  
**critical (1)** 80:19  
**cross (1)** 206:10  
**cscs (2)** 4:2,24  
**culture (1)** 65:13  
**cummins (1)** 138:17  
**current (9)** 76:23 77:9  
 110:2 113:11 137:19  
 145:10 157:24 163:2  
 175:1  
**currently (2)** 144:19  
 163:3  
**curtain (6)** 111:2,22  
 158:20 161:6 165:3  
 183:4  
**custodians (1)** 18:19  
**customer (19)** 15:11  
 17:23 38:14 54:23  
 74:21 76:5 88:14 98:9  
 110:9 114:25 115:4,5  
 129:8,9 148:14 162:11  
 170:6 179:25 198:23  
**customers (38)** 7:21 8:5  
 22:12 30:19,23  
 32:1,6,9 36:24  
 38:11,11 42:20 45:22  
 69:15 70:20 73:11  
 78:24 80:22 81:1  
 93:22 108:8,22 110:21  
 126:20,22 129:16  
 130:18,23 136:11  
 147:9,24,24 148:14  
 162:12 167:11  
 174:16,16 209:15  
**cut (5)** 57:22 133:9  
 168:23 171:20,21  
**cwct (9)** 63:23 181:21  
 182:5,7,12,22,25,25  
 186:21  
**cwct0000019 (1)**  
 185:17  
**cwct00000196 (1)**  
 186:2

**cwcts (1)** 185:13  


---

**D**  


---

**d2 (1)** 40:13  
**dan (12)** 178:4 181:21  
 182:5,7 190:24 191:23  
 198:6 199:17,17  
 200:23 202:18 203:13  
**danger (1)** 55:25  
**dangerous (1)** 66:5  
**daniel (13)** 165:6,9  
 181:10 182:11 191:7  
 198:3,18,22 202:13  
 208:23 215:18 216:24  
 219:6  
**data (18)** 15:8 17:21  
 18:9,25 19:1 20:3 34:5  
 76:23 77:9 78:7,17  
 95:3 123:14 124:22  
 125:2,8 144:20 198:4  
**database (2)** 157:25  
 181:6  
**datasheet (9)** 15:1  
 22:14 23:1 100:21  
 101:22,24 109:17  
 165:22,22  
**date (30)** 3:11 37:3  
 43:24 44:10 45:19  
 63:19 88:21 107:15  
 135:15 157:8 160:6  
 161:5 162:1,3,24  
 165:16 172:22  
 181:15,18,19 186:19  
 187:17 194:12  
 195:8,21,22 199:13  
 202:11 209:6 216:21  
**dated (9)** 2:9 15:3  
 107:11 111:7 131:20  
 154:23 205:3 210:3  
 216:21  
**dates (4)** 64:22 112:11  
 162:9 181:16  
**dave (1)** 138:17  
**dawn (1)** 168:21  
**day (16)** 45:3 119:5,5  
 122:8 149:15 150:15  
 155:4,19 156:1 165:16  
 170:23 172:9 183:8  
 215:7 219:17,21  
**day3310 (1)** 40:25  
**day33121215 (1)** 41:20  
**day367769 (1)** 174:13  
**days (8)** 115:16 119:3  
 149:17 202:12,14  
 203:14 214:3 216:22  
**daytoday (1)** 9:4  
**deal (3)** 7:22 8:16 72:2  
**dealing (7)** 9:4 30:23  
 42:10 89:12,17 179:17  
 201:3  
**dealings (2)** 88:21 157:1  
**deals (1)** 103:21  
**dealt (1)** 96:25  
**dean (1)** 59:8  
**dear (4)** 138:19 140:16  
 168:20 169:23  
**debbie (35)** 63:9,10  
 73:23 74:24 87:18  
 88:14 91:20 93:12  
 111:8 112:8 115:15  
 117:20 118:20  
 119:4,15 121:21  
 123:21 124:17 127:14

136:20 141:7 142:7  
 146:3,17,18 149:2  
 151:15 154:12,15,23  
 155:10,18 156:1 184:5  
 187:12  
**debs (2)** 115:18,21  
**debspaul (1)** 74:1  
**december (2)** 149:17  
 150:8  
**decided (2)** 6:25 124:7  
**deciding (1)** 144:15  
**decision (2)** 131:24  
 144:9  
**decisionmaking (1)**  
 79:11  
**decisions (2)** 142:6  
 155:25  
**deck (5)** 28:25 57:15  
 91:19,19 93:9  
**decomposition (1)**  
 186:17  
**decorative (1)** 58:18  
**deduce (5)** 26:22 42:4  
 46:12,16,19  
**deduced (2)** 57:14 73:5  
**deeper (1)** 83:6  
**defined (3)** 35:4 74:21  
 76:5  
**definition (2)** 12:24  
 186:13  
**degree (1)** 154:1  
**delivering (1)** 9:11  
**delivery (3)** 167:3  
 194:11 195:8  
**demands (2)** 13:14  
 163:2  
**demonstrate (2)** 134:21  
 176:4  
**demonstrates (1)** 21:7  
**department (2)** 64:24  
 202:5  
**departments (1)** 15:18  
**depth (1)** 55:10  
**derive (1)** 81:23  
**derived (1)** 49:21  
**described (10)** 37:9  
 38:7 41:16 59:15,19  
 99:6,7 191:21 192:10  
 211:23  
**description (4)** 104:2  
 167:14 168:7 204:12  
**design (9)** 6:5 10:7  
 15:25 47:5 146:7  
 155:25 165:6 166:25  
 167:1  
**designed (1)** 165:4  
**designer (5)** 5:6 17:24  
 22:17 98:7 165:2  
**designers (2)** 163:9  
 181:23  
**designing (1)** 144:10  
**desirable (1)** 65:21  
**desk (2)** 2:13 8:17  
**deskbound (1)** 8:10  
**desktop (7)** 120:22  
 130:9 134:20 135:12  
 136:6 146:15 189:8  
**despite (1)** 142:20  
**detail (17)** 15:10 21:9  
 22:2 44:9 48:18 49:9  
 52:13 65:5 75:24  
 88:19 118:6,13 126:18  
 172:14 202:6,9 208:20

**detailed (6)** 46:17 49:7  
 51:18 84:8 95:25 98:5  
**details (16)** 51:19 55:17  
 71:8 88:4 91:15 93:24  
 96:1 103:22 127:19  
 168:21 169:2 178:2  
 201:14 204:16  
 211:3,19  
**detect (1)** 212:20  
**develop (3)** 43:22  
 106:19 171:18  
**developed (2)** 63:14  
 160:12  
**developer (1)** 137:4  
**developers (3)** 7:18 8:6  
 89:3  
**developing (4)** 85:12  
 159:14 160:2 172:5  
**development (15)** 11:23  
 13:11 26:13,17 43:4  
 44:12 73:2,3,9 74:12  
 85:17,17 109:10  
 159:21 172:12  
**developments (2)** 88:9  
 174:17  
**diagram (8)** 40:1,5,7,9  
 57:16 60:9 61:4 96:8  
**didnt (65)** 5:13,17  
 10:18 17:15 23:19  
 27:11 29:20 32:24  
 46:2,11,17 56:25  
 60:24 72:1 81:2 87:1  
 92:22 96:19,20 99:23  
 100:21 109:2 113:23  
 114:11 116:20,24  
 123:8 124:19 126:6  
 127:4,5,8 129:23  
 138:8 149:25  
 160:8,9,21  
 171:17,19,22  
 179:14,21 187:16  
 188:3,8,9  
 200:13,14,18 201:1  
 204:2,11,14 206:13,18  
 208:18 212:22  
 213:9,12 215:4,4,5  
 219:3,11  
**died (1)** 45:5  
**difference (1)** 30:18  
**differences (6)** 21:9  
 22:2 59:14 119:17  
 126:23 199:25  
**different (34)** 2:2 6:24  
 9:1 23:11 41:6,7 43:12  
 56:11 85:18 87:4,15  
 93:16 117:3,3,7  
 119:21 123:7 130:24  
 131:14 153:3 156:19  
 168:13 184:21 188:24  
 189:1,1 193:16,16,18  
 196:14 210:16,17  
 214:13 215:19  
**differentiation (1)**  
 194:19  
**difficult (3)** 7:25 82:1  
 157:4  
**difficulties (1)** 143:3  
**difficulty (2)** 1:25 92:25  
**digest (1)** 95:3  
**digging (1)** 213:21  
**dimensions (2)** 21:10  
 59:2  
**diploma (1)** 4:1

**direct (2)** 170:8 206:23  
**directed (1)** 32:14  
**direction (2)** 146:25  
 184:16  
**directly (6)** 22:22 74:14  
 122:21 138:11 149:9  
 192:1  
**director (1)** 193:14  
**disagreed (2)** 183:11  
 185:3  
**discounts (1)** 73:11  
**discover (4)** 34:7  
 38:5,13 191:5  
**discovered (1)** 189:20  
**discovery (5)** 31:24  
 32:2 34:8 38:7 141:13  
**discuss (15)** 46:8  
 137:17 142:7 144:6  
 146:10 149:18 154:11  
 155:21 156:7 163:1  
 172:14 173:24 184:6  
 187:14 199:25  
**discussed (1)** 3:16  
 49:6 58:7 67:22 96:20  
 124:13 146:9 199:5  
 200:8 201:19 218:20  
**discussing (2)** 126:12  
 177:24  
**discussion (25)** 24:16  
 28:10 46:17 49:7  
 54:8,21 55:6,20 56:3  
 57:1,3 58:5 64:13  
 69:17 71:3 72:5 86:25  
 95:13 96:24 124:9  
 127:10 176:12,13  
 182:5,10  
**discussions (1)** 144:15  
**disperse (1)** 209:14  
**disseminate (1)** 179:19  
**distill (1)** 75:14  
**distilled (1)** 87:5  
**distinct (1)** 30:6  
**distinction (1)** 36:11  
**distribute (1)** 171:9  
**distributed (1)** 72:11  
**distributor (1)** 71:20  
**distributors (6)**  
 71:18,21,25  
 72:6,13,14  
**ditto (1)** 60:15  
**diversion (1)** 168:13  
**divided (1)** 144:3  
**division (3)** 4:16 6:3,19  
**dock (8)** 118:6,23  
 126:11,15,23  
 127:15,20 129:17  
**document (121)** 5:14  
 15:3,6,15 16:15,18  
 20:18,20,23 21:16  
 22:6,7 31:5,7  
 32:3,4,5,7,11,13,16  
 33:14 34:13,16,17,19  
 35:16 36:23 37:9,13  
 38:2,14,18,19  
 39:12,18,24 44:14  
 45:23 46:1 47:21 49:3  
 50:16 52:12 62:23,25  
 64:19 65:2,4  
 74:19,22 76:19 79:24  
 80:14 87:16 90:3  
 94:12,13,19,24  
 95:8,11,17,22  
 97:14,16 98:9,16

99:10 100:25 101:19	133:17,18,19 138:7	<b>effect (2)</b> 54:22 89:21	<b>emissivity (1)</b> 57:8	113:12	115:3	<b>faade (24)</b> 78:3 83:8
102:22 104:22 105:17	139:18 141:2 142:12	<b>effectively (6)</b> 7:9 13:24	<b>emphasise (1)</b> 69:20	<b>et (1)</b> 13:8	<b>exceed (1)</b> 109:20	121:1 126:17 127:19
107:11,19,21 110:25	146:8 147:14 150:13	18:23 42:24 113:18,20	<b>emphasises (1)</b> 68:25	<b>etc (5)</b> 21:11 22:3 36:1	<b>excess (1)</b> 191:11	144:10 149:6,11
112:4,21 115:17	153:1,2,12,23 154:4,9	<b>effects (1)</b> 83:8	<b>employ (2)</b> 149:9,14	67:12 149:8	<b>exchange (1)</b> 7:14	155:1,6,9,15,24
137:14 143:16 147:18	155:12,17 158:23	<b>efficiency (2)</b> 13:17,24	<b>employed (1)</b> 149:22	<b>eternit (10)</b> 58:13	<b>excuse (1)</b> 140:1	156:12 183:18 184:2
158:9 167:15,16	161:20 164:3,3,4,15	<b>efficient (3)</b> 83:2,11,17	<b>employee (2)</b> 157:25	59:23,25 60:16,22	<b>executive (3)</b> 4:8 59:9	215:9,14,18,21,22,24
168:14 185:20 192:17	169:6,20 170:1 173:17	<b>effort (2)</b> 101:2,2	158:20	96:16 98:20 147:12	196:1	216:13,14
193:19 195:4 200:9	174:10,14,15 175:4,6	<b>eg (2)</b> 71:15,17	<b>enable (1)</b> 156:18	148:10,16	<b>executives (1)</b> 136:19	<b>faades (1)</b> 85:1
201:14 203:19 204:17	176:14,15,15,16	<b>egginton (7)</b> 169:8,9,19	<b>encountering (3)</b> 89:15	<b>euroclass (10)</b> 49:19	<b>exercise (3)</b> 48:22 115:2	<b>facades (3)</b> 84:14 89:4
205:17	187:18 188:19 189:10	170:12 171:25 172:13	109:3 153:22	50:19 137:12 145:2	211:11	155:3
209:1,8,10,11,12,22	190:16 191:4,13,16	173:7	<b>end (16)</b> 64:24 92:3	146:23 147:8,11,19	<b>exhibit (1)</b> 7:14	<b>face (9)</b> 50:16 61:3
210:10,11 211:7	192:12 194:19	<b>eggintons (4)</b> 169:11,17	103:20 108:16 109:12	148:5,7	<b>existed (2)</b> 42:9 43:1	86:12,12 120:18
212:2,25 213:3,4	197:11,16 201:1	170:2 172:21	110:23 131:20 132:14	<b>euroclasses (1)</b> 49:17	<b>existence (3)</b> 38:5,13	124:2,3 155:20 195:23
214:24 215:14,16,25	203:17 208:20 210:14	<b>either (19)</b> 5:2,13 18:2	135:17 152:3 173:7	<b>europaean (5)</b> 5:14 40:13	104:24	<b>facer (1)</b> 19:14
216:4,6,15,16	211:13 213:17 214:12	19:14 30:24 33:25	187:19 190:6 192:25	41:15 42:5 128:24	<b>existing (1)</b> 195:18	<b>facers (1)</b> 28:13
218:5,12	215:2 217:18 219:10	34:22 37:24 40:20	199:13 208:8	<b>evans (24)</b> 47:14 68:11	<b>exists (1)</b> 195:10	<b>facetoface (2)</b> 86:15
<b>documentation (3)</b>	220:13	46:13 54:21 87:21	<b>enderby (1)</b> 137:9	73:23 74:24 87:18	<b>expand (2)</b> 139:2	87:20
60:17 204:20 217:23	<b>dots (2)</b> 56:21,23	112:19,20 174:17	<b>endorsement (1)</b> 201:25	88:14 91:20 96:25	148:21	<b>facings (1)</b> 186:15
<b>documents (43)</b> 14:22	<b>double (1)</b> 214:20	175:5 178:14 186:20	<b>enduse (2)</b> 51:23 96:5	111:9 112:9 116:6	<b>expanding (1)</b> 144:19	<b>factor (2)</b> 72:19 80:19
15:12 17:16	<b>doubt (1)</b> 95:16	191:6	<b>energy (4)</b> 13:14,21,22	118:19 119:8 127:14	<b>expect (3)</b> 73:18,18	<b>factory (4)</b> 12:16
18:2,3,5,16,20 33:8	<b>doubts (1)</b> 184:25	<b>elaborated (1)</b> 46:9	14:1	136:15,18 149:2,16,24	220:1	23:9,10,21
34:8 48:14 49:12	<b>down (39)</b> 1:15 2:8	<b>elaboration (1)</b> 27:8	<b>engage (2)</b> 10:6 126:23	154:12 155:8	<b>expected (2)</b> 151:23	<b>fail (1)</b> 46:20
51:22 63:20 86:8	16:2,6 18:21 19:4	<b>electric (1)</b> 4:10	<b>engaged (1)</b> 127:3	170:21,23 172:9	152:6	<b>failed (7)</b> 44:21 45:15
87:15 94:3,5,24 96:4	27:4,22 38:23 50:13	<b>electrical (1)</b> 4:16	<b>engineer (1)</b> 156:12	<b>even (10)</b> 50:17 93:8	<b>expecting (6)</b> 7:21	46:6,12,18 152:6
97:3 100:11 101:3	58:12 59:11 63:11	<b>element (2)</b> 27:13	<b>engineerconsultant (1)</b>	99:10 109:11 123:22	85:16 130:18,19	153:14
108:24 109:7 112:18	68:2 70:2 103:6	163:15	155:24	128:16,23 145:4	179:18,18	<b>failure (2)</b> 45:21 46:8
158:7 169:1,20,24	109:15 115:19 118:11	<b>elements (2)</b> 119:21	<b>engineering (1)</b> 4:19	149:14 152:12	<b>experience (9)</b> 4:5	<b>fair (12)</b> 14:5 20:22
176:11 177:21,22	127:12 132:12 133:8	152:12	<b>engineers (4)</b> 121:1	<b>event (4)</b> 64:3,5,5,15	6:18,19 7:1 15:16	52:3,4 72:19 87:24
192:16 200:15,16,22	138:14 143:22 145:8	<b>else (12)</b> 13:8 30:25	217:9,13,24	<b>events (1)</b> 109:6	30:16,22 86:6 124:3	88:8 98:8 146:24
201:13,21 202:2	146:13 149:1 150:8	34:24 35:21 45:2	<b>england (1)</b> 50:5	<b>eventually (1)</b> 172:22	<b>experiences (1)</b> 4:21	156:15 162:8 197:25
210:2,9 216:10	158:14 171:20,21	64:11 96:25 129:6	<b>english (2)</b> 3:25,25	<b>ever (38)</b> 5:10 10:16,19	<b>expert (2)</b> 66:6 89:21	<b>fairly (1)</b> 65:1
<b>does (27)</b> 17:17 25:19	186:10 191:23 192:20	139:15 142:7 184:19	<b>enlarged (1)</b> 181:7	11:15,19,25 16:13,17	<b>expertise (3)</b> 81:16	<b>faith (1)</b> 138:20
29:22 28:5 29:6,10	204:22 210:7,7 213:15	215:19	<b>enlightened (1)</b> 87:12	17:13,21 18:4 19:19	88:15 89:22	<b>fall (1)</b> 179:23
38:25 46:16 52:14	216:20	<b>elsewhere (1)</b> 94:8	<b>enlisted (1)</b> 100:12	29:22 42:24 60:19,25	<b>experts (1)</b> 100:12	<b>familiar (18)</b> 15:6
63:6 64:11 74:6 77:11	<b>dr (4)</b> 183:14 184:22	<b>email (111)</b> 7:14 9:5	<b>enough (8)</b> 76:24 77:13	61:15 63:24 65:2 66:8	<b>explain (13)</b> 2:16 4:21	20:20,21,24 22:5
78:25 79:10,20 88:13	187:5,19	23:25 32:21 43:19	78:17 95:2 125:6,6	73:11,14 114:24 115:4	9:16 49:9 64:2 70:17	31:10,12 34:16 93:7
117:13 118:14 120:9	<b>draw (1)</b> 179:22	73:22 75:2 90:11,25	168:2 219:21	129:20 142:15,19,23	75:16 88:5 92:11	102:24 104:22,24
153:7 161:24 162:4	<b>drawing (5)</b> 71:15 96:8	107:23 111:6,6,8,19	<b>enquiries (6)</b> 8:5,11,16	149:24 172:20	114:11 135:2 141:25	110:15 179:6,7
171:1 184:15 195:7,16	178:25 201:14 204:17	112:6 113:6	9:4 176:1,5	173:7,16,17 178:19	200:7	185:13,15,20
206:11 208:8	<b>drawings (2)</b> 127:21	115:12,15,19	<b>enquiry (2)</b> 124:11	191:14,20 192:8,13	<b>explained (2)</b> 68:7	<b>familiarised (1)</b> 32:10
<b>doesnt (11)</b> 50:23	198:11	116:2,14,16,24 117:19	206:3	<b>every (7)</b> 61:25	132:5	<b>far (19)</b> 14:17 19:14
102:17 104:9 116:5	<b>driver (3)</b> 13:18,20	118:1,2,4 119:14	<b>ensure (2)</b> 21:7,25	74:10,10 101:22	<b>explaining (1)</b> 178:6	31:16 32:18 52:10
139:20 141:1 162:6	82:23	121:17 122:15 123:20	<b>entailed (1)</b> 64:6	167:14 174:12 200:15	<b>explains (2)</b> 141:18	58:17 95:21 111:25
168:2,8 195:5 210:8	<b>driving (1)</b> 163:15	124:16 127:12,13	<b>entire (8)</b> 16:11	49:5 125:12 166:16	152:1	128:16 137:11,13
<b>doing (6)</b> 64:23 89:1	<b>dubai (5)</b> 53:19 54:25	131:12,16,23	19:5,8,10 27:4,24	173:15	<b>explanation (1)</b> 142:19	149:22 183:20 184:9
126:11 134:23 135:14	55:3,7,9	133:3,7,9,10 134:8	28:8,11	<b>everything (1)</b> 32:12	<b>explicitly (2)</b> 98:8	188:13,22 189:15
151:22	<b>due (7)</b> 14:23 75:7	136:15,17,25	<b>entirely (1)</b> 122:25	<b>evidence (30)</b> 1:5,24	173:10	207:10 213:21
<b>dominate (1)</b> 153:21	157:8 161:5,15 162:24	137:3,4,18,24 138:15	<b>entitled (8)</b> 24:22 36:18	2:8 3:16 21:5 22:13	<b>expresses (1)</b> 155:10	<b>fashion (1)</b> 128:21
<b>done (25)</b> 5:10 15:12	181:15	140:11,25	48:8 63:1 64:20 74:17	40:24,25 42:1 62:2	<b>expressing (3)</b> 93:8	<b>fatality (1)</b> 53:18
16:20 22:17 33:6,7	<b>during (9)</b> 14:16 20:24	141:2,3,5,10 142:13	90:23 105:4	76:25 77:9,13	108:22 109:1	<b>features (1)</b> 56:20
71:8 92:20 105:22	24:16 27:9 31:21 34:8	143:20 144:2	<b>entries (1)</b> 181:2	86:11,14 87:16,20	<b>expression (1)</b> 19:7	<b>february (16)</b> 44:20
115:2 132:9 135:9	40:20 60:19 178:19	145:14,20 148:24	<b>entry (10)</b> 88:15	117:17,18,19 120:21	<b>expressly (1)</b> 179:12	45:15 73:24 75:3,4
141:14 148:4 154:13	<b>durkan (1)</b> 137:4	149:1 150:6,8,9	157:4,11 162:16 181:6	121:3 123:14 125:7,14	<b>extensive (1)</b> 33:22	84:7 86:14,23 91:19
156:18 183:23 188:5		151:12	182:11,13 194:1,25	143:15 174:11 180:9	<b>extent (1)</b> 12:15	117:25 118:4 119:3
198:20 199:7 200:5	<b>E</b>	154:11,20,21,22	195:20	187:23 220:14	<b>exterior (5)</b> 6:6 55:7,15	121:21 122:8 123:22
202:20 205:13 213:21		155:10 165:13,14	<b>envelope (4)</b> 6:3,19 7:3	<b>exact (13)</b> 18:14	61:12 119:22	126:6
219:20	<b>e (1)</b> 40:9	166:21	33:19	37:3,25 45:19 55:17	<b>external (19)</b> 20:8	<b>feedback (12)</b> 31:25
<b>dont (122)</b> 8:23 12:4	<b>earlier (10)</b> 46:5 91:11	167:6,8,10,20,22	<b>envelopes (1)</b> 53:14	63:19 71:8 102:5	31:13,18 32:18	75:7 77:18 85:6
13:8 17:20 18:3 23:2	93:25 95:5 133:1	168:12,15,24	<b>environmental (1)</b> 57:8	108:10 126:18 127:5	33:15,16,19,25 34:3	108:12 122:22 124:18
25:5 26:1,15 29:2,22	145:20 177:16	170:2,10,18 173:12,13	<b>equally (1)</b> 175:24	130:6 171:12	36:2 40:3,4,11 55:14	127:18 136:10 143:2
34:6 35:16 36:21 37:3	187:4,22 199:12	178:1,16 182:19	<b>equipped (2)</b> 22:11 82:1	<b>exactly (20)</b> 14:4 20:12	91:6 94:13 97:20	150:3 152:16
38:4,6 43:2 46:9 49:22	<b>early (3)</b> 35:17 63:17	186:24 187:11	<b>equivalent (2)</b> 41:15	27:13 30:11 64:6	106:25 118:6	<b>feel (4)</b> 127:20 134:24
50:3,6,15 55:17 56:7	180:25	192:3,20 193:11	163:21	70:11 92:16 95:1	<b>externally (1)</b> 106:21	197:16 219:20
62:1 64:15,21 66:12	<b>earn (1)</b> 11:22	197:18 198:2,19	<b>erroneous (1)</b> 100:15	106:25 115:6 133:8	<b>extra (2)</b> 87:14 89:13	<b>feeling (1)</b> 190:23
67:9 69:6 70:7 72:1	<b>easier (2)</b> 187:8,9	199:13 202:3,12,15,23	<b>escape (1)</b> 37:20	173:25 177:4,10	<b>extract (2)</b> 51:12	<b>felt (3)</b> 32:8 197:14,15
74:10,11 79:14,22	<b>easiest (1)</b> 76:22	203:21 213:24 216:19	<b>especially (1)</b> 181:22	178:17,23 184:21	204:21	<b>fence (1)</b> 144:12
81:18 82:19 87:2,25	<b>easily (3)</b> 17:19 82:19	217:7,17 218:2,9	<b>essentially (5)</b> 18:9	200:10,25 216:8	<b>extrapolate (3)</b> 125:7	<b>few (11)</b> 31:4 49:15
89:24 90:8 92:2,4	211:17	<b>emailed (1)</b> 165:2	34:21 67:14 69:19	75:20 114:7 167:18	133:21,22	55:18 71:1,21 93:24
107:18 109:11,13	<b>eastern (1)</b> 4:13	<b>emailing (3)</b> 151:14	134:12	176:5	<b>extremely (1)</b> 106:24	97:13 123:24 149:17
110:20 116:1,13,17,17	<b>ecophon (1)</b> 193:14	165:1,12	<b>establish (2)</b> 122:13	<b>examples (6)</b> 23:15	<b>eye (4)</b> 10:11 58:12	165:7 182:8
117:14 121:11 122:21	<b>edge (1)</b> 57:21	<b>emails (3)</b> 8:11 130:15	123:3	83:24,25 92:1 104:18	194:20 212:18	<b>fibre (6)</b> 58:15 61:15
123:10	<b>edinburgh (1)</b> 184:11	142:25	<b>established (1)</b> 205:9			96:16 98:20 99:3
131:6,9,10,17,18,19	<b>edition (2)</b> 45:23,25	<b>embarked (1)</b> 32:2	<b>establishment (2)</b> 110:3			148:2
	<b>edward (2)</b> 145:10,17				<b>F</b>	

<b>field (6)</b> 77:1 135:5 157:24 179:17 183:17 184:1	210:1,19 212:4	183:7 184:13 207:13	<b>generic (2)</b> 11:12 72:13	181:25	<b>hammersmith (2)</b> 198:4 199:4	<b>heavier (1)</b> 83:7												
<b>figure (1)</b> 97:5	<b>fit (3)</b> 128:12 129:13 200:18	<b>fr (4)</b> 26:13 176:10 177:2,2	<b>george (7)</b> 118:10,23 126:11,15,22 127:15,20	<b>good (19)</b> 1:3,10,22 3:2 55:18 61:23 138:13,20 145:11 151:20 159:17 166:1 167:8 174:22 176:21 187:4,9 198:7 217:6	<b>hand (8)</b> 36:11 58:11 88:1 141:23,24 142:5 178:15 192:17	<b>height (33)</b> 29:17 39:19 52:19 53:1,4 98:1 100:7,15 101:11,15,21 102:10 103:4,15 105:14 106:8,12,15 109:20 110:6 164:17 166:15 191:8,12 203:4,7,24 204:6 205:7,20 206:8 207:2,18												
<b>file (8)</b> 193:6,19 194:8 195:22 196:23,24 201:12 202:17	<b>five (5)</b> 3:24 56:9 94:4 201:13 204:22	<b>fr4000 (1)</b> 26:8 <b>fr5000 (29)</b> 10:23 11:4,9 12:10,18 14:13 15:1,21,25 16:8,21 19:18,22 20:7,14 22:14 26:1 27:3,5,17,25 30:12,24 34:15 39:13 71:7 164:12 199:22,25	<b>georges (1)</b> 129:16 <b>gesture (1)</b> 138:20 <b>get (28)</b> 2:8 26:16 37:19 42:24 64:11 72:17 73:7 74:5 85:18 92:22 94:23 113:5 116:5 117:15 119:11 125:12 136:4 139:18 141:5,9 145:12 150:11 155:16,18 173:7 205:25 211:22 215:11	<b>gorilla (2)</b> 64:3,8 <b>government (1)</b> 13:20 <b>governments (1)</b> 13:14 <b>gradually (1)</b> 137:25 <b>graham (2)</b> 169:10,17 <b>gravity (1)</b> 131:10 <b>great (2)</b> 4:13 150:13 <b>greater (3)</b> 203:7,24 204:6 <b>green (6)</b> 76:10 80:2 82:10,22 84:20 179:24 <b>greenwich (2)</b> 136:21 137:10 <b>grenfell (33)</b> 12:11 14:13,17 59:12 88:20 127:2,6,9 160:17,19 163:7,23 164:2,10,14,20 165:8 181:4 190:2,13,20 191:1,3,8,11 192:1,8 194:1,4,24 198:4 199:3,5 <b>grew (1)</b> 57:4 <b>ground (3)</b> 35:25 167:22 186:8 <b>group (5)</b> 74:9 127:16 149:12 183:15 217:3 <b>grow (1)</b> 56:23 <b>guarantee (2)</b> 128:18 145:5 <b>guerilla (2)</b> 64:5,10 <b>guess (2)</b> 37:4 135:25 <b>guidance (23)</b> 33:25 36:17,19 37:2 38:2 41:5 50:5 76:19 91:9,10 94:12 111:15,22 114:21 116:19 120:14 148:18,19 149:7,23 150:2 183:3 186:19 <b>guide (22)</b> 50:2 94:2,3,9,10,15 95:6 97:11 100:19,20 109:18,18 112:15 165:21 177:24,25 179:1,2 201:17,18,19,20 <b>guidelines (1)</b> 185:7 <b>guys (2)</b> 156:2 217:6	<b>handed (1)</b> 174:4 <b>hang (1)</b> 120:4 <b>happen (4)</b> 65:21 141:4 158:14 173:16 <b>happened (9)</b> 149:20 152:1 156:11 160:7,9,10 178:13 216:2,5 <b>happening (1)</b> 129:24 <b>happens (3)</b> 3:3 157:25 193:8 <b>happy (10)</b> 2:1 56:14 76:23 78:6,17 119:25 123:16 125:6 172:14 180:19 <b>har000101496 (2)</b> 173:20 177:7 <b>har0001018429 (1)</b> 190:3 <b>har0001018432 (1)</b> 13:2 <b>har000101848 (1)</b> 175:18 <b>hard (2)</b> 34:11 36:7 <b>hardly (1)</b> 206:8 <b>harley (37)</b> 13:1 14:18 127:2 157:2,21 158:20,20,24 161:6,14,18 162:10 165:3 166:9 174:19 175:1,9,23,25 176:6,21 181:1 190:1,11,16,19,22 191:5,10,14,20 192:8 197:20 198:23 199:6 215:19 216:24 <b>harleys (6)</b> 158:11 173:23 174:12 175:21 190:11,18 <b>harris (3)</b> 216:20,25 218:7 <b>hasnt (1)</b> 183:23 <b>havent (3)</b> 2:17 76:6 140:5 <b>having (20)</b> 16:22 17:4,7 23:2 76:24 77:9 83:4 112:23 130:22 132:15 133:23 152:20 171:21 178:6 182:10 185:5 189:3 190:15 196:19 198:17 <b>hayes (3)</b> 9:3,7,8 <b>hazard (2)</b> 37:3 135:25 <b>head (5)</b> 8:24 14:20 70:25 136:20 150:21 <b>headache (2)</b> 192:3,3 <b>headed (4)</b> 9:1 68:10 71:11 193:15 <b>heading (7)</b> 33:16 40:2 44:8 47:11 72:22 97:16 128:5 <b>health (1)</b> 33:21 <b>hear (1)</b> 54:12 <b>heard (2)</b> 54:14 185:12 <b>hearing (3)</b> 1:4,5 221:3 <b>heat (5)</b> 13:25 14:1,3,5 46:13 <b>heath (1)</b> 138:16 <b>heathrow (1)</b> 4:20 216:20	<b>heights (4)</b> 53:15 68:19,20 105:5 <b>held (1)</b> 176:21 <b>help (17)</b> 2:22 14:22 81:21 107:19 112:4 122:2 144:14 146:16 154:5 155:24 156:14 157:14 159:6 161:12,24 162:5 176:17 <b>helpful (3)</b> 56:13 122:16 123:10 <b>helping (1)</b> 58:11 <b>here (38)</b> 3:17 33:14 49:2,16 52:16 53:2 55:1 62:23 70:2 85:19 89:17 91:18 99:6 114:14 120:2 126:10 129:25 138:11,15 145:7 151:14 154:1 155:11 163:23 168:17 169:15,24 170:25 176:12 189:13 194:24 195:16 198:2,8 201:7 214:8 219:8,8 <b>hers (1)</b> 187:2 <b>hes (7)</b> 13:4 24:11,17 42:2,4 178:13 190:16 <b>hesitate (1)</b> 170:1 <b>hh (6)</b> 126:16 127:18,21 128:16,19 129:4 <b>hi (16)</b> 74:1 90:16 111:10 115:18,21 118:21 119:6 127:17 149:5 150:10 165:25 170:24 172:11 182:23 198:6 214:5 <b>high (5)</b> 50:19,20 88:8 89:4 136:22 <b>higher (1)</b> 203:16 <b>highest (1)</b> 26:21 <b>highlighted (4)</b> 52:1 190:25 216:8 217:24 <b>highly (4)</b> 7:22 88:11 145:7 218:14 <b>highperformance (1)</b> 28:4 <b>highrise (12)</b> 11:11 35:14 36:8 75:14 89:17,18 106:22 143:6 156:23 175:3,5 185:2 <b>hilti (9)</b> 4:15,22 5:20,23 6:25 29:13 158:24 159:1 198:25 <b>hiltis (2)</b> 6:3,19 <b>himself (1)</b> 24:1 <b>hindsight (3)</b> 100:9 114:9,10 <b>history (3)</b> 25:25 26:6 53:25 <b>hold (1)</b> 121:23 <b>holdsworth (1)</b> 4:8												
<b>filled (1)</b> 61:11	<b>fixed (4)</b> 94:14 206:22 207:2 208:2	<b>fr5000s (1)</b> 16:17 <b>frame (4)</b> 61:9 94:14 132:17 206:23	<b>getting (10)</b> 71:24 75:7 88:4 114:1 122:2 132:8 143:3 147:23 150:3 181:23 <b>give (40)</b> 1:24 9:14,24 10:16,19 11:19,25 15:13 24:9 35:8 44:8 66:22 72:6,14 75:16 79:17 81:4 88:2 108:11 114:21 115:3 116:19 120:15,16,17,18 121:2,9 128:3 130:23 135:15 146:6 149:23 150:2 152:11,15 169:2 170:25 178:4 197:7 <b>given (35)</b> 12:16 18:12 21:21 24:14,14 25:16 33:11,12 34:1,2 38:8 44:6 76:6 94:19 101:4 104:13 110:7,9 114:13 134:10 142:19,22 143:15 148:1 154:2 166:22 171:24 179:4 185:7 195:23 196:3 197:1,2 199:3 200:17 gives (1) 103:22 <b>giving (10)</b> 1:24 18:6 44:13 85:5 89:18 149:7 152:7 161:14 162:1 179:19 <b>glazed (1)</b> 54:19 <b>glean (1)</b> 32:15 <b>gleaned (1)</b> 114:15 <b>global (6)</b> 183:16 201:15 205:3 209:2 217:10 218:3 <b>globe (1)</b> 45:6 <b>goes (15)</b> 33:24 51:4 98:2 106:17 138:25 139:4 151:21 152:1 159:10 169:10 202:22 205:5 207:13 212:6,11 <b>going (42)</b> 1:5,10,24 2:22 4:6 20:19 26:4 31:4 34:21 35:10 53:11 60:7 61:25 62:21 64:16 87:3 88:18 95:13 109:8 125:3 133:2 135:12,23,23 147:3 150:5 153:20 155:1,15 157:5 160:14 171:23 172:4 177:6,21 183:22 185:4,9 190:18 195:5 201:9 216:12 <b>gone (6)</b> 11:1 24:6 49:13 86:11 90:7	<b>gorilla (2)</b> 64:3,8 <b>government (1)</b> 13:20 <b>governments (1)</b> 13:14 <b>gradually (1)</b> 137:25 <b>graham (2)</b> 169:10,17 <b>gravity (1)</b> 131:10 <b>great (2)</b> 4:13 150:13 <b>greater (3)</b> 203:7,24 204:6 <b>green (6)</b> 76:10 80:2 82:10,22 84:20 179:24 <b>greenwich (2)</b> 136:21 137:10 <b>grenfell (33)</b> 12:11 14:13,17 59:12 88:20 127:2,6,9 160:17,19 163:7,23 164:2,10,14,20 165:8 181:4 190:2,13,20 191:1,3,8,11 192:1,8 194:1,4,24 198:4 199:3,5 <b>grew (1)</b> 57:4 <b>ground (3)</b> 35:25 167:22 186:8 <b>group (5)</b> 74:9 127:16 149:12 183:15 217:3 <b>grow (1)</b> 56:23 <b>guarantee (2)</b> 128:18 145:5 <b>guerilla (2)</b> 64:5,10 <b>guess (2)</b> 37:4 135:25 <b>guidance (23)</b> 33:25 36:17,19 37:2 38:2 41:5 50:5 76:19 91:9,10 94:12 111:15,22 114:21 116:19 120:14 148:18,19 149:7,23 150:2 183:3 186:19 <b>guide (22)</b> 50:2 94:2,3,9,10,15 95:6 97:11 100:19,20 109:18,18 112:15 165:21 177:24,25 179:1,2 201:17,18,19,20 <b>guidelines (1)</b> 185:7 <b>guys (2)</b> 156:2 217:6	<b>hard (2)</b> 34:11 36:7 <b>hardly (1)</b> 206:8 <b>harley (37)</b> 13:1 14:18 127:2 157:2,21 158:20,20,24 161:6,14,18 162:10 165:3 166:9 174:19 175:1,9,23,25 176:6,21 181:1 190:1,11,16,19,22 191:5,10,14,20 192:8 197:20 198:23 199:6 215:19 216:24 <b>harleys (6)</b> 158:11 173:23 174:12 175:21 190:11,18 <b>harris (3)</b> 216:20,25 218:7 <b>hasnt (1)</b> 183:23 <b>havent (3)</b> 2:17 76:6 140:5 <b>having (20)</b> 16:22 17:4,7 23:2 76:24 77:9 83:4 112:23 130:22 132:15 133:23 152:20 171:21 178:6 182:10 185:5 189:3 190:15 196:19 198:17 <b>hayes (3)</b> 9:3,7,8 <b>hazard (2)</b> 37:3 135:25 <b>head (5)</b> 8:24 14:20 70:25 136:20 150:21 <b>headache (2)</b> 192:3,3 <b>headed (4)</b> 9:1 68:10 71:11 193:15 <b>heading (7)</b> 33:16 40:2 44:8 47:11 72:22 97:16 128:5 <b>health (1)</b> 33:21 <b>hear (1)</b> 54:12 <b>heard (2)</b> 54:14 185:12 <b>hearing (3)</b> 1:4,5 221:3 <b>heat (5)</b> 13:25 14:1,3,5 46:13 <b>heath (1)</b> 138:16 <b>heathrow (1)</b> 4:20 216:20	<b>fr5000 (29)</b> 10:23 11:4,9 12:10,18 14:13 15:1,21,25 16:8,21 19:18,22 20:7,14 22:14 26:1 27:3,5,17,25 30:12,24 34:15 39:13 71:7 164:12 199:22,25 <b>fr5000s (1)</b> 16:17 <b>frame (4)</b> 61:9 94:14 132:17 206:23 <b>framing (4)</b> 150:7,17,19,20 <b>frcg (1)</b> 26:6 <b>freely (1)</b> 173:4 <b>frequency (1)</b> 174:15 <b>frequently (2)</b> 21:21 198:22 <b>friday (3)</b> 74:3,10 124:8 <b>frn (3)</b> 2:12 55:1 192:21 <b>frustrating (1)</b> 122:3 <b>full (16)</b> 19:15 27:12 34:4 86:23 87:10 99:17 117:18 184:23 206:3 216:16 217:10 218:12,15,20 219:2,9 <b>fullscale (4)</b> 20:3 31:1 35:1 37:16 <b>fully (1)</b> 124:13 <b>further (39)</b> 8:14 63:14,14 74:23 85:17 89:10,25 92:21 123:14 128:3,19 131:23 134:20,25 135:11 139:1 141:19 142:3,10,15,20 143:19 144:6,24 146:7,9,14,14,14,21 148:20 155:17 165:8 169:21 171:19 191:20,23,23 192:9 <b>future (5)</b> 144:14 163:2 172:5 182:4 199:9 <b>fyi (1)</b> 169:9	<b>fr5000 (29)</b> 10:23 11:4,9 12:10,18 14:13 15:1,21,25 16:8,21 19:18,22 20:7,14 22:14 26:1 27:3,5,17,25 30:12,24 34:15 39:13 71:7 164:12 199:22,25 <b>fr5000s (1)</b> 16:17 <b>frame (4)</b> 61:9 94:14 132:17 206:23 <b>framing (4)</b> 150:7,17,19,20 <b>frcg (1)</b> 26:6 <b>freely (1)</b> 173:4 <b>frequency (1)</b> 174:15 <b>frequently (2)</b> 21:21 198:22 <b>friday (3)</b> 74:3,10 124:8 <b>frn (3)</b> 2:12 55:1 192:21 <b>frustrating (1)</b> 122:3 <b>full (16)</b> 19:15 27:12 34:4 86:23 87:10 99:17 117:18 184:23 206:3 216:16 217:10 218:12,15,20 219:2,9 <b>fullscale (4)</b> 20:3 31:1 35:1 37:16 <b>fully (1)</b> 124:13 <b>further (39)</b> 8:14 63:14,14 74:23 85:17 89:10,25 92:21 123:14 128:3,19 131:23 134:20,25 135:11 139:1 141:19 142:3,10,15,20 143:19 144:6,24 146:7,9,14,14,14,21 148:20 155:17 165:8 169:21 171:19 191:20,23,23 192:9 <b>future (5)</b> 144:14 163:2 172:5 182:4 199:9 <b>fyi (1)</b> 169:9	<b>G</b>	<b>ga4000 (2)</b> 152:5,8 <b>gain (1)</b> 14:3 <b>gap (1)</b> 26:24 <b>garlics (1)</b> 9:6 <b>gaskets (1)</b> 36:1 <b>gauge (1)</b> 37:21 <b>gave (8)</b> 44:13,14 114:14,24 129:3 164:1 178:15 187:6 <b>gcses (1)</b> 3:24 <b>ge (1)</b> 4:10 <b>general (15)</b> 4:10 10:21 11:7 23:6 30:22 31:17 54:17 55:25 63:22,23 69:25 72:20 106:23 117:13 184:17 <b>generally (17)</b> 12:5 30:19 32:10 33:10 53:4 54:9 71:1 74:12 79:12 82:25 83:20 99:22 100:6 109:8 167:25 190:15,22	<b>ga4000 (2)</b> 152:5,8 <b>gain (1)</b> 14:3 <b>gap (1)</b> 26:24 <b>garlics (1)</b> 9:6 <b>gaskets (1)</b> 36:1 <b>gauge (1)</b> 37:21 <b>gave (8)</b> 44:13,14 114:14,24 129:3 164:1 178:15 187:6 <b>gcses (1)</b> 3:24 <b>ge (1)</b> 4:10 <b>general (15)</b> 4:10 10:21 11:7 23:6 30:22 31:17 54:17 55:25 63:22,23 69:25 72:20 106:23 117:13 184:17 <b>generally (17)</b> 12:5 30:19 32:10 33:10 53:4 54:9 71:1 74:12 79:12 82:25 83:20 99:22 100:6 109:8 167:25 190:15,22	<b>H</b>	<b>h2 (1)</b> 176:7 <b>habit (1)</b> 33:8 <b>habitually (1)</b> 9:24 <b>hadleigh (2)</b> 154:25 156:7 <b>hadley (4)</b> 150:7,17 151:5 154:24 <b>hadnt (10)</b> 5:12 30:13 70:9,10 93:8 107:17 109:10 132:24 150:21 188:16 <b>half (1)</b> 186:18 <b>halfway (3)</b> 59:11 149:1 216:20	<b>h2 (1)</b> 176:7 <b>habit (1)</b> 33:8 <b>habitually (1)</b> 9:24 <b>hadleigh (2)</b> 154:25 156:7 <b>hadley (4)</b> 150:7,17 151:5 154:24 <b>hadnt (10)</b> 5:12 30:13 70:9,10 93:8 107:17 109:10 132:24 150:21 188:16 <b>half (1)</b> 186:18 <b>halfway (3)</b> 59:11 149:1 216:20	<b>h2 (1)</b> 176:7 <b>habit (1)</b> 33:8 <b>habitually (1)</b> 9:24 <b>hadleigh (2)</b> 154:25 156:7 <b>hadley (4)</b> 150:7,17 151:5 154:24 <b>hadnt (10)</b> 5:12 30:13 70:9,10 93:8 107:17 109:10 132:24 150:21 188:16 <b>half (1)</b> 186:18 <b>halfway (3)</b> 59:11 149:1 216:20	<b>h2 (1)</b> 176:7 <b>habit (1)</b> 33:8 <b>habitually (1)</b> 9:24 <b>hadleigh (2)</b> 154:25 156:7 <b>hadley (4)</b> 150:7,17 151:5 154:24 <b>hadnt (10)</b> 5:12 30:13 70:9,10 93:8 107:17 109:10 132:24 150:21 188:16 <b>half (1)</b> 186:18 <b>halfway (3)</b> 59:11 149:1 216:20	<b>h2 (1)</b> 176:7 <b>habit (1)</b> 33:8 <b>habitually (1)</b> 9:24 <b>hadleigh (2)</b> 154:25 156:7 <b>hadley (4)</b> 150:7,17 151:5 154:24 <b>hadnt (10)</b> 5:12 30:13 70:9,10 93:8 107:17 109:10 132:24 150:21 188:16 <b>half (1)</b> 186:18 <b>halfway (3)</b> 59:11 149:1 216:20	<b>h2 (1)</b> 176:7 <b>habit (1)</b> 33:8 <b>habitually (1)</b> 9:24 <b>hadleigh (2)</b> 154:25 156:7 <b>hadley (4)</b> 150:7,17 151:5 154:24 <b>hadnt (10)</b> 5:12 30:13 70:9,10 93:8 107:17 109:10 132:24 150:21 188:16 <b>half (1)</b> 186:18 <b>halfway (3)</b> 59:11 149:1 216:20	<b>h2 (1)</b> 176:7 <b>habit (1)</b> 33:8 <b>habitually (1)</b> 9:24 <b>hadleigh (2)</b> 154:25 156:7 <b>hadley (4)</b> 150:7,17 151:5 154:24 <b>hadnt (10)</b> 5:12 30:13 70:9,10 93:8 107:17 109:10 132:24 150:21 188:16 <b>half (1)</b> 186:18 <b>halfway (3)</b> 59:11 149:1 216:20
<b>fireline (2)</b> 151:23 152:6	<b>fire (80)</b> 10:16 16:3,11,14,17,22 17:3,10 18:16 19:5,7 21:5 24:8 25:13 26:9,11,14 29:5,10 30:2,14 31:19 33:3,20 34:2 37:16,19,24 53:13 54:6 55:1,7 57:6,13 58:8 59:13,21 65:8 66:6,9,18,25 67:5 78:2 88:12 91:6,6 97:20 98:4 121:1 122:11 123:2 126:16 127:18 128:13,22 132:17 139:16 148:6,17 150:22,23 151:19 152:7,9,13 153:10 155:2 157:18 159:11 161:4,7,19 162:23 183:15,17 184:1 186:17 189:9 211:4	<b>fire (80)</b> 10:16 16:3,11,14,17,22 17:3,10 18:16 19:5,7 21:5 24:8 25:13 26:9,11,14 29:5,10 30:2,14 31:19 33:3,20 34:2 37:16,19,24 53:13 54:6 55:1,7 57:6,13 58:8 59:13,21 65:8 66:6,9,18,25 67:5 78:2 88:12 91:6,6 97:20 98:4 121:1 122:11 123:2 1																

holiday (1) 172:16  
 holistic (1) 189:9  
 home (3) 7:19 197:5  
 200:18  
 honest (1) 124:4  
 honeymoon (3)  
 137:1,23 141:16  
 hook (1) 69:20  
 hope (4) 31:3 112:3  
 128:25 179:23  
 hoped (1) 135:24  
 hoping (1) 175:8  
 house (15) 157:6  
 159:4,7 160:25 162:17  
 163:1 164:7,8 181:9  
 182:2 188:1 197:18,18  
 198:14 199:7  
 houses (1) 128:24  
 howard (9) 63:9,17  
 144:5 145:23 146:6,10  
 155:2,10 187:20  
 however (4) 39:8 93:24  
 175:22 217:23  
 huge (1) 118:24  
 hugh (1) 184:10  
 hyett (1) 100:11

I

ian (1) 151:3  
 id (14) 6:25 34:16 55:19  
 67:2 87:9 88:17 92:14  
 159:24 161:25  
 190:21,21 192:16  
 195:2 199:15  
 idea (9) 26:22 35:8 54:1  
 70:12 72:20 107:14  
 129:18 175:11 198:11  
 identical (2) 210:2  
 211:13  
 identified (4) 51:7  
 77:25 91:7 97:5  
 identifies (1) 58:11  
 identify (3) 7:14 77:8  
 84:23  
 identifying (1) 116:22  
 ie (4) 95:19 114:20  
 120:14 123:11  
 ignited (1) 55:15  
 ignorant (1) 81:25  
 ignore (2) 183:19 184:3  
 ii (1) 13:7  
 ill (7) 13:1 59:11 113:9  
 122:24 168:11 211:6  
 215:11  
 illustration (1) 204:25  
 im (52) 1:10 2:1,1 4:6  
 18:17 20:19 31:4  
 44:23 53:11 61:25  
 62:21 64:10 69:18  
 72:7 94:19 95:15  
 96:19 97:11 104:24  
 107:17 114:16  
 121:7,22 122:22 124:1  
 131:19 132:7  
 140:2,6,6,13 141:12  
 142:18 143:1 153:8,23  
 154:4,13,16 156:14  
 157:5 175:14 179:16  
 195:14 196:18 197:8  
 199:2 214:8 219:7,15  
 220:3,4  
 image (4) 55:1 58:3,6  
 65:4

images (3) 68:15 87:8  
 187:7  
 imagine (9) 72:3 105:1  
 112:13 129:9 158:2  
 159:9 208:11 213:20  
 215:21  
 immediate (1) 2:7  
 immediately (2) 59:24  
 171:20  
 implications (1) 67:11  
 implicitly (4) 32:13  
 61:18 88:22 173:9  
 imply (1) 67:5  
 importance (6) 56:24  
 112:23 136:22 179:4  
 194:18 200:17  
 important (12) 31:16  
 51:21 53:22 57:12  
 66:25 67:7 96:3  
 106:24 179:5,9,10,12  
 impression (7) 18:7,8  
 26:16 57:11 64:12  
 66:22 136:4  
 impressions (1) 114:13  
 inadvertently (1) 137:3  
 incentive (1) 72:13  
 incentives (2) 72:5,15  
 include (5) 6:10 7:22  
 10:23 71:7 174:5  
 included (4) 39:9 59:18  
 92:6 93:9  
 includes (1) 79:5  
 including (12) 36:1  
 90:2,12 92:25 112:21  
 136:19 176:2 192:17  
 205:7,19 206:7,21  
 income (1) 196:22  
 incoming (1) 8:11  
 incomplete (2) 216:4,15  
 incorporated (2) 61:1  
 114:4  
 incorporating (3) 56:5  
 148:5,7  
 incorrect (1) 207:10  
 increase (1) 56:21  
 incurred (1) 73:2  
 independently (1) 134:8  
 index (1) 222:2  
 indicate (3) 56:23 70:4  
 204:23  
 indicated (1) 124:15  
 indicative (1) 133:25  
 individual (4) 52:3 59:1  
 111:25 115:3  
 industry (12) 5:24 13:13  
 17:5 54:9 55:10 89:22  
 114:22 129:25 147:1  
 149:11 182:9 183:2  
 inevitable (1) 89:2  
 infer (1) 39:1  
 influence (4) 50:8 196:6  
 197:3,6  
 influencer (8) 77:2,25  
 78:19 80:10  
 86:12,15,25 87:20  
 influencers (6) 78:18  
 79:4 81:12 82:18  
 88:11 93:1  
 info (2) 128:25 198:8  
 information (4) 155:25  
 157:18 159:11 166:23  
 information (45) 38:8  
 40:19 50:15 54:12

59:3,13 65:8,23 66:6,9  
 70:18 75:15 87:6,8  
 88:1 89:13,19 92:14  
 114:23 127:1 128:3  
 130:17 138:11 140:20  
 150:2 161:10,15 164:1  
 176:19 179:16,19  
 191:20,24,25 192:9,13  
 193:21 196:9,16 197:6  
 200:15 203:18  
 217:13,16 218:21  
 informed (2) 142:6  
 176:8  
 informing (2) 166:11  
 167:10  
 inherent (1) 50:24  
 inhouse (1) 23:21  
 initial (4) 11:17 24:13  
 37:13 167:10  
 initially (3) 38:8 87:1  
 94:5  
 initials (2) 47:24 177:4  
 ink (1) 133:10  
 inner (3) 115:23 117:5  
 119:19  
 innovate (1) 106:18  
 innovation (1) 15:24  
 input (5) 43:10 145:7  
 155:24 171:22,24  
 inq00014100 (1) 107:9  
 inquiry (6) 1:21,23  
 40:24 53:18 100:13  
 222:4  
 insist (1) 127:5  
 inspectors (1) 12:3  
 install (1) 115:5  
 installed (2) 128:12  
 165:4  
 installers (2) 7:18 71:16  
 instance (5) 23:9 54:20  
 72:4 79:3 112:23  
 instead (3) 10:13  
 116:24 187:20  
 instigate (1) 10:9  
 institute (2) 64:4,20  
 instructed (1) 73:11  
 insufficient (1) 130:13  
 insulant (1) 30:10  
 insulants (4) 12:22 39:5  
 54:18,20  
 insulated (3) 52:24  
 103:2 166:14  
 insulation (57) 1:7 7:16  
 13:7,11,18,19 14:5,6  
 16:1,8 21:10 27:20  
 30:24 34:3,22  
 35:9,23,25 43:22  
 58:21,24 61:5,11  
 71:17,22 76:18,24  
 78:13,25 80:3,8,23  
 84:25 103:1,8 114:17  
 118:13 139:2,24  
 140:18,22 145:1  
 152:8,14 159:25 160:3  
 164:13 165:15 170:13  
 184:18 185:6  
 186:6,12,15 204:18  
 206:3 209:5  
 insurer (2) 77:4 79:5  
 insurers (3) 79:10,15  
 109:7  
 intelligence (3) 54:8,13  
 81:5

intended (3) 21:8 64:16  
 101:1  
 intention (2) 43:2 180:1  
 interacting (1) 38:11  
 interchangeability (1)  
 42:7  
 interchangeable (2)  
 41:10,12  
 interest (2) 10:9 196:17  
 interested (2) 144:13  
 196:18  
 interesting (1) 127:24  
 interestingly (1) 137:7  
 internal (3) 44:5 91:6  
 211:2  
 internally (3) 118:19  
 187:10 211:7  
 international (1) 118:25  
 interpretation (2)  
 137:16 145:3  
 interrupt (1) 44:25  
 into (19) 43:10 74:20  
 75:11 88:4 129:25  
 133:10 135:18 136:7  
 139:18 144:3,19  
 166:16 173:14 179:24  
 195:22 196:23,24,24  
 207:24  
 introduced (1) 20:23  
 introduction (7) 13:10  
 15:20 21:10 23:8  
 90:18 102:23 187:6  
 128:11,24,25 209:8  
 invest (3) 85:16 86:3  
 92:21  
 invested (1) 136:5  
 investigate (2)  
 128:22,23  
 investigation (3) 62:22  
 63:5,6  
 investing (1) 142:11  
 investment (15) 81:21  
 84:19,20 85:12,24  
 88:16 92:11,24  
 134:20,25  
 135:2,3,8,11 142:25  
 invite (1) 45:6  
 involve (4) 37:25 70:14  
 71:4 144:24  
 involved (18) 6:8 9:11  
 23:9 38:12 43:7,9  
 47:1,3,5 74:13 75:14  
 88:10 105:16 148:17  
 162:13 189:1 196:12  
 207:25  
 involvement (2) 14:16  
 43:13  
 involving (3) 10:19  
 89:20 136:25  
 irvine (1) 53:17  
 isnt (20) 47:22 58:16  
 80:20 82:15 99:10  
 102:3 103:20 106:12  
 140:25 141:3 165:17  
 170:3 177:14,16 194:2  
 207:10,21 212:18  
 214:1 217:1  
 issues (3) 38:22 127:25  
 181:23  
 item (3) 47:20 68:2  
 135:19  
 its (147) 3:1,14 7:16  
 8:22 11:6 13:2 15:1,3  
 17:3 18:7,12,13 23:6

24:22 30:11 33:1  
 34:11,15 36:7,18,22  
 38:5 41:2,4,22,23,24  
 42:8 43:10 47:22  
 49:13 51:10 52:3  
 53:4,7 57:7,20  
 58:17,18 61:7 63:8  
 64:10 65:1,21,22 66:9  
 68:18,25 69:4,20 72:7  
 74:10 80:1,19,19  
 82:15,25 83:15 84:23  
 85:5 86:8,17 89:8  
 90:7,23 101:24  
 102:3,14,14,15 103:19  
 104:14,24 105:1,4,24  
 106:14 107:11,21  
 108:19 115:18 116:23  
 117:6,17 118:15,16  
 127:15 129:13 130:3  
 131:20 136:8 138:6,7  
 140:25 142:6,14  
 143:24 144:3 153:3,13  
 157:4,7 160:24  
 161:17,20 162:17  
 163:17 166:8,25  
 167:24 168:2,3 171:15  
 172:1 176:17 178:14  
 181:11,17 182:13,22  
 185:17 187:8 189:9  
 194:24,25 195:6,6  
 196:17 197:1 198:23  
 200:24 205:17,18  
 208:11,24,25 209:8  
 210:11,15 211:13  
 214:13,14,18,21 216:3  
 217:19 219:17  
 itself (4) 38:15 50:24  
 73:4 204:15  
 ive (22) 16:14 42:3  
 44:18 52:10 67:16  
 75:25 84:8 106:2  
 107:14 113:9 114:15  
 140:15 154:9 158:14  
 159:10 161:20 166:4  
 186:21 197:17 200:23  
 207:7 218:10

J

jamie (3) 9:3,7,8  
 january (10) 15:3  
 115:13 134:18  
 136:15,18 151:13  
 154:24,25 156:5,13  
 job (5) 7:1,6 118:24  
 119:25 175:15  
 jobs (2) 111:13 120:3  
 john (1) 169:9  
 join (2) 6:20 45:7  
 joined (13) 4:7,9,13,15  
 5:10,17 6:14 7:6 15:4  
 20:11 21:13 23:7 31:7  
 joining (1) 151:6  
 joint (1) 127:23  
 joints (1) 21:9  
 jon (35) 24:1 28:20  
 44:13 47:13,22  
 48:2,4,17 75:20 90:12  
 93:6,10,14 96:10,24  
 106:8 108:19 113:6  
 127:15 132:25 133:4,9  
 134:8,12 136:20  
 172:13,16,23 202:4  
 214:4,6,8 215:15  
 218:9,15

jonathan (15) 1:11,13  
 24:1,4 46:7 63:11  
 107:24 118:20 119:6  
 121:23 172:11 190:10  
 214:5,8 222:3  
 jones (5) 143:21,24  
 149:10,21 211:8  
 journals (1) 68:16  
 jr (2) 47:21,22  
 july (3) 181:3,17 204:23  
 jump (1) 211:24  
 jumps (2) 212:10  
 217:12  
 june (9) 36:20 38:18  
 91:10 157:8 158:12,17  
 159:13 162:9 205:1  
 justified (1) 92:23

K

k (4) 27:25 28:3,6 117:1  
 k12 (4) 115:25  
 116:12,23 117:4  
 k15 (31) 26:18  
 27:18,23,25 116:23  
 117:6 128:11 129:12  
 131:3 134:23  
 135:5,6,14 136:6,21  
 137:1,11 138:22  
 152:17,21 153:16,20  
 154:2 156:22 157:13  
 159:23 160:3  
 163:3,11,15,21  
 keen (1) 124:1  
 keep (8) 2:6 67:7 74:4  
 122:10 131:2  
 174:19,21 194:20  
 kept (2) 175:9 194:20  
 key (5) 7:17 38:22  
 52:17 86:6 210:25  
 kind (4) 64:10,12 193:2  
 197:25  
 kindly (1) 124:10  
 kinds (2) 9:14 108:9  
 kingdom (1) 42:21  
 kingspan (44) 26:18  
 27:11,15,18,19,23  
 28:1,7 115:25  
 116:12,23 120:4 121:6  
 127:10,25 128:5,7  
 129:7,15 131:2,6  
 134:22 135:4,9,14  
 136:5 137:1,4,6,19  
 138:4,8,10,16  
 141:14,21 152:17  
 153:16,24 157:13  
 159:23 160:3 163:3,15  
 kingspantype (1) 81:7  
 knew (25) 19:24,25  
 20:5,5 23:21 30:23  
 32:13 36:13,14 39:3  
 70:8 104:24 113:2  
 143:14 145:16 153:23  
 159:25 160:11 170:6,7  
 171:1,10 174:19  
 198:23 208:21  
 knockon (1) 83:8  
 know (115) 2:3 3:3 8:23  
 14:14 15:4 17:11 18:2  
 19:18,22 20:2,11 25:5  
 26:20 36:10 38:6  
 40:16 43:11 46:2,22  
 49:20 50:3 54:2,5  
 55:2,18 58:18 60:24

66:13 67:9 72:1,16  
 74:5,10,11 81:2,7,19  
 82:19 87:2 90:21 92:8  
 93:3 96:20 107:13  
 109:11 110:20,20,24  
 111:25 114:19,24  
 116:17 121:11  
 129:6,21 131:9,17  
 133:16,18 137:9 138:7  
 142:12 143:17  
 149:13,20 150:1  
 151:10 153:1,10,23  
 154:4,7 155:13,17  
 156:11 157:16  
 158:17,19,23,24  
 159:22 160:6,9,15  
 161:20 164:19  
 166:3,5,19  
 171:17,21,22  
 172:17,21  
 174:15,17,21 176:15  
 178:1 182:24 185:1,4  
 188:19 189:10 190:16  
 191:16 195:10 207:23  
 208:21 213:14,18  
 214:11,12 215:2  
 219:12  
 knowing (2) 208:21  
 216:17  
 knowledge (22) 6:13  
 12:12 37:22 43:13  
 44:4,22 58:17  
 66:5,8,12 73:21 81:16  
 89:22 92:9 114:15,18  
 115:9 149:22 159:19  
 174:21 179:18 193:17  
 knowledgeable (6)  
 17:23 35:3 88:11 89:6  
 149:10 216:9  
 known (10) 29:11 31:9  
 38:19 54:4,5,23 61:7  
 93:4 103:24 159:16  
 knows (2) 45:2 172:13  
 knowsley (1) 53:15  
 kootherm (7) 26:18,20  
 28:3 117:1,2 136:21  
 138:22

L

l (1) 13:10  
 labc (10) 201:13,21,22  
 202:2,6,9,14  
 203:10,14 207:23  
 labcs (1) 204:16  
 laboratory (1) 17:9  
 lack (3) 82:11 89:8,21  
 lacking (1) 115:23  
 lady (1) 168:18  
 laid (1) 82:20  
 lake (2) 192:21 193:10  
 lamatherm (1) 59:21  
 lambda (7) 14:10 22:25  
 23:3,6,17,17 26:9  
 language (1) 3:25  
 large (7) 84:20 120:3  
 136:18 157:5 160:23  
 162:17 217:8  
 larger (5) 57:7 88:9  
 89:3 194:7 196:22  
 largest (2) 27:20 194:25  
 last (35) 6:17 18:6  
 28:25 33:1 45:12,12  
 53:19 64:3 67:21 73:1



88:24 92:10,23 93:1	134:6,7	likely (12) 10:25 11:6	126:11,15,23	113:24 133:11 141:3	mark (13) 134:17	101:25 117:15 124:20
97:13 101:19 106:2,4	left (12) 49:3 55:19	22:8 33:20 34:15	127:15,20 129:17	146:20 161:17 167:13	157:8,24 158:6,7	130:20 164:13
113:5 120:25 123:24	87:9 107:14,21 151:3	49:13 81:16 82:2	157:17 160:17 182:25	199:20 210:17	160:24 161:11,22	165:1,9,10 175:25
126:14 144:5 145:23	156:4,12 181:24	117:8 158:6 216:2	long (6) 15:23 35:14,15	loop (1) 122:10	162:4,20 181:11	185:5,6 186:4,12
152:19 153:13 155:8	211:12,18 212:15	218:14	48:13 85:22 219:17	loss (2) 14:1,3	190:24 191:7	189:4 196:7 205:22,25
161:8 162:3 181:17,18	lefthand (13) 21:18	likes (3) 112:23 149:11	longer (4) 42:12,13	lost (1) 14:2	market (49) 13:18 16:1	materials (29) 5:15
187:11 198:15 203:22	65:6 71:14 72:17	193:13	214:24 220:1	lot (15) 70:15 74:8	20:6 30:20 38:12	21:3,10,20 33:22
220:1	97:17 98:17 161:3,23	limitation (1) 206:8	longish (1) 108:7	75:12 131:8 155:23	42:10,21 43:1 54:8,13	37:14 39:14 54:6,17
late (7) 14:21 25:19	162:19 181:10 186:4	limitations (4)	look (146) 3:22 6:16	158:7 183:8,10,11	61:18 63:15 67:23	55:6 65:9,24 80:8
26:16 43:21 64:22	209:23 212:23	205:6,14,15 206:5	7:12,15 8:21,23	184:13 185:3,4,5	68:23 71:12 73:21	83:19 85:7 93:18
146:20 209:16	legislative (2) 49:2,8	limited (25) 19:23	14:22,25 15:2,8,10,19	187:8 219:24	74:17,20 75:25	104:13 107:6 109:8
later (34) 24:18 28:2	less (10) 81:15 82:1	29:20,22 30:3,25	16:6,13,17,18 17:13	louise (1) 9:6	77:12,22 81:5,20 82:6	122:18 144:7,21
40:18 45:16,18 54:14	83:2,18,19,20,20,21	34:23 36:2,12 39:6,14	21:2,17 23:11	low (2) 50:7,19	84:25 86:7 88:15 89:3	183:10 184:15 185:9
63:11,11,20 70:12	132:17 194:18	41:5,16,24 42:6,22	24:20,22,23 25:11	lower (1) 103:6	90:4 92:16 105:23	186:7,15 189:1 198:25
72:11 81:20 86:21	let (16) 2:3 3:3 41:22	50:12,18 76:9,18	26:2 28:19 32:13,16	lowrise (3) 79:23 84:9	114:16 130:17	materialsproducts (1)
87:16 88:19 95:9	74:5 90:21 99:25	78:12 95:19 143:15	33:5,15 35:20 36:22	89:16	135:2,24 136:6 137:19	35:23
99:14 117:24 119:3,5	111:4 135:23 147:22	179:7 186:9,13	37:19,20,22 38:22	lpcb (1) 29:3	143:3 148:14,21	mathematics (1) 3:24
123:22 127:9 146:5	149:13 157:16 160:15	line (23) 41:2 44:10,11	40:7,8,23 41:1,13,20	ls (2) 68:4,4	153:21 156:22 162:13	matrix (1) 165:20
149:17 163:6,25 165:7	166:19 172:16 185:25	50:10,17 63:12 68:18	44:7 48:18 49:1 50:23	ltd (2) 165:3 209:5	163:18,19 184:7	matter (4) 65:20 117:4
172:10 179:24 182:3	200:21	102:25 124:11 132:13	51:11 58:10 59:10	lunch (2) 125:13 126:12	187:15 188:2 213:25	139:20 156:4
189:25 193:5,5 211:6	lets (38) 6:16 20:16	145:21 151:16 152:19	62:24 63:13 65:5,6		23:2 43:23 68:23	matthew (2) 138:17
latest (2) 25:20 105:10	21:2 24:20 26:2 32:22	154:6 161:23 173:14	69:1 74:22 75:23	<b>M</b>	69:23	140:12
latter (1) 87:9	47:8 48:18 53:10	184:13 191:23 198:18	76:15 80:22 83:23	magnesium (10) 58:20	marketing (55) 14:7	matthewdave (1)
latterly (3) 12:19 18:13	58:10 76:15 86:2	199:3 203:10 205:18	85:8 86:2 88:7 89:25	59:25 60:4,12,21	15:17 43:10 44:5,16	138:19
21:15	89:25 90:22 94:8	207:13	90:22 91:2,8,24,25	61:1,13 96:12 99:2	64:13,18 65:22 66:24	max00000216 (1) 14:25
launch (49) 21:15 22:9	97:13 98:15 101:6,12	linear (3) 95:18 189:2,6	92:2 94:8 95:6,21	104:10	67:7,14,16 68:3,9,10	maybe (11) 38:20 56:9
31:15,23 32:3 34:17	103:18 109:15 138:14	lines (4) 23:11 41:20	101:6 109:18 104:18	main (7) 7:18 78:20	69:19,25 71:24	68:9 74:11 108:10
35:3,7,7,12 36:6,7	149:18 165:11 172:8	182:10 190:5	106:2 107:9,23 109:15	80:11 81:12 118:10	72:12,20 74:12	69:19,25 71:24
37:4 38:9 40:20	181:8,18,20 202:1,2	link (1) 184:10	112:22 118:11 122:13	131:6 176:23	93:17,22 94:6,20	188:19 215:15,22
43:17,18 44:9,12,15	208:23 209:20	linked (1) 83:15	123:2 126:16 128:9	mainly (1) 125:3	100:8 101:1,2,25	mciait (1) 118:5
46:24 47:10,11	210:9,18 211:11,17	linkedin (1) 184:10	129:3 133:2 136:14	major (11) 7:7 13:18	102:1 104:13,19	mcnamara (1) 184:10
48:8,11 68:13 71:3	212:14 213:21	linklaters (1) 99:16	138:14 139:25 140:24	71:19,21 75:12,13,13	105:2,25 107:6 113:18	mean (44) 17:17 26:23
94:20,20 95:4 96:10	letter (10) 121:7	list (20) 77:7 78:24	141:4 143:20 144:21	121:24 123:23 124:3	114:8,12,20 115:7	29:10,19 30:2 36:7
101:4 104:21 105:6	124:12,16,24,25	79:4,16,18,19,20	148:25 152:23 154:21	126:13	117:15 131:15 134:11	37:11,18 41:24 46:16
108:16 110:19 134:10	128:14,17 129:7	80:23 81:15 99:7	155:4 157:7 159:4	makes (2) 66:21 70:1	165:1,9,10 168:4	54:18 63:6 67:18
135:10,21 136:3	205:1,2	123:23 183:5 192:24	160:25 161:2 162:15	144:9	171:11 175:12 188:6	68:14 70:19 72:1 75:2
159:17,18 165:15,17	letters (12) 74:6 120:6	194:25 195:18,24	164:23 165:13	making (3) 106:7,11	191:22 192:10,15	77:11 78:25 82:17
174:24 190:22,25	121:4 127:11 128:9,10	196:8,19 201:15	168:11,13 169:21	144:9	202:5 207:20	117:1 120:25 121:25
199:14 214:3	129:2,3,18 131:5,5,9	204:17	170:21 172:8 177:7	managed (2) 173:17	marketplace (2) 81:22	123:9 130:15 135:19
launched (12) 10:24	level (4) 35:25 59:22	listed (4) 94:7 98:6	181:5,8,20 182:4,16	199:15	85:15	142:1,24 149:25 154:9
24:17 26:8 37:17,17	96:15 186:8	164:7 195:13	185:16,18 186:4 190:2	management (22)	marking (2) 24:21,25	164:3 175:12
48:24 70:10 87:2	levels (2) 59:20,24	listening (1) 11:8	192:19,20 193:1 194:1	15:17 74:9 75:16	marks (2) 106:5 121:4	178:12,13 194:6
89:10 138:6 166:12	liability (1) 64:21	literally (5) 60:17 77:18	195:5 198:2,11 200:23	92:10 93:13,15 105:1	marley (11) 58:13	195:16 197:17 199:13
182:1	licence (1) 158:4	87:5 113:25 203:17	204:15 205:12 206:15	108:12 114:20 124:25	59:23,25 60:16,22	205:16,17 206:11
launching (2) 26:23	life (1) 60:25	literature (20) 3:25	208:23 209:1,20 210:7	130:2 131:12	96:16 98:20 99:3	208:8 215:12 219:23
38:17	lifted (1) 132:25	21:21 22:16 59:4,16	213:7 215:1	134:19,25 138:12	147:12 148:10,16	means (7) 13:24 34:25
lawyers (1) 99:15	light (9) 38:10 40:20	67:8,15,16 100:8	217:17,19,19 220:18	142:8 171:4,18,22,24	martin (47)	70:13 143:11 167:25
layer (3) 60:3 96:12,15	59:13 60:7 76:6 80:16	105:25 114:12 115:8	looked (14) 32:21 34:9	172:5 213:20	1:3,12,14,18	208:11 220:3
layers (3) 151:23 152:5	93:14 110:18 216:6	171:11 178:3	51:3 91:11 96:9	managementmarketing	2:17,20,24 44:25 45:9	meant (12) 19:11,11
210:25	lightbulbs (1) 71:13	191:17,19,22	100:20 106:1 133:1	(1) 116:19	56:12,14,17 61:23	28:11 29:15 39:16
layman (1) 92:15	lighter (1) 83:11	192:11,15 207:20	177:8,16 181:2 187:3	manager (12)	62:5,10,14,17 90:8	42:22 83:5 100:4
layout (1) 211:4	lighting (1) 4:10	little (26) 4:21 12:15	214:14 215:2	4:14,16,18 7:7 63:10	103:19,25 104:2,5,7	148:13 177:4 188:24
lead (8) 83:7 99:21	like (60) 1:15 9:18 10:5	16:2 18:22 23:12	looking (57) 3:6 4:14	106:9 151:3,4 165:6	121:19 125:11,17,24	203:11
102:8 103:12 143:5	14:3 15:12 18:16	53:10 56:9 57:25	6:24 9:9 19:4 22:25	172:23 183:15 216:25	126:1 140:2,8	meantime (1) 166:18
154:15 183:17 184:1	20:17 23:8 27:6,7	58:10,12 66:5 71:12	36:25 48:22 54:25	managing (1) 193:14	169:12,14	measure (1) 39:2
leaders (1) 183:2	34:14 45:25 50:16,23	72:21 74:22 75:23	57:13,21 60:8 65:1	manner (1) 152:6	180:5,12,19,22	mechanical (1) 4:16
leading (1) 75:5	56:12 59:9 62:6,24	99:25 103:6 108:15	67:3 74:11 76:14	mantra (2) 109:19	183:20,23	mechanisms (1) 37:21
learn (4) 40:18 124:1	65:18 69:20 70:16	141:25 172:9 181:8	77:7,25 78:24 88:24	207:20	219:17,20,23,25	medium (6) 33:20 50:19
137:25 155:23	72:17 73:4 81:7	192:25 199:2	89:13 100:9 105:15	mantric (1) 106:3	220:7,10,17,21 221:1	84:19 85:12,24 92:24
least (23) 12:18 20:20	82:4,20,20 83:4 88:6	lizzie (11) 44:15 47:14	106:4,16,18 109:7	manufacturer (4) 27:20	masonry (6) 94:14	meet (17) 13:14,16
32:13,15 36:10	92:20 93:6 98:18	68:5,6,6 213:24	110:11 111:8 112:18	118:13 128:17 176:3	132:18,21 134:5	27:13 33:25 34:1,25
39:13,17 42:20 65:19	104:18 107:11 113:24	214:22 215:7,8,16	113:7 116:3,18	manufacturers (7) 1:6	206:21,23	39:6 40:4 52:22 63:15
86:3 110:22 113:2	124:15 125:18 126:22	216:23	117:17,18 119:4	21:22 24:7 64:21	master (1) 196:24	103:1 149:19 155:1,21
115:7 117:13 120:9	144:9,11,20 148:25	load (1) 151:22	120:23 123:9,12 134:7	144:11 188:5 196:11	matches (1) 119:19	166:13 182:3 203:5
130:4 135:8 146:20	154:21 161:17	loadbearing (1) 153:5	135:19 141:23 142:24	manufactures (1) 112:1	mate (1) 133:5	meeting (63) 39:8
163:16 196:4 197:24	166:16,18 173:14	local (1) 12:5	144:19 152:12 153:18	manufacturing (1)	material (39) 12:17	63:8,10,13,16,23,24
208:15 212:17	174:19 180:12 182:8	logic (1) 65:20	158:8,10 167:21 170:2	12:13	19:22 21:24 23:23	74:3 90:14
leave (3) 6:25 62:1	189:8 190:4 191:4	logo (3) 71:17,19	171:18 199:13 205:17	many (4) 61:17 73:14	29:20 30:24,25 34:23	93:20,21,23
192:7	192:19 194:17 208:25	185:21	207:7,12 208:14,17	162:12 174:25	35:9,25 40:12 43:10	94:16,20,23
leaving (1) 64:7	209:21 220:18	london (18) 4:17 7:19	looks (18) 27:5,7 50:16	march (10) 4:15 5:17	44:6 56:1 67:11	95:2,9,12,14 96:10
led (10) 6:20 13:11	likelihood (2) 82:24	75:12 88:8 89:3,12	72:17 73:4 87:17,23	6:20 15:5 31:6 36:4	72:10,11 83:3 87:14	99:15 122:10,12
96:25 97:4 108:9	83:14	118:6,23 120:3	98:9 104:16 107:11	40:17 107:12	93:22 95:19 96:17	126:16 127:18,23
112:24,24 133:23				185:14,19		146:2,3,5,17 151:18

154:7,8,24 155:9  
 156:6 164:2,4,8,25  
 167:24 173:1 181:21  
 182:6,7,12,16,22,25  
 184:5,17  
 187:4,12,16,18,22  
 189:25 190:14,15,16  
 191:6 193:15 199:8  
**meetings (2)** 190:15  
 191:6  
**meets (5)** 97:24 99:19  
 105:12 206:25 207:15  
**members (8)** 23:10  
 181:21 182:6,12,22,25  
 193:16 199:16  
**memo (1)** 64:21  
**memorable (1)** 65:1  
**memory (5)** 8:21 15:13  
 37:1 45:5 74:18  
**memories (1)** 158:13  
**mention (5)** 96:11,15  
 104:9 160:19 177:18  
**mentioned (7)** 56:7  
 144:8 155:7 181:3  
 184:3 192:2 199:8  
**merchants (1)** 71:18  
**merit (11)** 157:6  
 159:4,7 160:25 162:17  
 163:1 164:7,8 181:9  
 182:2 199:7  
**message (1)** 218:7  
**met (16)** 16:23 20:2  
 39:21 74:9 110:4  
 113:13,15,21 138:24  
 144:5 145:23 159:2  
 163:1 172:12 174:18  
 181:21  
**metal (5)** 55:22 61:9  
 119:22 133:24 150:19  
**method (1)** 21:9  
**methods (1)** 134:1  
**metre (1)** 204:21  
**metres (91)** 11:10,16  
 20:9,15 30:9 31:2  
 32:18 34:12,22  
 35:10,15 37:8 39:19  
 40:12 42:15 43:23  
 48:23 53:5,8 69:21  
 72:24,24,25  
 79:3,23,24 80:15,17  
 81:2,3,25 85:1  
 97:17,22 98:1 99:21  
 100:2,7,15  
 101:10,14,21 102:4,10  
 103:4,14 104:15  
 105:14 106:8,12,15  
 109:20 110:6 130:6  
 131:4 143:7 147:20  
 152:21,24  
 153:1,11,16,19 154:2  
 159:8,15 160:4 164:16  
 168:1 171:3 174:2  
 177:13,19 178:21  
 179:8 184:18  
 191:8,11,15 200:4,10  
 203:4,8,16,25 204:6  
 205:7,20 206:7,17  
 207:11  
**metresbelow (1)** 80:17  
**metsec (1)** 61:9  
**metsectype (1)** 150:20  
**michael (6)** 169:8,19,23  
 170:2,12 172:13

**midafternoon (1)** 2:5  
**midaugust (1)** 216:13  
**middle (12)** 49:4 57:7  
 71:13 82:21 85:24  
 96:7 98:17 156:5,13  
 170:11 186:25 219:1  
**midjan (1)** 156:15  
**midjanuary (2)** 138:1  
 143:2  
**midmorning (1)** 2:4  
**midtopic (1)** 219:14  
**might (32)** 7:25 8:21  
 14:22 15:11 24:12  
 43:1,24 61:11 73:5  
 78:25 79:1 81:1 88:4  
 99:21 100:5 103:12  
 112:25 128:21 129:5  
 143:6 147:21 154:1  
 158:3 167:17 169:14  
 172:4 176:18 179:23  
 196:17 200:5 219:16  
 220:1  
**millett (41)**  
 1:9,10,19,20,22  
 2:21,22 3:2 44:23  
 45:1,10,11 56:8,13,18  
 61:20 62:18,19 90:11  
 104:6,8 121:15,20  
 125:9 126:2,3  
 140:3,6,11  
 169:12,13,16  
 180:4,23,24 183:22,25  
 219:14,19 220:23,25  
**millimetres (8)**  
 60:3,11,15,22 96:12  
 99:2,2 104:9  
**milward (5)** 127:14  
 151:3,15 154:12,23  
**mind (5)** 66:17 67:7  
 95:17 206:10 211:16  
**mindset (1)** 35:13  
**mine (1)** 217:2  
**mineral (3)** 83:4 84:1  
 186:14  
**minor (1)** 139:8  
**minute (4)** 151:24,24  
 193:5,5  
**minutes (6)** 25:3 45:4  
 56:9,15 97:13 152:5  
**misleading (23)** 66:22  
 69:14,14 99:10  
 102:12,15,16,17  
 103:12 104:14 106:12  
 110:9 114:3,7,12  
 168:8 204:7,9,13  
 207:19 208:4,16,18  
**misleadingly (2)** 67:5  
 106:23  
**missed (1)** 182:1  
**missing (7)** 106:24  
 211:25 212:1,9 217:11  
 218:4,24  
**mistake (1)** 117:6  
**mix (2)** 11:1 183:8  
**mm (1)** 219:22  
**modern (3)** 61:11  
 133:25 185:6  
**modification (1)** 181:19  
**modified (2)** 162:4  
 181:17  
**moment (12)** 33:12  
 61:21 80:14 87:17  
 111:6 125:10 168:12

177:8 180:4 198:10  
 215:3 219:16  
**money (1)** 181:24  
**month (5)** 74:10 108:15  
 118:1 168:15 199:15  
**monthend (2)** 62:23  
 126:5  
**monthly (1)** 193:15  
**months (5)** 108:16  
 123:24 136:1  
 159:17,18  
**moorebick (47)**  
 1:3,12,14,18  
 2:17,20,24 44:25 45:9  
 56:12,14,17 61:23  
 62:5,10,14,17 90:8  
 103:19,25 104:2,5,7  
 121:19 125:11,17,24  
 126:1 140:2,8  
 169:12,14  
 180:5,12,19,22  
 183:20,23  
 219:17,20,23,25  
 220:7,10,17,21 221:1  
**more (70)** 4:21 8:24  
 12:5 17:11 18:22  
 20:24 26:24 31:16,25  
 32:4 34:15,16  
 35:2,3,4,24 42:13 44:9  
 56:10 57:12,25  
 58:10,12 75:23 76:16  
 79:21,22 80:19  
 81:16,19,24 82:2  
 83:2,11,17 85:19 87:8  
 88:19 92:12,14 105:24  
 118:16 122:2 124:18  
 130:9,14 131:8 132:16  
 133:25 134:1  
 141:20,25 142:2  
 156:17 163:9 172:14  
 175:9 181:8,16 184:9  
 186:8 188:13,17,23  
 189:16 191:25 197:24  
 205:20 219:25 220:4  
**morning (12)** 1:3,10,22  
 24:6 47:12 52:11  
 91:11 167:23 187:23  
 192:23 213:25 220:12  
**most (14)** 1:7 22:8  
 89:3,12 120:2 124:2  
 137:7 138:21 149:10  
 183:13 186:25 187:2  
 195:17,20  
**mostly (1)** 8:12  
**move (3)** 69:24 149:7  
 216:19  
**much (27)** 1:14,23 3:2  
 12:12 23:19,20 32:15  
 45:9,18 62:5 99:14  
 109:16 119:5,5 120:5  
 125:17 126:1 135:17  
 143:14 161:17  
 180:6,12,22 181:7  
 208:20 220:17,23  
**multi (1)** 34:3  
**must (31)** 2:20 25:12  
 48:12 58:7 65:9  
 105:22 112:13 122:3  
 137:15 139:5,6 148:3  
 150:3,4 159:13,16,19  
 182:13 190:21 192:24  
 196:3 198:20 202:20  
 205:9,13 213:14,19

214:8 215:13 216:5  
 218:23  
**mustntwin (1)** 194:17  
**mustwin (17)** 193:19  
 194:5,6,8,10,15,21  
 195:17,23,24  
 196:3,8,18,19  
 197:1,9,23  
**myself (13)** 32:10 38:8  
 67:18 85:20 92:15  
 97:8 132:24 146:18  
 172:23 176:20 178:4,4  
 209:13  


---

**N**

---

**naked (1)** 212:18  
**name (9)** 3:11 9:6  
 126:8 141:3 158:2,7  
 162:19 181:9 213:24  
**named (1)** 164:3  
**namely (5)** 6:18 8:12  
 59:21 69:10 148:4  
**names (1)** 67:4  
**national (4)** 4:1,13  
 40:13 49:17  
**natura (4)** 58:13 96:16  
 147:12 148:16  
**nature (3)** 29:16,17  
 54:13  
**nb (2)** 183:18 184:2  
**nbs (4)** 175:19 176:1,7  
 199:23  
**nearly (3)** 184:8  
 188:12,15  
**necessarily (2)** 10:8  
 197:12  
**necessary (4)** 134:24  
 176:3 214:20 217:19  
**need (34)** 2:3 13:8,16  
 15:10 16:17 23:2 32:4  
 34:6 36:22 83:7  
 90:7,21 98:6 111:12  
 112:4,15 119:11  
 122:13 123:3  
 127:21,21 139:18  
 141:20,21 143:21  
 149:9 155:6 169:20  
 174:14 199:21 211:13  
 214:17 215:10 217:9  
**needed (23)** 8:14 11:22  
 15:7 23:15 32:8  
 35:5,16 75:16 81:21  
 83:2 86:23 88:15  
 89:20 92:11 130:9  
 135:3,12 141:19  
 142:2,11 146:22  
 157:15 216:1  
**needs (3)** 119:24  
 157:22 205:22  
**negative (1)** 79:12  
**neither (1)** 111:24  
**never (14)** 5:4 18:12  
 29:23 67:16,22 114:3  
 127:2 142:22,25 145:8  
 149:22 197:14 201:7  
 211:16  
**newer (1)** 150:25  
**newest (1)** 195:3  
**news (1)** 118:25  
**next (30)** 7:13 24:23  
 25:16 44:2,24 45:16  
 48:7 51:2 52:20  
 53:15,16 76:4 83:23

84:18,18 92:5 94:10  
 101:12,16 104:6  
 127:22 128:4 132:12  
 134:17 135:19  
 144:17,20 145:9 156:2  
 181:1  
**nhbc (29)** 109:24  
 110:13,15 111:1,13,21  
 112:5,7,14,17 113:1  
 115:17  
 122:14,15,20,22  
 123:4,5,6,10,13  
 124:10,12,23 125:5  
 127:24 128:18 138:17  
 139:7  
**nhbcs (1)** 123:15  
**nice (1)** 197:20  
**nicholls (1)** 47:15  
**nobody (2)** 38:1 60:10  
**non (4)** 50:18 76:18  
 185:1 186:15  
**noncombustibility (1)**  
 50:12  
**noncombustible (17)**  
 37:14,24 41:16 83:3  
 85:6 98:23 128:12  
 137:15 144:25 183:10  
 184:15,18 185:6,9  
 189:3 207:3 208:3  
**noncompliant (1)** 124:7  
**nonlinear (1)** 208:12  
**nor (1)** 195:7  
**northern (1)** 47:15  
**note (17)** 21:4,12  
 36:17,19 37:2 38:2  
 41:4,5 91:10 101:13  
 124:14 139:9 166:22  
 185:13,18 202:11  
 216:21  
**noted (1)** 218:3  
**notes (3)** 206:19 207:8  
 208:14  
**nothing (8)** 2:15,19  
 55:24 84:19,23 119:11  
 137:14 164:21  
**notice (2)** 214:23 215:4  
**noticed (1)** 213:4  
**noting (1)** 186:16  
**november (12)** 1:1  
 62:24 63:18 143:25  
 146:21 149:2 184:6  
 187:13 192:22 194:4  
 205:2 221:4  
**number (18)** 90:11  
 102:22 110:25 114:10  
 136:18 167:23 169:1  
 173:24 176:24 184:20  
 185:14 194:24  
 195:1,16,17,24 205:3  
 209:7  
**numbered (1)** 210:4  
**numbers (1)** 204:20  
**nutshell (3)** 37:24 40:10  
 148:13  


---

**O**

---

**o (8)** 17:5,6 19:15 27:11  
 28:16 30:8 147:19  
 207:5  
**objection (1)** 175:24  
**observations (1)** 211:5  
**observe (2)** 45:4,7  
**obtain (2)** 25:12,22

**obtained (1)** 176:18  
**obvious (3)** 82:15  
 147:1,1  
**obviously (2)** 120:4  
 126:20  
**occasion (4)** 16:13 94:2  
 174:8 200:21  
**occasions (1)** 174:9  
**occupation (1)** 4:4  
**occur (5)** 114:11 179:11  
 203:25 204:11,14  
**oclass (1)** 23:14  
**oclock (4)** 47:12,13  
 220:12,23  
**october (12)** 63:23  
 111:7 112:9,12  
 115:12,16 135:17  
 181:18 182:3,19  
 185:12 186:18  
**offer (3)** 73:11 116:1,13  
**offered (2)** 9:17,18  
**offering (3)** 16:1 128:8  
 131:3  
**office (12)** 156:2  
 163:8,10,11  
 166:9,9,16 168:22  
 173:14 176:23 178:5  
 199:10  
**officer (1)** 59:9  
**officers (2)** 12:1 78:6  
**offices (5)** 10:1 173:23  
 174:12 190:11,18  
**official (1)** 49:23  
**offing (1)** 93:25  
**often (4)** 15:12 17:6  
 70:15 193:8  
**oh (2)** 141:8 166:8  
**okay (15)** 3:8 14:24  
 44:1 62:4 63:21 64:7  
 65:19 90:9 111:4  
 125:16 140:10 141:8  
 158:16 214:16,19  
**once (7)** 20:5 37:16  
 157:18 159:10 163:11  
 166:23 172:16  
**onepage (1)** 70:16  
**onesizefitsall (1)** 189:21  
**onesizefitsone (1)**  
 189:22  
**ongoing (4)** 15:24  
 118:24 122:16 193:19  
**online (3)** 107:10  
 205:10,23  
**onsite (1)** 167:3  
**onto (3)** 120:4 128:12  
 132:21  
**onwards (1)** 39:17  
**open (2)** 33:5,8  
**opened (1)** 178:16  
**opinion (15)** 92:9  
 100:13 121:23 124:4  
 128:8,11,15  
 129:2,7,12 131:5,9  
 183:8,9 184:14  
**opportunities (1)** 122:4  
**opportunity (2)** 15:9  
 94:23  
**opposed (10)** 19:18  
 38:14 46:1 83:4  
 131:25 147:11 194:16  
 196:4,20 199:22  
**option (4)** 112:19 144:6  
 146:9 150:4

**options (4)** 146:16  
 147:3 155:3 189:4  
**oral (2)** 40:24 174:11  
**orange (1)** 79:20  
**order (23)** 13:14 15:10  
 16:18 25:21 31:2 32:8  
 73:8 86:24 127:6  
 135:12 148:21  
 194:11,13,14,23  
 195:1,6,7,7,8,10 197:4  
 199:21  
**organogram (1)** 8:18  
**original (2)** 170:18  
 212:24  
**originally (6)** 14:12 46:4  
 91:20 92:5 164:13  
 189:5  
**originated (1)** 63:22  
**osullivan (2)** 59:8 60:13  
**others (6)** 107:21,25  
 118:9 120:1 156:16  
 179:20  
**otherwise (2)** 66:1  
 152:16  
**ought (1)** 41:2  
**ours (1)** 119:19  
**outer (3)** 59:22 115:24  
 117:5  
**outlaw (1)** 84:25  
**outline (1)** 85:18  
**outside (3)** 41:23 139:6  
 147:1  
**over (58)** 4:11 10:10  
 15:13 20:9 26:4,23  
 31:19 39:25 40:11  
 49:13 63:11 76:4  
 102:4,10 111:18  
 118:14 125:15 127:12  
 128:5 135:16,17  
 136:23 137:2,24  
 141:16 143:7,13  
 144:18,23 145:9  
 147:5,6 152:18  
 153:16,19,21 154:2  
 157:14 159:6,8 164:16  
 167:22 170:17 171:3  
 174:2 177:13,19  
 178:21 192:10 198:9  
 209:9,18 210:22  
 211:8,16,23 212:6,11  
**overlad (3)** 157:17  
 160:16 161:7  
**overnight (2)** 214:20  
 220:14  
**overview (4)** 44:14  
 47:21 63:2 126:14  
**own (3)** 75:18 171:11  
 174:21  
**owned (1)** 193:13  
**owner (1)** 158:21  
**oxide (10)** 58:20 59:25  
 60:4,12,21 61:1,13  
 96:12 99:2 104:10  


---

**P**

---

**pack (5)** 56:19 71:10  
 72:12,22 101:4  
**package (1)** 28:14  
**padding (1)** 128:15  
**pages (11)** 53:11 102:8  
 209:9,18 210:12,18,20  
 212:15 217:11  
 218:4,24

<b>paid (1)</b> 155:7	196:16 213:5	<b>performed (5)</b> 23:14	28:19,25 33:11 36:16	<b>precisely (3)</b> 46:18	<b>problem (9)</b> 2:23 86:16	193:18 196:11
<b>panel (11)</b> 58:13,18	<b>party (2)</b> 18:4 115:23	121:13 131:8 152:9	40:25 43:5 47:9 48:7	192:14 210:14	87:22,23 88:3 89:14	197:4,15,16
59:23,23,25 60:22	<b>pass (10)</b> 25:21	171:8	49:15 53:10 56:19	<b>predominant (1)</b> 69:22	116:22 117:16 120:2	<b>productspecification</b>
61:16,16 148:2,6,21	46:10,11,13 77:16	<b>performing (1)</b> 152:13	57:15 59:10	<b>predominantly (1)</b> 8:16	<b>problems (2)</b> 109:3	<b>(1)</b> 7:7
<b>panels (21)</b> 13:7 54:18	93:22 134:5 139:15	<b>perhaps (12)</b> 23:2 57:24	62:1,6,10,20,24 64:19	<b>premium (5)</b> 15:21	153:21	<b>professional (8)</b> 5:2,11
55:22,23 56:4 60:1	170:21 187:7	107:21 108:15 116:23	68:12 73:22 74:2	101:9 105:6 106:21	<b>procedure (1)</b> 92:16	11:23 128:8 129:1,7
61:17,19 98:20 99:3	<b>passages (1)</b> 42:3	122:24,24 131:18	84:18 90:17,21 93:19	165:20	<b>proceed (1)</b> 20:19	131:5,9
119:22 145:2,4 146:23	<b>passed (23)</b> 17:4	139:19 174:13 179:21	94:9 100:24 101:12,16	<b>prepared (9)</b> 74:24 75:1	<b>process (6)</b> 10:7 23:20	<b>professionals (6)</b>
147:2,7,10,18 148:1,7	20:2,13 25:12	211:14	102:23 103:18 108:2,4	88:25 90:3 104:21	79:11 124:2 137:8	7:23,25 11:22 30:20
171:8	30:12,13,25 39:20	<b>period (4)</b> 55:4	111:5 115:14 117:24	118:22 122:13 123:3	144:9	72:18 114:22
<b>paper (1)</b> 70:19	53:7 58:2 59:2 100:6	137:1,23 141:16	119:12,13 122:8	209:5	<b>processing (1)</b> 89:19	<b>progress (1)</b> 172:17
<b>paragraph (64)</b> 4:12	103:13 106:13 107:1	<b>periphery (1)</b> 174:21	125:13,18,20 126:4	<b>preparing (1)</b> 124:8	<b>produce (5)</b> 24:7 75:6	<b>progression (1)</b> 15:25
5:21 6:17 7:12,15	114:5 130:12 134:3	<b>permissible (3)</b>	127:11,12 131:16,23	<b>present (16)</b> 10:2	109:4 117:14 189:21	<b>prohibition (1)</b> 67:14
13:4,9 15:19 21:18	137:6 148:8 154:17	147:16,17,25	134:15 136:14,23	11:4,21 33:23 47:16	<b>produced (3)</b> 36:17	<b>project (62)</b> 4:18 10:8
22:18 33:18 34:7	168:21 204:5	<b>person (6)</b> 2:7 9:1,8	139:9,22 140:19	66:6,9 67:19,23 75:15	64:20 100:21	12:11 14:17 20:13
35:21 36:23 38:23	<b>passing (1)</b> 35:1	158:1 178:5 216:18	143:20,22 148:25	87:3 166:8,17 173:15	<b>product (158)</b> 10:17,24	70:17,18 71:1
39:8 43:6 44:3,7,11	<b>past (3)</b> 70:20 166:2	<b>personal (5)</b> 76:1,3	149:13 152:15 154:20	174:8 191:5	11:2 14:12	83:24,25 84:12,13
51:24 59:10 65:7	197:17	85:9,10 92:5	155:5 160:23 162:15	<b>presentation (44)</b> 11:18	15:16,17,24 16:12	88:21 92:1 118:23
66:19 67:3 93:18 98:2	<b>paste (5)</b> 113:25 115:2	<b>personally (6)</b> 67:18	165:13 166:19 168:11	27:9 28:10 44:5,13,15	17:1,7	121:7,11 122:11
105:9 106:2,5	133:9 167:18 168:23	111:1 129:23 132:24	169:20,25 170:11	47:8,10 48:3,11 49:2	19:5,8,10,12,12,15	126:11,25 127:20
109:16,23 110:1,13	<b>paul (32)</b> 47:14,14	155:23 171:17	172:16 173:13,20	52:1,6,10 54:3,21	21:24 26:19	128:9 137:9 139:6
113:5,8 118:11 120:25	68:11 73:23 74:24	<b>perspective (4)</b> 61:22	175:18 177:7 180:15	55:21 56:3 57:11	27:4,12,12,24	145:13,17 157:14
128:4 132:12	87:18 88:14 91:20	88:3 152:4 197:22	181:5,7 182:18	58:5,25 60:3,11	28:1,8,11 29:22 30:7,9	159:4,6,8 163:1
134:16,18 136:4	96:25 111:9 112:9	<b>phenolic (7)</b> 26:11,14	190:3,4 192:24 193:23	68:1,13 71:3 72:8,12	34:12,17 35:13,18,25	164:2,6,16 175:5,22
144:2,3,3,17 145:22	116:6 118:19,21 119:8	27:3,16,17,20 131:3	198:10 202:9 209:21	73:25 90:1,14,17,22	36:8 37:5,7,10,18	176:5 190:13,20
153:13 164:23 168:24	127:14 136:15,18	<b>phone (3)</b> 9:5 161:20,24	213:23 214:6 215:6	92:12 95:4 124:8	38:9,17 39:19	191:1,3
173:21 175:18 177:1,8	149:2,16,24 154:12	<b>photographs (2)</b>	216:4,16 220:12,13	134:9 135:1,2 173:18	43:4,11,14,23 44:4,17	194:5,8,10,15,17
178:8 183:6,7 186:5	155:8 170:21,23,24	87:11,12	<b>pleasure (2)</b> 166:11	183:18 184:2 187:5,9	46:25 48:24 49:14	195:3,17,23
190:4,6 202:25 203:22	171:17 172:9	<b>phrase (1)</b> 168:3	167:9	<b>presentations (19)</b>	52:21 56:19 59:16	196:1,3,22
218:2	192:21,23 193:10,13	<b>physical (3)</b> 125:5 130:9	<b>plural (2)</b> 69:9,13	9:12,14,24	63:10,14 67:17 69:23	197:1,4,9,19,23,25
<b>paragraphs (5)</b> 3:22 4:5	<b>pauldebbie (1)</b> 149:5	131:8	<b>pm (5)</b> 125:21,23	10:5,16,19,23	70:6 71:2 72:4,20	199:9 215:20 217:9,24
34:1 152:3 186:10	<b>pause (7)</b> 62:9 90:10	<b>physically (3)</b> 43:12	180:16,18 221:2	11:8,19,25 24:6,11,16	75:17 81:6,22	<b>projectcontractor (1)</b>
<b>parliamentary (1)</b> 53:18	125:19 161:13 180:14	178:15,20	<b>pocket (1)</b> 152:10	28:20 183:13	85:14,18,19 87:2 89:9	126:13
<b>part (63)</b> 4:10 6:22,23	209:25 220:22	<b>physics (1)</b> 3:25	<b>points (9)</b> 11:22 12:16	184:21,25 187:1,4	90:23 92:21	<b>projects (53)</b> 6:10,14
11:17 13:10 20:17	<b>pausing (9)</b> 26:12 58:15	<b>pick (4)</b> 26:5 113:23	16:7 38:23 49:14	<b>presented (15)</b> 44:16	93:12,24,25 101:5	70:6,20 84:4 88:9
24:12,13 25:18	71:19 88:13 106:10	162:9 179:23	51:24 66:17 93:1	50:1 51:9 55:25 60:9	105:1,10 106:9 108:12	89:1,6,15,16,17 112:5
31:7,10,12 35:17	166:2 171:1 202:11	<b>picked (1)</b> 116:5	217:12	68:4 69:15 94:25 95:3	109:9,10 110:4	120:10 121:24 122:3
39:9,20 47:16 52:5	207:19	<b>picture (2)</b> 8:18 124:5	<b>polyethylene (3)</b> 55:21	96:10 97:8 123:23	113:3,13,15,21	123:23 124:3,6,18
56:5 65:13 68:9 69:25	<b>pay (3)</b> 7:1 23:19	<b>piece (5)</b> 70:19 101:25	56:1,4	177:23 184:22 191:17	114:3,4,20 115:22	126:14 130:21 157:17
71:24 72:7,12 77:11	155:15	163:17 199:2 203:18	<b>polyisocyanurate (1)</b>	<b>presenting (4)</b> 67:17	116:19,20,20 117:7,10	160:16 161:7
79:10 95:4 98:10,15	<b>paying (1)</b> 140:14	<b>pin (1)</b> 18:21	12:19	92:25 130:16 174:5	120:1 121:8 122:2	163:2,5,24 164:4
101:2,3 102:5 109:21	<b>pdf (1)</b> 178:18	<b>pink (8)</b> 94:11 97:17	<b>polyurethane (1)</b> 39:5	<b>press (4)</b> 55:18 99:25	123:7 126:17 131:3,7	165:5 174:20,22,25
124:23 132:1,16,20	<b>peninsula (1)</b> 137:10	101:6,13 133:7 174:3	<b>pose (2)</b> 18:1 118:14	104:20 107:7	134:10,21 135:5,9	175:3,8,9 182:4
133:23 134:1,3,5	<b>penultimate (2)</b> 52:18	178:9,14	<b>posed (2)</b> 15:11 18:14	<b>pressure (8)</b> 73:8	136:3 137:1 138:8	192:24 193:17,21
138:4,6,10 145:20	88:7	<b>pinpoint (1)</b> 111:4	<b>position (4)</b> 6:24	195:25	142:2 143:13,17 144:7	194:7,9,20,21,21
149:18 170:7 172:12	<b>people (27)</b> 42:14,17,18	<b>pioneering (1)</b> 15:25	93:12,16 175:7	197:9,11,12,13,15,16	150:24 151:1 157:15	195:11,25
174:1 177:11 180:2	54:8 72:10 77:20	<b>pipelines (1)</b> 174:23	<b>positive (1)</b> 124:14	<b>presumably (5)</b> 49:5	159:14 160:3,11	196:5,13,16,20,20,23
187:11 188:4,8 194:19	85:5,15 89:19 90:12	<b>pir (17)</b> 12:9,19 13:12	<b>possible (6)</b> 74:4 120:5	70:9 98:14 119:8	161:15 163:4,21	197:17
202:17 207:8,8 208:9	93:6 112:22 117:17	15:21 16:1 24:7 26:17	157:6 160:23 181:7	213:18	165:20,22 166:17,24	<b>promised (1)</b> 24:5
209:22 210:21 212:4	120:22 124:19 130:17	39:13,18 52:22 69:4	209:24	<b>pretty (9)</b> 95:15 97:12	167:14,25 168:7	<b>promote (2)</b> 7:16 67:19
219:10	147:1 149:10 165:2	103:1 105:6 106:6,21	<b>possibly (6)</b> 63:24	107:17 109:16 129:13	170:17 172:5,23	<b>prompted (3)</b> 75:6
<b>partial (2)</b> 213:4 219:8	174:17 182:8 183:10	166:12 204:18	166:25 171:15 188:20	154:13,16 183:9	173:16,24 174:6	141:15 215:15
<b>particle (1)</b> 137:7	184:25 185:3 188:16	<b>pirphenolic (2)</b> 76:24	189:17 206:12	184:14	175:23,25	<b>prompts (2)</b> 140:25
<b>particular (40)</b> 10:8	190:22 193:20	83:5	<b>potential (26)</b> 7:20 8:5	<b>prevents (1)</b> 14:5	176:4,6,8,9,10 178:3	141:9
13:6 15:8 16:23 17:1	<b>per (2)</b> 121:7 217:7	<b>pitch (5)</b> 174:1	32:1 38:11,14 69:15	<b>previous (5)</b> 59:19	181:14 190:12,22	<b>proof (3)</b> 86:10 125:6
26:15,18,19 28:1 29:6	<b>perfectly (1)</b> 123:13	177:12,18 178:9,12	74:21 76:5 93:22	128:14 150:24 152:4	191:1 197:21 198:9	138:2
57:13 59:16 69:23	<b>perform (4)</b> 128:19,23	<b>pitching (1)</b> 178:11	110:21 115:4 129:8,16	166:22	199:16 200:5	<b>propagation (1)</b> 17:3
70:5 73:17 77:11 78:8	145:5 146:14	<b>pithy (1)</b> 48:21	130:18 148:21 162:10	<b>previously (3)</b> 106:1	201:13,25 204:12,21	<b>properties (2)</b> 12:9
79:25 80:15 82:25	<b>performance (42)</b> 9:22	<b>place (5)</b> 61:4 137:20	174:16,22,23 190:25	159:25 174:18	207:5 211:20 213:19	52:17
89:11 109:10	10:16 12:17 14:9	154:8 155:11 156:6	194:13,23 196:10,22	<b>pricing (1)</b> 4:10	<b>production (5)</b> 23:11,22	<b>proposal (3)</b> 149:20,21
110:16,17 113:23	15:21	<b>placed (1)</b> 57:10	199:9 206:1	<b>principle (6)</b> 31:17	43:9 159:20 204:21	156:11
121:11 123:8 125:5	16:3,11,14,18,22 17:6	<b>plan (4)</b> 44:16 68:4	<b>potentially (12)</b> 11:3	65:11,13,22 66:25	<b>products (48)</b> 7:17,21	<b>proposed (2)</b> 126:24
135:5,15 145:17	19:5,8 21:3 26:9,14,21	72:14 155:21	14:21 57:3 79:2	67:13	9:17,19 10:10,22,25	164:20
150:22,23 164:6	34:1,2,25 37:20 51:6	<b>planned (1)</b> 70:21	103:12,16 117:8	<b>prior (6)</b> 5:20 35:7,12	12:9,14 13:20,22	<b>proposing (2)</b> 115:5
171:14 189:11 195:6	52:23 57:12	<b>planning (1)</b> 148:15	130:19 149:7 168:8,10	151:5 172:24 198:25	16:25 17:22 21:3	118:13
197:9 205:8 215:16	66:7,10,23 76:25	<b>plans (1)</b> 149:18	172:6	<b>priority (1)</b> 196:4	23:6,16 26:14,17	<b>proposition (1)</b> 52:21
<b>particularly (7)</b> 26:20	77:10,14 83:13,15	<b>plasterboard (1)</b> 98:25	<b>practice (2)</b> 129:20,22	<b>privy (5)</b> 44:22 67:24	29:12,16 34:14 37:23	<b>proprietary (1)</b> 21:20
29:8 32:12 42:12	94:16 97:20 98:4	<b>play (1)</b> 89:2	<b>prater (1)</b> 181:25	124:24 144:10 150:21	39:13 43:12 61:14	<b>protection (1)</b> 152:13
122:16 196:6 205:18	103:2 105:6 106:21	<b>plc (1)</b> 118:10	<b>pre (1)</b> 151:5	<b>probably (11)</b> 35:20	65:9,24 70:6	<b>protestations (1)</b> 1
<b>parties (1)</b> 127:22	151:17 153:11 155:3	<b>please (105)</b> 1:11	<b>preceding (4)</b> 38:18	41:2 56:9 124:2	71:6,22,23 74:12	142:21
<b>partners (4)</b> 137:5	166:13	2:6,10 3:3,9 7:13 13:3	43:18 71:5 81:6	136:16 137:16 155:21	76:19,24 81:8,9	<b>prove (1)</b> 39:11
139:7,17 140:12	<b>performancelled (1)</b>	14:25 18:7 20:16	<b>precepts (1)</b> 67:21	183:23 210:8 215:15	83:1,12 117:3 149:12	<b>proved (1)</b> 77:16
<b>parts (4)</b> 32:10 124:17	8:14	21:17 24:20 26:3	<b>precise (1)</b> 126:23	219:20	171:19 175:21 185:2	<b>provide (5)</b> 33:20 95:18

113:21 120:21 139:22  
**provided (7)** 59:4  
 93:21,23 94:1 142:10  
 143:1 203:19  
**provides (3)** 5:23  
 94:12,15  
**providing (4)** 120:10  
 129:15 150:1 152:13  
**provision (1)** 22:5  
**provisions (1)** 40:5  
**proximity (1)** 194:11  
**ps (1)** 198:14  
**psychometric (1)** 4:9  
**public (2)** 45:4 67:17  
**publication (1)** 186:19  
**publications (1)** 55:11  
**published (1)** 185:14  
**pull (2)** 71:15 72:19  
**pur (1)** 13:12  
**purchasing (2)** 196:7  
 197:3  
**purporting (1)** 137:6  
**purpose (6)** 10:4 11:21  
 14:7 128:12 129:13  
 196:8  
**purposes (1)** 14:7  
**pursue (1)** 124:11  
**push (7)** 71:17,25  
 123:11 134:19,24  
 149:24,24  
**pushed (1)** 135:25  
**putting (6)** 48:25  
 117:20 129:25 131:11  
 184:25 194:22  
**puzzle (1)** 26:4

Q

**q (726)**  
 3:6,8,11,14,16,19  
 5:2,4,6,8,10,13,17,20,23  
 6:2,5,8,10,13,16,23  
 7:2,6,9,11,25  
 8:3,8,17,20,22  
 9:6,10,14,24  
 10:1,4,11,13,15,19,23  
 11:4,7,13,15,19,24  
 12:3,5,7,18,22,24  
 13:1,24  
 14:3,5,9,12,16,19,22,25  
 15:9,14,19  
 16:6,17,21,24  
 17:7,11,13,17,23  
 18:6,21 19:4,17,21,25  
 20:2,7,11,16 21:1,16  
 22:10,17,24 23:5,24  
 24:16,20  
 25:8,10,16,24 26:4,16  
 27:1,8,15,22  
 28:5,10,15,19  
 29:9,15,19,25  
 30:6,11,16,22  
 31:4,10,12,17,21  
 32:2,7,15,21  
 33:1,5,7,11 34:18  
 35:6,20 36:10,14,16  
 37:6,10 38:1,5,13,21  
 39:16,23 40:16,22  
 42:6,9,16,20,24  
 43:3,19 44:1 45:20  
 46:4,8,11,16,21  
 47:1,5,8,19,24  
 48:1,6,13,15,18,25  
 49:11,15,23

50:1,4,7,10,16,24  
 51:2,11,16  
 52:5,8,10,15  
 53:7,10,25  
 54:2,7,12,16,21,25  
 55:6,9,14,20,25 56:3  
 57:1,6,11,15,19,24  
 58:5,10,19 59:6  
 60:7,15,19,25  
 61:4,6,8,15  
 63:16,20,22  
 64:1,7,10,18  
 65:5,13,16,18,20  
 66:2,12,15  
 67:3,10,17,21,25  
 68:6,12,17,22,25  
 69:4,6,8,13,17,19,24  
 70:4,9,12,14,19,23  
 71:3,7,9,24  
 72:5,13,17,21  
 73:7,11,14,17,20  
 74:15  
 75:1,4,6,18,20,22  
 76:4,13 77:22,25  
 78:5,10  
 79:4,8,10,15,18  
 80:1,19,22 81:11,23  
 82:5,10,15,21  
 83:10,13,22  
 84:7,10,12,16,23  
 85:3,8,22,24  
 86:2,6,9,19,22 87:15  
 88:3,7,18,23  
 89:14,17,21,25  
 90:6,14  
 91:2,6,13,17,22,24  
 92:8,22 93:6,17  
 94:7,23 95:6,13,16,21  
 96:15,19,24 97:10  
 98:12,14  
 99:6,10,13,18,25  
 100:10,18,23  
 101:6,19,24  
 102:3,7,12,15,17,20  
 103:11,17  
 104:12,17,25  
 105:3,19,21,23  
 106:2,17  
 107:4,9,16,18,21  
 108:7,14,19 109:1,14  
 110:1,12,23 111:4,18  
 112:11,14 113:2,5,20  
 114:2,7,10,24  
 115:4,10,21  
 116:9,11,22  
 117:6,9,12,19,23  
 118:9 119:3,17  
 120:9,15,20,25 121:4  
 122:7,24 123:15,19  
 125:1 126:8,10  
 127:2,5,9 128:3  
 129:6,11,20,22  
 130:3,11,22  
 131:2,13,20  
 132:4,8,12  
 133:2,7,12,15,18,20  
 134:3,7,12,14  
 135:10,17,21  
 136:2,4,10,13 137:23  
 138:3,13 140:16  
 141:4,9,12,18,25  
 142:4,7,14,17,19,23  
 143:2,9,11,19 144:2

145:20  
 146:2,5,9,17,19  
 147:5,16,21  
 148:4,11,13,20,23  
 149:24 150:6  
 151:7,10,12  
 153:4,7,9,13,20  
 154:1,5,11,14,19  
 155:13,16,18  
 156:10,15,21,25  
 157:11  
 158:8,16,19,22,25  
 159:3,10,13,17,22  
 160:2,6,9,13,19,22  
 161:17,22 162:3,7,14  
 163:14,19,23  
 164:8,10,12,16,19,22  
 165:19,25 166:5,7,10  
 167:4,8,13,19  
 168:5,7,11 169:7  
 170:6,9,21  
 171:10,15,24 172:7  
 173:1,3,7,10,12,19  
 174:8,11,24  
 175:3,5,7,12,15,17  
 176:15,17,25  
 177:5,18,24  
 178:8,19,25  
 179:4,10,15,21 180:2  
 182:10,15,22  
 185:11,17,23,25  
 186:23  
 187:11,20,22,25  
 188:4,8,10,21  
 189:5,13,20,24  
 190:10,18  
 191:2,5,10,14,19  
 192:3,5,7,13,19  
 193:5,8,10,23  
 194:1,4,10,15,21,24  
 195:5,10,13,15,23  
 196:3,8,15  
 197:1,8,12,22  
 198:2,21  
 199:2,10,18,21,25  
 200:3,7,13,17,21  
 201:6,12  
 202:1,17,19,21,25  
 203:13,21  
 204:3,9,11,15 205:14  
 206:5,10,14,19  
 207:13,23  
 208:1,7,10,13,18,22  
 209:16,20 210:6,14,18  
 211:11,22  
 212:9,14,20,23  
 213:7,10,13,18,21  
 214:3,11,14,17,20  
 215:1,4,6,18,24  
 216:3,7,11,19 217:3,5  
 218:15,19 219:4,6,12  
**qa (1)** 25:2  
**qualification (2)** 40:11  
 188:16  
**qualifications (3)** 3:20  
 4:25 5:2  
**qualified (5)** 7:22 30:9  
 121:2 194:10,16  
**qualifying (2)** 37:7,10  
**quality (1)** 204:21  
**quantifying (1)** 23:5  
**queries (3)** 108:2,20  
 113:25

**query (1)** 131:24  
**question (35)** 2:2,2 13:4  
 18:1 20:13 22:22  
 25:11 28:5 41:4,9,12  
 44:24 45:12,16 66:1  
 73:21 93:17 103:11  
 104:6 120:12 122:1,24  
 132:6 147:21 158:10  
 160:1 170:14,15  
 171:25 172:21 173:8  
 188:9 194:22 198:15  
 206:11  
**questioned (2)** 45:23  
 46:1  
**questioning (1)** 61:22  
**questions (27)** 1:21 2:1  
 3:19 8:1 15:11 18:14  
 22:11 24:9 31:4 32:6  
 43:3 46:3 63:15  
 75:9,10 77:19 82:1  
 90:20 93:13 97:11  
 108:4,10,12 132:8  
 169:25 220:4 222:4  
**quickly (2)** 33:13 53:12  
**quite (16)** 17:6 33:13  
 82:18 87:1 92:19  
 93:4,4 140:6 157:4  
 163:17 166:9 174:19  
 182:8 188:15 205:23  
 219:17  
**quiz (3)** 25:5,6,6  
**quotation (5)** 106:5,10  
 121:4 132:13 133:7

---

**R**

---

**r (1)** 211:8  
**radar (2)** 116:7 117:21  
**rail (1)** 58:22  
**rails (1)** 98:21  
**rain (2)** 181:14 204:25  
**rainscreen (38)** 6:10  
 52:24 53:8 58:14  
 61:16,16 72:23 101:9  
 103:2 105:7 110:5  
 112:1 115:6 120:3  
 138:23 140:18 147:12  
 148:1,1,16 162:22  
 165:15,21,22 166:14  
 170:13 176:9 178:22  
 181:13 183:4 198:9  
 200:25 201:16,17  
 203:3 205:6 206:7,21  
**rainscreens (1)** 173:5  
**rainscreenzip (1)** 198:5  
**raised (3)** 108:13 161:7  
 175:24  
**raising (1)** 75:9  
**ran (4)** 8:17,17 48:15  
 209:17  
**range (17)**  
 26:1,13,20,21 27:25  
 28:4,6 56:19,20 89:8  
 105:11 117:2 134:22  
 135:13 136:7 155:3  
 162:9  
**rated (1)** 147:11  
**rather (11)** 15:23 28:16  
 35:20 64:11 133:13  
 141:21 167:2 175:13  
 176:9 200:22 215:23  
**rating (5)** 21:6,11,24  
 22:4 25:13  
**ray (5)** 13:1 40:23  
 175:17 190:2 199:11

**rbk00059351 (1)** 64:19  
**rbk000593514 (1)** 66:16  
**rbkcs (1)** 64:23  
**re (3)** 170:13 205:1,2  
**reach (1)** 185:6  
**reaching (3)** 68:20  
 105:5 152:7  
**read (19)** 3:12 4:6  
 16:2,15 22:7 27:17  
 32:7 42:3 51:16 53:9  
 59:11 94:23 99:11  
 157:4 184:4 186:21  
 205:14 207:7 215:1  
**reader (4)** 99:21 100:5  
 102:8 103:13  
**readied (1)** 43:17  
**readily (1)** 85:19  
**reading (5)** 117:4  
 122:23 137:13,18  
 206:15  
**reads (1)** 98:9  
**ready (3)** 62:14 121:24  
 125:24  
**reaffirm (1)** 132:19  
**real (2)** 60:25 81:18  
**realise (1)** 99:13  
**realised (3)** 148:6  
 218:11,23  
**realistic (1)** 145:1  
**really (17)** 23:19 63:12  
 69:9 82:14 92:10,13  
 112:20,22 120:12  
 124:4,17 141:24  
 147:14 179:13 194:13  
 196:18 219:7  
**reason (26)** 6:22 20:6  
 26:13 48:24 66:1  
 69:22 76:21 77:7  
 78:14 79:17 80:4,24  
 83:10 89:5 96:22  
 99:23 110:7 139:7  
 142:22 143:1,17  
 145:19 152:22 195:19  
 200:13,18  
**reasoning (1)** 34:14  
**reasons (7)** 35:18 46:8  
 54:5 80:23 82:21 86:2  
 139:9  
**recall (21)** 11:6 26:15  
 49:10 50:15 55:24  
 63:8,19 65:4 71:8 84:6  
 132:5 151:11 158:10  
 160:5 164:18 167:7  
 176:13 190:14 191:25  
 201:10 216:17  
**recalls (1)** 176:12  
**received (9)** 100:25  
 124:12 156:21 165:8  
 202:23 203:21 214:22  
 216:20,23  
**recent (3)** 138:21  
 195:18,20  
**recently (3)** 3:12 181:22  
 182:24  
**recipients (1)** 110:25  
**recognise (1)** 185:21  
**recognised (3)** 109:6  
 151:7,9  
**recollection (7)** 14:23  
 19:11 52:5 105:24  
 109:5 177:14 178:13  
**recommend (2)**  
 152:17,21

**recommendations (1)**  
 186:6  
**record (7)** 154:9 157:20  
 158:3,15 160:14  
 161:12 163:16  
**recorded (2)** 159:5  
 182:11  
**records (1)** 157:23  
**recoup (1)** 73:8  
**recruited (1)** 7:2  
**red (7)** 51:25  
 52:22,23,25 76:6  
 79:19 84:19  
**redraw (1)** 126:18  
**reducing (1)** 13:24  
**refer (7)** 27:15 63:7  
 74:15 112:14 131:5  
 163:19 198:18  
**reference (30)** 11:10  
 15:7 21:23 22:20  
 27:16 35:15 51:8  
 58:19 64:10 68:22  
 70:1,5 73:3 78:2  
 81:4,14,18 99:1  
 102:24 109:23  
 110:14,17 112:3 159:7  
 161:14,22 177:1 194:7  
 204:20 217:15  
**referenced (4)** 17:6  
 80:18,19 117:2  
**references (2)** 16:14  
 17:2  
**referencing (1)** 190:16  
**referred (10)** 9:8 32:11  
 43:20 60:12 79:6  
 84:24 128:14 163:23  
 187:22 199:11  
**referring (9)** 24:11,17  
 121:5 140:11 152:20  
 178:8,9 188:19 201:7  
**refers (2)** 154:6 176:7  
**reflect (1)** 176:11  
**reflected (1)** 139:12  
**refresh (3)** 8:21 15:13  
 74:18  
**refurbishment (2)** 1:8  
 165:7  
**refuse (1)** 77:12  
**refusing (1)** 77:12  
**regarded (1)** 186:16  
**regarding (8)** 65:8  
 108:3,20 111:12  
 122:17 124:10 140:17  
 217:15  
**regards (1)** 193:2  
**regime (2)** 139:1 187:6  
**regimes (2)** 5:14 153:22  
**region (2)** 4:17 90:14  
**registered (4)** 201:14  
 202:6,9 204:16  
**registration (1)** 4:4  
**regs (2)** 76:20 88:12  
**regular (2)** 75:9 174:18  
**regulations (8)** 5:11  
 31:8,13,25 67:12  
 141:22 142:9 143:4  
**reid (1)** 47:14  
**reinforcing (1)** 130:8  
**reiteration (1)** 139:14  
**relate (1)** 17:4  
**related (4)** 4:4 19:15  
 28:16 62:2  
**relates (5)** 28:3 98:5

157:6 160:25 181:9  
**relating (9)** 31:13 65:23  
 90:17 111:2 125:15  
 169:25 191:21 192:9  
 220:14  
**relation (16)** 7:3 12:13  
 27:5 32:17 53:22  
 60:15 102:1 103:24  
 116:9 118:22 120:14  
 146:7 165:12 173:22  
 190:2 192:7  
**relationship (7)** 151:2,5  
 157:1 159:24 172:24  
 176:21 198:24  
**relationships (2)** 4:20  
 174:18  
**relative (1)** 56:24  
**release (6)** 18:3 104:20  
 107:7 161:15 162:1  
 186:17  
**released (1)** 94:5  
**relevance (7)** 57:4  
 83:10,14 128:11  
 129:12 153:10 171:7  
**relevant (10)** 11:2 35:2  
 49:14 80:6 132:1  
 134:1 145:13 169:1  
 176:8 181:19  
**reliant (1)** 189:18  
**reluctant (1)** 171:3  
**rely (1)** 71:24  
**relying (2)** 89:21 114:19  
**remainder (2)** 60:1  
 128:14  
**remark (1)** 141:15  
**remember (78)** 11:7  
 12:2,6 14:9 20:20 12  
 23:3 24:10 25:5,6 26:1  
 27:8 28:18 29:6,9  
 35:11 37:3,6 45:19  
 46:4 48:10,13,15  
 49:8,12 50:1 53:20  
 54:7 55:17,17 64:6  
 73:19 79:9 84:4,7 95:1  
 96:24 108:8,10 116:9  
 131:18 142:24  
 146:2,11 150:17 153:7  
 154:14 156:6 164:1,12  
 169:5,6 173:22,25,25  
 174:3,8,25  
 177:4,10,11,24  
 178:5,11,19,24,25  
 182:5,7,10 185:21  
 186:1 190:15,18  
 198:17 209:10 213:2  
 216:8  
**reminder (2)** 161:17,21  
**repeat (4)** 2:1 28:5  
 122:14 147:21  
**repeated (2)** 101:21  
 103:5  
**repeats (1)** 109:16  
**repetitive (1)** 75:10  
**rephrase (2)** 41:22  
 122:24  
**replicate (1)** 150:25  
**replicated (1)** 218:22  
**reply (2)** 170:25 171:21  
**report (53)** 34:2 43:15  
 51:18,19 58:4 62:23  
 86:13,15,18,24  
 87:4,10,21 89:11  
 95:25 96:1 98:4 99:17

112:19 122:12 123:2  
 126:5 127:23 138:23  
 139:5,8,13,17 162:21  
 181:12 201:15 204:23  
 205:3 208:22  
 209:2,3,7,17  
 213:11,15,15,16  
 214:7,13  
 217:10,10,15,25  
 218:4,13,16,21 219:8  
**reports (4)** 59:15  
 112:25 211:4,24  
**represent (1)** 58:6  
**representative (3)**  
 173:23 177:11 190:10  
**represented (2)** 14:10  
 17:1  
**represents (1)** 15:25  
**request (3)** 140:20  
 192:2 215:13  
**requested (6)** 8:13 10:3  
 86:21 191:23 214:6,11  
**requesting (2)** 114:22  
 124:18  
**requests (1)** 147:24  
**require (2)** 118:12  
 123:13  
**required (2)** 186:8  
 205:8  
**requirement (8)**  
 31:12,22 36:4,5  
 139:14,24 140:23  
 186:16  
**requirements (10)**  
 13:17 32:17 39:7  
 49:11 91:15 95:10  
 109:19,24 140:18  
 209:4  
**requires (2)** 83:18 139:8  
**requiring (1)** 13:10  
**research (2)** 110:3  
 113:12  
**resist (1)** 31:19  
**resistance (4)** 17:10  
 21:6 39:1 130:23  
**resistant (1)** 132:17  
**resolving (1)** 122:16  
**resource (1)** 8:3  
**respect (6)** 16:16  
 82:16,19 100:8  
 146:10,12  
**respects (1)** 208:15  
**respond (5)** 22:15  
 114:22 118:17 133:5  
 155:4  
**responded (1)** 20:14  
**responding (1)** 155:11  
**response (28)**  
 108:2,9,20 109:15,22  
 110:9 113:21,25  
 114:2,24 120:14 122:7  
 131:24 132:4,12,25  
 133:9 139:16,25  
 140:24 141:10  
 155:16,17,18  
 172:9,18,20 215:6  
**rest (7)** 34:6 50:13  
 145:14 212:1 213:11  
 216:4 219:8  
**restricted (2)** 78:16  
 80:9  
**restriction (4)** 80:6,7,24  
 82:11

**restrictions (2)** 81:3,25  
**result (8)** 109:3 139:10  
 151:24,25 152:10,11  
 156:8 191:19  
**results (4)** 21:20 93:1  
 142:10 151:20  
**resume (2)** 180:8  
 220:11  
**retain (1)** 149:21  
**retaining (1)** 13:22  
**retested (1)** 154:17  
**review (3)** 122:12 123:2  
 127:21  
**reviewed (1)** 208:20  
**reviewing (1)** 127:19  
**revision (2)** 45:25  
 139:12  
**revisited (1)** 102:21  
**rewarded (1)** 73:14  
**rhymes (1)** 35:18  
**riba (3)** 64:3,4,14  
**richard (7)** 127:14  
 151:3,15 154:12,15,23  
 155:22  
**ride (1)** 72:9  
**rig (8)** 46:15 59:22  
 60:1,5,20,23 97:4,5  
**right-hand (18)** 15:2  
 33:16 51:11 66:3 67:3  
 69:2 71:16 95:22 98:3  
 157:7 159:5 161:1  
 162:3,18 210:11,19,20  
 212:2  
**rights (1)** 123:13  
**rigid (2)** 13:12 39:5  
**rigorous (1)** 124:9  
**ring (2)** 29:7 153:7  
**rise (2)** 88:8 89:4  
**risk (16)** 33:21,23 37:22  
 49:18,20,24 50:4,8,20  
 54:19 84:23 85:4  
 99:18 100:5 118:14  
 206:14  
**risky (1)** 143:17  
**rob (3)** 8:25 9:3 136:19  
**robbie (3)** 217:7,14,18  
**robust (1)** 83:20  
**roger (4)** 150:7,10  
 151:14 156:7  
**role (11)** 7:9,16 9:11,16  
 68:6 158:1 188:5,8  
 197:3,14 201:22  
**roof (3)** 176:10 177:2,3  
**room (4)** 49:5 62:1,3  
 180:10  
**rooms (25)**  
 1:11,13,14,22 18:8  
 20:19 45:12 56:14  
 61:24 62:14,20 64:25  
 80:14 88:19 104:22  
 125:12,24 126:4  
 145:13 167:23  
 180:7,19,25 190:10  
 222:3  
**roper (39)** 24:1,1 28:20  
 32:23 44:13 46:7  
 47:13,22 48:2,4,17  
 49:8 63:11 75:20  
 90:2,12 93:6,10,14  
 96:10,24 106:9 107:24  
 108:19 118:20 127:15  
 133:4 134:12 136:20  
 172:13,23 202:4,25

205:12 214:4,8  
 218:9,15,25  
**ropers (6)** 43:19 113:6  
 132:25 133:9 134:8  
 203:21  
**rough (1)** 50:2  
**roughly (1)** 174:25  
**round (3)** 23:10 28:18  
 182:17  
**round-robin (1)** 182:20  
**rounds (1)** 64:23  
**route (15)** 34:24 37:12  
 71:11 76:22 94:15  
 95:7,18 148:12 184:23  
 188:24 189:3,6,7,12  
 208:12  
**routes (7)** 34:21 37:13  
 52:12 146:13  
 189:2,6,14  
**royal (1)** 64:4  
**rs (7)** 81:6 121:24  
 124:3,5 172:12 176:9  
 182:1  
**rs5000 (206)** 10:24  
 12:10,19 20:5,6 21:15  
 22:9 24:18 28:2  
 31:15,23 32:3 34:17  
 35:4,5,12 36:6,8  
 37:5,18 40:20  
 43:3,8,16  
 44:4,8,12,15,21 45:14  
 46:5,23,24 47:11  
 48:3,8,22 52:17 56:6  
 58:23 59:16 63:4  
 64:18 67:23 68:22  
 69:19 70:9,20 71:25  
 72:18,24,24  
 73:4,8,15,17,24  
 74:17,20 76:1 77:12  
 79:13,21 81:2,17  
 82:3,24 83:25  
 84:1,2,4,14 85:12  
 86:10 89:1,7  
 90:4,14,18,23 93:21  
 95:18 97:19,23  
 98:5,10,22 99:19  
 100:14,21 101:8  
 102:1,3,9 103:7  
 104:14,21 105:11,23  
 106:6,19 108:3,20,23  
 109:2 110:2,19  
 111:12,24 112:5  
 113:11 114:3 115:1  
 116:9 118:23 123:23  
 124:7,9,14 125:4  
 126:17 127:7  
 130:5,12,20,24 134:21  
 135:13,23 136:8  
 137:2,18,24 138:5  
 139:23 140:21 141:20  
 142:8,10,15 143:6,23  
 144:6 146:22 147:10  
 148:1,14 149:3,8  
 150:18 151:7,17,20  
 152:9,23 153:14,22  
 156:18 162:2,11  
 163:16,20,20 165:9,15  
 169:2,25 170:13  
 171:2,8,11 173:4  
 174:24 178:11,21  
 179:7 182:22 184:7  
 187:14 188:2  
 190:12,19

191:2,5,10,14 198:4,9  
 199:19,21 200:1,3,24  
 202:7,10 203:2,15  
 204:5,18 206:16,20,24  
 207:8,14 214:7 217:8  
**run (10)** 121:17 142:3  
 145:10 148:24  
 150:22,24 154:21  
 166:18 168:15 193:15  
**running (3)** 9:4 140:13  
 193:20  
**runs (4)** 23:23 115:12  
 209:9 210:22  
**ryan (3)** 168:18 169:3,4  
 169:3,4  
 171:23 172:4  
**scheduled (1)** 2:4  
**scheme (1)** 4:3  
**schemes (1)** 113:1  
**scope (2)** 132:20 139:2  
**screen (12)**  
 2:12,15,17,19 3:3  
 54:25 90:5 140:4  
 181:14 204:25  
 209:22,24  
**scroll (1)** 210:7  
**scrutinised (1)** 120:3  
**sealants (1)** 36:1  
**seaton (8)** 44:15 47:14  
 68:5,6 213:24 214:22  
 215:7 216:23  
**seatons (1)** 68:6  
**second (29)** 44:9  
 46:1,10 63:3 69:8 77:7  
 87:17 103:5 105:9  
 106:3 109:23 110:13  
 115:18 127:12 128:3  
 133:7 147:4,6 150:8  
 151:2 154:17 161:23  
 186:5 192:20 205:20  
 206:5 210:10,14 218:2  
**section (18)** 33:14 34:7  
 41:17 51:3 57:20  
 69:25 95:11 126:18  
 127:21 132:2,24  
 210:22 211:24,25  
 212:10,11,11 215:4  
**secure (4)** 196:1,4  
 197:20 217:8  
**see (220)** 2:21,24 4:12  
 8:17 9:6 10:11,15 15:3  
 16:4 18:11 22:19,24  
 23:1 24:3 25:14,16  
 27:1 28:22 33:17  
 34:18 35:21 36:3  
 40:3,6,9,10,14,15  
 47:11,19 49:2,5,16,17  
 51:5,11,14 52:15  
 53:13,19,25 55:1  
 56:20 58:23 60:18  
 61:4 62:7 63:2 66:4,18  
 68:2,17,18,19 69:6  
 70:2 71:12,14  
 72:22,24,25 74:20  
 75:25 76:4,17 77:20  
 79:4,18 81:12  
 82:10,13 83:22,24  
 84:1,1,2,2,12,18,20  
 85:1,9 88:3 90:7,12  
 91:4,9,18,18,22,24  
 92:2,4 93:19 94:9 96:7  
 97:16 101:17,20  
 102:24 103:9  
 105:19,21 107:10  
 108:5,7,19 109:16,24  
 111:4,16 115:18  
 116:11,12,18  
 193:11,12,18  
 196:10,12  
**sale (1)** 85:14  
**saleable (1)** 85:20  
**sales (43)** 6:2 7:3,9  
 17:20 18:8,23,24  
 47:15,17  
 73:7,8,12,15,18 81:18  
 82:3,7 85:20 88:3  
 92:13 93:11,16 97:8  
 113:19,20 151:2,4  
 162:11 174:1,15  
 175:12,14 177:12,18  
 178:9,12 187:4 195:25  
 202:4,22 203:10  
 209:14 216:25  
**salesforce (5)** 157:4  
 159:20 162:16 181:2,6  
**salesman (1)** 197:3  
**salesmans (1)** 197:22  
**salesperson (4)** 66:24  
 85:13 150:1 197:14  
**salient (2)** 49:13 218:21  
**same (37)** 41:19 47:24  
 48:25 50:21 66:3  
 92:17 101:13,13,16,17  
 103:11 106:25 110:7  
 114:16 115:6 119:5,5  
 122:8 133:8 149:3  
 150:15 155:4,19 156:1  
 168:18,23 170:23  
 171:12 172:9 178:18  
 200:10,25 207:19  
 211:11,14 212:17  
 215:7  
**sap (1)** 9:20  
**sarah (7)** 183:14  
 184:5,22  
 187:1,5,13,19  
**satisfactory (2)** 76:25  
 77:13  
**satisfy (3)** 78:17  
 186:6,13  
**satisfying (2)** 95:10  
 186:16  
**save (1)** 13:20  
**saville (1)** 4:8  
**saw (15)** 39:12,17 75:16  
 77:22 92:16,23 93:2

S

95:8 133:4 141:12  
 162:10 163:19 168:24  
 199:12 206:10  
**saying (15)** 42:2 54:8  
 85:22 108:19 110:23  
 124:14 130:11 150:9  
 169:19 170:16  
 178:19,24 185:8  
 189:13 200:23  
**sbem (1)** 9:20  
**scale (1)** 34:4  
**scenes (3)** 160:11  
 171:23 172:4  
**scheduled (1)** 2:4  
**scheme (1)** 4:3  
**schemes (1)** 113:1  
**scope (2)** 132:20 139:2  
**screen (12)**  
 2:12,15,17,19 3:3  
 54:25 90:5 140:4  
 181:14 204:25  
 209:22,24  
**scroll (1)** 210:7  
**scrutinised (1)** 120:3  
**sealants (1)** 36:1  
**seaton (8)** 44:15 47:14  
 68:5,6 213:24 214:22  
 215:7 216:23  
**seatons (1)** 68:6  
**second (29)** 44:9  
 46:1,10 63:3 69:8 77:7  
 87:17 103:5 105:9  
 106:3 109:23 110:13  
 115:18 127:12 128:3  
 133:7 147:4,6 150:8  
 151:2 154:17 161:23  
 186:5 192:20 205:20  
 206:5 210:10,14 218:2  
**section (18)** 33:14 34:7  
 41:17 51:3 57:20  
 69:25 95:11 126:18  
 127:21 132:2,24  
 210:22 211:24,25  
 212:10,11,11 215:4  
**secure (4)** 196:1,4  
 197:20 217:8  
**see (220)** 2:21,24 4:12  
 8:17 9:6 10:11,15 15:3  
 16:4 18:11 22:19,24  
 23:1 24:3 25:14,16  
 27:1 28:22 33:17  
 34:18 35:21 36:3  
 40:3,6,9,10,14,15  
 47:11,19 49:2,5,16,17  
 51:5,11,14 52:15  
 53:13,19,25 55:1  
 56:20 58:23 60:18  
 61:4 62:7 63:2 66:4,18  
 68:2,17,18,19 69:6  
 70:2 71:12,14  
 72:22,24,25 74:20  
 75:25 76:4,17 77:20  
 79:4,18 81:12  
 82:10,13 83:22,24  
 84:1,1,2,2,12,18,20  
 85:1,9 88:3 90:7,12  
 91:4,9,18,18,22,24  
 92:2,4 93:19 94:9 96:7  
 97:16 101:17,20  
 102:24 103:9  
 105:19,21 107:10  
 108:5,7,19 109:16,24  
 111:4,16 115:18

116:6,7,11 118:4,7,18  
 119:1,15 120:7 121:15  
 122:5 126:10 127:13  
 128:1,22 129:25  
 132:2,12 133:5,7  
 136:10,17 137:19,21  
 138:11,15 140:11,19  
 143:25 144:3,16  
 145:25 146:5,19  
 147:5,6 151:7,14  
 152:19 157:6,9  
 159:3,10,11 162:18  
 163:12,20,23  
 165:19,23 167:4,19  
 168:17,23 169:9,12,18  
 170:3,11,19  
 172:7,8,18 182:20  
 185:25 186:2 188:21  
 190:8 193:3 194:24  
 195:16 196:13 200:18  
 202:2,6 203:22  
 204:2,17,22 205:11  
 208:1,23  
 210:2,9,12,14,15,21,23  
 211:8,9,19,20  
 212:3,4,6,7,12,13,24  
 213:21 215:10  
 216:11,12 217:13  
 218:9,16,17  
**seeing (7)** 18:9 43:14  
 65:4 88:8 95:17 127:5  
 193:1  
**seek (2)** 66:5,8  
**seeking (3)** 42:25 43:22  
 120:14  
**seem (5)** 116:1,13  
 119:22 141:1 210:5  
**seemed (4)** 42:13 75:12  
 81:4,8  
**seemingly (1)** 189:23  
**seems (15)** 3:7 51:1  
 89:5 99:9 136:25  
 138:18 139:18 141:4  
 151:13 157:24 181:16  
 193:25 207:22 212:19  
 218:4  
**seen (18)** 32:21 43:19  
 44:12 46:14 60:13  
 65:3 92:20 94:21 97:3  
 100:1 109:17 112:6  
 115:17 154:6 183:2  
 187:11 188:11 207:20  
**selecting (1)** 10:11  
**sell (3)** 81:17 135:13,23  
**selling (5)** 69:20 73:17  
 120:1 197:15,16  
**send (12)** 101:1 136:17  
 139:17 150:8  
 165:14,19,20 166:21  
 193:6 198:10 215:17  
 216:22  
**sending (11)** 10:4 74:23  
 112:8,21 130:1 140:12  
 168:18 191:19 209:10  
 217:17 218:7  
**sends (2)** 169:19 218:15  
**sense (3)** 42:24 73:7  
 179:21  
**sent (32)** 28:20 32:23  
 33:9 90:1 91:20  
 105:25 107:24 115:16  
 136:15 137:3 165:9  
 167:6,11 169:3 178:2

182:17,19 191:18  
 192:16 200:16  
 202:12,18 203:19  
 205:11 208:22 213:2,7  
 216:15 217:11,15  
 219:1,7  
**sentence (11)** 6:17  
 15:23 16:7 43:8 123:1  
 128:10 129:11 203:22  
 206:5,6 208:8  
**separate (3)** 9:20 34:24  
 145:15  
**september (12)** 2:10  
 41:1 107:24 108:17  
 110:23 112:11 113:7  
 131:20,21 135:18  
 168:15 170:12  
**series (1)** 105:10  
**serious (1)** 130:4  
**services (4)** 5:24 7:17  
 9:18 10:22  
**set (19)** 4:5 38:23 76:19  
 84:18 85:9 91:9 94:17  
 97:24 99:19 105:12  
 110:4 111:15 113:13  
 119:17 132:1,4 195:11  
 203:6 206:25  
**sets (6)** 27:2 49:16  
 52:11 66:17 91:3  
 108:7  
**seven (1)** 190:5  
**sfs (3)** 98:24 115:23  
 117:5  
**shadow (1)** 212:20  
**shall (2)** 31:18 45:4  
**share (3)** 47:24 88:8  
 196:15  
**shared (2)** 30:19 193:17  
**sharing (1)** 196:9  
**sharman (11)**  
 165:3,12,14  
 166:7,8,21 167:1,5  
 168:12,24 173:12  
**sheathing (9)** 61:7,8,13  
 98:23 119:19 137:15  
 139:11 144:25 206:23  
**sheet (1)** 201:13  
**ship (1)** 198:14  
**short (5)** 61:24 62:12  
 125:22 180:17,  
**shortest (2)** 101:24,25  
**should (36)** 2:11 9:15  
 21:6,24 27:17  
 33:19,25 36:2 38:19  
 39:7 40:4,12 65:24  
 69:9 79:11 85:11 86:3  
 101:1 105:1  
 120:13,15,16,16,17  
 142:21 144:15,21,24  
 155:21 170:25 172:14  
 184:4 188:1 194:14  
 209:8,9  
**shout (1)** 24:9  
**show (21)** 2:10 3:8,21  
 13:1,3 20:17 23:13  
 39:25 74:16 81:20  
 86:11 87:19 113:9  
 117:25 126:18 168:2  
 171:1 173:19 181:3  
 185:25 209:8  
**showed (3)** 95:4 100:3  
 178:16  
**showing (6)** 86:14

178:20 210:25 211:2,3  
214:18  
**shown (18)** 12:15  
19:2,3 44:18 48:13,14  
52:11 60:17 75:25  
96:23 99:16 106:2  
113:9 135:1 147:3  
159:10 178:17 218:10  
**shows (3)** 138:23  
167:20 171:6  
**sic (1)** 112:3  
**side (24)** 19:14 38:12  
51:11 71:14,16 72:17  
123:16 144:12 157:7  
161:1,23 162:18,19  
166:25 167:1.3 181:10  
192:7 209:23  
210:11,19,21 212:2,23  
**sided (2)** 183:9 184:14  
**sig (4)** 71:17,19,19 72:6  
**signatory (1)** 87:7  
**signature (3)** 3:9  
212:14,15  
**signatures (2)** 211:8  
212:21  
**significance (2)** 16:21  
79:8  
**significant (1)** 86:8  
**significantly (3)** 8:12  
21:11 22:4  
**signify (1)** 16:24  
**silence (3)** 45:4,7,8  
**simco (1)** 58:22  
**similar (4)** 36:1 97:12  
129:20,22  
**simple (2)** 171:25,25  
**simplified (1)** 74:4  
**since (2)** 5:20 114:15  
**single (6)** 81:23  
84:12,12 101:22  
135:22 143:5  
**singular (2)** 77:17 125:4  
**sir (47)** 1:3,12,14,18  
2:17,20,24 44:25 45:9  
56:12,14,17 61:23  
62:5,10,14,17 90:8  
103:19,25 104:2,5,7  
121:19 125:11,17,24  
126:1 140:2,8  
169:12,14  
180:5,12,19,22  
183:20,23  
219:17,20,23,25  
220:7,10,17,21 221:1  
**sirmadam (1)** 140:16  
**sit (2)** 1:15 58:20  
**site (6)** 118:25 157:15  
163:2 164:4,8 199:8  
**sits (1)** 2:7  
**sitting (2)** 53:2 114:14  
**situation (2)** 123:8  
128:16  
**situations (1)** 152:18  
**six (2)** 16:7 168:16  
**size (5)** 56:21,23 194:11  
196:21 197:2  
**skills (1)** 4:3  
**skips (1)** 212:11  
**slabs (1)** 61:10  
**slice (1)** 57:22  
**slide (51)** 25:4,16 26:5  
27:2 28:25 29:6 30:2  
49:20 50:7,17,24 51:2

52:16,20 54:25  
56:18,19,25  
57:1,13,15 60:7 62:25  
64:2 68:13 69:2  
71:10,11 72:22,23  
76:8,9,14 78:11 80:1  
83:23 84:17 85:8,8,25  
91:8,18,18,19  
92:3,10,23 93:2,8,9  
187:3  
**slides (23)** 24:22 25:25  
48:8,10,16 49:16 53:11  
56:8 68:13 69:24  
74:2,15,23 75:6,18,23  
76:4 81:20,24 92:6  
182:16 183:19  
184:3,22  
**slideshow (10)**  
48:8,10,13 53:10  
56:10 70:1 86:22  
90:24 96:9 100:3  
**slowly (2)** 204:18  
210:20  
**small (3)** 21:8 22:2  
166:9  
**smaller (2)** 57:8 89:15  
**smiley (1)** 155:20  
**smoke (1)** 186:17  
**sold (1)** 28:7  
**solely (2)** 26:11 39:1  
**solid (1)** 134:2  
**solution (6)** 15:22 83:3  
105:6 145:1 163:11  
185:9  
**solutions (4)** 72:23  
106:19 149:6 189:9  
**solve (4)** 2:20,22,24 3:4  
**somebody (1)** 10:5  
**someone (5)** 119:24  
174:19 198:23,24  
215:19  
**something (29)** 14:10  
18:10,12 27:10 28:12  
40:17,19 45:25  
67:6,24 72:3 74:13  
83:4 86:17 116:3  
120:22 121:8 129:23  
135:15 137:25 138:8  
150:20 157:22 159:20  
184:19 185:15 191:4  
211:25 214:13  
**sometimes (3)** 79:1,1  
186:14  
**somewhere (1)** 45:24  
**son (1)** 158:21  
**soon (3)** 119:12 135:10  
145:11  
**sort (47)** 8:11 9:1  
10:6,9 17:10  
23:9,12,13 24:13  
29:12 31:24 32:5 42:9  
54:14,14,16,17 70:15  
72:8 74:9 75:9,11  
79:23 81:18 82:7  
92:14 93:14 115:2  
116:18 121:6,9,13,13  
135:19 150:23 151:5  
161:14 167:2,18  
171:20,22 176:21  
184:25 185:8 187:7  
189:2 196:24  
**sorted (1)** 195:4  
**sorts (2)** 10:5 17:15

**sotech (9)** 169:4  
170:3,6 171:9  
172:13,19,20,24,25  
**soundbloc (1)** 152:5  
**south (2)** 151:4 217:3  
**southern (4)** 47:15,17  
92:13 93:10  
**space (2)** 78:16 80:9  
**spanning (1)** 61:10  
**spate (1)** 55:3  
**speak (11)** 144:13  
145:11 150:13 166:1  
167:9 172:20 198:7,13  
199:16 215:9,24  
**speaking (2)** 145:8  
172:19  
**spec (1)** 157:19  
**special (1)** 32:17  
**specialist (23)** 4:11 6:3  
18:15 37:19,19,25  
77:6 78:1,2,2,23 79:5  
81:14 82:12 88:10  
89:7 126:16 148:17,18  
179:17 201:4,4 215:22  
**specialists (14)** 42:19  
75:8,13 89:20 114:19  
120:4,25 121:25  
124:7,20 125:2 130:19  
131:10 189:10  
**specific (15)** 40:19  
69:16 72:14,14 78:8  
81:4 85:3 120:20  
142:12 160:1 168:2  
172:3 178:6 195:25  
206:1  
**specifically (26)** 7:2  
24:12 31:11 56:2 81:6  
137:14 153:1,2,8  
158:13 178:24,25  
185:24,25 190:12,19  
191:3,13,14,16 192:8  
199:19 200:19,23  
201:3 209:12  
**specification (14)** 94:2  
97:11 100:19 107:10  
109:18 124:2 175:20  
176:1,7 177:24 179:2  
199:23 201:18,20  
**specifications (2)** 89:23  
135:6  
**specifcs (1)** 201:10  
**specified (6)** 14:13  
123:24 164:13 175:22  
176:10 199:22  
**specifier (1)** 88:2  
**specifiers (1)** 106:20  
**specify (2)** 72:18 126:17  
**specifying (4)** 16:8  
51:21 96:3 103:7  
**specs (2)** 145:10 182:4  
**spectrum (1)** 147:2  
**spelling (1)** 64:7  
**spent (1)** 42:12  
**spin (3)** 73:24 74:3,6  
**spinn (2)** 124:8,13  
**split (2)** 74:20 76:1  
**spoke (6)** 48:15 172:13  
183:11 185:3  
190:21,23  
**spoken (4)** 93:3 149:6  
166:2 190:21  
**spotchecks (1)** 23:22  
**spread (20)** 17:3 21:24

22:21 31:14,19 33:20  
38:25 39:2 41:23  
50:14 53:13 55:15  
76:25 77:10,14,21  
91:6,6 204:23 207:6  
**spreadsheet (1)** 193:24  
**squire (4)** 137:5  
139:7,17 140:12  
**st (10)** 118:10,23  
126:11,15,22  
127:15,19 129:16  
145:10,17  
**staff (2)** 190:11,19  
**stage (10)** 31:20 93:10  
124:11 125:5 130:3  
132:10 143:2 146:15  
164:19 216:5  
**stages (2)** 11:17 165:11  
**stakeholders (3)** 7:17  
130:9,13  
**stand (2)** 74:6 88:5  
**standard (14)** 16:23  
17:2 24:7 42:5,5 49:18  
108:2,9 109:15,21  
112:8 113:21 114:24  
167:10  
**standards (5)** 64:20  
67:12 110:14,15 111:2  
**standing (2)** 45:7 57:20  
**standpoint (1)** 93:15  
**stapley (2)** 190:24  
191:7  
**start (10)** 1:5 41:2  
118:1 131:15 143:22  
157:3 163:6,25 168:17  
212:1  
**started (6)** 24:15 46:2  
108:11 158:23 164:25  
211:12  
**starts (2)** 51:12 167:9  
**statement (29)** 2:9,14  
3:6,12,21 5:21 6:17  
7:12 13:2 26:15 27:11  
36:21 42:8 43:5 44:2  
47:2 59:8 60:13 93:19  
94:7 113:24 129:13  
134:15 164:22 173:20  
175:17 177:6 190:3  
199:12  
**statements (3)** 68:8  
77:19 186:20  
**states (2)** 137:14  
205:18  
**steel (8)** 61:9 94:14  
132:17 134:4  
150:7,17,19 206:22  
**step (4)** 94:15,15 95:6,6  
**stepbystep (1)** 187:6  
**stephen (4)** 63:9,17  
146:18 187:20  
**steps (2)** 84:18 92:5  
**steve (6)** 144:5,8,14  
145:23 155:2,10  
**stick (1)** 211:17  
**sticking (1)** 202:1  
**still (6)** 56:8 79:4  
114:16,16 152:13  
155:1  
**stocked (1)** 72:11  
**stocking (1)** 72:3  
**stone (1)** 119:22  
**stood (2)** 30:16 177:3  
**stop (3)** 117:18

220:2,11  
**storey (5)** 34:3 35:24  
203:7,24 204:6  
**storeys (2)** 207:1,18  
**straight (4)** 3:4 211:24  
212:10 219:6  
**strand (4)** 143:24  
145:9,13 149:4  
**strapline (1)** 105:8  
**strategy (6)** 26:10  
64:13 69:19 71:24  
72:2 177:15  
**stratford (1)** 217:9  
**strengthen (1)** 81:22  
**strenuously (1)** 179:22  
**stress (1)** 139:5  
**string (2)** 141:5 170:10  
**stringent (1)** 132:16  
**strive (1)** 179:22  
**strongly (1)** 80:16  
**structural (1)** 206:22  
**structure (3)** 83:9  
132:17 134:4  
**structures (3)** 21:3  
65:9,24  
**struggle (1)** 156:22  
**studied (1)** 70:24  
**studies (13)**  
70:2,8,12,14 71:4,6  
120:22 130:10 134:20  
135:12 136:6 146:15  
189:9  
**study (1)** 70:24  
**sub (2)** 78:21 80:12  
**subcontractor (1)** 81:13  
**subcontractors (2)**  
79:18,20  
**subject (15)** 73:24  
90:14 117:4 118:6  
124:9 136:21 143:19  
165:15 170:13 182:22  
198:3 199:3 202:5  
207:2 208:2  
**subjected (1)** 19:19  
**subjecting (1)** 151:7  
**subparagraph (1)** 59:20  
**subsequently (1)** 60:19  
**substantial (1)** 73:2  
**substantiate (3)**  
21:5,23 22:20  
**substantiated (1)** 66:21  
**substrate (5)** 22:3 61:2  
128:13 207:3 208:3  
**successful (2)** 46:22  
73:15  
**successfully (12)** 35:1  
39:20 52:22 97:19,23  
105:11 106:7 131:3  
166:13 203:5 206:24  
207:14  
**sufficiently (1)** 179:12  
**suggest (4)** 53:4 106:13  
173:3 197:2  
**suggested (2)** 49:23  
128:19  
**suggesting (2)** 197:8,12  
**suggestion (2)** 50:7  
172:18  
**suggests (3)** 52:1 59:13  
208:4  
**suitability (4)** 37:23  
104:14 120:10 152:23  
**suitable (19)** 21:25

52:19 53:4 99:22  
101:10,14,20 102:4,9  
103:14 127:7 134:21  
166:23 175:22,24  
176:4 191:10 197:21  
200:3  
**suite (2)** 94:24 104:12  
**suited (1)** 200:6  
**summarising (1)** 156:16  
**summary (2)** 91:3  
203:25  
**supplychain (1)** 198:12  
**supplying (1)** 198:25  
**supported (1)** 4:8 8:3  
69:25 83:19 85:11,14  
116:18 211:5  
**supporting (6)** 22:13  
83:9 98:21 169:20,24  
204:20  
**suppose (26)** 11:10  
12:15 18:13,17 23:12  
35:2 38:7 43:18 69:16  
83:19 114:17 120:22  
124:21 133:25 135:6  
136:1 138:9 146:13  
168:2 174:23 175:15  
176:20 179:18 188:25  
194:23 202:25  
**suppression (1)** 183:15  
**sure (37)** 24:19 27:13  
28:12 31:3 42:23  
43:24 54:4,24 56:25  
72:7 75:2 95:15,15  
107:17 112:10 116:10  
121:7 140:2 141:12  
146:22 153:23  
154:13,16,18 172:4,22  
173:2,2 177:21  
179:5,16 184:21  
186:22 195:21 199:24  
200:2,12  
**surface (9)** 17:3 21:23  
22:21 38:25 39:2  
41:23 50:14 65:19,20  
**surfaces (3)** 40:3,4,11  
**surname (1)** 131:18  
**surprise (1)** 42:16  
**surprised (4)**  
38:5,6,13,16  
**survey (1)** 80:25  
**sway (1)** 149:25  
**system (77)** 8:3,9 33:22  
39:9,20 47:5  
51:13,17,20,21,25  
52:2 56:5 57:16  
58:1,22 59:14,17,20  
60:25 61:9 69:11  
80:16 83:6,6,12,18,19  
91:4 95:24 96:2,3,7  
97:1 98:10,19,24  
99:6,7,22 102:5  
103:22 104:3 111:24  
112:2 113:3,16,22  
114:4 119:17  
126:24,25 130:6,25  
134:4,5 138:24 144:10  
148:7 153:24 156:18  
161:10 164:20 171:16  
178:22,23 200:10,25  
201:8 210:23,25,25  
211:1,2,3,22 212:5  
**systems (22)** 7:4 34:4  
52:24 54:19 65:9,24

94:14 97:21 103:3  
110:5 125:7 134:22  
135:14 136:7 150:20  
165:4 166:14 170:17  
171:3 206:21,22 207:9

---

**T**

**t (1)** 211:8  
**table (4)** 39:7 41:13  
49:16 95:11  
**tactics (2)** 64:3,5  
**tag (1)** 68:18  
**tagged (1)** 63:12  
**tailor (3)** 184:7 187:14  
188:6  
**takeaway (1)** 52:5  
**taken (4)** 58:3 104:12  
114:13 163:9  
**taking (3)** 2:4 8:11  
204:17  
**talk (4)** 62:1 156:11  
190:11 220:13  
**talked (1)** 177:22  
**talking (8)** 42:17,18  
50:20 125:14 174:16  
175:19 180:9 190:18  
**talks (1)** 147:18  
**tall (3)** 33:23 174:2  
177:13  
**tamweel (1)** 55:2  
**tangled (1)** 147:22  
**target (1)** 162:10  
**targeting (1)** 82:8  
**task (6)** 161:4,23  
162:21,23 181:12,14  
**tailor (6)** 150:7 151:14  
153:13 156:7 217:7,18  
**taylor (1)** 154:11  
**team (66)** 8:9,15,17  
9:2,2,9 17:20  
18:8,23,24,24 20:14  
22:23 47:15,17  
68:9,10 73:7,18 85:21  
90:16  
92:11,13,18,18,18  
93:4,11 94:6 102:1  
105:2 108:12 111:10  
113:18,19,20 114:21  
116:19 123:11 124:25  
127:17 130:2,2 131:12  
134:10,11 136:24  
138:12 157:18 159:11  
166:23 168:4 171:18  
172:25 173:18 176:23  
179:20 182:23 187:10  
188:20 199:16  
202:4,23 206:2 209:14  
213:20  
**teams (1)** 97:8  
**tease (1)** 29:19  
**tech (1)** 202:5  
**technical (34)** 4:25  
8:1,5,9,17,24 9:2,9  
10:20 12:12 18:24,25  
20:14 22:23 24:22  
36:19 37:2 38:2 41:4,5  
71:15 81:16 82:1 88:4  
89:22 91:9 118:5  
136:20 141:6 161:2  
176:23 185:13,18  
206:2  
**technicalproduct (1)**  
93:15

technique (1) 167:18  
 technology (4) 5:23  
 183:1,18 184:2  
 telephone (1) 161:25  
 telford (1) 163:8  
 telling (5) 52:6 87:18  
 88:14 133:15 208:19  
 tells (1) 153:18  
 temporary (1) 145:18  
 ten (4) 56:15 131:8  
 135:4 214:3  
 tend (1) 79:21  
 tends (1) 106:13  
 tenodd (1) 81:9  
 tenure (8) 18:13 22:8  
 31:20,21 35:17 54:15  
 109:12 110:19  
 term (3) 29:11,14 168:3  
 terminology (3) 50:3  
 66:20 100:3  
 terms (5) 63:22 92:15  
 117:13 129:15 195:1  
 terracotta (1) 138:22  
 test (179) 17:9,21  
 18:9,25 19:19 20:2,3  
 21:5 22:13 24:8  
 29:5,10  
 30:1,2,3,3,5,14,18  
 31:1 33:3,5 34:5 35:1  
 37:16,24 39:21  
 43:15,20 44:20  
 45:14,21,24  
 46:5,5,10,14,18,19,22  
 47:1 51:10 53:7,23  
 58:2,3,8 59:2,17 60:9  
 76:23 77:9,15,17  
 78:7,17  
 86:12,15,18,24  
 87:6,7,12,21 89:11  
 92:25 97:4,5 98:16  
 99:17 100:6 102:25  
 103:14 106:7,14 107:2  
 112:19,25 113:3,3  
 122:12 123:2,9 124:22  
 125:2,4,5 128:23  
 130:12 131:24 132:9  
 133:23 134:2,3,5  
 135:22 136:8  
 138:5,6,21,21,23  
 139:10,11,16 141:15  
 142:10,20 143:5  
 144:15,19,21 145:6  
 147:13 148:2,4,6,9,9  
 150:12,21,22,23,25  
 151:8,9,9,10,13,19,22  
 152:2,4,11,24  
 153:2,3,4,4,10,15  
 154:2,11 156:8 157:18  
 159:11 160:6  
 161:4,7,19 162:23  
 171:7,13,14 172:2  
 177:18 178:3  
 184:24,24  
 189:19,21,22  
 191:21,24 192:9,17  
 204:4 205:1,3 209:2  
 211:4,24 215:14  
 217:10,10,15,25  
 218:3,21  
 tested (47) 39:10  
 51:18,20 59:14,20  
 60:5,20 63:14 69:11  
 77:21 95:25 96:2,8

97:6,19,23 98:10,19  
 99:8 102:5 103:22  
 104:3 105:11 114:3,5  
 115:7,8 118:14 119:18  
 120:24 126:24 130:7  
 138:23 143:14 153:24  
 156:19 177:19  
 178:7,23 192:14  
 200:11 201:8 203:5  
 206:24 207:5,14  
 210:23  
 testers (1) 4:9  
 testing (46) 5:14 18:16  
 23:12,14,17 43:8,14  
 47:3,6 63:4 86:11 89:8  
 90:19 92:15 94:17  
 123:14 128:15,20  
 130:9 132:19 134:20  
 135:9,11 136:5 139:1  
 142:3,15 143:19,24  
 144:6,24 146:9,14,21  
 148:20 149:3,8 152:23  
 153:22 155:3 156:17  
 172:6 187:6 188:1  
 189:17 205:2  
 tests (24) 17:13,25  
 21:20 25:12,21 30:12  
 50:11 77:1 91:15  
 121:12 123:16  
 128:21,24 130:14  
 131:9 132:16 133:21  
 141:19 144:11 146:7  
 150:18 156:21 171:19  
 188:5  
 text (10) 16:6 51:12  
 69:1 108:7 133:8  
 139:9 167:8 168:18  
 207:23 208:16  
 thank (44)  
 1:12,14,17,20 3:2  
 14:24 21:1 45:9,11  
 56:17  
 62:5,8,10,16,17,19  
 102:20 104:5,17 107:9  
 125:9,17,20,25  
 126:1,3 140:15 148:23  
 156:25 158:8 163:19  
 180:5,12,15,21,22,24  
 220:10,17,20,21,23,25  
 221:1  
 thanking (2) 1:23  
 150:16  
 thanks (3) 133:5 215:8  
 217:23  
 thats (109) 2:22  
 5:1,3,19,22  
 6:1,8,20,22 7:8,24  
 9:13 11:4 14:8,11 15:4  
 28:9 40:7 47:18,23  
 48:1,5,20,25 52:4,21  
 58:15,18 59:3 60:8  
 61:21 66:12,14 68:24  
 69:12,16,22 70:13  
 72:20 77:17,24  
 83:13,13 84:11,15  
 85:10,22 86:5 91:1,21  
 92:3 100:23 101:19  
 104:9 105:8,18 106:12  
 109:21 117:8,20  
 119:3,18 120:12  
 121:17 130:15 131:1  
 133:14,15 134:6  
 136:9,12 140:11

141:9,17 143:23  
 147:17 148:22 151:6  
 156:4 158:8 159:17  
 163:22 165:18 166:20  
 172:3 174:13  
 175:9,11,15 177:10,17  
 178:12 187:22 188:15  
 189:13 191:17 192:4  
 193:9 202:24  
 207:10,19 208:4,4  
 209:24 212:17 214:2  
 218:6,6,14  
 themselves (1) 31:13  
 thereafter (1) 21:13  
 therefore (27) 14:6 20:7  
 27:22 52:24 53:3  
 83:7,20 97:25 99:20  
 100:1 102:7 103:3  
 105:13 106:4 109:19  
 110:5 113:14 134:4  
 136:6 166:14 167:25  
 179:6,23 203:6,23  
 206:25 207:17  
 theres (13) 2:19 15:23  
 50:16 57:3 99:1  
 124:17,17,24  
 195:20,21 196:6  
 211:25 219:24  
 thermal (12) 8:12  
 9:18,22 13:16,24 14:9  
 26:24 34:3 56:22  
 57:9,12 205:23  
 thermally (4) 26:25  
 83:2,11,17  
 thermocouples (5)  
 46:14 60:4,16,23 99:3  
 thermoset (1) 186:14  
 thermosetting (2) 12:22  
 39:5  
 theyd (5) 37:16  
 150:22,24 160:1  
 185:14  
 theyre (4) 41:12 74:17  
 210:3,3  
 thick (3) 137:8 138:22  
 139:12  
 thicker (1) 185:5  
 thickest (1) 145:1  
 thickness (5) 22:2  
 139:2 205:8,21,25  
 thing (10) 28:16 42:4  
 48:21 66:5 81:23  
 83:21 118:12 131:6  
 144:8 187:5  
 thinking (3) 4:23 48:20  
 180:2  
 thinner (1) 83:17  
 thinnest (1) 145:1  
 third (17) 8:23 16:6  
 37:18 38:23 70:2  
 76:9,10 98:2 110:1  
 113:8 118:11 124:23  
 147:5,7 173:14 183:6  
 202:25  
 thirdparty (2) 28:22  
 201:24  
 thoroughly (11) 94:24  
 99:10,11 102:12 110:8  
 208:16 213:7  
 114:2 179:6,6 204:7  
 208:16 213:7  
 121:17 130:15 131:1  
 133:14,15 134:6  
 136:9,12 140:11

42:21 87:1 100:4  
 112:24 123:4 139:18  
 142:11 153:14 155:7  
 183:22 184:9 187:8  
 188:14,18,23 189:16  
 three (20) 4:18 37:13  
 41:18 49:18 74:20  
 76:4,5 81:24,24 82:18  
 84:24 87:15 91:22  
 95:23 111:7 112:6  
 119:3 152:3 186:10,18  
 threefour (1) 136:1  
 through (22) 4:6 9:5  
 11:1 15:24 22:8 24:6  
 46:13 48:15 49:11  
 57:20,23 86:11  
 94:16,17 97:13 122:23  
 137:18 142:3 145:10  
 152:6 177:22 215:2  
 throughout (9) 16:11  
 19:5,8,9 27:4,24  
 28:7,11 41:24  
 thrust (1) 184:16  
 thursday (3) 122:11  
 127:18 221:4  
 tier (21) 74:9  
 76:7,10,11,14,16  
 78:12 80:1,2,22  
 83:25,25 84:1,2,3,5,7  
 91:24,25,25  
 tiers (5) 74:21 76:5  
 81:24 82:18 91:22  
 tim (1) 181:24  
 time (117) 6:14 8:1,1  
 12:11,13 13:17 14:9  
 16:15 19:7 20:21,25  
 21:13 26:16 27:23  
 28:6 29:13 30:16,22  
 33:2 35:11 40:16,16  
 41:7,9 42:10 43:25  
 47:12 52:8 54:22  
 55:11,20 60:2,19  
 61:25 65:14 68:7,10  
 69:16 70:7,15 71:5  
 77:23 80:25 82:10  
 86:16,22 88:18 91:13  
 93:23 94:21 98:12  
 99:13,18 105:19,21  
 106:22 107:5,8,18  
 109:11 110:15,24  
 111:1 113:2 114:12  
 115:11 116:21 117:25  
 121:6 123:4 129:14  
 130:11 133:20 134:17  
 135:16,17 138:1,9,9  
 142:16 146:8 147:23  
 148:9 153:25 157:14  
 158:3,12,17,24  
 159:1,7,13,19 160:20  
 161:16 162:8 165:10  
 172:3 174:24 175:8  
 179:11 182:1 186:1  
 187:25 188:4 193:20  
 195:22 197:21 199:12  
 204:11 206:13 208:18  
 209:16,19 212:20  
 214:25 216:13  
 timeline (1) 109:9  
 timely (1) 128:21  
 times (5) 102:22 114:11  
 167:23 173:24 174:13  
 timing (4) 35:11 38:18  
 111:4 199:2

title (8) 7:6 27:16 29:1  
 143:23 149:3  
 167:15,15 186:3  
 titled (1) 90:4  
 today (6) 1:5,23 3:17  
 45:2 114:14 124:12  
 todays (1) 1:4  
 todd (2) 169:10,17  
 together (10) 41:1 45:3  
 53:21 76:15 92:14  
 108:11 199:2 204:18  
 209:20 213:1  
 told (23) 17:9 18:17  
 39:16 40:24 46:4 47:2  
 53:20 60:10,10,14,19  
 96:11 113:18,20  
 114:10 122:14,20,21  
 123:1 150:4 160:15  
 164:12 220:5  
 tomorrow (4) 193:1  
 220:4,12,24  
 too (3) 23:19,20 136:20  
 took (6) 41:24 63:11  
 154:8,15,16 156:6  
 tool (1) 82:7  
 topic (9) 12:8 56:11,12  
 62:21 131:14 161:4  
 162:23 181:1,14  
 topics (2) 57:2,4  
 torch (1) 55:12  
 total (2) 60:5 149:6  
 tour (2) 21:16 23:9  
 towards (2) 11:22 58:21  
 tower (27) 12:11  
 14:13,17 55:2 59:12  
 88:20 127:6 160:17,19  
 163:7,23 164:2,14,20  
 165:8 181:4 190:2,20  
 191:3,8,11 194:1,4,24  
 198:4 199:3,5  
 trade (3) 21:22 67:4  
 68:16  
 trading (1) 4:13  
 traffic (2) 76:6 80:16  
 trail (5) 136:25  
 137:4,18,24 141:10  
 trained (1) 22:11  
 training (8) 5:11,13  
 24:5,10,14,23 27:9  
 90:24  
 transcriber (1) 2:8  
 transcript (2) 40:25  
 41:19  
 transfer (2) 13:25 14:6  
 transitioned (1) 93:11  
 travel (1) 184:16  
 tried (3) 23:13 74:4  
 194:20  
 trouble (1) 8:4  
 true (3) 3:14 14:8 131:1  
 truncated (1) 87:4  
 try (5) 2:6 29:19 118:15  
 147:22 150:2  
 trying (4) 18:17 36:25  
 199:2 217:8  
 tuesday (4) 47:13  
 107:12 144:5 145:24  
 turn (18) 12:8 34:20  
 39:23 53:15 56:10,18  
 62:21 64:18 73:21  
 78:11 96:6 97:10  
 101:12 157:1 201:20  
 210:18,20 212:5

turning (4) 47:8 93:17  
 127:2 208:22  
 turns (2) 86:23 99:12  
 twig (1) 96:19  
 twominute (2) 45:7,8  
 type (14) 13:7 18:14  
 27:20 83:5 85:14  
 120:19,20 153:3  
 161:2,24 162:21,22  
 181:12,13  
 types (10) 13:21 16:25  
 61:14,19 81:9 83:1,12  
 171:8,19 216:10  
 typical (1) 204:25  
 typo (2) 183:19 184:3  
 U  
 uae (1) 55:4  
 uk (4) 5:14 41:15 67:23  
 202:4  
 ultimately (3) 34:11  
 39:11 196:23  
 umbrella (1) 193:12  
 uncertainty (1) 130:5  
 underneath (10) 16:7  
 63:2 71:14,17 95:23  
 161:9,22 162:18,25  
 167:8  
 understand (37) 12:10  
 16:21 19:6,15 20:7  
 26:12 32:5 34:19  
 39:12 41:6,9 42:2  
 46:11 51:8 57:17  
 58:1,25 59:17 78:5  
 87:1 95:7 112:17  
 124:20 144:9,20,24  
 146:12 155:2 187:8  
 196:15 200:25 201:22  
 203:9 205:14,15  
 206:14 208:14  
 understanding (16)  
 1:25 7:3 12:10 16:25  
 30:17 50:8 81:19  
 82:7,8 121:14 125:1  
 128:16 129:14 163:14  
 174:20,22  
 understood (12) 12:18  
 30:2 32:12 35:9,17  
 52:8 98:12 123:15  
 130:3 179:13 189:5  
 201:24  
 underwrite (1) 121:8  
 undesirable (4)  
 87:24,25 197:23,24  
 undue (2) 197:11,12  
 unfamiliar (1) 176:1  
 unfortunately (6) 79:17  
 201:10 207:25  
 216:10,17 219:5  
 unhappiness (1) 77:9  
 united (1) 42:21  
 university (1) 183:2  
 unless (5) 102:4 129:7  
 148:17 161:25 200:24  
 unlocks (1) 86:7  
 unquestioningly (1)  
 168:5  
 unrealistic (1) 185:8  
 unsafe (1) 143:6  
 unsure (3) 42:14  
 171:6,10  
 until (8) 31:15 36:7  
 47:12 99:14 116:5  
 148:4 156:21 221:3

update (4) 161:6,18  
 162:1 182:3  
 upgrade (1) 13:10  
 upshot (2) 154:14 173:1  
 urgent (2) 139:24  
 140:23  
 usable (1) 34:12  
 usage (1) 80:17  
 used (82) 1:7 9:19  
 11:3,3,5,9,15 13:6  
 15:12 20:8,15 21:5,23  
 22:1 29:17 30:9 31:2  
 34:15 35:10,19 36:1  
 37:8 42:14 47:6 53:8  
 54:6,18 55:6 56:5  
 58:8,18 60:1,4 68:15  
 69:21 70:7,9,21  
 82:19,24 84:4 85:6  
 98:10 100:6 106:25,25  
 112:20 113:1 121:10  
 123:17 125:7 130:5,24  
 135:7 137:7,15 138:22  
 139:11 146:22  
 147:12,17 156:18  
 159:15 160:4 167:13  
 171:12,12 172:2 174:2  
 176:6 177:12 178:21  
 186:12 189:4 191:15  
 193:18 205:19,24  
 206:20 207:9 208:12  
 useful (6) 8:21 128:25  
 183:13 186:25 187:2  
 196:15  
 usher (4) 62:6 125:18  
 180:13 220:18  
 using (15) 20:3 22:20  
 34:4 76:19 79:21  
 81:1,6,9 84:14 132:20  
 137:11 151:20 152:4  
 184:23 185:1  
 uvalue (2) 166:19 206:3  
 uvalues (1) 206:6  
 V  
 vague (2) 67:11 118:15  
 validate (2) 23:16 88:25  
 valuable (2) 124:4  
 145:7  
 value (11) 14:10  
 23:3,6,17,18  
 194:11,13,14,23  
 195:1,7  
 values (3) 13:11,11  
 22:25  
 variability (1) 188:25  
 variety (2) 206:20 207:9  
 various (2) 52:11 90:1  
 vast (1) 42:18  
 ventilated (4) 170:16  
 171:2,16 173:4  
 verbatim (1) 109:17  
 verge (2) 163:5,24  
 version (21)  
 87:5,7,21,22 201:16  
 209:23 210:15 211:11  
 212:10,15,16  
 214:15,21,23 216:22  
 218:3,15,20 219:1,2,9  
 versions (2) 43:15 87:4  
 versus (1) 27:18  
 viewing (1) 98:21  
 viewing (1) 127:25

views (5) 81:20 92:22
93:5,7 184:16
vinci (1) 217:8
visit (2) 172:25 199:10
visiting (2) 173:23
175:10
vividly (1) 25:9
voice (1) 2:6
volunteer (1) 192:13
voyage (4) 31:24 32:2
34:8 38:7
vs (1) 27:17

W

wages (1) 64:11
wakelin (1) 151:3
wales (1) 50:5
walk (5) 119:25
120:16,19 122:4
197:23
walkaway (1) 197:19
walking (2) 23:10
197:24
wall (28) 11:14 18:23
20:8 32:18 33:16 36:2
57:20,21,22 58:21
78:16 80:9 94:13
107:1 111:22 118:6
133:24 134:2 150:21
151:22 153:5,19 161:6
165:3 183:4 205:6,19
206:7
walling (2) 111:2 158:20
walls (8) 31:18,19
33:15,25 34:3 40:4
106:21 186:7
wanting (3) 112:14
123:11 217:16
wapping (1) 118:25
war (1) 64:11
warned (1) 220:5
warning (1) 53:25
warns (1) 98:8
warranting (1) 172:1
warranting (3) 170:16
171:2,15
warren (3) 8:25 9:3
136:19
wars (1) 45:5
wasnt (40) 11:17 28:1
44:22 47:4 53:24
54:19 55:5 69:14
77:13 79:24 80:17
82:7 89:14,16 99:14
108:16 111:3 122:25
123:24 124:24
135:22,23 150:4,5,22
151:7,9 156:9 159:18
169:4 172:3 173:4
176:20 189:2,11
197:12 208:5,6 216:9
218:12
way (36) 2:2 23:17
27:10 28:18
37:7,10,23 39:18 42:1
47:5 48:25 53:9 56:24
63:13 85:22 92:16,24
112:25 133:21 145:12
152:7 155:20 176:5
178:6 188:22 194:21
195:10,13 196:6,9,12
197:14 203:12 205:22
208:11 219:15

waylands (3) 197:18,18
198:14
ways (2) 13:22 37:9
website (1) 205:24
wed (2) 93:3 105:25
wednesday (1) 1:1
week (1) 127:22
weekend (1) 145:11
weeks (11) 43:18 93:25
111:7 112:6 135:21
145:10 157:15 165:7
168:16 174:12 198:13
weight (1) 83:7
weighty (1) 83:18
welcome (1) 1:3
went (5) 23:5 114:18
172:24 196:23,24
werent (17) 18:18 20:21
41:10 47:1,2 60:10
75:20 79:19 94:1
105:16 111:1 125:6
132:9 142:10 155:14
170:7 194:21
west (1) 4:17
weve (21) 24:6 32:21
43:19 49:3 51:3 60:12
97:3 100:1,20 102:21
109:17,18 115:17
154:6 156:16 187:11
188:11 200:8 207:20
212:24 214:14
wharf (2) 136:21 137:9
whatever (1) 173:3
whats (2) 61:7 210:14
whereby (1) 18:24
whilst (3) 38:10 60:24
198:25
white (2) 133:10 163:7
whole (15) 11:1,21
13:13 19:12 28:16
48:22 83:21 111:24
114:13,17 173:18
184:8 188:12,22
200:10
whom (2) 176:18 188:5
whose (1) 213:24
wider (6) 77:20 83:6
123:17 134:22 135:13
136:7
willing (1) 149:13
willoughby (9) 157:8,24
158:6 160:24
161:11,22 162:4,20
181:11
willoughbys (1) 158:7
win (4) 72:9 157:19
192:24 197:10
window (1) 183:1
winning (2) 163:6,24
wish (3) 122:2
172:15,17
witness (27) 1:17 3:12
43:5 56:16 59:8 60:13
62:4,8,16 68:7 93:18
125:16,25 164:22
175:17 180:11,21
190:3 199:11
219:15,18,22,24
220:6,9,16,20
witnesses (1) 1:6
wont (1) 121:23
wool (3) 83:4 84:2
186:14

worded (6)
116:2,14,15,25
117:15,19
wording (11) 101:13,17
102:12,24 103:5,12
105:16 106:3 113:23
167:13,21
work (8) 6:25 9:22
59:12 124:15 169:7
172:12 210:8 212:25
worked (6) 5:4,20 6:2
21:14 193:11 196:13
working (4) 6:10 38:10
159:14 193:21
world (2) 45:5 114:17
worry (1) 90:8
worse (2) 50:21 103:19
worst (1) 132:19
worth (1) 137:18
wouldnt (18)
17:15,17,18 18:10
19:20 23:19 29:13
54:5 57:14 82:4 89:7
117:19 133:24 146:25
180:1 204:7,8,9
write (6) 56:25 67:16
116:24 118:19 158:14
160:21
writes (2) 121:21 156:1
writing (7) 66:17,25
67:7,14 120:5 121:6
130:1
written (1) 138:9
wrong (3) 18:7 53:23
181:24
wrote (3) 104:25 126:6
130:16
X
x (2) 72:10 98:25
xmas (1) 155:20
Y
yeah (33) 6:9,15 13:21
20:1 30:8,20 33:10
43:25 51:10 61:7
65:12,19 67:18 75:5
84:15 88:17 95:15
102:14 117:8 120:17
121:2 126:9 129:10
141:1,8 147:17 162:12
164:9,11 167:17 170:7
189:1 203:12
year (10) 24:18 38:18
45:15 116:4 135:18
144:20 155:8 163:6,25
174:13
years (8) 4:18 55:18
81:10 99:16 118:24
131:8 135:4 186:18
yellow (1) 84:20
yesterday (1) 166:12
yet (7) 2:18 70:9,10
119:7,11 153:20
183:24
youre (22) 1:24 20:20
22:20 26:2 50:20
57:20 62:2 87:3 89:17
112:8 126:11 130:15
133:15 140:6 172:1
180:10 189:13 197:2
201:6 216:7,12 217:20

yours (3) 10:13 11:20
160:25
yourself (6) 1:15 29:10
111:11 133:20 161:17
206:11
youth (2) 84:10,13
youve (2) 87:13 112:6
Z
zip (2) 201:12 202:17
0
0 (54) 16:3,11,14,22
17:1,5,7 19:4,7,15
22:13,21 23:14
25:12,21 26:9
27:4,11,24 28:7,11,16
30:7,8,13,18 36:11,19
39:23 40:12
41:5,14,15,17,22
42:6,22 50:7,8,13,20
91:10 145:2,4 146:23
147:7,11,19,25
148:5,7,20 204:23
205:2
0021 (1) 23:3
02622511 (1) 4:4
050814 (1) 48:9
I
1 (41) 38:22 41:2 47:13
50:21 65:5 76:7,14,16
84:1 90:1 91:14,24
101:7 102:23 127:12
134:1,5 138:4 144:3
148:24 149:16,17
155:19 170:22,22
172:8 185:19 194:24
195:1,16,17,24
210:8,12,21 211:12
216:21 217:21 218:8
222:3,4
10 (11) 118:24 121:21
122:8 123:22 157:8
158:12 162:9 211:3
220:12,23 221:3
100 (2) 173:2,2
1000 (1) 1:2
10062014 (1) 161:11
100millimetre (1) 58:23
100mm (2) 98:22,24
1052 (1) 149:3
107 (1) 125:21
11 (16) 1:1 53:11,11,13
73:24 75:4 86:23
91:19 164:23 209:6
210:3,12,21 211:4,7,7
11082014 (1) 181:15
1125 (1) 62:11
113 (1) 190:4
1140 (4) 61:25
62:7,10,13
1185 (1) 59:10
11am (1) 150:12
11th (1) 205:4
12 (9) 33:14 41:19,20
91:2 132:2 209:18
211:6 212:16 221:4
120 (1) 151:24
122 (1) 21:17

125 (3) 33:18 51:3
132:2
125mm (1) 98:25
126 (4) 13:4,9 34:1 40:3
127 (4) 34:24 35:21
39:8 95:11
129 (1) 34:1
12millimetre (3)
58:13,19 61:1
12mm (5) 59:25
98:20,23 137:8 139:11
12page (7) 87:7,21
143:16 210:11 213:15
214:12 216:6
13 (2) 28:24 181:18
13165 (1) 24:7
135 (38) 20:3 31:1
34:4,25 39:21 43:15
44:14 45:23 47:21
49:4,9 51:4,6,9
52:2,23 57:24 62:22
94:17 97:24 99:20
102:5 103:2 105:12
110:4 113:13 114:5
138:24 140:20 166:13
167:24 184:23 187:7
203:6 206:25 207:15
218:15,22
1352013 (1) 209:4
13b (1) 41:17
14 (9) 47:12,13
53:11,11 91:8,8
136:15,18 143:25
14th (1) 204:23
15 (5) 41:20 154:24
170:12 214:3 215:7
15mm (1) 151:23
16 (3) 21:18 22:18 51:5
1659 (1) 133:4
17 (5) 3:22,24 36:22
134:16 192:22
1714 (1) 133:5
17th (2) 205:1,2
18 (102) 3:22 11:10,16
20:9,15 30:9 31:2
32:18 34:12,22
35:10,15 36:19 37:8
38:2 39:19 40:12 41:5
42:15 43:23 48:23
53:5,8 69:21
72:24,24,25
79:3,23,24
80:15,17,17 81:2,3,25
85:1 91:10,17,18
97:17,22 98:1 99:21
100:2,7,15
101:10,14,21 102:4,10
103:4,14 104:15
105:14 106:8,12,15
109:20 110:6 130:6
131:4 143:7 147:20
152:21,24
153:1,11,16,19,21
154:2 159:8,15 160:4
164:16 168:1 171:3
174:2 177:13,19
178:21 179:8 181:17
184:18 191:8,11,15
200:4,10
203:4,8,16,25
204:6,21 205:7,20
206:7,17 207:11
18072014 (2) 162:4,24

18m (32) 29:5,10 35:24
48:20 52:19,25 53:3
69:8,13 80:6,6,7,24
88:12 89:4 127:25
152:18 157:14,18
159:6,11 161:4,6
162:23 166:15
170:14,17 181:14
186:8 198:9 207:2,18
18metre (3) 82:11
153:3 161:19
19 (3) 4:5 56:18 91:24
190 (4) 143:24 145:9,13
149:4
1980s (1) 64:22
1991 (1) 53:15
1992 (1) 53:16
1994 (1) 4:7
1997 (1) 4:9
1999 (1) 53:17
19th (1) 149:19
2
2 (50) 15:2 21:4 43:6
45:25,25 50:21 59:22
75:25 76:8 78:12
83:25 84:2,5 91:25
98:25 111:18 121:21
122:7 127:13
132:16,20 133:23
134:3 136:16 138:6,10
144:3 146:23 147:11
151:22 152:5 157:15
160:9 161:7 169:18,22
170:3,11 205:3
209:7,17
210:4,9,10,22
211:13,18 217:11
218:1,4
20 (2) 91:24 115:16
2004 (1) 4:13
2005 (2) 206:25 207:15
2007 (2) 4:15 5:20
2008 (1) 26:8
2011 (3) 185:14,19
205:2
2012 (4) 6:2 15:3 53:19
55:4
2013 (2) 55:4 64:24
2014 (83) 5:17 6:20
10:24 14:21 15:4,5
24:2 25:20 26:17 31:6
34:9 35:8 36:4,6,20
40:17 42:21 43:19,21
44:5,10,19,20
45:13,21 46:23
47:8,10 58:2 59:2,18
60:5 62:24 63:18
91:10 107:24 108:17
110:23 111:7 112:9
115:12,16 130:13
131:20,21 135:10
143:25 146:21
149:2,17 156:19 157:8
158:12,17 159:13
160:9 161:18 162:9,10
164:25 165:14 168:15
171:13 174:24
181:3,17,18 182:19
185:12 186:18 192:22
194:4 198:3 199:6
202:3 204:23 205:1,4

209:6,16 215:7 216:21
218:17
2015 (22) 45:18,21 55:9
73:24 75:3 84:7
86:14,23 91:14 115:13
117:25 122:8 123:22
126:6 134:18 138:1
143:2 149:18 151:13
154:24 156:13,15
2016 (2) 55:9 107:12
2018 (1) 2:10
2020 (3) 1:1 41:1 221:4
205 (2) 125:13,20
207 (1) 125:23
21 (5) 4:12 23:3 91:25
182:19 211:22
22 (13) 4:6 5:21 6:17
26:9 91:25 107:12
111:7 112:9,12 150:8
211:22 212:1,3
222 (4) 211:22 212:5,10
217:12
223 (1) 212:7
224 (1) 212:7
23 (4) 92:2,3 173:21
177:8
24 (1) 3:8
25 (4) 25:4 52:15,16
131:20
26 (2) 25:17 52:20
27 (10) 7:12,15
57:15,15 60:7 154:25
198:3 199:6 208:23
213:3
27th (3) 151:18 154:7
156:7
28 (8) 2:10 24:2 26:5,5
28:21 32:21 43:19
149:2
29 (9) 44:7 107:24
112:11 113:7 202:3
203:21 205:12 216:21
218:17
295255 (7) 205:3
209:7,17 210:4 217:11
218:4,21
295369 (1) 217:15
3
3 (30) 48:19 50:21
76:11,14 80:1,2,22
83:25 84:3,7 91:25
95:21 103:20
115:14,18 119:13
121:22 136:23 141:4
143:22 144:18 145:21
164:22 168:16 210:22
211:14,24,25 212:11
215:4
30 (1) 174:13
31 (3) 161:18 162:10
175:18
31082014 (1) 161:5
32 (1) 72:21
321 (1) 180:16
335 (3) 180:8,15,18
33page (1) 86:24
35m (1) 128:13
3rd (1) 115:23
4



4 (20) 3:21 25:11,17 49:1 62:25 66:16,16 67:3 78:11 96:6 97:5 119:9 140:7 144:18 187:13 211:24 212:2,4,11 217:12	189:7,14,15,20 191:21 192:9 205:1 <b>84141 (4)</b> 24:8 32:23 33:3 131:25 <b>841412002 (2)</b> 34:5 94:18 <b>84142 (9)</b> 49:4 91:4 131:25 138:21 141:15 204:4 206:24 207:14 217:25 <b>841422005 (7)</b> 34:5 94:18 97:20,24 98:19 105:12 203:5 <b>8millimetre (1)</b> 96:16 <b>8mm (1)</b> 59:23				
<b>40 (4)</b> 40:1,5,7 69:24 <b>4000 (3)</b> 19:19 26:23 72:25 <b>435 (1)</b> 221:2 <b>45 (2)</b> 25:3 218:20 <b>45minute (1)</b> 48:3 <b>467 (1)</b> 23:15 <b>476 (7)</b> 16:12 17:2 19:6,9,19 25:18 191:24 <b>47611 (1)</b> 50:13 <b>47621 (1)</b> 153:4 <b>4764 (1)</b> 50:12 <b>4th (1)</b> 184:6	<hr/> <b>9</b> <hr/> <b>9 (5)</b> 41:1 47:12 85:8 119:3 211:1 <b>90 (1)</b> 151:24 <b>95 (2)</b> 39:25 40:2 <b>954 (1)</b> 192:21 <b>96 (1)</b> 39:25 <b>97 (1)</b> 40:7				
<hr/> <b>5</b> <hr/> <b>5 (22)</b> 4:11 44:5,10 47:10,13 67:10,25 76:10 80:1 93:20 94:20 97:15 118:18 126:10,13 138:14,16 164:25 165:19 210:22 212:6,15 <b>5000 (4)</b> 19:18 26:23 56:20 105:10 <b>51 (2)</b> 27:1,2 <b>55 (1)</b> 134:16 <b>56 (1)</b> 135:19 <b>57 (2)</b> 36:23 71:10 <b>59page (1)</b> 48:8 <b>5th (2)</b> 47:12 150:12					
<hr/> <b>6</b> <hr/> <b>6 (17)</b> 7:13 25:18 60:3,11 83:23 93:18 96:12 99:2 104:9 111:21 118:2,4 165:14,16 168:25 186:2 210:23 <b>6000m2 (1)</b> 217:8 <b>69 (2)</b> 110:14 111:15 <b>6k (1)</b> 152:10 <b>6millimetre (1)</b> 60:21 <b>6mm (1)</b> 59:25					
<hr/> <b>7</b> <hr/> <b>7 (6)</b> 25:18 43:6 44:7 49:15 84:17 210:24 <b>73 (2)</b> 185:14,18					
<hr/> <b>8</b> <hr/> <b>8 (8)</b> 41:13 51:2 60:15,22 99:2 151:13 175:18 211:1 <b>80mm (1)</b> 138:22 <b>83 (1)</b> 152:5 <b>8414 (33)</b> 20:4 30:4,5,18 31:1 35:1 39:21 43:20 44:20 45:14,24 49:9 53:23 58:2 59:2 92:25 106:7,14 107:1 123:16 148:9 150:23 151:9 184:24 188:17,22					