

OPUS2

Grenfell Tower Inquiry

Day 89

February 11, 2021

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Thursday, 11 February 2021

1
2 (10.00 am)
3 SIR MARTIN MOORE–BICK: Good morning, everyone. WeLcome to
4 today’s hearing. As before, I’m here with my fellow
5 panel members, Ms Thouria Istephan and Mr Ali Akbor.
6 MS ISTEPHAN: Good morning, everyone.
7 MR AKBOR: Good morning, everyone.
8 SIR MARTIN MOORE–BICK: Can I begin by reminding those of
9 you who are not active participants in the proceedings
10 to keep your cameras and microphones switched off at all
11 times, unless for some reason you need to intervene.
12 Today we’re going to continue hearing from
13 Ms French, so I’m going to go straightaway to Ms French
14 to check that she can see and hear us all clearly .
15 MS DEBORAH FRENCH (continued)
16 SIR MARTIN MOORE–BICK: Ms French, are you there?
17 THE WITNESS: Yes, good morning.
18 SIR MARTIN MOORE–BICK: Good morning. And you can see me
19 and hear me, I hope, clearly?
20 THE WITNESS: Yes, I can, thank you, sir.
21 SIR MARTIN MOORE–BICK: Good, thank you very much.
22 Well, I think I had better just go through the usual
23 housekeeping arrangements.
24 Can you confirm that today, as before, you are alone
25 in the room from which you are giving evidence?

1

1 THE WITNESS: Yes, I am.
2 SIR MARTIN MOORE–BICK: Thank you.
3 Can you confirm that you have no documents or other
4 materials with you?
5 THE WITNESS: No, I don’t.
6 SIR MARTIN MOORE–BICK: Good.
7 Can you confirm that your mobile phone is in another
8 room and there is no other electronic device with you
9 which is capable of receiving messages?
10 THE WITNESS: No, nothing at all.
11 SIR MARTIN MOORE–BICK: Thank you very much.
12 Well, as you know, your legal representatives are in
13 the virtual hearing room in case they need to take any
14 steps to safeguard your interests . If there are
15 problems from your point of view, please just attract my
16 attention, but we have been through all that, and you
17 have become quite familiar with how the system works.
18 I hope we’ll have a trouble–free morning.
19 I have already reminded you about the importance of
20 not talking to anyone about your evidence while you’re
21 out of the room. That goes at all times, of course, if
22 I forget to remind you later on.
23 Is there anything you would like to raise before we
24 start?
25 THE WITNESS: No, thank you.

2

1 SIR MARTIN MOORE–BICK: Right, very good. In that case,
2 I’ ll ask Mr Millett to put some more questions to you.
3 Yes, Mr Millett.
4 Questions from COUNSEL TO THE INQUIRY (continued)
5 MR MILLETT: Good morning, Mr Chairman, thank you, and good
6 morning, members of the panel.
7 Good morning, Ms French. Thank you very much for
8 coming back to us.
9 I just want to pick up on one or two matters from
10 yesterday very briefly , if I may.
11 You agreed, I think, yesterday, that you knew that
12 Grenfell Tower was a high–rise residential building; can
13 you confirm that that’s right?
14 A. Yes.
15 Q. You told us yesterday that you knew that PE cassette was
16 going to be used as the rainscreen cladding material on
17 Grenfell Tower; yes?
18 A. Yes, looking at the information from the last few days,
19 yes.
20 Q. You told us — and the reference is at {Day88/168:16–20}
21 of the transcript — that you didn’t have sufficient
22 knowledge about the differences between PE and FR or
23 between rivet and cassette to be able to recommend or
24 advise about the fire risks of any or all of those; is
25 that right?

3

1 A. Yes.
2 Q. Why did you not yourself, therefore, seek internally any
3 advice within Arconic about whether PE in cassette form
4 was appropriate for Grenfell Tower?
5 A. I don’t know. I felt that it was something that other
6 people within the project would be picking up on and
7 asking any necessary questions for me to answer or get
8 information for them.
9 Q. You said yesterday, at {Day88/171:6} and following, that
10 you did not offer Harley or CEP a choice as between PE
11 core or FR core.
12 Did you ever actually tell either CEP or Harley in
13 terms, expressly, that the Reynobond 55 for
14 Grenfell Tower had a PE core?
15 A. I don’t believe so, no.
16 Q. Why is that?
17 A. Again, it just wasn’t something that was ever discussed
18 generally with any customers in terms of the core.
19 Q. Now, I want to turn back in the chronology, please, to
20 March 2015.
21 As Arconic’s customer — and just to remind you and
22 everybody else, you had left Arconic by then and gone to
23 Taylor Maxwell; yes?
24 A. Yes.
25 Q. As Arconic’s potential customer at Taylor Maxwell, you

4

1 would sometimes have use for fire certifications ,
 2 wouldn't you?
 3 A. Yes, we would be asked by certain customers of our own,
 4 Taylor Maxwell's own, for certain documents, yes.
 5 Q. Yes. Can we go to {MET00053173/135}, please. This is
 6 your exhibit DF5 at page 135. This is an email chain
 7 from early March 2015, and at the bottom of that page is
 8 your email, you can see it there, to
 9 Gwenaelle Derrendinger of 3 March 2015. You can see
 10 that it is a request by you. You say:
 11 "Could you please send over copies of the Certs for
 12 FR and PE Reynobond Certs please.
 13 "Thanks.
 14 "Debbs."
 15 What prompted you to ask for those documents?
 16 A. I don't recall , unless it was a specific customer
 17 enquiry.
 18 Q. A specific customer enquiry; was that specific customer
 19 enquiry the first time that you have had ever had, in
 20 your experience up to that time, such an enquiry from
 21 a customer?
 22 A. Well, as I say, having -- working in -- at the level
 23 that I'm now working at, we're much closer to installers
 24 and other people within the industry.
 25 Q. Was it the first time you yourself had ever been exposed

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1 to such a request?
 2 A. I don't recall having them before that, no.
 3 Q. Right. Given that it was the first time you had ever
 4 been exposed to such a request, did it surprise you that
 5 such a request had never filtered down the chain of
 6 supply to you while you were working at Arconic and
 7 selling Reynobond PE 55?
 8 A. I don't believe I would have thought of it in that
 9 manner at the time. It was -- as I say, I was working
 10 in a different environment and was -- probably just took
 11 it that that was the thing to expect.
 12 Q. You took it that that was the thing to expect, what, at
 13 Taylor Maxwell or of end users?
 14 A. Well, within the questions that would potentially be
 15 coming from customers within -- from Taylor Maxwell
 16 customers.
 17 Q. Did you not wonder why it was that requests such as
 18 these that we can see in this email, which you were
 19 passing on down to Arconic, had never come down to you
 20 at Arconic during all your years there?
 21 A. No, I don't believe I -- I don't remember thinking along
 22 those lines , no. I had a request and I was just
 23 satisfying the request.
 24 Q. Yes. I mean, it's odd, though, isn't it? You were
 25 dealing with many customers, as you've described them to

6

1 be, for many, many years, and you told us yesterday,
 2 I think, you never had a request of this nature about
 3 the fire certificates from those with whom you were
 4 dealing, but here you are, only a few weeks after
 5 joining Taylor Maxwell, passing into Arconic just that
 6 sort of request. Did that not strike you as strange at
 7 the time?
 8 A. No, I don't believe so.
 9 Q. Can we go, then, to the top of the page, and this is
 10 Gwenaelle Derrendinger's response to you on 9 March, and
 11 she attaches three documents, as you can see: test
 12 reports for cassette/rivet, cassette and rivet, as you
 13 can see there from the attachments. She says:
 14 "Hello Debbie,
 15 "Sorry for answering you just now, I replace
 16 Marie-Claude and I am not as reactive as I would like
 17 [unsmiley face].
 18 "Attached the certificates requested."
 19 Do you see that?
 20 As I've just shown you, she attached three
 21 certificates . Let's just look at those, if we can.
 22 The first one is at {MET00053173/137}. You can see
 23 that that is a fire classification report done under the
 24 European Standard in respect of Reynobond FR, if you
 25 look at "Commercial brand", date of issue: 27 September

7

1 2012.
 2 When you received Ms Derrendinger's email, did you
 3 open the attachment or any of the attachments?
 4 A. I don't recall .
 5 Q. Did you open this attachment and look at this
 6 specifically ?
 7 A. I don't recall .
 8 Q. Right.
 9 Let's look at the next one that she sent you, the
 10 second of three, that's -- I'm so sorry, before we jump
 11 away from this, can I take you to page 140
 12 {MET00053173/140}, which is the classification itself,
 13 and you can see that here is the FR classification :
 14 B-s1, d0.
 15 Let's then go to the next one she sent you, which is
 16 at {MET00053173/141}. This is the second of the fire
 17 classification reports she sent you, dated, as you can
 18 see at the bottom of the page, 4 December 2014, so not
 19 long before. This time the commercial brand is
 20 "REYNOBOND 55 PE (cassette system)", do you see that?
 21 And if you go to page 143 {MET00053173/143} in this
 22 report, you will see that the classification for
 23 cassette was E.
 24 If we go to the third classification report that
 25 Ms Derrendinger sent you on 9 March 2015, that is at

8

1 {MET00053173/145}. Again, the date at the bottom is
 2 4 December 2014, and this time the commercial brand is
 3 "REYNOBOND 55 PE (riveted system)".
 4 If you go to page 148 {MET00053173/148} in this fire
 5 classification report, you can see that the
 6 classification is class C, C-s2, d0.
 7 Now, I've shown you all of those and the results for
 8 each of them, FR, cassette and rivet — so FR, and PE in
 9 cassette and PE in rivet. Having shown you those, are
 10 you sure you didn't open those certificates and read
 11 them when you received them from Ms Derrendinger?
 12 A. I don't recall whether I would have opened them in that
 13 specific email or not, no.
 14 Q. Do you remember what you did with those certificates?
 15 We've seen that they were requested of you by an end
 16 customer. Did you send them on to the end customer?
 17 A. Whoever had requested the information, I would have
 18 passed that back on to them, yes.
 19 Q. Would it have been your practice at the time to have
 20 checked what Gwenaelle Derrendinger had sent you before
 21 sending that on to your end customer?
 22 A. I don't recall. It depends what the request would have
 23 been.
 24 Q. Well, you have seen the request, or at least the terms
 25 in which you reported that request to

9

1 Gwenaelle Derrendinger in the email I showed you.
 2 When you passed what you had asked from
 3 Ms Derrendinger back to your customer, did you not check
 4 the documents that you were sending to them?
 5 A. As I've said, I don't recall whether I checked those as
 6 part of that email or not.
 7 Q. No, my question was: would it have been your practice at
 8 the time to have checked?
 9 A. I don't recall.
 10 Q. You don't recall what your practice was?
 11 A. No, I don't recall whether I would have opened them or
 12 not. I would have passed the information on to the
 13 customer for them to — so that they had got the
 14 information they requested.
 15 Q. Yes, I understand that you don't recall specifically
 16 whether you did or didn't. My question is whether it
 17 was your practice at the time, when asked for something
 18 like this from customers and asking for it in turn, as
 19 you do, and getting it back, that you would have checked
 20 what you received, before sending it to your customers.
 21 Was that your practice at the time?
 22 A. I, yes, generally look at stuff before it goes off, but
 23 I would still just pass it over to the customer for them
 24 to have the information they requested.
 25 Q. If it was your practice at the time to open the

10

1 documents and check them, even if cursorily to make sure
 2 that what you had asked for was what you were getting,
 3 did you not notice these classifications for each of
 4 these three types of product?
 5 A. Again, I can't answer that question. I would have
 6 passed the information on to the customer for them to
 7 decide what they needed to do with it.
 8 Q. Did you discover at this moment when you got these
 9 certificates from Gwenaelle Derrendinger that indeed
 10 Reynobond 55 in PE had a class C in rivet and class E in
 11 cassette?
 12 A. I don't recall what my reaction was at the time.
 13 Q. Right. So do we take it from that that you had no
 14 reaction to it at the time?
 15 A. I don't recall. I can't answer that. I don't recall
 16 what my reaction was at the time.
 17 Q. Right.
 18 If, up to that moment, you had not known that
 19 Reynobond 55 PE in rivet had a C and in cassette had
 20 an E, and if, in accordance with your practice, you had
 21 opened these documents, even if just to check that what
 22 you had asked for was what you were getting, it would
 23 have come as something of a shock to you to discover,
 24 wouldn't it, that these panels had these
 25 classifications ?

11

1 A. Yes, it would have done.
 2 Q. Were you surprised that you weren't sent any information
 3 by Ms Derrendinger showing that Reynobond PE was
 4 class 0?
 5 A. Again, I don't recall what my thinking was, but again,
 6 I ... I can't answer that, I don't know.
 7 Q. You see, your request of her was for certificates for FR
 8 and PE Reynobond, and she's only sent you the European
 9 ones. Were you surprised not to have received from her
 10 any test data, classification reports, which showed that
 11 Reynobond PE and FR had class 0?
 12 A. Looking back at it now, yes, it was surprising that
 13 a copy of the BBA wasn't sent alongside it.
 14 Q. Well, never mind the BBA. You had asked for
 15 certificates. I suppose that might include the BBA, but
 16 were you surprised at the time — not now, but at the
 17 time — that Ms Derrendinger sent you nothing which
 18 showed that Reynobond 55, FR or PE, had achieved
 19 a class 0 in accordance with national class?
 20 A. As I say, I don't recall what I thought at the time.
 21 I don't recall the event.
 22 Q. Am I right in thinking that, at Taylor Maxwell, you were
 23 dealing with UK customers?
 24 A. Yes.
 25 Q. And therefore in the UK market?

12

1 A. Yes.
 2 Q. And given what you told us yesterday about your
 3 perceived irrelevance of the Euro classifications and
 4 the only classification that mattered in that market
 5 being national class 0, why didn't you go back to
 6 Gwenaelle Derrendering and say, "Well, thank you very
 7 much for these Euro classifications; what I need,
 8 please, is the national classifications"? Why didn't
 9 you do that?
 10 A. I don't know.
 11 Q. Is it --
 12 A. I don't recall.
 13 Q. Sorry, do you want to continue?
 14 A. Sorry, I don't know.
 15 Q. You don't know.
 16 Is it because, in fact, you had prior to this point
 17 come to understand that European classifications were
 18 just as relevant to your UK customers as national class?
 19 A. Again, I don't recall. I think there was more
 20 prominence around the European certificates, but I don't
 21 recall them still being more important than the BBA that
 22 was being requested.
 23 Q. You see, you say you don't recall, and I appreciate
 24 these matters are some six years ago now, almost
 25 six years ago, I do understand that. What I'm really

13

1 seeking to get from you is some sort of explanation for
 2 what you did at the time when looking at the documents.
 3 Whether you can recall specifically or not, I do
 4 understand, but I would like to understand what you
 5 would have done by reference to what you might
 6 habitually have done.
 7 Let me try this once more.
 8 You told us yesterday that you dealt in the UK
 9 market and, to your way of understanding, the only thing
 10 that mattered to your UK customers was the national
 11 classifications for fire and not the European
 12 classifications for fire. That was what you told us on
 13 a number of occasions.
 14 Did that understanding ever change?
 15 A. I don't -- as I say, I think towards the end of my time,
 16 then there were definitely more questions and more
 17 certificates being shared on the European certificates,
 18 but I really cannot remember what my thinking was
 19 around -- or my understanding at the time of the
 20 relevance of those EN certificates compared to the BBA.
 21 Q. Were you surprised at the time not to have received any
 22 class 0 certification material from
 23 Gwenaelle Derrendering?
 24 A. Again, I really cannot recall what my response was at
 25 that particular time.

14

1 Q. When you passed this material that you had received from
 2 her back to your customer, did your customer ask you for
 3 the national classification for PE and FR?
 4 A. I don't know. I can't remember what their specific
 5 question was or what the specific request was. I don't
 6 recall what other information, if any, I would have sent
 7 on.
 8 Q. Do we take it from that answer that you sent these to
 9 your customers, they never came back to you to ask you
 10 for the national class 0 certificate, and we've
 11 certainly seen no documentation to that effect?
 12 A. As I say, I can't recall the exact situation that you're
 13 talking about, but I would have sent the information on
 14 and that would have been passed over to the relevant
 15 customer that had requested the information.
 16 Q. I'm bound to suggest to you that, at least by this
 17 point, you knew very well that European classifications
 18 were of extreme relevance to UK customers, and Arconic
 19 knew that, your customers knew that, and I'm suggesting
 20 to you that you knew that.
 21 A. As I said, I think it was becoming more apparent that it
 22 was -- they were more relevant.
 23 Q. Can we move to July 2015, and again this is the same
 24 exhibit run, and look at page 152, {MET00053173/152},
 25 DF5. This is an email run in July 2015 between you and

15

1 Ms Derrendering at Arconic.
 2 At the bottom of the page, you will see an email on
 3 30 July 2015 from you to Gwenaelle Derrendering, and you
 4 can see that there, just below the "Visit our NEW
 5 website at [Taylor Maxwell]", do you see that?
 6 A. Yes.
 7 Q. Underneath that it says:
 8 "We have a project we are working on where we are
 9 specifying Reynobond and the architect is looking for
 10 details on fire rating.
 11 "Could you forward to both myself and Chris Taylor
 12 copies of current fire certificates for RB 55 4mm
 13 PE core[.] Could you also put a description together so
 14 we can explain the class of fire rating and length of
 15 burn time, if you could also include the same info for
 16 the FR core as well please."
 17 Above that you send a follow-up email, it's in
 18 French, "De: Debbie French", "Envoyé: jeudi 30 juillet",
 19 30 July, to Gwenaelle Derrendering. You see that? It's
 20 also gone to Vince Meakins, who by this time had taken
 21 over your role, which you had previously occupied until
 22 the previous December. I think that's right, isn't it,
 23 as you told us yesterday?
 24 A. That's right.
 25 Q. You say:

16

1 "Should have said we have to achieve class 0 rating
 2 both riveted and cassette panels."
 3 Now, am I right that by this time -- this is
 4 July 2015 -- you knew that there might be a difference
 5 in the fire performance as between rivet and cassette
 6 fixes?
 7 A. Yes, looking at that, yes.
 8 Q. Yes. When did you learn that such a difference existed?
 9 A. As I say, I think it was the few months leading up to
 10 that particular point.
 11 Q. So while you were at Taylor Maxwell?
 12 A. Yes.
 13 Q. Did that come as a surprise to you?
 14 A. I've certainly learnt a considerable amount since I've
 15 been there, a huge amount, so --
 16 Q. Did it come as a surprise to you?
 17 A. I don't recall -- again, I don't -- I can't recall my
 18 exact reaction to it, but yes, it probably would have
 19 been.
 20 Q. Did you seek to understand how it could have come about
 21 that for so many years you had not understood that there
 22 was a difference between the fire performance of rivet
 23 on the one hand and cassette on the other?
 24 A. I don't believe I did, no.
 25 Q. Was that not a serious matter for you to try to work

17

1 out?
 2 A. No, I didn't -- I don't think that I looked at it in
 3 that way at the time.
 4 Q. Did you seek to alert Reynobond, with whom you were
 5 dealing and had been dealing throughout 2015, that the
 6 BBA certificate drew no such distinction?
 7 A. No, I don't -- I didn't do that.
 8 Q. Why is that?
 9 A. I don't know, I can't answer that question.
 10 Q. Did you seek to alert your clients to the fact that from
 11 now on the BBA certificate, although it drew no such
 12 distinction within it, ought to be treated as drawing
 13 that distinction?
 14 A. No, I don't believe I did. But, again, I would have
 15 expected, if the BBA wasn't valid, that it wouldn't have
 16 been -- it should have been withdrawn.
 17 Q. Did you continue to use the BBA certificate at
 18 Taylor Maxwell with your customers when you were selling
 19 or recommending Reynobond 55, either in PE or in FR?
 20 A. The BBA certificate was available online, on the -- as
 21 a search for anybody. So, yes, I would have been.
 22 Q. Well, there are two parts of that sentence which don't
 23 necessarily marry up. It was available online. My
 24 question, I'll ask it again, is: did you continue to use
 25 the BBA certificate yourself while at Taylor Maxwell

18

1 when you were selling or recommending Reynobond 55 in
 2 either format to your customers?
 3 A. I can't remember a specific instance of sending
 4 anything, but yes, possibly.
 5 Q. At any stage, do you recall ever telling your customers
 6 that if they were going to order Reynobond 55, that
 7 there was a difference in the fire performance as
 8 between rivet fix and cassette fix with a PE core?
 9 A. No, I don't believe I did.
 10 Q. Why is that?
 11 A. I can't -- I don't know, I can't answer that question.
 12 Q. So do we take it that, from July 2015 onwards, even
 13 though by then you knew, as you've told us, that there
 14 might be a difference in the fire performance as between
 15 rivet and cassette--fix for PE, you still sold
 16 Reynobond 55 PE to your customers without alerting them
 17 to that difference?
 18 A. Possibly, yes.
 19 Q. Now, above this email we can see an email from
 20 Gwenaelle Derrenderinger the same day, if we just go back
 21 to the document, please {MET00053173/152}. She attaches
 22 a document, if we go to the top of the page, and this is
 23 the same day, 30 July 2015, to you and copied to
 24 Vince Meakins:
 25 "Dear Debbie,

19

1 "Please find attached the document requested.
 2 "Should you need additional information please let
 3 me know.
 4 "Kind regards,
 5 "Gwen."
 6 I should just note to you the attachment, which is,
 7 "RB554 FR -- BS 476 -- Class 0 Summary", that's the pdf.
 8 Do you see that?
 9 A. Yes.
 10 Q. If we go to page 154 {MET00053173/154}, we can see the
 11 attachment, and this is a report by Exova Warringtonfire
 12 called "Class 0 Summary Report"; do you see that?
 13 A. Yes.
 14 Q. It's dated, if you look at the bottom right--hand corner,
 15 5 December 2012.
 16 Was this a document you had ever seen before, do you
 17 think?
 18 A. I recall having seen that before, yes.
 19 Q. You recall having seen that before. When you received
 20 it at the time, 30 July 2015, did you recall at that
 21 time that you had seen it before?
 22 A. I -- well, it wouldn't have -- because I recognised it,
 23 I wouldn't have questioned that.
 24 Q. Right.
 25 A. I don't recall seeing it specifically at that time, but

20

1 I am familiar with the document.
 2 Q. Well, I appreciate you may very well be familiar with
 3 the document now, Ms French, I understand that, but my
 4 question is whether you were familiar with it at the
 5 time or whether it was a new document you had never seen
 6 before?
 7 A. No, I was familiar with it at the time.
 8 Q. Can you tell us how you had become familiar with it, so
 9 that you were familiar with it by July 2015?
 10 A. I think I'd seen it on -- in documents that had been
 11 passed to me during my time at Reynobond.
 12 Q. Who would have passed this to you during your time at
 13 Reynobond?
 14 A. Well, again, I can't be specific, but I would say it
 15 would have come from the sales technical team.
 16 Q. Would it have been sent to you by email, or how would it
 17 have been sent to you?
 18 A. I believe it would have been on an email format of some
 19 description.
 20 Q. Would it have come from Claude Wehrle or somebody else
 21 in his team?
 22 A. It could have come from Claude, it could have come from
 23 anybody in that team.
 24 Q. Did it come as a request by you to them?
 25 A. I can't recall.

21

1 Q. Was it unprompted and came to you as part of the
 2 information they felt you ought to have?
 3 A. I really can't recall as to what the situation was, but
 4 I do recognise the -- having seen the document before.
 5 Q. Right. Were you given any explanation as to what this
 6 document represented or did?
 7 A. I don't believe so.
 8 Q. Right.
 9 Let's go over the page to page 155
 10 {MET00053173/155}, please. Here's a table which says
 11 that the product reference is Reynobond FR. Do you see
 12 that?
 13 A. Yes.
 14 Q. And above that, you can see the objective:
 15 "To assess the results of tests to BS 476:Part 6 ...
 16 and ... 7 ..."
 17 Do you see that there?
 18 A. Yes.
 19 Q. If you go to the opinion at the bottom, it says:
 20 "We consider the results of the tests to
 21 BS 476:Part 6 ... and ... 7 ... demonstrate that the
 22 product, as tested, complies with the requirements for
 23 Class 0, as defined in paragraph A13(b) of Approved
 24 Document B, 'Fire Safety', to the Building Regulations
 25 2000."

22

1 When you saw this document, this told you that FR
 2 Reynobond was class 0, didn't it?
 3 A. It would have done, yes.
 4 Q. Did you notice that Gwenaelle Derrendinger did not send
 5 you any such similar report in relation to PE, whether
 6 in cassette--fix or rivet--fix?
 7 A. I don't recall what -- at the time, I don't know.
 8 Q. We haven't seen an email in which you go back to her and
 9 ask her for the equivalent report for PE core. Did you?
 10 A. I don't recall. I don't recall to that detail what
 11 I did afterwards. We were asking for information to
 12 explain both cores, from what I can remember on that
 13 email, and that information would have been passed on.
 14 Q. It looks very much from the records we've got that you
 15 didn't go back and ask her for the equivalent report for
 16 PE core. Do you accept that you didn't?
 17 A. I can't, because I can't remember what I did on that
 18 particular situation.
 19 Q. On the footing that you didn't go back and ask her for
 20 such an equivalent report, is that because you knew
 21 there wasn't one?
 22 A. No, I think the question in the email was that the
 23 customer was requesting they had to achieve a class 0,
 24 and we were asking for an explanation and the difference
 25 between the two, and information to support class 0. So

23

1 if that's what they'd sent us, we would have passed that
 2 on.
 3 Q. Indeed. And that supported class 0, as you put it, for
 4 Reynobond FR. There was no such report we've seen which
 5 supported such a claim for PE.
 6 I'm putting to you that you didn't go back and ask
 7 Gwenaelle Derrendinger for an equivalent report because
 8 you knew very well there wasn't one?
 9 A. No, I don't believe that would have been the reason why.
 10 I don't recall.
 11 Q. Did you suspect, even if you didn't know, that there was
 12 no such equivalent report for PE?
 13 A. Again, I can't answer that with clarity without
 14 remembering the exact circumstances of the situation.
 15 Q. Well, let's go back to how you actually used that
 16 information. If we move on in the same exhibit run,
 17 please, to page 159 {MET00053173/159}, you can see here,
 18 from the second email from the top of that page, here's
 19 an email which is a follow-on from the email that
 20 Gwenaelle Derrendinger sent you, which is the bottom
 21 part of the email you sent her.
 22 Now, I need to go to the bottom of the previous
 23 page, page 158 {MET00053173/158}, to go to the beginning
 24 of your message back to her. You can see at the bottom
 25 of page 158 that you send an email to Danny McQuaid and

24

1 Grahame Byrne, copied to Chris Taylor and Vince Meakins,
2 on Friday, 31 July 2015.

3 If you turn then to the top of page 159
4 {MET00053173/159}, please, you say:

5 "We need to make sure we only order FR core if
6 project needs to achieve an '0' fire rating – if we
7 don't highlight this to genius they only order PE only
8 and it won't have the rating required.

9 "Vince can you please confirm if FR is the same cost
10 to us as PE."

11 Now, just to be clear, Grahame Byrne, who was one of
12 the recipients of this email, was he at Genius Facades?

13 A. Yes, he was.

14 Q. I've shown you the text at the top of page 159, "We need
15 to make sure we only order FR core".

16 Is it right, or do you accept, that your email
17 proceeded on the basis that there was no class 0
18 certificate for PE core?

19 A. On that basis, yes.

20 Q. Yes. On what basis did you reach that conclusion?

21 A. I guess from the certificates that we'd been sent over
22 and the clarification from Alcoa at the time.

23 Q. Yes. What were those?

24 A. That the -- to meet the requirements of what the
25 customer was requesting as class 0, it needed to be FR.

25

1 Q. So are you telling us that by virtue of the fact that
2 you had received no class 0 certificate for PE, you had
3 inferred that there was no such certificate?

4 A. I don't believe that's the way I thought of it at the
5 time, we were just -- we had had clarification from
6 Alcoa in terms of the information we were asking and
7 that's what we were then following up with.

8 Q. Well, just help me understand your evidence, please.
9 You told us a moment ago that your email proceeded on
10 the basis that there was no class 0 certificate for PE
11 core, you had agreed with that, on the basis of this
12 email. Then I've asked you what was the basis of your
13 conclusion, and you said you "guess from the
14 certificates that we'd been sent and the clarification
15 from Alcoa at the time". Let me look at that answer
16 just a little bit more closely.

17 First of all, what clarification had you received
18 from Arconic that there was no class 0 certificate in
19 relation to PE-cored Reynobond 55?

20 A. I don't know what information we'd had from -- whether
21 they'd sent something very specific to say, "There is no
22 class 0 for PE", but looking at the information they
23 sent across, in answer to the question we'd asked,
24 they'd supplied the certificate that had a class 0, and
25 that's what we would have been sending on.

26

1 Q. Exactly, and that is why I'm putting to you that you had
2 inferred, from the absence of any class 0 certificate
3 for PE and the fact that they'd only sent you one for
4 FR, that in fact no class 0 certificate existed for PE;
5 that's right, isn't it?

6 A. Yes.

7 Q. Yes, thank you.

8 Was it not then something of a surprise to you to
9 learn, after selling PE-cored Reynobond 55 for many
10 years on the understanding that it had class 0, to
11 discover that it didn't?

12 A. Again, I don't recall specifically thinking that, but
13 I was surprised by that point that it -- that the PE was
14 not a class 0.

15 Q. Did you take this up with Gwenaelle Derrendinger?

16 A. No, I don't believe I did.

17 Q. Did you take it up with Vince Meakins, who after all had
18 taken over your role by then within Arconic?

19 A. No, I don't believe I did.

20 Q. Why is that?

21 A. I don't know.

22 Q. Was this not a major moment for you? After all, as you
23 told us, the only thing that mattered to your UK
24 customer base so far as fire classification was
25 concerned was national class 0. Here you are, either

27

1 being told or working out that there was no class 0
2 certificate for that product. That would have come as
3 an earthquake to you at the time, would it not?

4 A. I don't recall it did in that sense. I was involved in
5 lots of other things at the time, and I don't remember
6 what my reaction was.

7 Q. You would have remembered that reaction, if you had
8 genuinely been surprised and shocked to learn that the
9 material you had been selling to your UK customers did
10 not have the one fire classification you understood it
11 needed. You would have recalled your reaction, I'm
12 bound to suggest to you.

13 A. Yeah, I -- possibly. I cannot remember what my reaction
14 was to that, other than, you know, surprised at the time
15 that it didn't have the class 0.

16 Q. You see, isn't the reality that you weren't surprised at
17 the time, which is why you don't recall any particular
18 reaction to it?

19 A. I'm not sure.

20 Q. Isn't the reality that you knew and had known for a long
21 time either that there was no class 0 which supported
22 Reynobond PE 55, or you didn't know one way or the
23 other?

24 A. No, I hadn't known that for all that period of time, no,
25 I hadn't known that.

28

1 Q. Let's go to your second witness statement at page 15
 2 {MET00053162/15}, please, paragraph 53. You address
 3 this question to some extent here, and you say at
 4 paragraph 53:
 5 "I do not recall why I concluded that Reynobond PE
 6 did not have a 'Class 0' rating as a result of this
 7 exchange. I don't think I spoke to Gwenaelle about the
 8 issue at the time and I assume now that it was because
 9 no 'Class 0' report for Reynobond PE had been provided
 10 and so I was not able to provide confirmation to my own
 11 customer who had requested it."
 12 Now, do you accept that that reasoning there is not
 13 reflected in your email to Genius Facades, is it?
 14 A. Erm ... no, possibly not.
 15 Q. Why is that?
 16 A. I can't -- I don't know, I can't answer that question.
 17 Q. To be fair to you, you do say it, that this is
 18 an assumption you're making now. That's right, is it?
 19 A. Yes.
 20 Q. Now, we've seen many times in your witness statement and
 21 in your evidence over the last day or two that your
 22 justification for being comfortable selling Reynobond PE
 23 was that it was national class 0, and here we are, at
 24 the end of July 2015, where you tell your customers that
 25 if they need to have a class 0 material then they had to

1 order Reynobond FR.
 2 Do we conclude from that that the entire basis of
 3 your belief, such as it was, that you could sell PE
 4 safely in the United Kingdom had by now disappeared?
 5 A. Again, I don't think I'd thought of it in that context.
 6 I was relying on people that had got far more knowledge
 7 of those things to be providing the right information
 8 and the right certificates.
 9 Q. And who would that have been?
 10 A. That would have been within Alcoa, people within Alcoa.
 11 Q. Who were you dealing with in Alcoa? Was that
 12 Vince Meakins?
 13 A. Well, yeah, generally. I didn't have much -- many
 14 dealings with Vince Meakins. It would have been with
 15 emails sent in to Gwen at the time.
 16 Q. Right.
 17 Why were you dealing with Gwenaelle Derrenderger at
 18 the time and not Vince Meakins, who had taken over your
 19 job?
 20 A. Most of our communication went through the fabricator,
 21 rather than -- we didn't buy it directly off of Alcoa,
 22 we were buying it through a fabricator. But obviously
 23 some of my communication in the early days before Vince
 24 started went directly through to Alcoa.
 25 Q. You sent this email -- I know it's disappeared from the

1 screen, we can have it back if you like, but it's
 2 31 July 2015 -- some three and a half months after the
 3 first order of Reynobond PE 55 for Grenfell. At this
 4 time, at this moment, Reynobond PE was still being
 5 supplied to that project and the refurbishment was still
 6 going on. I'm telling you that as a fact.
 7 Is there a reason why you didn't alert Vince Meakins
 8 to the true scale of the problem, and tell him that, on
 9 the Grenfell Tower project, Reynobond 55 PE had been
 10 sold on the basis that it had class 0?
 11 A. I don't know. I'm not -- I can't recall the -- I think
 12 it was the middle of 2015 or some point towards the
 13 middle of 2015 that I even learnt that it had been
 14 ordered. So, no, I wasn't ... I didn't do that.
 15 Q. Is it fair to say that at this point you knew for
 16 certain, or as certain as you could be on what you had
 17 in front of you, that the BBA certificate was factually
 18 incorrect to the extent that it represented that
 19 Reynobond 55 PE had class 0?
 20 A. Again, I don't recall thinking of it along those lines.
 21 That would have been for other people to decide whether
 22 it needed to be withdrawn or not.
 23 Q. So is this your evidence: that you left that issue, that
 24 problem, for Vince Meakins and others at Arconic to sort
 25 out for themselves?

1 A. Well, I don't -- again, I don't recall thinking along
 2 those lines or in that context, to have made that
 3 particular decision one way or another. I was getting
 4 on with what I was doing and didn't -- it didn't -- no,
 5 it didn't occur to me to do any of that.
 6 Q. Did it not occur to you at the time that during 2013 and
 7 2014 you were selling Reynobond 55 with a PE core on to
 8 a high-rise residential building under a serious
 9 misapprehension as to its fire classification?
 10 A. No, it didn't.
 11 Q. Why is that?
 12 A. I could -- I don't know, it just -- it didn't.
 13 Q. You must have realised, surely, come mid-2015, when you
 14 discovered, as you confirmed to us, and you realised
 15 both that cassette and rivet performed differently in
 16 a fire and that PE did not actually have anything to
 17 support its claim to class 0, that you had sold
 18 Reynobond PE 55 on to the Grenfell Tower project on
 19 a false basis as to its fire classification?
 20 A. No, I don't -- I didn't -- I don't -- I didn't do that.
 21 Q. You didn't realise?
 22 A. No.
 23 Q. How could you not have realised?
 24 A. I didn't have the knowledge to be able to put the -- put
 25 all those facts together.

1 Q. I want to turn, then, to a different topic, which is the
 2 recording or the transcript, I should say, of
 3 21 June 2017, of a discussion between you and
 4 John Simmons of Simco, and indeed of Genius Facades, as
 5 I think you confirmed. Now, this is a few days after
 6 the Grenfell Tower fire.
 7 Do you recall having a telephone conversation with
 8 John Simmons of Simco on 21 June 2017.
 9 A. I do.
 10 Q. Did you know that he had recorded it?
 11 A. No, I did not know he'd recorded it.
 12 Q. Right.
 13 There is a transcript of the recording, which is at
 14 {MET00040858}, can we just have the first page of that
 15 up, please.
 16 (Pause)
 17 Yes, thank you.
 18 Now, I may have misled you, and I apologise.
 19 I think I put to you that it was a telephone
 20 conversation; in fact, I think it wasn't a telephone
 21 conversation, was it?
 22 A. Sorry, say -- repeat that question.
 23 Q. Do you remember whether this was a telephone
 24 conversation or a face-to-face conversation?
 25 A. I believe it was a telephone conversation I was having.

1 Q. Right.
 2 Now, we can see that the transcript starts in the
 3 middle of the conversation, with a male saying, "Try and
 4 resolve this (INAUDIBLE)", do you see that? And the
 5 conversation is set out in tabular form, with "Person
 6 speaking: Male", on the left, and "D FRENCH" also in
 7 that column, and the text of the conversation between
 8 the two of you in the right-hand side of the table.
 9 If you go to page 2 {MET00040858/2}, and go five
 10 lines down on page 2, please, you can see that J Simmons
 11 says:
 12 "Yeah we now have an issue yeah this seems to
 13 coincide as when do you know exactly when they had their
 14 Typole certificate take taken away?"
 15 Now, the word "Typole" appears repeatedly in this
 16 transcript. Can you help us interpolate that?
 17 A. No idea. Never heard the expression.
 18 Q. Well, does he mean or was he saying "Type O", and this
 19 is a mistranscription?
 20 A. I don't know, I couldn't -- it could very well be.
 21 I don't know.
 22 Q. Were you aware that any documentation or certification
 23 which said that Reynobond was class 0 had been removed
 24 or withdrawn?
 25 A. Sorry, could you just repeat the question?

1 Q. Were you aware at the time you had this conversation
 2 whether any documentation or certification -- let me try
 3 that one again, you're quite right.
 4 Were you aware at the time that any certificate in
 5 relation to Reynobond had been removed or withdrawn?
 6 A. No, I was not aware that anything had been withdrawn,
 7 apart from the -- obviously understanding what the new
 8 EN certificates were.
 9 Q. Can we then scroll down to the next part of this
 10 conversation, row 6, where you respond and you say:
 11 "I don't know because ..."
 12 Do you see that?
 13 A. Yes.
 14 Q. "I don't know because we weren't we weren't given any
 15 information about it and I can ... I cannot cannot
 16 cannot."
 17 Then it goes on:
 18 "J SIMMONS: Why did they not make that public?
 19 "D FRENCH: Because I think they were challenging the
 20 testing of it and it was also coinciding with them
 21 looking at developing a different a different coloured
 22 core.
 23 "J SIMMONS: right.
 24 "D FRENCH: But I don't know whether that was whether
 25 the certification was connected to the core. There was

1 a lot of stuff in.
 2 "J SIMMONS: OK.
 3 "D FRENCH: Terms of development that they didn't.
 4 "J SIMMONS: Right.
 5 "D FRENCH: They they didn't share with any of us.
 6 "J SIMMONS: Right this is the problem.
 7 "D FRENCH: (INAUDIBLE) are very secret over stuff
 8 like that.
 9 "J SIMMONS: Secret they can't be. They need to come
 10 to this party right in short they have been selling this
 11 material under a BBA certificate yeah."
 12 SIR MARTIN MOORE-BICK: Mr Millett, can I just interrupt
 13 you. I think it would help all of us, but particularly
 14 the witness, if we could scroll down the document,
 15 because we now can't see what you're reading.
 16 MR MILLETT: I'm sorry, Mr Chairman, I have been following
 17 on a different document which has markings on it, and
 18 you are quite right.
 19 We are, I think, in the middle of page 2, where the
 20 word "INAUDIBLE" appears, if I can go back to that.
 21 SIR MARTIN MOORE-BICK: Right, thank you.
 22 MR MILLETT: And you say:
 23 "D FRENCH: (INAUDIBLE) are very secret over stuff
 24 like that.
 25 "J SIMMONS: Secret they can't be. They need to come

1 to this party right in short they have been selling this
 2 material under a BBA certificate yeah."
 3 Just pausing there, is this a reference to a change
 4 in the core colour of Reynobond PE from translucent to
 5 black?
 6 A. Yes, I believe they were looking to change the core
 7 colour.
 8 Q. Right. Even though you left Arconic at the end of 2014,
 9 you were still aware about that change, weren't you,
 10 clearly, from --
 11 A. I believe I had some information from I think it might
 12 have been Peter Froehlich that they were looking to
 13 change the colour of the core.
 14 Q. Right. You seem from this to have been aware that there
 15 was some kind of testing programme going on at the end
 16 of 2014; is that right?
 17 A. Again, yes, I was aware.
 18 Q. And, as we've seen, you just say next to the word
 19 "INAUDIBLE":
 20 "[They] are very secret over stuff like that."
 21 Do I understand correctly that Arconic did not share
 22 information with you about, for example, testing
 23 programmes?
 24 A. Not until it was necessary for it to be published, no.
 25 Q. Right. When you say not until it was necessary to be

1 published, what would dictate whether it was necessary
 2 to be published?
 3 A. I guess when they needed to update certificates.
 4 Q. Am I right in thinking that Arconic did not share
 5 information with you about the fire performance of
 6 Reynobond?
 7 A. They would have shared with me various -- the
 8 certificates once anything has been -- testing had been
 9 done and was -- certificates need to be published,
 10 that's when they would send them to us.
 11 Q. What was it that you were referring to here in this
 12 conversation when you said, "[They] are very secret over
 13 stuff like that"? What's the "that"?
 14 A. I think it was referring to the change in core. They
 15 wouldn't want the market to know that they were looking
 16 at a different -- bringing out a new product or
 17 a different core or a new development until they were
 18 ready to do it.
 19 Q. Can we just scroll up a little bit up this page to about
 20 seven lines above the big "INAUDIBLE", where you say:
 21 "Because I think they were challenging ..."
 22 Can you see that? Just above halfway down the
 23 screen in front of you:
 24 "Because I think they were challenging the testing
 25 of it and it was also coinciding with them looking at

1 developing a different a different coloured core."
 2 When you said "I think they were challenging the
 3 testing of it", what was that a reference to?
 4 A. I can't recall whether that was -- what that was,
 5 whether that was the new core or what that would have
 6 been in relation to.
 7 Q. Right. Was it something to do with the performance of
 8 Reynobond in a fire test?
 9 A. I honestly don't know, I can't recall that.
 10 Q. When you said, "I think they were challenging the
 11 testing of it", what was the source of your information?
 12 A. Again, I can't -- I don't recall.
 13 Q. Who was challenging?
 14 A. I don't recall.
 15 Q. Is it fair to say, just looking at this so far, that
 16 you, while you were at Arconic, had an idea that
 17 something was wrong with the fire performance of
 18 Reynobond PE core?
 19 A. No, it was becoming more apparent after I'd left, not
 20 before. Or I don't recall it becoming apparent before.
 21 Q. Right.
 22 Shall we go to page 3 of the transcript
 23 {MET00040858/3}, please, and I want to pick it up nine
 24 rows down with you. If we blow that up a little bit,
 25 you say there, about a third of the way down the screen:

1 "D FRENCH: Christ but surely I know that the BBA.
 2 "J SIMMONS: You said to me, you said to me when they
 3 had the core when they had their fire certificate
 4 removed on the PE core, yeah you said they made an eye
 5 level [probably high-level] decision not to put this in
 6 the public domain.
 7 "D FRENCH: They I don't know if I said they didn't u
 8 ... they made a decision not to put it in the public
 9 domain, they made some decisions not to make it.
 10 "J SIMMONS: Public.
 11 "D FRENCH: (INAUDIBLE) known and I'm I'm pretty
 12 certain that was because they were challenging it.
 13 "J SIMMONS: OK.
 14 "D FRENCH: So whether that.
 15 "J SIMMONS: So we need to find out.
 16 "D FRENCH: Whether they challenged it.
 17 "J SIMMONS: Yeah.
 18 "D FRENCH: And they then held onto their
 19 certification I don't know that's that's what I can't
 20 help you with."
 21 That's what the transcript says.
 22 Were you aware of a high-level decision not to make
 23 the fire performance of Reynobond publicly known?
 24 A. No, I don't think I was, no.
 25 Q. What were you referring to here?

1 A. I can't recall, I don't remember.
 2 Q. You don't remember. This is in the aftermath of the
 3 Grenfell Tower fire, a few days later. You say, "They
 4 made a decision not to put it in the public domain".
 5 What is it that was not put into the public domain?
 6 A. Possibly the new testing, whether they were still
 7 challenging it or not. I don't recall the exact
 8 discussion that I was having with John Simmons at the
 9 time. It was not ever easy having a discussion with
 10 Mr Simmons.
 11 Q. Why is that?
 12 A. Just generally was not normally a discussion -- it was
 13 not easy having discussions sometimes with him.
 14 Q. Do you know who made the decision that you're referring
 15 to here, the decision not to put it in the public
 16 domain?
 17 A. No, I don't.
 18 Q. Do you remember anything about these kinds of decisions
 19 being communicated to you while you were at Arconic?
 20 A. No, I don't recall.
 21 Q. Let's go back to the transcript and look below where we
 22 were, and this may not be that easy to find on the page.
 23 I'll try and help you as best I can. It's about 14 rows
 24 up from the bottom. It's now, I think, a quarter of the
 25 way down the screen. You say:

41

1 "D FRENCH: And they then held onto their
 2 certification I don't know that's that's what I can't
 3 help you with.
 4 "J SIMMONS: Well this is the this is the other
 5 issue.
 6 "D FRENCH: Well you see the (INAUDIBLE).
 7 "J SIMMONS: This is the other issue this is the
 8 other issue we've got yeah that letter that you got out
 9 of in December 15 is a completely different fire code to
 10 what's on their BBA (TAPS 4 TIMES).
 11 "D FRENCH: But again you can't deny that they've
 12 sent that out."
 13 Then if we go over to page 5 {MET00040858/5},
 14 15 lines down, we can see there are two reasonably large
 15 chunks of Simmons speech, and he then says in the second
 16 of those, "And then basically", do you see that? He
 17 says:
 18 "And then basically the next step to this then is in
 19 2015 they issued a letter we we haven't got a clue where
 20 it come from yeah addressed to us which you sent to me
 21 the other day yeah and when I checked when I checked the
 22 fire codes on that letter albeit they are still stated
 23 both products that are Typole when I checked the fire
 24 codes on that letter yeah they are different to the
 25 BBA."

42

1 Do you know what letter Mr Simmons is referring to
 2 there from December 2015?
 3 A. I can't remember specifically, but I think there was
 4 a letter that he is referring to there that they
 5 received from Alcoa, but I can't remember the details of
 6 it.
 7 Q. Right. Let me see if this helps you.
 8 Could you please go to {ARC00000699}. This is
 9 a letter dated 14 December 2015 from Claude Wehrle to
 10 Genius Facades. Do you see?
 11 A. Yes.
 12 Q. It's addressed to "Dear partners", and in the second
 13 paragraph he says:
 14 "The British Standard BS476 part 6&7 are not
 15 relevant to distinguish between our Reynobond PE and our
 16 Reynobond FR. Both are classified 'Class 0' when tested
 17 in accordance with this standard.
 18 "But those 2 products are very different in their
 19 behavior when exposed to a flame. This difference is
 20 shown when tested in accordance with the European
 21 standard EN 13501 where following classes are achieved:
 22 "Reynobond PE class E.
 23 "Reynobond FR class B-s1,d0."
 24 Do you see that?
 25 A. Yes.

43

1 Q. Is this the letter, do you think, that Mr Simmons was
 2 talking about?
 3 A. Yes, I believe so.
 4 Q. This was a letter sent nearly a year after you left
 5 Arconic, so we weren't able to ask you about it because
 6 you weren't there then.
 7 My question is: did you see this letter or had you
 8 seen this letter by the time you were having this
 9 conversation with Mr Simmons in June 2017?
 10 A. I -- the first time I saw it was when he showed it to
 11 me.
 12 Q. He says in the text of the conversation I've read to
 13 you, there is "a letter ... addressed to us which you
 14 sent to me the other day". Is this the letter that he
 15 was referring to in that conversation?
 16 A. I don't remember whether that was the one, but I do
 17 recall seeing that letter that you've just shown.
 18 Q. In what context or in what circumstances do you recall
 19 seeing the letter that I've just shown you?
 20 A. Again, I think it was Mr Simmons that showed it to me.
 21 Q. Right. What letter are you referring to, then, which he
 22 says you sent him the other day?
 23 A. Again, I don't recall that one, I think it's the one
 24 you've just shown me.
 25 Q. Right. So you had a copy of this letter as well, did

44

1 you?
 2 A. No, I think it's that he showed it to me.
 3 Q. You --
 4 A. I don't recall --
 5 Q. Sorry, I'm so sorry.
 6 A. I don't recall what letter is being referred to in that
 7 transcript, but I do remember seeing that letter that
 8 you've just shown me.
 9 Q. Can you account for how he says that you sent him
 10 a letter the other day, which you say is this letter, if
 11 you hadn't received that letter yourself from Arconic or
 12 got it --
 13 A. I don't recall receiving that letter directly in to
 14 myself from Arconic.
 15 Q. Do you remember whether anybody at Arconic had sent you
 16 this letter?
 17 A. No, I don't recall that.
 18 Q. Can we go back to the transcript -- well, let me ask
 19 you: did you appreciate, when you saw this letter,
 20 whenever that had been, that Arconic's position
 21 according to Claude Wehrle was that, when exposed to
 22 a flame, Reynobond 55 with a PE core was a class E?
 23 A. Yes, I did.
 24 Q. Was that the first time that you discovered that fact?
 25 A. As I say, my knowledge had improved significantly by

45

1 then, and I was beginning to certainly understand the
 2 details of it in great -- in much better -- in a lot
 3 more detail.
 4 Q. Again, did that not come as something of a shock to you,
 5 to discover that, far from being class B as the
 6 BBA certificate had represented, Reynobond 55 standard
 7 with a PE core had achieved a class E, at least in
 8 cassette?
 9 A. Yes.
 10 Q. And given that it had come as a shock, did you not seek
 11 to take that up with somebody at Arconic and ask them --
 12 A. No, I didn't. No.
 13 Q. Did you not have a conversation with Vince Meakins about
 14 it?
 15 A. No, I don't believe so.
 16 Q. After all, Vince Meakins had taken over your role at
 17 Reynobond; did you not seek to tell Vince Meakins to
 18 warn Harley and warn those on the Grenfell Tower project
 19 that you had supplied Reynobond 55 with a PE core which
 20 in fact did not have class B but class E?
 21 A. No, that wasn't something that I did.
 22 Q. Again, why is that?
 23 A. I don't know, I'd moved on and I didn't think in that
 24 way.
 25 Q. Right.

46

1 Did you not appreciate by this time, at the very
 2 latest, that the material you had supplied for
 3 application as the rainscreen at Grenfell Tower was not
 4 up to national class or Euroclass fire standards?
 5 A. There would have been many other people in -- within the
 6 chain that would have been looking at what was being
 7 ordered all the way through that. So, no, I wouldn't
 8 have thought to do any of that.
 9 Q. You may have thought that there were other people in the
 10 chain looking at that; I'm interested in what you
 11 thought and did. My question: didn't you appreciate by
 12 this time, at the very latest, that the product, the
 13 material that you had supplied for application as the
 14 rainscreen at Grenfell Tower, was not up either to
 15 national class fire standards or European class fire
 16 standards?
 17 A. No, I didn't think to do any of that.
 18 Q. Did it not occur to you that the material you had sold
 19 for use at Grenfell Tower was dangerous?
 20 A. No, it didn't occur to me.
 21 Q. Why is that?
 22 A. I don't know.
 23 Q. Can we go back to the transcript, please, page 6 now
 24 {MET00040858/6}. I would like to go to eight lines
 25 down, and Mr Simmons says:

47

1 "J SIMMONS: Which is rightly so yeah and just to let
 2 you know we set fire to a piece of stack next to a piece
 3 of Reynobond the Reynobond goes up like a fucking
 4 bonfire the stack does withstand it yeah. Round about
 5 the same time Alucabond[sic] completely mo ... removed
 6 their PE core from their shelves and said and the excuse
 7 they give was we now only wanna sell one product,
 8 renamed it Alucabond Plus which is their FR grade.
 9 "D FRENCH: Yeah and (INAUDIBLE).
 10 "J SIMMONS: Yeah so both of them coincide with round
 11 about these dates.
 12 "D FRENCH: Yeah.
 13 "J SIMMONS: The PE core was removed from the market,
 14 they never give no excuse for why they did it now under
 15 the duty of care yeah basically Alucabond would not have
 16 brought that into the public because anything they'd
 17 sold prior to that they'd have been liable for.
 18 "D FRENCH: Mm.
 19 "J SIMMONS: So they just changed their product,
 20 changed their name and everything else and just hoped to
 21 god that nobody's noticed it.
 22 "D FRENCH: Mm.
 23 "J SIMMONS: Why did Reynobond not do this at the
 24 same time?
 25 "D FRENCH: I don't know there was no dis .. no well

48

1 there were some discussions around when Alucabond did do
 2 that and it was it was the cost implications.
 3 "J SIMMONS: But don't you ag d ... you said
 4 "D FRENCH: Because.
 5 "J SIMMONS: You said you advised that they fucking
 6 that they should do the same.
 7 "D FRENCH: Well I did say to them that they should
 8 do the same but that was down to the fact that it was
 9 more to do with the fact that we didn't want two
 10 products in the market but there was an awful lot of
 11 stuff going on because the sign and display market was
 12 not doing as it should be (INAUDIBLE)."
 13 Now, John Simmons refers there to a decision he
 14 thinks Alucobond made to withdraw the sales of PE-cored
 15 ACM and only go with FR. Was that at around about the
 16 same time as the UAE fires in April/May 2013 that we
 17 looked at in detail yesterday?
 18 A. I don't know, I'm not sure of the dates.
 19 Q. Now, you say in the transcript that there were some
 20 discussions around it. What discussions were those?
 21 A. The PE and the FR you mean?
 22 Q. Discussions about whether to withdraw the Reynobond PE
 23 panel from the market in the way that Alucobond had
 24 done, and proceed only with selling FR core.
 25 A. Yeah. I recall vaguely having a conversation with

1 Merxheim about whether we would be doing the same thing
 2 for the UK, and I believe that the answer was that we
 3 would continue as we were.
 4 Q. For commercial reasons?
 5 A. I believe that that -- again, my recollection of it is
 6 very vague, but I believe that was part of the reasons.
 7 Q. Now, just to go back to the transcript where we were, if
 8 we can, please, you said to Mr Simmons -- and this is
 9 just before the second "INAUDIBLE" in the lengthy
 10 passage there, about three-quarters of the way down the
 11 screen:
 12 "Well I did say to them that they should do the
 13 same ..."
 14 Who is the "them" there? Who did you tell that
 15 Reynobond should do the same?
 16 A. It would have probably been a discussion with
 17 Peter Froehlich. He was my direct line manager at the
 18 time.
 19 Q. And "at the time"; which is the time?
 20 A. Again, I can't be -- I'm not sure when that would have
 21 been. It would have been latterly rather than -- with
 22 my time with them rather than earlier on.
 23 Q. Again, would that have been around about the time that
 24 you saw the Richard Geater email in May 2013, escalated
 25 that email to Peter Froehlich and others, and then wrote

1 the 13 May email to your approved fabricators?
 2 A. Possibly. I'd be guessing.
 3 Q. Well, I don't want you to guess, I'm just trying to
 4 prompt your recollection. Is it your recollection that
 5 that would have been the time when you would have had
 6 that discussion that you're referring to here?
 7 A. Yes, possibly.
 8 Q. Right. Do you remember what Peter Froehlich said to
 9 you?
 10 A. As I say, I think the -- I don't remember specifically
 11 what he said, but the general consensus was we were
 12 going to continue as we were.
 13 Q. Did he tell you that Arconic did not want two products
 14 in the market?
 15 A. I can't remember whether that was the reason for it or
 16 what it was. We already had two products on the market.
 17 There was already FR -- well, they were already
 18 manufacturing FR and PE, so I'm not sure that would have
 19 been the reason for not withdrawing it.
 20 Q. If we can go back to the transcript, please, again, and
 21 just look a few lines above where we were just looking
 22 together a moment ago, you see that you say there, in
 23 response to Mr Simmons saying "Why did Reynobond not do
 24 this at the same time", that's remove PE from the
 25 market, you say:

1 "I don't know there was no dis.. no well there were
 2 some discussions around when Alucabond did do that and
 3 it was it was the cost implications."
 4 Could you just help me, by cost implications, what
 5 did you mean?
 6 A. The fact that we would have had to have supplied FR at
 7 a more expensive rate.
 8 Q. Who told you that?
 9 A. Because the cost -- the difference between FR and PE
 10 were -- there was a cost difference between PE and FR.
 11 Q. So does that mean that you would have made smaller
 12 margins if you had only been selling FR?
 13 A. Well, as I said yesterday or the day before, I wasn't
 14 involved in the margins, I had no idea what margins
 15 Alcoa were making at the time on any of their products.
 16 Q. No, but clearly you had got the impression from
 17 somewhere that you were passing on to Mr Simmons that
 18 the reason why Reynobond was not removed from the market
 19 in the same way that Alucobond had been removed, in each
 20 case PE, was cost implications, and I'm just seeking to
 21 understand exactly what you meant when you told him that
 22 it was cost implications.
 23 A. Then, yes, that must have been along those lines, yes.
 24 Q. Right. So do we take it from that as a general point
 25 that, to the best of your recollection, the reason why

1 Arconic did not withdraw its Reynobond PE panel from the
 2 market in the way that 3A had removed its Alucobond PE
 3 panel from the market was because of commercial
 4 considerations?
 5 A. I mean, as I say, I can only go on what they were giving
 6 me at the time, but yes.
 7 Q. Yes.
 8 Do you recall whether, in considering those
 9 commercial considerations, any consideration was given
 10 to the fire safety consequences of continuing to sell
 11 Reynobond 55 PE?
 12 A. I don't recall any conversations of that nature.
 13 Q. You're now the national cladding director at
 14 Taylor Maxwell, aren't you?
 15 A. Yes.
 16 Q. I think you have occupied that role since early 2018,
 17 haven't you?
 18 A. That's right.
 19 Q. Would you sell a façade today with Reynobond PE
 20 cassettes for use on a tall residential building,
 21 regardless of the regulatory environment?
 22 A. We don't currently get involved in any ACM materials.
 23 MR MILLETT: Mr Chairman, Ms French, I've come to the end of
 24 my prepared questions, and I think it's time for the
 25 morning break in any event.

53

1 SIR MARTIN MOORE-BICK: Yes.
 2 MR MILLETT: I'm grateful to you, Ms French, for bearing
 3 with me so far.
 4 I'm going to ask the Chairman to take a break now,
 5 but also to see whether there are any further questions
 6 to come from others who are observing this.
 7 SIR MARTIN MOORE-BICK: Yes.
 8 Well, Ms French, it's time we had a break anyway,
 9 and that will give an opportunity for those who want to
 10 suggest any further questions to contact counsel for
 11 that purpose.
 12 So we'll stop now, we'll resume at 11.30, and please
 13 remember what I said to you in the past about not
 14 talking to anyone about your evidence over the break.
 15 Then, when we come back, we will see if there are any
 16 further questions. All right?
 17 THE WITNESS: Thank you, sir.
 18 SIR MARTIN MOORE-BICK: Thank you very much.
 19 (11.16 am)
 20 (A short break)
 21 (11.35 am)
 22 SIR MARTIN MOORE-BICK: Welcome back, everyone. We're going
 23 to see whether there are any more questions counsel has
 24 for Ms French.
 25 So, Ms French, you are there, are you? You can see

54

1 me and hear me?
 2 THE WITNESS: Yes, I can, thank you, sir.
 3 SIR MARTIN MOORE-BICK: Thank you very much. We will go
 4 straight to Mr Millett, then.
 5 Mr Millett, do you have any more questions?
 6 MR MILLETT: Mr Chairman, I do have one or two more
 7 questions.
 8 You told us this morning that you recall having
 9 discussions, after I had shown you the transcript, with
 10 Arconic personnel at Merxheim about whether to withdraw
 11 Reynobond PE from the market in the light of the UAE
 12 fires.
 13 Can I ask you to be shown yesterday's transcript,
 14 please, at {Day88/88}.
 15 (Pause)
 16 If you go to maybe the top of {Day88/89}.
 17 I'm sorry, that is a wrong reference. Never mind.
 18 Yesterday, when I asked you questions about whether
 19 you had had any discussions about the UAE fires with
 20 anybody at Merxheim, and I asked you why it was you
 21 continued to offer Reynobond 55 PE core as a standard in
 22 the UK market without some kind of warning as to its
 23 fire performance, you said {Day88/118:25}:
 24 "Answer: I would have needed to have had a specific
 25 guidance from Merxheim to do different.

55

1 "Question: Did you seek any such specific guidance
 2 from Merxheim?
 3 "Answer: I don't recall doing so.
 4 "Question: You don't recall doing so; does that
 5 mean you don't think you did so, to the best of your
 6 recollection?
 7 "Answer: Yeah, I can't recall."
 8 In light of the evidence this morning, what is your
 9 recollection? Did you in fact have any discussions with
 10 anybody at Merxheim in the light of the UAE fires about
 11 whether or not you should be, or Arconic should be,
 12 withdrawing Reynobond 55 PE core from the market?
 13 A. As I've just explained, I do recall having some
 14 conversation about the PE and FR core on the UK market.
 15 What I don't recall is whether that was specific to the
 16 fires — other fires in other parts of the world.
 17 That's the bit I can't recall.
 18 Q. I see.
 19 The Chairman asked you to help him, and he said
 20 {Day88/119:13}:
 21 "You might have said to Merxheim, 'Should we still
 22 be offering PE as standard?', without expressing a view
 23 either way, but at least prompting them to consider the
 24 question.
 25 "Answer: And I don't recall whether I did or

56

1 didn't, sir."

2 Is your recollection different now, my having shown

3 you the transcript of your conversation with Mr Simmons

4 this morning?

5 A. Yes, it would — it has certainly brought back some

6 other thoughts that, yes, I probably have had other

7 conversations with Merxheim about it.

8 Q. So can we now proceed on the basis that it is your

9 evidence that, at the time of the UAE fires, you did

10 have discussions with those at Merxheim about whether or

11 not Reynobond 55 with a PE core should be withdrawn?

12 A. Yeah, there were some discussions — I do believe I had

13 those — some discussions about whether — what the plan

14 was for PE and FR.

15 Q. In the light of the UAE fires?

16 A. I can't remember whether that was specifically about the

17 UAE fires, but I do recall having conversations with

18 them about FR and PE cores.

19 Q. Just to put the point again: can we take it, therefore,

20 that from that point onwards in time, mid-May 2013 at

21 the latest, you knew that Reynobond 55 with a PE core

22 was risky from a fire safety point of view?

23 A. I'm not sure it would have been — that would have been

24 my thinking. I would have been guided by Merxheim as to

25 whether it was — it was okay to leave it in the market

57

1 or not leave it in the market.

2 Q. Now —

3 SIR MARTIN MOORE—BICK: I'm sorry, Mr Millett.

4 Just help me a little bit more, Ms French. Did you

5 not form some view of your own as to whether it was

6 sensible to keep selling PE in the market?

7 A. I don't believe I did, no, sir. I think I was very much

8 being guided by what Merxheim were — the factory were

9 telling me to do.

10 SIR MARTIN MOORE—BICK: All right. Thank you.

11 MR MILLETT: Now, at the very end your evidence, Ms French,

12 you told us and you agreed that you were now the

13 national cladding manager at Taylor Maxwell, and now

14 I think national cladding director at Taylor Maxwell.

15 Can you explain how you were given that role without

16 any technical knowledge, understanding or training about

17 technical matters?

18 A. The majority of the work we're — the — some of the

19 systems that we deal with are non-combustible systems

20 and the — I'm looking after some administration

21 functions, and other external salespeople.

22 Q. Do we take it that your role even now does not require

23 you to have any real technical expertise, understanding

24 or experience?

25 A. We basically work very closely with the manufacturers we

58

1 deal with, and they provide all the necessary tools and

2 information and advice that we need to be able to pass

3 on to our customers.

4 Q. Right. Does that tell us that when you're dealing with

5 manufacturers, including Arconic, even now, you would

6 expect the people you're dealing with as a customer to

7 have the relevant technical expertise, experience and

8 knowledge?

9 A. Yes.

10 Q. Can you explain how you, as you have told us, when you

11 were at Arconic, did not have the expertise, training,

12 technical experience, et cetera, that you would expect

13 someone in your position to have?

14 A. Sorry, could you repeat the question?

15 Q. Can you explain to us how it is that you didn't have, as

16 you told us yesterday, the technical experience,

17 knowledge, education, expertise, when you were

18 performing your role at Arconic that you would now

19 expect someone occupying that role to have?

20 A. Yeah, we've — I mean, my knowledge has grown

21 significantly since joining Taylor Maxwell, and we have

22 lots and lots of training with all of our product

23 manufacturers on an ongoing basis.

24 Q. No, that wasn't quite an answer to my question. I'll

25 put it one more time.

59

1 Can you explain to us how it is that you didn't have

2 the technical experience, as you maintain, the technical

3 knowledge, the education and the expertise when you were

4 performing your role in sales at Arconic that you would

5 now expect someone occupying that role today to have?

6 A. I'm not really — sorry, I'm not really following the

7 question very well.

8 Q. Let me put it more simply.

9 You told us yesterday that in the sales role you

10 didn't have any technical knowledge and expertise and

11 you left that to others. You are now telling us that in

12 your role that you occupy today, you would expect

13 salespeople to have the technical knowledge. Can you

14 account for the difference?

15 A. I'm not sure that I've actually said that. Our — the

16 salespeople at Taylor Maxwell, as I say, they are all —

17 they receive relevant training from our manufacturers

18 and we have significant support from our manufacturers,

19 our product manufacturers, to be able to give the right

20 advice — the right information across to customers.

21 We're — we don't offer advice to those customers, we

22 just make sure they have all the right information to

23 hand.

24 Q. I have a final question for you, and it's a question

25 that the Inquiry ask people with a particular sphere of

60

1 responsibility .
 2 Looking back on your time at Arconic and your
 3 involvement in selling Reynobond 55 with a PE core for
 4 cassette use at Grenfell Tower, is there anything,
 5 looking back on that, looking back on your time at
 6 Arconic, that you would have done differently?
 7 A. I've obviously had a number of -- a good few years to be
 8 able to reflect on this. I mean, firstly I want to say
 9 that it was a dreadful tragedy, one that I hope that we
 10 never have to witness again. I've learnt significant
 11 amounts, and there is an awful lot that I've learnt and
 12 taken on board fully, and I'm making sure that I improve
 13 on that knowledge every day and that I pass that on to
 14 everybody that I'm currently working with and come into
 15 contact with.
 16 MR MILLETT: Ms French, thank you very much. I should
 17 thank you for your evidence and for coming to
 18 the Inquiry and assisting us with our investigations .
 19 We are extremely grateful. Thank you very much.
 20 I have no further questions for you.
 21 SIR MARTIN MOORE-BICK: Thank you, Mr Millett.
 22 Well, it just remains for me, Ms French, to thank
 23 you very much for making yourself available to give
 24 evidence. I'm sorry that we detained you for rather
 25 longer than we originally hoped to do so, I hope it

61

1 hasn't caused too much inconvenience, but it has been
 2 very helpful for us to hear your evidence, so we are
 3 very grateful .
 4 That's all the questions we have for you, and you
 5 are now, as it were, released. Thank you very much.
 6 THE WITNESS: Thank you, sir.
 7 (The witness withdrew)
 8 SIR MARTIN MOORE-BICK: Now, at this stage, we will have to
 9 have another short break while we make arrangements to
 10 call our next witness. So we shall now, as it were,
 11 suspend the hearing for I hope not too long, until we're
 12 ready to see the next witness.
 13 Thank you all very much.
 14 (11.46 am)
 15 (A short break)
 16 (12.12 pm)
 17 SIR MARTIN MOORE-BICK: Welcome back, everyone. I'm sorry
 18 about the delay, but we are now ready to see our next
 19 witness, who I think is Mr Vince Meakins. Is that
 20 right, Ms Grange?
 21 MS GRANGE: Yes, that's correct, Mr Chairman. Please could
 22 we have Mr Meakins.
 23 MR VINCE MEAKINS (called)
 24 SIR MARTIN MOORE-BICK: Now, I'm going to ask Mr Meakins
 25 whether he can hear me and see me, but at the moment

62

1 I can't see or hear him. He may be off my screen.
 2 THE WITNESS: I can hear you, sir.
 3 SIR MARTIN MOORE-BICK: Ah, Mr Meakins, yes. I can now see
 4 you. I have discovered how to get you into shot.
 5 So you can hear me, can you?
 6 THE WITNESS: I can hear you clearly, sir, yes.
 7 SIR MARTIN MOORE-BICK: And you can see me, I hope?
 8 THE WITNESS: Yes, I can, yeah.
 9 SIR MARTIN MOORE-BICK: Very good.
 10 Now, I think on the screen in front of you, you
 11 should have the words of the affirmation.
 12 THE WITNESS: Yes, I have.
 13 SIR MARTIN MOORE-BICK: Good. Well, could I ask you to make
 14 that affirmation, as the next step, please.
 15 THE WITNESS: Of course.
 16 (Witness affirmed)
 17 SIR MARTIN MOORE-BICK: Very good, thank you very much
 18 indeed.
 19 We've got a couple of housekeeping matters to deal
 20 with.
 21 Could I ask you, please, if you could confirm that
 22 you are alone in the room from which you're giving your
 23 evidence?
 24 THE WITNESS: I am.
 25 SIR MARTIN MOORE-BICK: Thank you. That you don't have any

63

1 documents or other materials with you?
 2 THE WITNESS: I do not.
 3 SIR MARTIN MOORE-BICK: Good, and that your mobile phone is
 4 in another room and you have no other electronic device
 5 with you that's capable of receiving messages?
 6 THE WITNESS: I haven't, and it is not in the room.
 7 SIR MARTIN MOORE-BICK: Yes, thank you very much indeed.
 8 Now, you'd probably like to know that your legal
 9 representatives are in the virtual hearing room. They
 10 will be following the evidence, and they are able to
 11 intervene if they consider it necessary to do so. But
 12 I've asked them to keep their microphones and cameras
 13 switched off unless there is a need to do that.
 14 All right? But they're there to keep an eye on you, so
 15 to speak.
 16 I hope we shan't have any problems with sound or
 17 vision, but if we do have technical difficulties, we
 18 will take a short break while we resolve them.
 19 If you need to attract my attention for any reason,
 20 just make some sort of gesture so that I can see that
 21 you want to say something.
 22 THE WITNESS: I will.
 23 SIR MARTIN MOORE-BICK: Is that all right? Okay.
 24 We shall have the usual break for lunch, and a short
 25 break in the course of the afternoon. If you need any

64

1 additional break, again would you indicate, please.
 2 THE WITNESS: I will.
 3 SIR MARTIN MOORE—BICK: Talking about breaks, I think
 4 I should say now that once you have started giving your
 5 evidence, it's very important that you don't discuss
 6 your evidence or anything related to it with anyone else
 7 until you have completely finished. I'll try to remind
 8 you of that when we have breaks, but if I forget to do
 9 so, would you please bear that in mind at all times.
 10 THE WITNESS: I will.
 11 SIR MARTIN MOORE—BICK: Anything you would like to ask me or
 12 raise before we start?
 13 THE WITNESS: No, I think I'm okay at this point, thanks,
 14 sir.
 15 SIR MARTIN MOORE—BICK: Very good. In that case, I will
 16 invite Ms Grange to put some questions to you.
 17 Yes, Ms Grange.
 18 Questions from COUNSEL TO THE INQUIRY
 19 MS GRANGE: Yes, thank you, Mr Chairman.
 20 Thank you, Mr Meakins. We are very grateful for you
 21 attending the public inquiry and assisting us with our
 22 investigations.
 23 If you have any difficulty understanding anything
 24 I'm putting to you today, please just ask me to repeat
 25 the question or put the point in a different way.

65

1 We will have the break this afternoon, but if you
 2 feel you need a more frequent break, just let us know.
 3 Please try and keep your voice up as well, for the
 4 transcriber, who is taking a clear note of everything
 5 we're saying. Do try not to shake or nod your head; we
 6 do need a recorded answer for the transcript to my
 7 questions.
 8 A. I understand.
 9 Q. Okay, let's go to your witness statement, then,
 10 {MET00053164}. So this is your witness statement to
 11 the Inquiry, and if we go to page 33 of that statement,
 12 we can see there that it's dated 4 November 2019.
 13 Is that your signature?
 14 A. It is.
 15 Q. Have you read that statement recently?
 16 A. I have.
 17 Q. Can you confirm that the contents are true?
 18 A. I can confirm, yes.
 19 Q. Have you discussed your evidence before coming here
 20 today?
 21 A. No, I haven't.
 22 Q. Now, I'm going to start by asking you some questions
 23 about your career history.
 24 If we can begin by looking at paragraph 5 of your
 25 witness statement on page 2 {MET00053164/2}, and if we

66

1 look in the first two lines, you tell us there that you
 2 began working in effect for Arconic on 1 May 2015 as the
 3 UK sales manager for its Reynobond product range. Do
 4 you see that there?
 5 Now, you refer to Arconic as AAP—SAS throughout your
 6 statement, but in common with how Mr Millett has just
 7 dealt with it, I'm going to refer to that as Arconic
 8 throughout. Is that okay?
 9 A. That's fine, yeah.
 10 Q. And even though Arconic was previously known as Alcoa,
 11 wasn't it, before 2016?
 12 A. That's correct, yes.
 13 Q. Yes, so we will refer to Arconic.
 14 Now, it's right, isn't it, that the UK sales manager
 15 role for Arconic was vacant at the time you stepped into
 16 that position? Is that right?
 17 A. It was, yes.
 18 Q. And Deborah French, your predecessor, had left Arconic
 19 to go to Taylor Maxwell in December 2014, before you
 20 starting in May 2015; that's right, isn't it?
 21 A. I believe so. I'm not 100% of the dates for Deborah,
 22 but certainly, yeah, there was a gap.
 23 Q. But you were aware, were you, that there had been
 24 a period of several months with the role being vacant?
 25 A. Yes, for sure, yeah, round about six months or so, yeah.

67

1 Q. Yes.
 2 If we could look at paragraph 6 of your statement,
 3 you give us some of your background prior to joining
 4 Arconic. So this is on page 2 as well. You explain
 5 there that prior to joining Arconic you worked for
 6 a company called Category Cladding (UK) Limited, that's
 7 in the second line, and that was part of the Euroclad
 8 Group; is that correct?
 9 A. That's correct, yes, yeah.
 10 Q. Is it right that you worked for Category Cladding from
 11 2008 until you took up your role with Arconic in
 12 May 2015?
 13 A. That would be correct, yes.
 14 Q. Then two lines down in paragraph 6 of your statement,
 15 you begin to explain what Category Cladding was, and you
 16 tell us that it was a manufacturer and supplier of metal
 17 roof and wall products, thus including aluminium
 18 composite material, ACM, and other metal composite
 19 material, MCM, rainscreen systems; is that right?
 20 A. It's correct, whereas I worked on the MCM side, the ACM
 21 was a company called Booth Muirie that were part of the
 22 category — sorry, part of the Euroclad group.
 23 Q. I see, yes.
 24 A. The ACM was under the Booth Muirie banner.
 25 Q. I see. Yes, because you continue in that paragraph of

68

1 your statement, if we could pick it up in the fourth
 2 line, to say:
 3 "While I knew broadly what those products were,
 4 I did not work on those product lines while at
 5 Euroclad."
 6 So can we just be absolutely clear: which product
 7 lines did you not work on while you were at --
 8 A. -- the ACM side, the aluminium composite material. It
 9 was the metal composite material.
 10 Q. I see. So you did work on the MCM side?
 11 A. On the MCM side, yes.
 12 Q. What type of metal composite materials were those?
 13 A. That would be a steel metal material that would
 14 predominantly be sort of put onto agricultural
 15 buildings.
 16 Q. You say it was a composite material; what was in the
 17 core of that, steel --
 18 A. It would have been any insulated material, so it would
 19 have had an insulated backing.
 20 Q. I see. What was the nature of that insulated backing,
 21 did you know what substance it was?
 22 A. I'm not 100% sure. I think it would have been a PIR or
 23 something along those lines, or PUR material.
 24 Q. Now, during those seven years that you worked at
 25 Category Cladding, did you gain any understanding about

69

1 what ACM products were, even though you weren't directly
 2 involved with those products?
 3 A. Not really. I didn't get involved in the ACM side, as
 4 I say, that was Booth Muirie. I had an understanding of
 5 what the products were, but I -- not an in-depth
 6 understanding.
 7 Q. What did you understand about ACM products at that time?
 8 A. I knew they were aluminium coated material with a core,
 9 and, you know, they were used in architectural projects
 10 as well as corporate identification product, that
 11 sort of thing.
 12 Q. Yes. Did you learn in general about cladding systems
 13 and products for external wall applications?
 14 A. Sorry, at --
 15 Q. Yes, at Category Cladding.
 16 A. I had some sort of knowledge throughout my sort of
 17 career, because I worked for Ash & Lacy, as you're
 18 aware, prior to that, so, yeah, I had an idea of what
 19 these cladding rainscreen façade systems were.
 20 Q. Yes. I'm going to come to Ash & Lacy in just a moment.
 21 Just focusing on the time you were at
 22 Category Cladding, did you come to have any
 23 understanding about different fire properties of
 24 different cladding products, such as ACM, MCM?
 25 A. No, I didn't, I'm afraid.

70

1 Q. Were you expected in your role to have any understanding
 2 of fire safety performance?
 3 A. No, we had a technical team or a person within the
 4 company that would have sort of given us guidance on
 5 that, but no, I was never trained in that side of
 6 things.
 7 Q. Now, if we go back to paragraph 6 of your statement, as
 8 you have just been telling us, you also worked for
 9 another company. If we look now in the last four lines,
 10 you say:
 11 "Prior to working for Euroclad I was also a business
 12 development/sales manager for Ash & Lacy Limited whose
 13 business also includes the supply of rainscreen cladding
 14 systems."
 15 Do you see that there?
 16 A. Yes, I can, yeah.
 17 Q. Now, when did you start to work for Ash & Lacy?
 18 A. Oh, goodness. I really can't recall off the top of my
 19 head. I was there a few years, so it would have been
 20 a few years prior to me starting -- five or six years
 21 prior to me starting with Category Cladding. I'm not
 22 sure what date that would be, I'm sorry, I would have to
 23 look that up.
 24 Q. That's fine.
 25 When you were there, did Ash & Lacy supply

71

1 components of rainscreen façades?
 2 A. They did, yes.
 3 Q. And did they supply whole cladding systems as well?
 4 A. They had their own cladding system, yes.
 5 Q. Yes.
 6 When you were there, did you have responsibility for
 7 particular products or lines of products with them?
 8 A. Yes, there were three products. There was an Ashzip
 9 product, which would have been predominantly for the
 10 roof, that was a cladding, aluminium cladding for the
 11 roof area, and there was a flat-to-pitch conversion
 12 system that I also used or I was responsible for. But
 13 not so much the rainscreen side. We occasionally got
 14 involved, but it was mainly for the flat-to-pitch
 15 conversion and standing seam roofs.
 16 Q. I see. When you first gave that answer, you said, "Yes,
 17 there were three products", and then we didn't quite
 18 catch what you first said there. You said, "There was
 19 a [something] product, which would have been
 20 predominantly for the roof, that was a cladding" --
 21 A. Yeah, that would have been a rainscreen product, which
 22 would be an ACM product, sorry; a flat-to-pitch
 23 conversion product, which basically converted a flat
 24 roof into a pitched roof, it was a steel-framed system;
 25 and then there was the covering of the system, which

72

1 would have been the Ashzip, we called it, which
 2 predominantly that's what I worked on mainly.
 3 Q. So that was an aluminium composite material product?
 4 A. That was an aluminium steel product that would have been
 5 rolled out and zipped up to seal the system. So it
 6 wasn't a composite material, it was just a standing --
 7 it was a steel material -- sorry, an aluminium material.
 8 Q. So it was made of solid aluminium?
 9 A. Solid aluminium, yeah, yeah.
 10 Q. Is it right that Ash & Lacy was also a fabricator of ACM
 11 and MCM panels?
 12 A. Yes, they were, yeah, yeah.
 13 Q. Were you aware that Arconic supplied ACM to Ash & Lacy
 14 from time to time? Did you come across Arconic when you
 15 were --
 16 A. Not in my time, no. It was mainly Alucobond and Larson
 17 were the two main people that I dealt with. Didn't deal
 18 with Arconic then.
 19 Q. Yes. So you didn't come into contact with any Arconic
 20 representative?
 21 A. No, I didn't, no, not whilst working there.
 22 Q. Now, if we go to page 5 of your statement
 23 {MET00053164/5} and look at paragraph 16 now, about
 24 six lines down there is a sentence beginning "Because",
 25 and you say:

73

1 "Because I had previously worked in sales roles in
 2 businesses operating in this sector, I had good
 3 experience working with fabricators in particular."
 4 Now, are you referring to your roles with Ash & Lacy
 5 and Category Cladding there when you say that?
 6 A. Yes, I would be, yes.
 7 Q. Yes. By "this sector", when you're referring to "this
 8 sector" there, "operating in this sector", do you mean
 9 the cladding sector?
 10 A. I mean the metal industry, if you like, the ACM, MCM
 11 industry. So, yeah, cladding as well, yeah.
 12 Q. So you had particular experience of supplying to
 13 fabricators; is that correct?
 14 A. Yes.
 15 Q. Yes.
 16 Now, let's move on to talk about your role at
 17 Arconic.
 18 We know that you started as UK sales manager for the
 19 Reynobond range in May 2015; that's right, isn't it?
 20 A. That's correct.
 21 Q. How were you recruited for that role?
 22 A. I was recruited through an agency, a London agency, and
 23 then I was interviewed in London by a guy from France,
 24 and that's how I was employed.
 25 Q. Do you know who it was from France who interviewed you

74

1 for that post?
 2 A. Yes, I do. I'm just -- I'm ever so sorry, you'll have
 3 to bear with me, names have sort of slipped from my
 4 memory. It would have been a guy -- the HR guy. Can we
 5 come back to that and I'll --
 6 Q. Yes.
 7 A. Yeah.
 8 Q. Okay, yes.
 9 Were you asked about your experience, when you were
 10 interviewed, with cladding products, like MCM products?
 11 A. To a certain extent, yes, yes.
 12 Q. Were you asked about your understanding of the UK market
 13 for cladding products?
 14 A. Yes.
 15 Q. Were you asked anything about the regulation of the use
 16 of façade materials in the UK?
 17 A. No, I can't -- I don't believe I was, no.
 18 Q. Now, if we look again at your statement at page 2
 19 {MET00053164/2} --
 20 A. Sorry, can I just stop you one second? Christoph Rek
 21 was the guy who interviewed me, yes. Sorry, it's just
 22 come back to me, apologies.
 23 Q. Was it just him interviewing or was anyone else looped
 24 in from France?
 25 A. It was just him.

75

1 Q. If we look at your statement at page 2 {MET00053164/2},
 2 and I want to look now at the end of paragraph 5. Just
 3 picking it up three lines up from the end of that
 4 paragraph, you say:
 5 "Because I was and remain resident in the UK, I was
 6 and remain technically employed by Kawneer UK Limited
 7 although I received (and continue to receive) all of my
 8 instructions from and report to personnel at [Arconic]."
 9 Now, that's right, isn't it? That was the
 10 arrangement?
 11 A. Absolutely correct, yes.
 12 Q. Now, we heard about that arrangement from
 13 Deborah French. She also was employed by Kawneer but
 14 she was furthering the business of Arconic in the UK.
 15 In your case, is it right that you were on the
 16 payroll of Kawneer?
 17 A. That's correct, yes. They were just purely to pay the
 18 wage. It was more convenient, apparently, to have
 19 a UK-based payroll company. So, yes.
 20 Q. But is it right that you received all of your
 21 instructions from Arconic?
 22 A. All of them, yes.
 23 Q. So being on the payroll, as you've just said, was just
 24 an arrangement with Kawneer, and it was totally
 25 understood that you acted at all times for Arconic; yes?

76

1 A. Absolutely, yes.
 2 Q. Were you paid a salary in that position, as UK sales --
 3 A. I was, yes, yes.
 4 Q. Did you ever receive any commission for the sales that
 5 you made?
 6 A. I did later on in the employment, yes.
 7 Q. When you say later on, from what time period onwards did
 8 you receive a commission?
 9 A. I guess it would have been about three or four years
 10 into my employment before I was issued with any sort of
 11 commission of any type.
 12 Q. I see. So after the Grenfell Tower fire in 2017, you
 13 would say?
 14 A. It was actually before the fire. Sorry, maybe I've got
 15 my -- yeah, it was before the fire. There were two
 16 instances that I remember. It would have been paid on
 17 an annual -- sort of yearly basis, that I come away with
 18 some sort of commission for hitting a -- the yearly
 19 target.
 20 Q. How was that commission calculated? What was the basis
 21 on which you got the commission?
 22 A. It would have been through square metrage and profit
 23 margin.
 24 Q. I see. Were you aware, therefore, of what the profit
 25 margins were on the products you were selling?

77

1 A. We were set a margin and we had to hit the margin, and
 2 if we hit the margin obviously we came away with some
 3 sort of commission structure, or some finance, you know,
 4 commission, yeah.
 5 Q. Yes, on top of your salary?
 6 A. On top of the salary, yeah, yeah.
 7 Q. Did you have specific sales targets you were expected to
 8 achieve?
 9 A. Yes, I did, yeah, yeah.
 10 Q. How were those targets worked out? Were they with
 11 reference to a particular product or particular
 12 quantities of products?
 13 A. They would have been worked out for a square metrage,
 14 how much square metrage you would do in the month and
 15 how much you were selling the product at. I'm not
 16 entirely sure how it's worked out, but they worked it
 17 out that if you hit the volume and the margin, then you
 18 would come away with some sort of commission, if you
 19 were on target for the year, and they would pay you that
 20 at the end of the year, if that makes sense.
 21 Q. Yes.
 22 We know that you were the UK sales manager for the
 23 Reynobond product range.
 24 A. Yes.
 25 Q. Did you have sales targets for specific aspects of the

78

1 Reynobond range, or just for Reynobond in general?
 2 A. There were two sides to Reynobond that I was working on:
 3 one of them was the corporate identification, CID, which
 4 would have been the likes of supermarket stores, car
 5 showroom garages, and also the architectural side of the
 6 Reynobond. So they would have been two separate sort of
 7 things run along the side, but you would get paid your
 8 commission as one.
 9 Q. I see.
 10 Within the architectural side, were your targets
 11 broken down to, for example -- and we'll talk about it
 12 in a minute -- Reynobond PE versus Reynobond FR
 13 products, was it broken down in that way?
 14 A. No, it wasn't, no, it was just Reynobond in general, the
 15 products in general.
 16 Q. Was it just a commission arrangement? Were you ever
 17 paid a bonus as well?
 18 A. No, I was never paid a bonus, no, just commission.
 19 Q. Yes.
 20 Now, in terms of reporting lines up from you, is it
 21 right that when you started your manager at Arconic was
 22 Peter Froehlich?
 23 A. That's correct, yes.
 24 Q. And that was until 2016; is that right?
 25 A. I would not -- I'm not 100% sure, but it would have been

79

1 around that time, yes, yes.
 2 Q. Is it right that in 2016 you were then managed by
 3 Lionel Marconnet for a short period of time?
 4 A. That's correct, yes, yes.
 5 Q. And then he was replaced by Veronika Deffontaine?
 6 A. That's correct, yes.
 7 Q. What oversight of your work did your managers have?
 8 A. They had pretty much total control in a way, whereas
 9 they would tell you what targets to hit and what margins
 10 we could sort of go to, if you like. We had a margin
 11 level that we could sell at, but anything below
 12 a certain level we had to get authorisation from whoever
 13 the manager was at that time.
 14 Q. Just to be clear, were all your managers based at
 15 Merxheim in France?
 16 A. They were, yes.
 17 Q. Did they regularly send instructions to you as to what
 18 you were required to do in your role as UK sales
 19 manager?
 20 A. No, I wouldn't say regularly. We had sort of quarterly
 21 meetings that would have been via Skype, and then we had
 22 sort of half-yearly meetings that we would go to France
 23 and discuss where we were. But they were pretty much
 24 available on a daily basis. But we'd catch up on
 25 a weekly report system.

80

1 Q. Yes. And your communications with them, were they by
2 email, by telephone? What was the pattern of
3 communication with them on a normal week?
4 A. That would be both telephone and email, yeah.
5 Q. Yes.
6 A. Mainly email, if --- yeah.
7 Q. Yes.
8 Were you ever instructed by Merxheim to promote
9 a particular product within the Reynobond range?
10 A. We were --- obviously there were new things that were
11 coming on to the market, they were developing new
12 projects --- sorry, new products, and yeah, we were asked
13 to promote various different products as they come on
14 board. One of them would have been, as you're probably
15 aware, the A2 product that didn't really take off. But,
16 no, in general, as and when the products came to market,
17 we were asked to promote them.
18 Q. We're going to come back to some more detailed questions
19 about the A2 product. Just to be clear, is what you
20 mean a Reynobond product that had achieved European
21 classification A2; is that correct?
22 A. It was an A2 product, yes, yeah.
23 Q. Yes.
24 Now, is it right that your direct manager reported
25 to the director of sales and marketing within Arconic?

81

1 A. I believe so, yes, he did.
2 Q. When you were with Arconic, that was Alain Flacon?
3 A. Yes, it was initially, yes.
4 Q. And then, in 2017, is it right that Lionel Marconnet
5 himself took on that more senior role?
6 A. That would be correct around that time, yes, 2017, yes.
7 Q. Your role --- is this right? --- in short, was to generate
8 sales for Arconic in the UK?
9 A. Yeah, well, it was to generate sales and after sales, so
10 to make sure that --- you made sure that the customers
11 and the clients were happy once the sale had been made.
12 So, yeah, it was a --- that type of role, yeah.
13 Q. And you were specifically responsible for selling the
14 Reynobond range; that's right, isn't it?
15 A. It was Reynobond, yes.
16 Q. We know that when Deborah French was working for
17 Arconic, there was another UK sales rep,
18 a Mr Robert Campbell, who was working on the Reynolux
19 products. Now, was that the case when you were UK sales
20 rep?
21 A. It was, yeah, initially, and then he was taken over by
22 somebody new. But, yes, he was there when I first
23 started, yes.
24 Q. So there was somebody separate who had their eye on the
25 Reynolux range?

82

1 A. On the Reynolux, yeah, solid aluminium, yeah.
2 Q. Just help us, what was the difference between Reynobond
3 and Reynolux?
4 A. Reynolux is a solid aluminium, so there is no core, and
5 Reynobond, as you're aware, has a core.
6 Q. Yes.
7 Were you also responsible for selling any other
8 composite panels, any other MCM, metal composite
9 material, panels during that time?
10 A. No, it was just the ACM product, and the Reynodual
11 product, which would have been a solid --- two pieces of
12 solid aluminium that were adhered together, so it was
13 a solid, one sheet of aluminium. Very similar to the
14 Reynolux, but two solid pieces of material.
15 Q. Yes. So you weren't responsible at all for any zinc,
16 ZCM ---
17 A. We were occasionally asked for ZCM, yeah, and zinc
18 aluminium, that type of thing, but it was very rare.
19 There wasn't an awful lot of call for it. We went
20 through a company, if I remember rightly, called VMZinc.
21 Q. I see. So if anyone was asking for that, did you just
22 simply direct them to VMZinc?
23 A. Yes, yes, at the end, yeah.
24 Q. Do you still work for Arconic?
25 A. I do still work for Arconic, yes. I have been on

83

1 furlough for quite a while. I've just come off of
2 furlough. But, yes, I'm still currently on their books.
3 Q. What's your current role? I appreciate you're on
4 furlough, but what is your job title?
5 A. Sorry, it's a bit difficult at the moment, because I'm
6 not sure what my title is. At the moment I haven't got
7 a --- shall I say I haven't got a position at
8 Reynobond --- sorry, Alcoa, at the moment --- or Arconic
9 at the moment.
10 Q. This time last year, before the pandemic took hold, what
11 was your position within Arconic?
12 A. It was very similar to what I'm doing at the moment, but
13 it was a lot of chasing queries and looking and talking
14 to clients that were not --- wanted me to come to site
15 and have a look at site with varied issues they may have
16 with the cladding. But the sales role had sort of died
17 off on the architectural side, obviously due to the
18 fire, and I was --- most of my focus was on the corporate
19 identification market.
20 Q. I see, but were you still in the position of ---
21 A. Sorry, yes ---
22 Q. --- sales manager?
23 A. Yes, I was, yeah, yeah.
24 Q. Yes.
25 Now, I want to ask you some questions now about your

84

1 training and your induction at Arconic when you began
 2 working for them in May 2015.
 3 Let's look at your witness statement at this point.
 4 If we go to page 5 {MET00053164/5} and look again at
 5 paragraph 16, you tell us there -- I'm just going to
 6 read this with you. So you say:
 7 "After joining the business on 1 May 2015 my time
 8 was initially spent being introduced to work colleagues
 9 and undergoing an induction process which meant a number
 10 of visits to Merxheim in France which included learning
 11 about the different products manufactured by [Arconic].
 12 I do not remember any specific details of this training
 13 but it would have covered, at a very high level, some
 14 technical points including that the fire resistant
 15 version of the Reynobond product was available. Because
 16 I had previously worked in sales roles in businesses
 17 operating in this sector, I had good experience working
 18 with fabricators in particular. In practical terms
 19 therefore this initial period, which included
 20 Peter Froehlich coming over to the UK and introducing me
 21 to existing customers of [Arconic], meant that I started
 22 my active role as UK Sales Manager in approximately
 23 early July 2015. Whilst that introductory period
 24 informed my understanding of the manufacturing process
 25 in Merxheim I had no actual involvement in relation to

85

1 the manufacture of any products nor did I have any
 2 knowledge or detail of the quality assurance checks or
 3 related procedures which are undertaken as part of those
 4 manufacturing processes in Merxheim."
 5 So you have told us a little bit there about your
 6 induction and the period of time that you were inducted
 7 between May 2015 and July 2015. I've just got some
 8 further questions about that.
 9 We've already noted that there was this gap of a few
 10 months between Deborah French leaving the UK sales
 11 manager role and you taking that role up. Does that
 12 mean that there wasn't a formal handover from
 13 Deborah French to you as part of that induction process?
 14 A. That's correct. There was no formal handover
 15 whatsoever.
 16 Q. Ms French has told us in her evidence that she did meet
 17 you on a couple of occasions after you had started in
 18 post. She told us that she'd met you as part of
 19 a meeting to do with Genius Facades and in her role at
 20 Taylor Maxwell, and she has also said that she met you
 21 to hand over some boxes of brochures to you. Is that
 22 correct?
 23 A. That's correct, later on, yeah, in July/August sort of
 24 time, I would guess.
 25 Q. I see. So this was later in 2015 that she met you to

86

1 hand over the brochures?
 2 A. I -- from what I can recall, yes, yes.
 3 Q. Was there any kind of informal handover from her, if not
 4 a formal one, when you met her?
 5 A. Nothing that, you know, was -- that stands out in my
 6 mind, no. There was nothing really formal. It was
 7 quite informal. The literature was out of date, so the
 8 literature was disposed of.
 9 Q. Yes, you tell us that in your statement, that she gave
 10 you some boxes of brochures, but you realised those were
 11 out of date so you disposed of them; is that correct?
 12 A. That's correct, yes.
 13 Q. So did she tell you anything, give you any tips about
 14 the role, at all?
 15 A. No. To be fair, I didn't ask her for any tips, and
 16 I can't recall Deborah ever giving me any tips. She was
 17 still in an active cladding sort of role working for
 18 Taylor Maxwell, so, you know, I'd have had contact with
 19 her, but she didn't necessarily give me any sort of
 20 tips.
 21 Q. Was there any reason why you didn't ask her questions
 22 about the role? Were you not curious to find out from
 23 her information about, you know, how it had gone for her
 24 and, you know, what the state of the UK market was at
 25 that time?

87

1 A. I guess we had sort of conversations on that sort of
 2 level where we asked about the -- you know, what the
 3 industry's doing. I was still working with Deborah, as
 4 you can imagine, with Genius Facades systems, so we were
 5 still having conversations. But, no, I didn't get
 6 in-depth conversation about what the market's doing or
 7 where we are. My remit was to bring on as much business
 8 and work with as many fabricators as possible.
 9 Q. You have told us a little bit about your induction at
 10 paragraph 16, and you've said that effectively that
 11 induction process went from May to July; is that right?
 12 A. Around about July time, yes, yes.
 13 Q. Was it a gradual induction process or did you have
 14 a kind of intensive period of time when you received
 15 training during that time?
 16 A. From what I can remember, it was a block training. So
 17 I had a week or four days in France with training,
 18 various different sort of aspects, and then I came back
 19 to France a few weeks later for some additional
 20 training. So it would have been spread over
 21 a two-week/three-week period, thereabouts.
 22 Q. Just help us, that training, particularly the training
 23 you had in France, did that include any training on the
 24 technical aspects of ACM and the Reynobond product
 25 range?

88

1 A. No. I met the technical team, I was introduced to all
2 of the team in the technical team and reassured that,
3 you know, they were there for me every step of the way
4 and, you know, it's only a phone call away if I need
5 them. So the technical were there for complete back-up.
6 But no real technical training as such, no.
7 Q. Who did you meet in that technical team?
8 A. Bear with me. Names are terrible. It would have been
9 Claude Wehrle and Nicolas Remy. They're the only two
10 people I can name. There were four or five members at
11 that time in the technical team, or I should say --
12 yeah, four or five, but they were the two main players.
13 Q. Did they give you any form of technical presentation or
14 technical briefing on the products you were to sell?
15 A. No, they'd go over the projects -- the products, even,
16 and explain what they are, what their purposes are, but
17 nothing in-depth, you know, it was just what the product
18 is.
19 Q. Did you receive any briefing from them about the fire
20 performance of the products at that stage?
21 A. No, none whatsoever.
22 Q. If we can return to your witness statement at page 2
23 {MET00053164/2}, paragraph 6, if we look at the very end
24 of that paragraph, I just want to look at that final
25 sentence, you say:

89

1 "Prior to joining [Arconic], my knowledge of ACM, as
2 a product, was relatively limited."
3 And you have explained to us this morning that you
4 were mainly involved on the MCM side in your previous
5 role at Category Cladding.
6 Can we just have a look at a document now, this is
7 {INQ00014264}. This is a document you might not have
8 seen before. It's dated May 2015, we can see at the
9 top, 27 May 2015. What this appears to be is an email
10 that contains some minutes of a meeting.
11 Now, it's sent from someone called Virginie Leicht,
12 and it's sent to a number of people, including your
13 boss, Peter Froehlich, and others, Claude Schmidt is on
14 there, Claude Wehrle is on there, and the subject is
15 "weekly meeting -- 22/05/2015".
16 What we see in the substance of the email, we've
17 got:
18 "Hello
19 "[Please] find below minutes of our meeting.
20 [Please] feel free to add any comment to the report."
21 We can see the initials of the attendees are there,
22 and we see CWE, which we believe to be Claude Wehrle.
23 He was the head of technical sales support team in
24 France, wasn't he?
25 A. Yes, I do believe he was, yes.

90

1 Q. Yes.
2 This note is around the time that you started at
3 Arconic in May 2015, and if we can go down to page 4 of
4 it {INQ00014264/4}, right at the bottom there, under the
5 initials "CWE", so this appears to be a part of the
6 meeting that Claude Wehrle was leading or providing some
7 information, and if we look at the fourth bullet point
8 under "CWE", it says there:
9 "Technical training -- Vince -- Already has very good
10 technical knowledge in the area of cladding."
11 Now, I just wanted to ask you about that. That
12 indicates, at least from Mr Wehrle's point of view, that
13 you came into the job with a good technical knowledge
14 about cladding. Is that right?
15 A. I assume so, yeah, reading that, yeah, he assumed that
16 I had very good knowledge of cladding.
17 Q. Is that what you told him? Did you say, "I've got good
18 technical knowledge of cladding and cladding products"?
19 A. I would have done, yeah, yeah.
20 Q. But is it right that when you say that your knowledge of
21 ACM as a product was limited, is that because at
22 Category Cladding you had focused mainly on MCM
23 products?
24 A. That's correct, yes. When I say cladding, it would have
25 been metal cladding, not necessarily an aluminium

91

1 composite material, but cladding, yes.
2 Q. So when you had your technical briefing from Mr Wehrle's
3 team in France, were you able to ask questions about the
4 technical properties of ACM products?
5 A. Yeah, I knew the basics of ACM products, so yes, to
6 a certain extent.
7 Q. When you talk about the basics of ACM products, what do
8 you mean by that?
9 A. I guess the fabrication, how they're fabricated, how
10 they're formed, and where they're sort of -- they're put
11 within the building. But that would be as far as it
12 went.
13 Q. Now, in terms of what was covered, just a bit more
14 detail on this.
15 We've seen at paragraph 16 of your statement
16 {MET00053164/5} that you tell us that your induction
17 covered technical points at a high level, that's the
18 phrase you've used.
19 Were you told this: were you told that ACM was
20 a composite cladding material consisting of two thin
21 sheets of aluminium bonded to a core?
22 A. Yes.
23 Q. Were you told that one type of core was PE,
24 polyethylene?
25 A. Yes.

92

1 Q. Did you know that already before you worked for Arconic
2 or were they telling you that during your technical
3 briefing?

4 A. I knew, when they were telling me in the technical
5 briefing, that there were two main cores, the
6 polyethylene, the PE, and the FR, the fire retardant,
7 but I didn't really understand what the two cores were
8 at that point.

9 Q. Did they tell you during the briefing what the two cores
10 were, the difference between PE and FR cores?

11 A. One was fire retardant, the PE is a standard core,
12 that's how it was put.

13 Q. I see. Did they tell you anything about the fire
14 properties of the PE product specifically?

15 A. No, I don't believe they had -- they felt the need to go
16 or did in that -- go down that road at that moment in
17 time, no.

18 Q. Why don't you think they felt the need to do that --

19 A. They may have done that at a later date in my training,
20 but certainly when I first started with the company they
21 weren't sort of bombarding me with too much sort of
22 technical fire and uplifts and loads and that type of
23 thing. It just didn't -- wasn't given to me early on.

24 Q. I see. How much later did you start to receive more
25 technical information?

93

1 A. I guess that would have been every time we had
2 a half-yearly or yearly sales meet, the technical team
3 would do a presentation on certain things within the
4 materials, what they're developing, what they're moving
5 on and that type of thing, so I would have picked it up
6 later on at various different sales meetings, I guess.

7 Q. I see, okay. We'll come back to that.

8 Can we just look at your witness statement at this
9 point again. If we go to page 11 {MET00053164/11} and
10 look at what you say at paragraph 32.1. So you say
11 there:

12 "Unsurprisingly none of the ACM product with a PE
13 core was considered non-combustible or of limited
14 combustibility (that would hardly be surprising in
15 circumstances where the core is polyethylene, indeed
16 I would be surprised if anyone in the industry was
17 unaware that polyethylene is combustible)."

18 Now, just breaking that down for a moment, are you
19 saying it was well known in the construction industry
20 that polyethylene was combustible?

21 A. With that sentence -- that paragraph, I would have said
22 that later on in my employment, that, yeah, for sure
23 I would have known that PE was a polyethylene --
24 combustible. How combustible, I was unaware, but I knew
25 that it was combustible of some type, later on in my

94

1 employment with Arconic, meaning a good few years down
2 the line, because it was all new to me, the PE or the FR
3 when I first started. So I make that quite clear, that,
4 sorry, when we were talking about what I knew early on,
5 initially, when I first started my employment with the
6 company, they give me basic training, although it was
7 quite intense when it comes to product knowledge, but it
8 wasn't so intense with the fire aspect or the wind
9 uplift. This would have been later on in my employment
10 I would have realised that, yeah, it was combustible.

11 Q. I see. So I think what you're saying is when you
12 started to work at Arconic, you didn't know that PE,
13 polyethylene, was combustible; is that your evidence?

14 A. Yeah, it was never mentioned. It was a standard core,
15 and that to me was just a standard core. I took it as
16 a standard sort of core, whatever that meant, but yeah.

17 Q. You say it wasn't ever mentioned, but did you in any
18 event know from your previous experience or other
19 experience that PE was combustible?

20 A. No, I can honestly say I didn't. I didn't work with PE
21 in any other ... with Ash & Lacy, for instance, it would
22 have been I guess an FR core because it would have been
23 an Alucobond product, looking back on it. But no,
24 I didn't come across it before in any previous
25 employment.

95

1 Q. So if you didn't know that it was combustible, with all
2 the experience you had in the cladding industry, why are
3 you saying there that you're surprised if anyone in the
4 industry was unaware of that fact?

5 A. As I said, this -- later on, a few years down the line,
6 I'd be very surprised that the people that are using it
7 on a daily basis were not aware of it. It just doesn't
8 make sense that, you know, if you're ordering something
9 and you're technically minded and you're a fabricator,
10 then you would know the difference, knowing what I know
11 now, that they would know PE is a different core from FR
12 core and they would know what the two differences are.

13 Q. I see. You have said that several times, that later on
14 you would have been surprised if no one had known. You
15 were starting work for Arconic in May 2015; when do you
16 mean by "later on"?

17 A. Sorry, yeah, I would say about a year or 18 months down
18 the line of the employment, when you get to talk to the
19 fabricators and the people that are using the products
20 on a daily basis, you know, you learn an awful lot and,
21 yeah, it would have been a good 18 months/two years
22 before I knew the complete difference between the two.

23 Q. Were you told anything about the properties of
24 polyethylene during your induction and your training?

25 A. No.

96

1 Q. Were you told anything about its fire performance?
 2 A. No, that's nothing that will have come up.
 3 Q. So at that point, even though you were selling the
 4 product for architectural use, or about to start selling
 5 it for architectural use, you didn't know that it was
 6 combustible and you weren't told that in your training;
 7 is that correct?
 8 A. That's correct.
 9 MS GRANGE: Mr Chairman, I think that's a good moment. I'm
 10 mid-topic on training and induction, so I'll carry on
 11 after the break, but I think it makes sense to pause
 12 there.
 13 SIR MARTIN MOORE-BICK: I think you're right, I think we
 14 should stop there.
 15 Mr Meakins, we're going to have a break now so that
 16 we can all have some lunch.
 17 Please remember what I said to you earlier about not
 18 talking to anyone about your evidence or anything to do
 19 with it over the break.
 20 THE WITNESS: Yes.
 21 SIR MARTIN MOORE-BICK: We will see you again at 2 o'clock,
 22 please.
 23 THE WITNESS: Thank you. Thank you, sir.
 24 SIR MARTIN MOORE-BICK: Good, thank you. See you then.
 25 (1.01 pm)

1 (The short adjournment)
 2 (2.00 pm)
 3 SIR MARTIN MOORE-BICK: Good afternoon, everyone, welcome
 4 back. We're going to continue hearing evidence from
 5 Mr Meakins.
 6 So the first thing I'm going to do is to see if
 7 Mr Meakins is there and whether he can hear me and see
 8 me clearly. Mr Meakins?
 9 THE WITNESS: I can hear you and see you clearly, sir, yes.
 10 SIR MARTIN MOORE-BICK: Very good, thank you very much.
 11 Well, then, Ms Grange, it's over to you. Thank you
 12 very much.
 13 MS GRANGE: Yes, thank you, Mr Chairman.
 14 Yes, Mr Meakins, can I just pick up on a few points
 15 from the evidence just before the break.
 16 You told us that your induction consisted of a week
 17 in France and then you were back in the UK, and then you
 18 went back to France again. Were you back in France in
 19 time for a sales meeting on 2 July 2015, do you think?
 20 A. I can't recall -- I can't honestly be certain. I don't
 21 remember a sales meet. I may well have been, but
 22 I can't be certain, I'm sorry.
 23 Q. Okay. I'll come to some documents in a little while in
 24 your evidence that might help you recollect that, but we
 25 just wanted to clarify that at this stage.

1 You said in your evidence that you didn't
 2 appreciate, during your training and induction, that PE
 3 was combustible, but that there did come a time when you
 4 came to appreciate that. When was that and how did you
 5 learn of that?
 6 A. Well, I think for certain after the Grenfell fire,
 7 I think everybody was more aware of how combustible the
 8 PE really is, but up until that time, I was pretty
 9 much -- you know, I knew it was a standard core, but
 10 really didn't know that it was as combustible as what
 11 it's turned out to be.
 12 Q. So are you saying now that you didn't think it was
 13 combustible at all prior to the Grenfell fire?
 14 A. I was unaware that it was combustible in a sense where
 15 it would fuel in a fire, if you like. But I'm not very
 16 technically minded, so in a way I was -- I knew it was
 17 a PE core, a standard core, I knew it was some form of
 18 plastic, but I didn't realise it was as combustible as
 19 what it's turned out to be.
 20 Q. I appreciate that. But if you'd been asked, let's say
 21 in 2016, "This PE core, is it a combustible material?",
 22 what would your answer have been?
 23 A. I think it probably would have been -- you know, it's
 24 a very difficult question to answer, because if --
 25 I would never have been selling or involved in a product

1 if I knew how combustible it was. So I probably would
 2 have said, "It's our standard core, it has some form of
 3 plastic in it", but I wouldn't necessarily have said,
 4 "It's a highly combustible material", because I was
 5 unaware of that, I didn't realise.
 6 Q. I appreciate you might not have said it was a highly
 7 combustible material, but would you have said it was
 8 a combustible material?
 9 A. I probably wouldn't have done. The answer to that is
 10 probably not. I would have said it's a standard core,
 11 it may ... no, I really -- sorry, I can't really answer
 12 that question and say I would have said it was
 13 a combustible material, because, you know, if I, for any
 14 reason, thought that it would have been a very
 15 combustible material or a combustible material, then
 16 I would have asked questions to why we were selling it
 17 at all.
 18 Q. I see.
 19 Did you ever discuss the combustibility of
 20 polyethylene with Claude Wehrle or any member of his
 21 technical team in Merxheim in France?
 22 A. I can't recall ever talking to them about a combustible
 23 material, the PE material, no.
 24 Q. You have no recollection of that sort of discussion at
 25 all?

1 A. I have no recollection of talking about combustibility
2 in PE, no.

3 Q. Talking about combustibility at all in relation to any
4 of the Reynobond products?

5 A. I can honestly say, no, I can't remember that we had
6 a conversation about the products being combustible.

7 Q. I see.
8 Did you ever discuss the combustibility of PE with
9 any fabricators in the years 2015, 2016?

10 A. I'm trying to think if there was an instance that we
11 spoke about combustibility prior to the Grenfell fire,
12 and there was -- there's nothing that stands out in my
13 mind that I would have spoken to any fabricators with
14 regards to combustibility and PE.

15 Q. What about its poor fire performance? Did you ever
16 discuss its poor fire performance in general terms with
17 any fabricators in 2015, 2016 and prior to the fire?

18 A. Prior to the fire ... I can't recall. I can't remember
19 ever talking to any fabricators about the combustibility
20 of PE, no.

21 Q. And what about with any other customers in the UK,
22 discussing the poor fire performance of PE, do you have
23 any recollection of that?

24 A. I can't -- unless I would have been asked the
25 question -- I can't remember being asked any direct

101

1 question about how combustible PE was. So, in answer to
2 that question, I just can't -- I can't remember,
3 I'm afraid, sorry.

4 Q. I see.
5 Thinking back to your induction, then, and when you
6 met the teams in France, did you discuss with them the
7 fact that the standard core for the Reynobond product in
8 the UK was the PE core?

9 A. Yes, because standard core would -- in my eyes, was
10 a standard black PE core at that time.

11 Q. I see.
12 Was there any discussion at that time about the
13 difference between the standard PE core and the FR core
14 with Claude Wehrle and his team, or anyone else at
15 Merxheim?

16 A. I was aware that the PE core was a standard; core, and
17 the FR core was a fire retardant core. But that's as
18 far as it -- I understood it to be. I'm sorry,
19 that's -- no.

20 Q. So the level of your understanding never went beyond
21 that; is that your evidence.

22 A. Yes, it is, yeah.

23 Q. Did your understanding about Reynobond PE's performance
24 in fire ever change during the time that you worked at
25 Arconic?

102

1 A. I think with specifications that were coming through on
2 the market and they were being asked for an FR core over
3 a PE core, then sure, it changed, you know. I'd ask the
4 question as to why not a PE core, and it doesn't perform
5 very well in a fire, so it needs to be specified an FR
6 core in this case, but that would be as far as it
7 sort of went, really.

8 Q. I see. When did those sort of discussions start taking
9 place, where you were being told that the reason they
10 didn't want a PE core was because it didn't perform well
11 in fire?

12 A. I'm trying to think of an instance -- a particular
13 project. But it would have been a main contractor or
14 a specifier or someone that would have specified that it
15 had to be an FR core, because that was what was written
16 in the specification, because they wouldn't accept a PE
17 core as a standard core. So I would obviously put
18 forward the fire retardant, the FR core.

19 Q. When that was brought to your attention by these main
20 contractors or other professionals, did you go back to
21 Merxheim and have a conversation with them about still
22 selling the PE core if it performed worse in fire?

23 A. I can honestly say I didn't, no.

24 Q. Can we have a look at something that Mr Wehrle says in
25 his witness statement at this point. That's at

103

1 {MET00053190/27}. I want to look at paragraph 94 of
2 this statement, in the first two sentences in that
3 paragraph. So Mr Wehrle says this:
4 "Since PE (polyethylene) is a plastic, it is
5 of course combustible; in other words, it will, when
6 exposed to heat and/or to a flame, in due course catch
7 fire. This is something that would certainly be very
8 well known by anyone in the construction industry who
9 was involved with the specification, purchase,
10 fabrication or use of cladding or cladding systems."
11 So that's Mr Wehrle's evidence.
12 Now, I think you told us this morning -- is this
13 right? -- that when you began working for Arconic, you
14 didn't know that PE was combustible and, when exposed to
15 heat or flame, would catch fire; is that correct?

16 A. That was never explained to me when I started with the
17 company. As far as I was concerned, it was a standard
18 core. I would have questioned it at that early stage,
19 asking to why we manufactured this product if it was at
20 all combustible in that way. So that was my
21 understanding. It was just the standard PE with
22 an amount of plastic in the core. But nothing was ever
23 put that -- put to me like that when I started at the
24 company.

25 Q. I see. So Mr Wehrle didn't say anything like this to

104

1 you when you started at the company; were you ever told
 2 something like this by anyone else at Arconic prior to
 3 the Grenfell fire?
 4 A. No. No one has ever spoken to me about the flame and it
 5 will catch fire in a fire. It had an amount of plastic
 6 in it, so you assume later on, which I did, when you get
 7 speaking to contractors and mainly fabricators that know
 8 their business inside out, would say that it can't be
 9 a plastic core and it has to be an FR because it's been
 10 specified. But that's as far as my — I was ever told.
 11 Q. I see.
 12 A. I was never told that in that words, no.
 13 Q. Do you ever recall Mr Wehrle or anyone else at Arconic
 14 telling you about how long it took for Reynobond PE to
 15 catch fire in the event of a fire event?
 16 A. No, I can't recall ever being told that.
 17 Q. Were you ever told about its performance in fire once
 18 a fire had begun within the panels?
 19 A. No, I was never told that.
 20 Q. Did you ever learn anything about the effect that
 21 different fixing methods, so for example the difference
 22 between a rivet and a cassette, might have on the fire
 23 performance of Reynobond ACM panels with a PE core?
 24 A. I can't recall ever being told that personally, no.
 25 I don't remember. I may have heard it somewhere, but

105

1 I honestly can't remember anyone telling me on
 2 a one-to-one basis that this is the case.
 3 Q. When you say you may have heard it somewhere, do you
 4 mean you might have heard it somewhere within the
 5 company, or external to the company?
 6 A. I think it could well have been external to the company,
 7 or it may have been at the company, it's been too long
 8 ago for me to remember exactly, but ...
 9 Q. I see.
 10 A. I'm sorry, I can't answer that, being honest.
 11 Q. To be clear, you're saying you didn't know there was
 12 a difference in how the rivet performed and how the
 13 cassette PE panels performed?
 14 A. No, I don't honestly believe that anyone's told me that
 15 they performed differently in a fire.
 16 Q. Now, we've already seen that in your training, and you
 17 have told us, you learned that there was an FR version
 18 of Reynobond. What were you told about that FR-core
 19 version? Were you given any details about it?
 20 A. I was told that it was a fire retardant product that was
 21 used within the core, but that's as far, really, as it
 22 — I was told, and obviously the competitors were using
 23 that product at the time. But that's about it, really.
 24 Q. Were you told about what the core actually comprised of?
 25 A. It's probably in writing or in some literature

106

1 somewhere, but no, I can't recall ever being told of
 2 what the build-up of the product was.
 3 Q. So you didn't know that it was a 70% mineral fibre and
 4 30% thermoplastic?
 5 A. I do now, but I didn't at that time, no.
 6 Q. "At that time", are you talking about your induction or
 7 are you talking about at any time when you were selling
 8 Reynobond before —
 9 A. Sorry, I'm talking about the induction, when I first
 10 started with the company, you know, I didn't really know
 11 the difference between the two cores at all.
 12 Q. And they didn't help you with that?
 13 A. No. One was fire retardant and one was a standard core.
 14 Q. Were you not curious as to precisely what the FR core
 15 comprised of and wanted to know so you could sell it to
 16 your customers?
 17 A. Well, looking back on it, I knew the two cores were
 18 different, I knew one was slightly cheaper than the
 19 other one, and I honestly believed that it was — it may
 20 have been down to the client's budget of some type.
 21 Early on, I'm talking, when I started with the company,
 22 to make that quite clear, because I was quite naive and
 23 new to the company, not realising what the two were.
 24 I mean, I knew that one was a fire retardant, because
 25 it's FR, I knew the PE was a standard core and I knew it

107

1 standed(sic) for polyethylene, but that was as far as it
 2 went.
 3 Q. Were you told that there was a difference in the type of
 4 applications that the two cores could be used for?
 5 A. No. As far as I was concerned, the application — the
 6 two cores could be used in the same application.
 7 Q. So did you —
 8 A. There was no difference.
 9 Q. Were you told that both cores could be used on
 10 a high-rise building?
 11 A. I was at that time told — I don't think the
 12 conversation came up about high-rise buildings when
 13 I first started with the company and what product to use
 14 and what not product to use. I learned that myself
 15 later on down the line, so I wasn't specifically told by
 16 anybody at Arconic on the technical team not to use a PE
 17 at certain heights.
 18 Q. I see. You say you learnt that yourself later on down
 19 the line; when did you learn that?
 20 A. I think I learnt it talking to fabricators, main
 21 contractors, and of course reading through the
 22 literature as it goes on, and knowing that you use the
 23 FR on most applications, and that was my main remit, was
 24 to sell the FR product. I mean, we were told to —
 25 through Alain Flacon, when he was the managing director,

108

1 was to focus on — all of our efforts on FR, because
 2 that's the way it was at the time. But I didn't really
 3 think of any difference.

4 Q. I see. When were you told by Alain Flacon that you were
 5 to focus on selling the FR product?

6 A. That would have been at sales meets. When we had the
 7 sales meets, it was like, "We really do want to progress
 8 with the FR sales and, you know, promote that", and the
 9 market dictated that that's what was being used, the FR
 10 product, and that's what was being specified. So really
 11 it was more or less selling itself, to be honest.

12 Q. Were you ever told in terms not to sell the PE product,
 13 or at least not to sell it for certain applications?

14 A. No, I wasn't, no.

15 Q. Did there come a time when you appreciated that the PE
 16 core ought not to be used for tall buildings?

17 A. Yes, there was. The time was obviously after the
 18 Grenfell fire, and probably a year running up to the
 19 Grenfell fire, the tragedy, that the PE wasn't being
 20 specified for buildings at certain heights. So the only
 21 specification I was putting forward would have been the
 22 FR or the A2, that I'm sure we'll come to at some stage,
 23 that we were trying to manufacture and break into the
 24 market with.

25 Q. Is it your evidence that you knew for the year running

109

1 up to the Grenfell fire that PE should not be specified
 2 for tall buildings because it was dangerous to do so?

3 A. That was my understanding, that people weren't, yeah,
 4 specifying the PE product on tall buildings. Yes.

5 Q. Did you ever have a conversation with Claude Wehrle and
 6 his team about that at the time?

7 A. I can't recall ever having a conversation with
 8 Claude Wehrle or the team about specifying PE on
 9 high-rise buildings or anything over a certain height.
 10 It probably would have been mentioned maybe at a sales
 11 meeting, but that was the standard practice at that
 12 time, running up — everybody was specifying an FR
 13 product, so that's what was being put through to the
 14 market.

15 Q. Was it a more general conversation, without reference to
 16 tall buildings, that PE shouldn't be specified at all on
 17 architectural projects because it was dangerous?

18 A. I think it was probably a general sort of conversation
 19 along the lines — but I was dictated to by — an awful
 20 lot, with the fabricators that would specify or the
 21 architect would specify, you know, that's the product
 22 that needs to be used on these buildings, so that's what
 23 was being put forward.

24 Q. I appreciate you say that you were being pushed in that
 25 direction by effectively your clients, your fabricators

110

1 and those that were specifying. But what were the
 2 messages you were getting from Merxheim in France about
 3 the use of PE in architecture and its safety?

4 A. Well, I guess we were being — as I said before, we were
 5 trying to promote and focus on the FR product, and that
 6 was something that we were very keen to do. But, yeah,
 7 there was no real conversations over what not to put on
 8 a building and what to put on a building, if that makes
 9 any sense. Yeah.

10 Q. Were you told why you had to focus on selling the FR
 11 product by Merxheim?

12 A. I think that's the — we were told that that's the way
 13 the market was going, that was the trend — I mean,
 14 everybody was using FR materials, our competitors were
 15 using — the majority of them were using FR material.
 16 So we were just focused on that. I know we were
 17 manufacturing in it and we really wanted sort of make
 18 a dent in the market, if you like, you know, by using
 19 FR.

20 Q. Was that specifically because people were aware at that
 21 point that it was not safe to use PE on architectural
 22 projects?

23 A. Sorry, are you talking about the people in Merxheim?

24 Q. Yes.

25 A. I'm not 100% sure on that. I'm not — I don't know.

111

1 I can't answer your question on that, because we were
 2 just told that the FR product is the one that needs to
 3 be in the forefront, really.

4 Q. I see.

5 A. No one's ever mentioned any more.

6 Q. What did you actually do to focus on the FR product?
 7 Did you only offer FR? What steps did you take to
 8 implement that direction?

9 A. I think, you know, as I said before, the market dictates
 10 to me — I'm not sure how it works in other industries,
 11 but I would be asked for these products, or I would see,
 12 if I was working on a building and it was a certain
 13 height or the building warranted a fire retardant
 14 product, then that's the product that I would specify
 15 and put forward. But it doesn't always work like that
 16 because there are obviously fabricators and alike that
 17 will order the material without me knowing what the
 18 building was, what height it was or what the building
 19 consists of. So that was entirely out of my hands,
 20 you know, they would purchase it direct through France.

21 Q. I see. Did that ever prompt a conversation between you
 22 and anyone at Merxheim about the status of existing
 23 projects where PE was being used?

24 A. It's a very difficult conversation — sorry, difficult
 25 question to answer for me, because a lot of the projects

112

1 that were specified or spoke about weren't necessarily
2 the project names that they'd given, because they've --
3 fabricators are very -- they like to keep their projects
4 close to their hearts, and they won't tell you exactly
5 what it is, because they're worried that the
6 specification or the project will get out and it will be
7 priced elsewhere. So I can only answer on my side of
8 things, and that would be: none of the questions really
9 were asked about what were in the pipeline and what
10 projects were there and weren't there, so ...

11 Q. I see.

12 You have just explained about what was happening
13 with the fabricators and what you were aware of through
14 them. I'm asking you about Merxheim: did you ever have
15 a conversation with someone at Merxheim about the fact
16 that PE was being used on existing projects and about
17 the safety of that?

18 A. No. I understand, sorry, I misunderstood your question.
19 No, the answer to that question: no, I can't recall
20 having a conversation -- I just can't remember having
21 a conversation with anybody at Merxheim about that.

22 Q. If we could look back again at paragraph 32.2 of your
23 statement on page 11 {MET00053164/11}. Actually, we
24 looked at 32.1 before, but just looking at 32.2 below
25 that you say:

113

1 "None of the ACM with an FR core was considered
2 non-combustible or of limited combustibility."

3 Do you see that there?

4 A. Yes, I can see that, yeah.

5 Q. So what was your understanding of how you could
6 categorise the FR core from a combustibility point of
7 view? If it wasn't non-combustible or of limited
8 combustibility, what was your understanding about what
9 it was?

10 A. In my terms, I would say the FR product would have been
11 a product that didn't catch fire. Does that make sense?

12 Q. Well, if that's your evidence.

13 Were you told anything more specific about the fire
14 performance of the FR product during your induction and
15 training for Arconic?

16 A. No, I can't recall I was.

17 Q. So were you ever aware that the FR core met certain
18 classifications, either national or, for example,
19 European?

20 A. I recall that there was a -- yes, I was aware.

21 Q. And what standards did it meet, the FR core, as far as
22 you were told by Merxheim?

23 A. Well, I assume it -- from what I understood, it was the
24 spread of flame, a zero rate -- does that make -- do
25 you understand what I said there?

114

1 Q. Are you saying it was national class 0, the FR?

2 A. Yes.

3 Q. That was your understanding, was it?

4 A. That was my understanding, yes.

5 Q. I see.

6 Now, Mr Wehrle gives some evidence about the
7 training that was delivered by Merxheim in his witness
8 statement. If we can look at that, it's at
9 {MET00053190/36}, and I want to look at paragraph 124.
10 So this is Mr Wehrle's witness statement. He says:

11 "I have also been asked to confirm whether [Arconic]
12 provides training to its staff and contractors in
13 relation to the technical performance of its products
14 including in respect of fire performance. In relation
15 to [Arconic] employees (and external sales teams) this
16 training occurs in different forms but includes
17 information on technical matters being provided to
18 relevant employees as part of their 'on-boarding'
19 process. This is usually at least a half-day session
20 and the content will depend upon the particular role of
21 the employee, for example, if they were responsible for
22 sales into France there may be a greater focus on French
23 related technical certifications."

24 Do you see that there?

25 Now, do you remember undergoing a half-day session

115

1 with Mr Wehrle and his team as part of the induction
2 process?

3 A. I can remember some time -- yes, it could have been
4 a half-day training period, vaguely.

5 Q. Is he right that that half-day session for you had
6 a greater focus on UK-related technical certifications?

7 A. I can't honestly say that it was related to the UK
8 performance, no.

9 Q. So does that mean you don't think it did that, or you
10 just have no recollection?

11 A. I really have no recollection of him ever talking about
12 the regulations for the UK, no.

13 Q. So you don't think he said anything to you about the UK
14 regulatory regime; yes?

15 A. I can't remember him -- yeah, I just can't remember that
16 conversation. Or there was some training, obviously
17 half a day training, but I can't remember -- I'm ever so
18 sorry, I can't remember that far back. I can't remember
19 that being said.

20 Q. What about particular certifications that were held by
21 the Reynobond product range which were relevant to the
22 UK market, were you told about that?

23 A. Again, I really can't recall. I can't remember things
24 being mentioned about the UK.

25 Q. Did you receive any briefing on any BBA certificates at

116

1 this time?
 2 A. Sorry, are we talking about my induction course, aren't
 3 we? No, there was nothing mentioned about the BBA at my
 4 induction course.
 5 Q. So were you unaware throughout your induction that there
 6 was a BBA certificate that was relevant to the Reynobond
 7 architectural wall panels?
 8 A. There was a BBA certificate that was in the literature,
 9 certainly I was aware there was one, but there was no
 10 discussion — in—depth discussion about it, no.
 11 Q. And you're aware based on your own knowledge and your
 12 own research, or you were told that by Merxheim, that
 13 there was this BBA certificate in existence?
 14 A. It would have been in the literature pack and there
 15 would have been a BBA certificate of some type there, if
 16 I remember that far back, so I would have seen the BBA
 17 Kitemark, but that would have been as far as it went,
 18 really.
 19 Q. You talk there about the literature pack; what was the
 20 literature pack?
 21 A. It would have been some brochures — again, just bear
 22 with me, sorry, I'm trying to think back and rack my
 23 brain on what the literature pack would have — it would
 24 have been some brochures on the products, and, as I say,
 25 the BBA certification may have been in there.

117

1 I remember seeing a BBA document.
 2 But, you know, just basic information about the
 3 products, really, and the literature, the literature
 4 brochures.
 5 Q. Was that a physical hard copy pack you were provided
 6 with or was it some kind of electronic batch of
 7 information?
 8 A. It would have been a hard — if I remember, a binder.
 9 Yeah, so it would have been in a binder.
 10 Q. I see.
 11 Were you told that there was a difference between
 12 the Building Regulations regimes in England and Wales as
 13 between that and Scotland?
 14 A. No, I can't recall ever being told the differences about
 15 the two or three.
 16 Q. I see.
 17 Let's look at page 14 of your witness statement now
 18 {MET00053164/14} and paragraph 42.
 19 So it's at the bottom of that page. I just want to
 20 look at what you say in the first four lines. You say:
 21 "Prior to the Grenfell Tower fire my level of
 22 knowledge about matters such as the UK Building
 23 Regulations, Approved Documents and industry guidance in
 24 relation to fire performance matters was limited, which
 25 is not surprising in circumstances where my role was/is

118

1 purely a sales role."
 2 Was any part of your training or induction directed
 3 at the Building Regulations or the practical guidance in
 4 the approved documents?
 5 A. I really can't recall anything being mentioned. So the
 6 answer would have to be, I'm sorry, I can't remember,
 7 but it's very doubtful, I don't think it was.
 8 Q. Did you know about the existence of Approved Document B
 9 on fire safety between 2015 and 2017, while you worked
 10 in your role as UK sales manager?
 11 A. I'm sorry, could you repeat that question?
 12 Q. Yes. Did you know about the existence of Approved
 13 Document B on fire safety between 2015 and June 2017?
 14 A. I ... no, I can honestly say I didn't look into any
 15 regulations where it comes to that, no.
 16 Q. So you didn't even know there was something called
 17 Approved Document B on fire safety? You didn't know
 18 that?
 19 A. I would have heard of the document, but I haven't read
 20 it and I can't tell you the in—depth wording of it,
 21 because — I knew it was there, but the contents of it
 22 I can't recite to you, I can't tell you.
 23 Q. During your training, were you made aware that there was
 24 stricter guidance about cladding materials for use on
 25 high—rise buildings?

119

1 A. I'm sorry, I'm trying to think again. Just bear with me
 2 if I pause, because I'm drastically trying to think back
 3 to them times, and I can't recall — we knew that there
 4 was regulations at a certain height, but I can't recall
 5 what date that would have been or what year it would
 6 have been. So I'm sorry, I can't remember if that was
 7 ever mentioned.
 8 Q. Did you know at any time that there was special guidance
 9 within ADB, Approved Document B, about high—rise
 10 buildings and the types of cladding materials that could
 11 be used over 18 metres?
 12 A. At any time?
 13 Q. Yes.
 14 A. Yeah. I knew that obviously, as I mentioned before, we
 15 couldn't use certain products over the 18 metres, but
 16 no, I can't recite the document. I wouldn't be able to
 17 tell you what the document actually meant.
 18 Q. So you were never curious enough to see what that
 19 guidance said about what you could and couldn't use over
 20 18 metres?
 21 A. It's — I was — it's easy for me to say this, but we
 22 had a technical team, and the technical team were the
 23 ones that would have told me if there were any issues
 24 with the BBA certificate or if there were any things we
 25 could or couldn't do with the material. So I relied on

120

1 them to give me up-to-date information on anything that
 2 we needed to know.
 3 Q. But as a salesperson and a sales representative of these
 4 panels in the UK, didn't you need to know and have at
 5 least a basic understanding of the circumstances in
 6 which panels could be used on tall buildings?
 7 A. I agree, I think we -- you know, I had a knowledge of
 8 what -- as I said to you before, what product could be
 9 used over 18 metres and what couldn't, and the FR
 10 product was being used over an 18-metre. But apart from
 11 fire performance, I can honestly say the question --
 12 I've never been confronted by anybody to say, "Look, you
 13 can't use these on this product -- on this project" or
 14 "This isn't acceptable in this market", so I assumed,
 15 which we shouldn't do, that everything was A--okay with
 16 the product and the product was perfectly suitable to be
 17 used in the conditions that I was specifying it.
 18 Q. Did you know that both national and European
 19 classifications were both relevant to the use of
 20 Reynobond panels in the UK?
 21 A. No, I'm afraid I didn't.
 22 Q. So you didn't know that the practical guidance on
 23 fire safety cites both national classifications and
 24 European classifications? You didn't know that?
 25 A. These were set out in a document of what kind? Are we

121

1 talking about the BBA certification?
 2 Q. Well, that does it, that has both European and national
 3 classifications.
 4 A. Yeah. As I said, I was aware that they were a document
 5 and they were there in the document, but I never really
 6 digested the document.
 7 Q. But were you aware in more general guidance around the
 8 Building Regulations that it was referring to both
 9 national and European classifications?
 10 A. I'm afraid I wasn't, if I'm honest.
 11 Q. Did you understand that the European classifications
 12 were relevant to the UK market?
 13 A. Yeah, I ... no, I can't honestly say I did.
 14 Q. So what classifications did you think were relevant to
 15 whether or not panels could be used in the UK?
 16 A. I -- you know, as I mentioned before, the BBA
 17 certification was a document that I thought was good
 18 enough for our material to be -- to go on, and assumed
 19 that everything in that document was good enough for us
 20 to use our materials within the UK market.
 21 Q. We'll come to look at it in a little bit of detail
 22 later, I'm going to take you to the BBA certificate, but
 23 did you ever read it yourself?
 24 A. Again, if I'm very honest, absolutely honest with you,
 25 I glanced over it, I saw the BBA certificate, but I was

122

1 reliant on the technical team in France to tell me that
 2 everything within that BBA certificate was okay. If it
 3 had ever been brought up that this wasn't a document
 4 that was any good to us and we couldn't use it for
 5 whatever reason, then I would have looked into it a lot
 6 more, but if I didn't, I assumed that that document was
 7 a document that was okay for me to present in the UK.
 8 Q. I see.
 9 Were you ever made aware by Merxheim that there had
 10 been changes to certain fire classifications of certain
 11 products?
 12 A. I can't recall, no.
 13 Q. Do you recall there being any particular emphasis in
 14 your training on the UK regulatory requirements?
 15 A. Not in my training, I can't recall that this was ever
 16 discussed with UK, no.
 17 Q. So thinking back to what Mr Wehrle said, we just looked
 18 at it, where he said there would be particular emphasis
 19 in the training on whichever regulatory regime was
 20 relevant to that person, is it your evidence that in
 21 your case that didn't happen?
 22 A. I can honestly say that I don't recall him ever talking
 23 to me about the UK regulations, what can be done and
 24 what can't be done. I can't obviously talk for other
 25 people that he may have trained, but in my case I don't

123

1 recall that.
 2 Q. Did he ever say to you in general terms that the UK
 3 regulations were weak or soft around the use of
 4 Reynobond panels?
 5 A. No, that conversation never happened. No, I never
 6 remember him ever saying that.
 7 Q. I see. So you don't remember being given any
 8 information during your training about the technical
 9 requirements for UK sales in this country?
 10 A. No, I don't recall ever getting trained on UK
 11 regulations.
 12 Q. Okay.
 13 Can we just look at a document from 2014 now.
 14 I appreciate this is before your time at Arconic. If we
 15 can go to {MET00053158_P07/33}.
 16 So this would appear to be some slides from a sales
 17 meeting, it's a Reynobond and Reynolux sales meeting,
 18 January 2014, and it's called "Technical Assistance".
 19 Now, I appreciate this is more than a year before
 20 you started at Arconic, but I want to ask you just about
 21 a couple of passages in here, to see if you can help us.
 22 If we go on to page 36 {MET00053158_P07/36} in this
 23 presentation, if we look at the bottom of that page, or
 24 the second half of that page, we can see that it says,
 25 second paragraph up:

124

1 "Please The person in charge of a country
2 and/or market has to check the certifications and
3 qualifications needed to sale ... "

4 Do you see that there?

5 A. I can see that, yes.

6 Q. So that appears to be a message to whoever was in charge
7 of a country or market to check the certifications and
8 qualifications needed to make sales.

9 Now, was that a message ever given to you, either
10 during your induction and initial training or later, by
11 Merxheim?

12 A. I can't recall there ever being a message like that
13 being given to me, and obviously I can't comment on that
14 document. It's the first time I've seen that document.
15 It's before my time, as you're aware. I can't recall
16 ever seeing a document with that wording, I'm afraid,
17 sorry.

18 Q. I appreciate you haven't seen a document with that
19 wording, but more generally, was that message ever
20 conveyed to you by those at Merxheim, that they were
21 reliant on you to be looking out for relevant
22 certifications in the jurisdiction that you were
23 operating in?

24 A. Certainly not, because if it had have been, then it
25 would have been a different scenario and I would have

125

1 been looking out for that, for sure.

2 Q. So your evidence is that you simply didn't have your eye
3 on that at all; no?

4 A. Well, not at all, I just wasn't given that message.
5 No one was ever -- no one ever asked me that or told me,
6 "We would like you to do that". So, no, there was never
7 that sort of conversation with anybody.

8 Q. Did that ever feel uncomfortable, selling a product into
9 a market where you were wholly unaware of what the
10 regulatory regime was around that product?

11 A. No, I, again, assumed that the technical team had
12 provided me with everything that I needed for the UK
13 market, Building Regulations and everything, and
14 everything was okay to present to the UK market, and
15 there were no changes ever told to me throughout my
16 employment, you know, that, "You can't use this" or "You
17 shouldn't be doing this". So I relied quite heavily on
18 the technical team to tell me these things.

19 Q. Here your technical team is based in France. Did it not
20 ever occur to you that, being located in the market,
21 operating in it on a day-to-day basis, you might
22 actually be in a good position to make sure that the
23 products were being sold appropriately and in accordance
24 with the relevant regulatory regime in the UK?

25 A. It didn't occur to me -- the conversation never come up

126

1 with any of my fabricators or any of the people that
2 I was working quite closely with, that would have known
3 about these issues, so nothing was pursued, no, it
4 didn't occur to me.

5 Q. I see.

6 Can we go back to that presentation and look at the
7 same slide we just had up on the screen, so it's page 36
8 of the presentation {MET00053158_P07/36}. The last kind
9 of bullet on this page says this:

10 "Impossible for a project but Check and ask in
11 order to ... Anticipate."

12 Now, it appears that what that's encouraging you to
13 do, or possibly encouraging you to do, is to check what
14 certifications and qualifications might be needed for
15 particular projects.

16 Again, is that a message that was ever conveyed to
17 you?

18 A. No. Not that I can recall, no.

19 Q. Now, did your understanding of the relevant regulatory
20 regime in the UK change during the period May 2015
21 through to June 2017? Did you ever gain a greater
22 understanding of what the relevant regime was in the UK?

23 A. Yes, with the knowledge of the experts and people that
24 I was working with, that did change over time, yes.

25 Q. Can you help us as to what in particular changed? What

127

1 did you become more aware of as time went on about the
2 regulatory requirements in the UK?

3 A. I guess the over -- the 18-metre height of a building,
4 as we mentioned before, you know, that was quite clear,
5 that you weren't to use certain products over that
6 height. And, yeah, that's -- and that's about it,
7 really.

8 Q. How quickly did you become aware of that, that it was
9 quite clear that you were not to use certain products
10 over 18 metres?

11 A. Well, it was -- you know, we were in conversations with
12 various different fabricators, architects, developers,
13 everybody that I worked with sort of were speaking about
14 it on a regular basis, so we knew that that was the
15 case.

16 Q. Would you say that you would have known that that was
17 the case by the end of 2015, having started in the role
18 in mid-2015?

19 A. Probably not, no, if I'm honest. I started quite naive
20 where it comes to regulations, nothing was explained to
21 me about them, so I was still in my training, visiting
22 fabricators and getting to know the UK market, really,
23 right the way until the end of 2015. So not
24 necessarily, no.

25 Q. But by the end of 2016, would you say you did have that

128

1 clear understanding about --
 2 A. My knowledge was getting better, yes, by the end of
 3 2016, of the markets.
 4 Q. And by the end of 2016, were you clear that you couldn't
 5 use certain products over 18 metres?
 6 A. That was pretty much --- pretty much so, yeah, it was
 7 being spoken about quite a lot, so the conversations
 8 would come up quite regularly, yes.
 9 Q. Did you ever then relay those conversations back to
 10 Merxheim and say, "By the way, the mood music here is
 11 that we can't use certain products over 18 metres"? Did
 12 you --
 13 A. They were -- yes --
 14 Q. -- feed that back -- sorry.
 15 A. Sorry, no, sorry, it's me butting in, sorry, I do
 16 apologise. No, that would have been -- they would have
 17 known, that would have been the knowledge for sure by
 18 the end of 2017. I know Claude Wehrle and the team
 19 would have known that products should never have been
 20 used over a certain height, because if I was aware of it
 21 in the UK, it would have been mentioned and he would
 22 certainly have had that knowledge.
 23 Q. Did you mean to say 2017 just then or did you mean 2016?
 24 A. Sorry, 2017, yeah, by the end of -- by the end of 2017
 25 I would assume he would have known that everything would

129

1 have been that ... you know, regulations would have been
 2 over 18 by then.
 3 Q. You have said that by the end of 2016 you were clear
 4 that you couldn't use certain products over 18 metres;
 5 was that also Merxheim's understanding?
 6 A. I can't be certain that they would have known that by
 7 the end of 2016, but as time went on, they definitely
 8 would have been aware of it.
 9 Q. Is that just an assumption you're making or is that
 10 based on conversations or exchanges you actually had
 11 with --
 12 A. It would have been a conversation that I would have had
 13 with France in the technical team. At some stage --
 14 I can't recall exactly when, what date -- I would have
 15 mentioned the over-18-metre situation and they would
 16 have been aware of it, yeah.
 17 Q. Let's look at page 15 of your witness statement now
 18 {MET00053164/15}, this is paragraph 43.
 19 I want to look at around the first nine lines of
 20 what you say in this paragraph. So you say:
 21 "I do need to understand some of the terminology
 22 used in the industry in order to be able to 'speak the
 23 industry language' and I was of course aware, for
 24 example, that a product with an A2 core or a FR core
 25 would have a better fire performance rating than an

130

1 equivalent product with a PE core but I was not aware
 2 of, and was not involved in, the technical detail behind
 3 that. From a sales perspective, I was aware that it was
 4 important to have a Class 0 rating for panels in terms
 5 of what I understood related to the potential spread of
 6 flame on the surface of panels, but that's as far as my
 7 knowledge went and in the case of ACM the surfaces are
 8 all the same (ie aluminium) and therefore it was no
 9 surprise to me to understand that the Reynobond product
 10 had that Class 0 rating whether that was for a PE, FR or
 11 A2 core."
 12 Now, just pausing there, you said in the first
 13 couple of lines that it was important that you did have
 14 some of the terminology used in the industry in order to
 15 be able to "speak the language".
 16 On fire performance, can you help us with what that
 17 terminology would have consisted of?
 18 A. I'm sorry, can you ... in fire performance, I don't
 19 understand --
 20 Q. Yes, what terminology would you have felt comfortable
 21 using about fire performance in your role as sales
 22 manager in the UK?
 23 A. Well, as I've mentioned, it would have been a class O or
 24 class 0 spread of flame, and that's probably as far as
 25 it would have gone, and the FR product being

131

1 a fire retardant product. But that's as far as it would
 2 have gone.
 3 Q. I see.
 4 You talk about the different core performances and
 5 you say that you were of course aware that there were
 6 differences in fire performance between the PE and the
 7 FR cores. How did you become aware of that?
 8 A. As we mentioned before, earlier on, it would have been
 9 through, you know, talking to the fabricators and the
 10 people I dealt with on a daily basis. As time went on
 11 I become more and more aware of the differences in the
 12 core. But that was self-taught, if you like, because
 13 I came into the industry with very little knowledge
 14 about the PE, FR, A2 or whatever core it was at the
 15 time. So my knowledge was very limited in 2015 all the
 16 way through until 2016. I learnt this through talks
 17 with fabricators in the UK and specifiers, and they told
 18 me a bit about where we were with FR and PE. But that's
 19 as far as my knowledge sort of went.
 20 Q. Did you ever seek to verify that with your superiors or
 21 with the technical team at Merxheim, this knowledge that
 22 you were gaining about the different fire performance
 23 between FR and PE cores?
 24 A. My understanding was that the technical team understood
 25 that and they knew that, they knew the difference

132

1 obviously between a PE and an FR core and an A2 core
 2 because they're technical. It was just on a personal
 3 level, I was learning this through a second source,
 4 through my fabricators and my customers. So I didn't
 5 feel the need to relay that back to France in any way,
 6 because they -- I assume they already understood and
 7 they knew, or they should have done, you know, they're
 8 a technical team, so ...
 9 Q. How did you become aware of the class 0 requirement?
 10 Where did that come from?
 11 A. That was on the BBA certificate, so I'm aware of that.
 12 Q. Did anyone at Merxheim talk to you about what that
 13 meant, what the significance of it was, what tests it
 14 had undergone to get that?
 15 A. No, I can honestly say that that was never taught me or
 16 explained to me how we came about getting that test or
 17 that certificate. It was just there in writing on the
 18 BBA.
 19 Q. Why was it no surprise to you -- this is what you have
 20 just said in your statement that we just read -- to
 21 understand that the Reynobond product had a class 0
 22 rating, whether that was for the PE, FR or A2 core?
 23 A. I -- being the company they are, I mean, Arconic are
 24 a huge organisation, they'd been going for many years,
 25 30 years in the industry, it would have been the basic

133

1 sort of thing that you would assume that they would
 2 have, so it was no surprise to me that we had the
 3 class 0 rating.
 4 Q. How did you know that class 0 was the basic rating?
 5 Where did that knowledge come from?
 6 A. Sorry, I mentioned the basic -- that's just something
 7 that I knew that was on the BBA certificate, and that is
 8 spread of flame, it's what it is, you know, it's --
 9 that's what it's --
 10 Q. What do you mean when you say, "That's just spread of
 11 flame, that's what it is"?
 12 A. Sorry, it's coming across a bit sort of not quite clear.
 13 Q. Sorry.
 14 A. I've seen it in the document, I've read it in the
 15 document, and I assumed that a company like Arconic
 16 would have that as a standard certification in the BBA.
 17 Q. If we just look back at what you have said in your
 18 statement, at paragraph 43, page 15 {MET00053164/15},
 19 you say, if we pick it up five lines down:
 20 "From a sales perspective, I was aware that it was
 21 important to have a Class 0 rating ..."
 22 Then a little bit further on, you say:
 23 "... that's as far as my knowledge went ..."
 24 Then you say this:
 25 "... in the case of ACM the surfaces are all the

134

1 same (ie aluminium) and therefore it was no surprise to
 2 me to understand that the Reynobond product had that
 3 Class 0 rating ..."
 4 So it does appear from that that you know a little
 5 bit more about testing than you're saying, because
 6 you're saying that you knew from the fact that the
 7 surfaces were all the same that that meant there was no
 8 surprise about all those products having class 0; is
 9 that right?
 10 A. I -- what I mean by that is the aluminium surface
 11 would -- it would be a spread of flame to a certain
 12 extent, because it is an aluminium surface. Yeah, maybe
 13 my wording's not fantastic, but that's as far as I knew.
 14 Q. So you knew that the class 0 test, what, your
 15 understanding was it was a surface spread of flame test;
 16 yes?
 17 A. That was my understanding, yeah, that it was a surface
 18 spread of flame test, and -- yeah.
 19 Q. Did you learn that from somebody within Arconic or did
 20 you learn that from somebody else?
 21 A. I think I learned that from somebody else along the
 22 line. There was no reason for anybody to discuss that
 23 later on with me. I think I picked that up off of
 24 a customer along the line somewhere, yeah.
 25 Q. Was there anything said about class 0 in your training?

135

1 A. I'm sorry, I can't recall -- I can't think that way --
 2 that far back, so I really don't know. I don't think
 3 so, no.
 4 Q. Did you ever tell your customers that Reynobond panels
 5 had a class 0 rating regardless of the core?
 6 A. No, I don't recall ever speaking to any of my customers
 7 about a class 0 rating. They would generally ask the
 8 question if they needed to know it, but I never had that
 9 conversation with them, unless I was asked. So, no,
 10 I don't remember having a conversation.
 11 Q. So if they'd asked the question, "Do all your Reynobond
 12 panels have class 0?", what would have been the answer
 13 that you would have given?
 14 A. At that time -- depending on what year we're talking, at
 15 the early stages of my employment or later on in my
 16 employment, sorry?
 17 Q. Can you help us, what answer would you have given at the
 18 early stages of your employment?
 19 A. The early stages of my employment I probably wouldn't
 20 have been able to answer the question, and it would have
 21 been -- it's in the BBA document, and I would have asked
 22 the technical team to clarify or answer their question
 23 for them.
 24 Q. And did your knowledge about class 0 ever change between
 25 then and the Grenfell Tower fire?

136

1 A. Between then and the Grenfell Tower fire, you -- I've
 2 gained a lot more knowledge, yes, down the line.
 3 Q. And what have you learned about class 0 and the
 4 Reynobond products in that time?
 5 A. Well, I think that -- the Reynobond hasn't got
 6 a class 0, and we know that for the PE. So that no
 7 longer exists. And, yeah, that's as far as I know.
 8 Q. When did you come to be aware of that, that the
 9 Reynobond product didn't have class 0 for the PE?
 10 A. I can't recall an exact date. I mean, again, I would
 11 just be guessing, and I don't want to do that. I'm not
 12 sure of the year, but along the line, I would certainly
 13 have known of it.
 14 Q. Can you help, was that pre-fire, pre the Grenfell Tower
 15 fire, that you became aware that the Reynobond PE
 16 product did not have the class 0?
 17 A. No, that would be after the fire.
 18 Q. What was it about the aluminium surface that told you
 19 that it would be class 0?
 20 A. Because the -- because it's a metal -- two pieces of
 21 metal, you assume that the spread of flame would
 22 literally spread across the metal, so that's how
 23 I become aware of that. It's very crude the way I'm
 24 trying to explain it, but in my mind that was the reason
 25 for it, the spread of flame.

137

1 Q. Did anyone within Arconic ever explain that to you?
 2 A. No, nobody's explained that to me in Arconic.
 3 Q. What was your understanding of what class 0 meant in
 4 terms of its use on buildings? What was the
 5 significance of the material having class 0?
 6 A. Well, it was purely a regulation -- it was purely
 7 a document that needed to be had to be able to sell the
 8 product within the UK.
 9 Q. Did you think that if it had class 0 you could use it on
 10 any building in the UK?
 11 A. I can't answer that question, I'm sorry, I assume ...
 12 I don't know, I can't answer that question.
 13 Q. As we just read in your statement, you said that class 0
 14 was important from a sales perspective; yes?
 15 A. Yes.
 16 Q. So did the label class 0 positively assist you to make
 17 sales?
 18 A. I think the BBA certificate was a -- was asked for on
 19 several occasions, and if we didn't have a BBA
 20 certification then the sale probably wouldn't have gone
 21 forward, because it's something that -- you know, the
 22 Kitemark in the UK is something that people take as
 23 a security blanket sometimes and, yes, it did help with
 24 selling the product in the UK for sure.
 25 Q. Were you ever made aware -- and I want to focus on the

138

1 time pre-fire at the moment -- that there was no test
 2 report supporting Reynobond 55 PE's classification as
 3 class 0?
 4 A. I can't remember ever being ... no, I can't remember
 5 ever being told this. I can't remember, I'm sorry.
 6 Q. So does it follow that for the entire time, 2015, 2016
 7 and up to June 2017, you understood that there were test
 8 reports supporting Reynobond 55 PE's classification as
 9 national class 0?
 10 A. Yes, I thought that that was kosher and we did have it.
 11 Q. Now, you also mentioned the Euroclass system in the
 12 paragraph we've just read. What did you know about that
 13 European classification system?
 14 A. I didn't know an awful lot about the European
 15 classification, because I didn't really need, at the
 16 early stages of my employment, to know much about that.
 17 So, no, I don't know an awful lot.
 18 Q. Was European classification covered at all in your
 19 induction or training?
 20 A. Not European, no, it wouldn't have been, no.
 21 Q. No, so Claude Wehrle's technical team, they didn't tell
 22 you anything about the European classification system
 23 and the significance of classifications under it?
 24 A. I can't recall -- I can't honestly remember them talking
 25 to me about that, the European classification, no.

139

1 Q. Were you briefed on what classifications the Reynobond
 2 product had under that European classification system?
 3 A. I -- again, I just can't remember ever being -- ever
 4 having this conversation or ever being told anything
 5 about the European classification.
 6 Q. Did you subsequently come to learn about that European
 7 classification system while performing your role?
 8 A. I got to know more about it, yeah, but again, I didn't
 9 know the ins and outs of the European classification,
 10 no.
 11 Q. Did you know in very general terms that the
 12 classifications went from broadly A1 down to F? Did you
 13 know there were these letters under --
 14 A. Vaguely, yes, I knew the letters, yeah, were there.
 15 Q. And did you know that A and B were at the top end, the
 16 better end of the scale, and E and F were at the worse
 17 end of the scale in terms of fire performance?
 18 A. To a certain extent, I sort of knew that these letters
 19 meant something, and I assumed that A was the better and
 20 F would have been the not so good.
 21 Q. If you had seen something that said B-s1, d0, would you
 22 have known what the s and the d were referring to?
 23 A. No, I'd be guessing. No, I don't know exactly what they
 24 stand for.
 25 Q. You have mentioned in your statement, we just looked at

140

1 it , and you mention a number of times the A2 core. You
 2 have mentioned it already in your evidence today. Did
 3 you appreciate that this was a reference to the European
 4 classification A2?
 5 A. I didn't, no. We didn't have an A2 and haven't had
 6 an A2 in the UK, so no, I didn't.
 7 Q. I see. But it's right, isn't it, that before or around
 8 the time of the fire , A2 was being talked about more and
 9 more; is that not right?
 10 A. A2 was, yes, and I knew it as A2, yes, an A2 product.
 11 Q. But you didn't know that, by referring to it as an A2
 12 product, that was a reference to the European
 13 classification system?
 14 A. No, I didn't.
 15 Q. When you started at Arconic, were you made aware that
 16 different fixing systems, cassette and rivet, had
 17 different European classifications?
 18 A. Was I trained in — are you asking me was I trained in
 19 this field , was I told about these different
 20 classifications at the beginning of my employment?
 21 Q. Yes.
 22 A. The answer to that would have been: no, I can't recall
 23 ever being told about any of this when I started.
 24 Q. When you started at Arconic, the classification for
 25 Reynobond PE rivet—fix was a C and the classification

141

1 for a Reynobond PE cassette—fix was an E. Were you made
 2 aware of those during your training?
 3 A. No, I wasn't, no.
 4 Q. Were you subsequently made aware of those
 5 classifications by anyone else at Arconic?
 6 A. No, I wasn't, no.
 7 Q. Prior to the Grenfell Tower fire, were you aware that
 8 the Reynobond PE rivet was a C and the PE cassette was
 9 an E?
 10 A. I wasn't aware and I wasn't told, I'm afraid, no, sorry .
 11 Q. So just to be absolutely clear , you say in your
 12 statement that the Reynobond PE, FR and A2 panels, you
 13 thought they were class 0, but it's right, is it, that
 14 you weren't aware that those cores achieved very
 15 different fire performances under the European
 16 classification system?
 17 A. That's correct, yes.
 18 Q. You were never told that by anybody at Merxheim; is that
 19 your evidence?
 20 A. I can't recall anybody at — and the technical team ever
 21 discussing this with me, no.
 22 Q. And is it right that those different cores were priced
 23 differently ?
 24 A. They were, yes.
 25 Q. And based on your understanding, were they priced

142

1 differently because they behaved differently in fire ?
 2 Why were they priced differently?
 3 A. My understanding was that the standard core that we'd
 4 had was a standard core with a certain amount of plastic
 5 in it , and the FR core was a fire retardant core that
 6 was a new product that had been sort of manufactured,
 7 and the manufacturing process was more costly, so the
 8 cost of that product would be slightly more expensive.
 9 Q. When you say slightly more expensive, in your time as
 10 sales representative , what was the price differential ,
 11 on average, between the PR(sic) and the FR—cored
 12 Reynobond?
 13 A. Sorry, the PE or the FR, did you say?
 14 Q. Yes, what was the price differential between the two of
 15 them?
 16 A. Yeah, I would say there was a good £2 difference per
 17 square metre between the two, the PE and FR.
 18 Q. Looking again at your witness statement, if we can look
 19 now at page 15 {MET00053164/15}, paragraph 45, at the
 20 very bottom of that page, you say this:
 21 "I do not remember ever knowingly recommending
 22 Reynobond PE as suitable for use above 18 metres and
 23 I do not know if [Arconic] ever obtained professional
 24 advice or guidance from an external body relating to the
 25 suitability of Reynobond PE for use above 18 metres in

143

1 the UK."
 2 So that's the evidence you give there. I just want
 3 to ask you some questions about that.
 4 Are you saying there that you didn't recommend
 5 Reynobond with a PE core for use above 18 metres because
 6 you knew it was unsuitable in that application?
 7 A. That's correct, if I — I would never have recommended
 8 a PE over an 18—metre building.
 9 Q. So your evidence, is it , is that you would never have
 10 recommended PE for an over—18—metre building; yes?
 11 A. Not knowingly recommended over an 18—metre building, ie
 12 if someone had come to me and asked me, "I've got this
 13 building, it 's over 18 metres, Vince, would you
 14 recommend putting the PE core on the building?", the
 15 answer would have been no. If there had been
 16 a fabricator or a customer would have phoned in to
 17 France and ordered the material for a project that I was
 18 unaware of in PE that was over 18 metres, and I didn't
 19 have an understanding — I didn't have any knowledge of
 20 that, then that would have been a different thing,
 21 because that often happened, where I would be, if you
 22 like , played off with the internal staff and the — me
 23 being an external guy in the UK, they would phone up
 24 France and place an order for some material for
 25 a project that I was unaware of. So if it was out of my

144

1 control, there was not a lot I could really do about
2 that.

3 Q. I see. So just going back to your answer where you said
4 you would never have recommended PE for a building that
5 you knew was over 18 metres, was that right from the
6 outset of your work as UK sales representative, or was
7 that a practice that came at a particular point in time?

8 A. That was a practice later on, as I say, later on in my
9 career. At the beginning of my employment, I probably
10 wouldn't have known the difference — I know I wouldn't
11 have known the difference, and I wouldn't have
12 recommended — not recommended it over 18 metres,
13 because I didn't know the difference between the two,
14 really.

15 Q. And why did your practice change so that you wouldn't
16 have recommended it for buildings that you knew were
17 over 18 metres at a later stage? Why did you change?

18 A. I think, as I said before, it had been dictated to me in
19 specifications, and also, you know, talking to
20 architects and fabricators and contractors, they weren't
21 specifying projects over 18 metres with anything but
22 a fire retardant product or an A2 product. So,
23 you know, speaking to the likes of Sotech, one of my
24 fabricators, very clocked on within the industry, they
25 made it quite clear that they wouldn't be ordering any

145

1 materials from me if it was PE and if it was over
2 a certain height, it had to be the right specification.
3 So ...

4 Q. Just so we're absolutely clear, that was something that
5 was dictated to you by your customers downstream and not
6 something that was said to you by anyone else at
7 Arconic; is that right?

8 A. I can't recall having a conversation with anybody at
9 Arconic about the over 18 metres. I would have
10 explained to them: in the UK, that's what's happening,
11 you know, the over-18-metre rule, but I — honestly, if
12 I'm wrong, I can't recall anybody from technical
13 explaining to me that we shouldn't be using materials
14 over a certain height, it was just something that
15 I would have explained or maybe picked up along the
16 line, but nobody actually sat me down and spoke to me
17 about this, I already knew about it because that's what
18 was happening with specifications in the UK.

19 MS GRANGE: I see.
20 Mr Chairman, I think that might be an appropriate
21 moment for the afternoon break, if that's okay.

22 SIR MARTIN MOORE-BICK: Yes, that sounds sensible.
23 Mr Meakins, we will have a short break at this
24 point. We will come back, please, at 3.35.
25 Let me just remind you, please, not to talk to

146

1 anyone about your evidence or anything to do with it
2 during the break. All right?

3 THE WITNESS: Thank you, sir, thank you.

4 SIR MARTIN MOORE-BICK: We will see you at 3.35.

5 THE WITNESS: Thank you, bye bye.

6 SIR MARTIN MOORE-BICK: Thank you very much.
7 (3.17 pm)

8 (A short break)

9 (3.35 pm)

10 SIR MARTIN MOORE-BICK: Welcome back, everyone.
11 Mr Meakins, are you there?

12 THE WITNESS: Yes, sir, here.

13 SIR MARTIN MOORE-BICK: You can see me and hear me, that's
14 good, and you're ready to carry on?

15 THE WITNESS: I think so, yes.

16 SIR MARTIN MOORE-BICK: All right. Yes, Ms Grange, when
17 you're ready, then.

18 MS GRANGE: Yes, thank you.
19 I have some questions now about your understanding
20 of the UK marketplace.
21 We heard evidence from Deborah French that there was
22 a widespread understanding within Arconic that the UK
23 was a PE market. Now, was that your understanding when
24 you started working for Arconic?

25 A. No, it wasn't, no. My understanding was — remembering

147

1 that when I started, we had a big focus on FR as well as
2 PE, so it was pretty much 50/50, I would say, when
3 I first started.

4 Q. Was that something that was communicated to you in your
5 induction and training, that the UK was a 50/50 market
6 as between PE and FR?

7 A. No, that was my findings in the marketplace, the UK
8 marketplace, working with different fabricators. So
9 when I started, my programme was to bring on more
10 fabricators, because we only ever worked — when Deborah
11 was working with the — with Arconic or Alcoa at the
12 time, as you're aware, with a few fabricators,
13 a handful. I was looking at bringing five or six or
14 maybe seven fabricators into the UK market so we could
15 work with more fabricators and grow the market. So the
16 feedback from them was, you know, they were using FR as
17 well as PE. So it wasn't dominated by PE when I'd
18 started, when I was speaking to more customers.

19 Q. I see.
20 Ms French also told us that she would automatically
21 specify PE-cored ACM when supplying to her customers in
22 the UK, that that was the default position. Was that
23 your default position when you began working for
24 Arconic?

25 A. When I began working for Arconic, for the first

148

1 six months, because the area was vacant for six months
 2 prior to me starting, six to eight months, customers
 3 would ring in to France and place their orders via
 4 France, the internal sales team, so I didn't have a lot
 5 of communication where it comes to orders with customers
 6 until into sort of 2016, and then I was finding that
 7 more and more people were using FR and PE. So
 8 I wouldn't necessarily, you know, put forward the PE --
 9 because that was a standard material, that was classed
 10 as standard, that's the term we used if people were to
 11 order via the office and they didn't specify that they
 12 needed a fire retardant material, then they would order
 13 our standard material, which you know as PE. So I would
 14 look at the specification, look to see what the building
 15 was, if I was talking to an architect, and then specify
 16 what I thought would be the correct material, depending
 17 on what the building was.

18 So it was pretty much a 50/50 thing, but we were
 19 focusing on more and more FR as my employment went on.

20 Q. I see. So if a client was silent on the type of core
 21 and just said, "I want Reynobond ACM", in, say, early
 22 2016, I think what you have just told us is that you
 23 would just assume they wanted a PE core; yes?

24 A. No, sorry, I didn't make myself clear. If I was
 25 face-to-face with a client and they were telling me

1 about the project and they said, "We have this project,
 2 Vince, we need to know -- we want your standard material
 3 on this project", or they would say, "We would like to
 4 order some ACM from you", and I'd seen the drawings, for
 5 instance, and I knew what the building was, then I would
 6 look at them and specify the correct material. I'm
 7 talking about 2016/2017 here, when I was talking to
 8 customers, my knowledge was better of the product, and
 9 I would specify the correct FR, if need be, or PE. They
 10 wouldn't just order it, they would ask me what they
 11 think should go on the building, and at that time, as
 12 you're aware, everything was steering towards the
 13 over-18-metre, the FR, and it was becoming more and more
 14 popular. So I would recommend that they were to use
 15 this.

16 If they were to phone up and just order the material
 17 from France, and it wouldn't go through me at all --
 18 because that went on for a good six months to
 19 eight months, well into my employment, because that's
 20 what people were used to doing, just phoning France and
 21 ordering material -- they would just order a standard
 22 material or they would say they need some ACM material,
 23 and we would take -- the order, from what I understand
 24 now, would just be our standard PE material, and there
 25 wouldn't necessarily be any questions asked: what the

1 building was, what type of building, where it was going.
 2 They would just be given the materials via France.

3 Is that clear? Sorry, it makes ... so I'd have to
 4 be in front of the client before I would specify what
 5 needs to be specified.

6 Q. Yes, I understand. Yes, that's very helpful.

7 Just going back to the point you mentioned about, if
 8 you were in front of the client and you had the details
 9 of the project and the type of building, you said you
 10 would make sure you specified the correct product.

11 How would you make that assessment, what was the
 12 correct and what was the incorrect product?

13 A. Well, I would look at the drawings. So we would sit
 14 down, we would discuss the project, what the project
 15 was, what type of building the project was. If -- this
 16 is if I'm with a specifier, an architect, I would then
 17 advise them that we have two products, which would have
 18 been the FR or the PE, and explain to them, you know,
 19 they need to be using this because it's over 18 metres,
 20 for instance, on a certain project or, you know, they
 21 can decide on what project they -- what material they
 22 want to purchase.

23 So, yeah, I would just steer them as best I could in
 24 the right direction and then they would make their
 25 decision, and that's how it would go.

1 Q. I see.

2 How did you know to advise them that if it was over
 3 18 metres, they needed the FR product?

4 A. As we spoke before, when that started to come into play,
 5 the over-18-metre rule, as we sort of keep mentioning
 6 it, it would be a fire retardant or an A2 product that
 7 generally would go at that level, so you would just
 8 assume that they would want that product anyway, because
 9 nine times out of ten, an architect would be talking to
 10 a fabricator or a main contractor and they would
 11 automatically know that that's the product that needed
 12 to be put onto that building, so they would specify that
 13 product, be it our material or Alucobond or Larson,
 14 whatever competitor may have been on that specification,
 15 they may have been talking to me about an alternative
 16 product, which would be our Reynobond FR, and I would
 17 specify our equivalent to whatever was specified, if
 18 I didn't specify that product myself.

19 Sorry to go all around the houses, but that's
 20 generally how it would work.

21 Q. I see. And this 18-metre rule that you're talking
 22 about, where did you understand that came from and when
 23 did it come in?

24 A. The 18-metre rule come in later in my employment.
 25 Obviously early on I wouldn't have known the difference.

1 As I said, when I first started to work with Arconic,
 2 I didn't know anything about the 18-metre rule because
 3 I knew very little about the products. But as it went
 4 on, I guess it would have been in 2016, latter part of
 5 2016/17, just as a wild rough guesstimate, along them
 6 sort of -- round them sort of areas, then we started to
 7 discuss different heights in buildings, if I was asked.
 8 Q. I see. So did you think there was some kind of new
 9 regulatory requirement that came in around --
 10 A. I understood that it had always sort of been there,
 11 I understood that this is the material that should be
 12 used at that height, so that's something that was --
 13 I mentioned before that I was learning from fabricators
 14 and learning from the industry in a whole, you know,
 15 they were saying, "You need to use this material at this
 16 certain height, Vince, this is what needs to be done,
 17 and you need to specify this and it needs -- it can't be
 18 this material". I'd often get phoned from a fabricator
 19 and they would say to me, for instance, "Vince, we'd
 20 love to use your material, but unfortunately it has to
 21 be an A2 material, it can't be FR or PE, so we can't go
 22 with your material", so I would lose projects because of
 23 that, and you would just then walk away from it because
 24 I knew I didn't have an A2 product to compete with the
 25 likes of Alucobond or -- I'm using Alucobond as

153

1 an example, but there are other sort of manufacturers
 2 obviously of A2.
 3 Q. Yes, I'm going to come to that in just a moment.
 4 Were you aware that there were other countries --
 5 Germany, for example -- where the FR core was standard
 6 material?
 7 A. I was aware, yes. I was only aware later on in my
 8 employment, after talking to my colleague, Torsten. He
 9 is a German sales manager, and they never had -- they
 10 never used any PE materials, it was only the FR
 11 material. That was early on in the employment as well,
 12 I found that that's the case in that country, that
 13 typical -- them sort of countries, they were using the
 14 FR and weren't really -- didn't know anything about the
 15 PE.
 16 Q. Did that ever prompt a conversation between you and
 17 anybody at Merxheim to say, "Well, why in these other
 18 countries are they only using FR? Why is PE even
 19 available for sale at all in the UK?"
 20 A. If I'm absolutely honest, no, it didn't, and looking
 21 back on it in hindsight, maybe I could have said
 22 something and said, "Well, why are we using the PE?"
 23 I assumed that we were -- it was an old material that
 24 we'd been using for many, many years before I'd started,
 25 and we were getting rid of this material and dwindling

154

1 it out and focusing more on the fire retardant, FR,
 2 material to keep up with the European market. But
 3 I didn't honestly think for an instant to sort of say,
 4 "Well, guys, you know, why are we using this?"

5 Q. Yes.

6 Ms French told us that the UK, as well as, she said,
 7 being predominantly a PE market, it was also
 8 a predominantly cassette market as opposed to a rivet
 9 market. Was that your experience as well?

10 A. I think that, yeah, a lot of people that were designing
 11 on the architectural market would go for a cassette
 12 panel over a face-fixed panel. However, because I was
 13 doing, as I mentioned before, the corporate
 14 identification and the architectural market, and in the
 15 end, by 2017, if you see the figures or you see what
 16 I was doing, I was focusing an awful lot more on the CID
 17 market, so that would have been a mixture of face-fixed
 18 and cassette, but mainly face-fixed. So mine was
 19 slightly different because I wasn't just in the
 20 architectural market, I was in the corporate
 21 identification market and the architectural market, so
 22 it was pretty much, I guess, 50/50 towards the end with
 23 me. But on the architectural market for sure it was
 24 mainly cassette panel.

25 Q. Yes. Yes.

155

1 Now, you have talked about your competitors, and is
 2 it fair to say that you were keeping a very close eye on
 3 what your competitors were doing during the time you
 4 were UK sales manager?

5 A. On certain competitors, you would see specifications
 6 coming up with their name, you know, to say that they're
 7 Alucobond or they're Larson or they're whoever they may
 8 be. So I wouldn't say a close eye, but I was aware of
 9 their products and aware of the projects that maybe they
 10 were getting involved in.

11 Q. Yes. Ms French has given us a list of Arconic's
 12 competitors in the UK. Do you agree with this list: it
 13 was Alucobond, manufactured by 3A?

14 A. Yes, yes, Alucobond was leading, yeah.

15 Q. Alpolic, produced by Mitsubishi Chemicals?

16 A. Yes, they would have been, yeah, a competitor.

17 Q. And then Alucoil produced by Larson, I think you just
 18 mentioned them; is that right?

19 A. Larson, yes, yes.

20 Q. Were they the main UK competitors?

21 A. They were, and then we started to -- there was a --
 22 Stacbond I think was being introduced later on down the
 23 line, which were a very -- seemed to manufacture very
 24 cheaply and they broke into the UK market. But, no,
 25 I agree, they were the main competitors in the UK, yeah.

156

1 Q. Was it part of your role to report back to Merxheim
2 about what your competitors were doing in the UK market?
3 Was that part of the dialogue you had with them?
4 A. I think the sales team in Merxheim and the technical
5 team were always very interested in what the competitors
6 were doing, so any information that I gathered on my
7 travels around fabricators I would sort of collect and
8 then disperse back to France, be it via an email or send
9 literature to them, so they were aware of what the
10 competitor may be up to and what our fabricators may be
11 doing.
12 Q. Were you keeping an eye on what fire performance other
13 competitor products had?
14 A. I can say that I know that I lost an awful lot of
15 projects with Arconic or Reynobond due to not having
16 an A2-rated fire product. So we were losing an awful
17 lot of business in the UK market due to not having this
18 material. So we were losing large projects, as you can
19 imagine, these are high-rise buildings and buildings
20 that this material was being used on, so there was quite
21 a few square metres of project that were being — that
22 we were losing in the UK because we just didn't have the
23 material.
24 Q. Did you communicate that back to Merxheim?
25 A. Absolutely, yeah, it was every — every six months or

157

1 a yearly sales meet and every weekly report there would
2 have been something about an A2 product that we haven't
3 got that we are — we're losing.
4 Q. Were you aware that, certainly by 2013, Alucobond's
5 standard material was Alucobond Plus, which had an FR
6 mineral core achieving European classification B—s1, d0?
7 Were you aware of that?
8 A. I'm certainly aware that Alucobond had a standard
9 material of FR when I started with the company, as early
10 as that I knew that Alucobond was a standard FR
11 material, but I was also told that they were still
12 producing a polyethylene material as well for certain
13 applications, and I don't know what them applications
14 would have been for. But their standard material, as
15 I was aware of, would have been an FR material.
16 Q. When you said to Merxheim, "Look, guys, we're losing
17 work here because we haven't got an A2 product, we
18 really need that", what was the response that you got
19 back?
20 A. The response was, "We're working on an A2 product and
21 we'll hopefully be able to bring it into the market at
22 some stage, but it's very costly", and, you know, they
23 were trying to develop an A2 product, and that went on
24 for quite a while, actually, it was a few years, or
25 I should say 18 months/two years before anything

158

1 actually become of it, and then it didn't really — it
2 didn't break out into the UK market, but that's another
3 thing.
4 Q. Right.
5 Just information sharing for a moment between you
6 and Merxheim. You have talked about your weekly reports
7 already. Can we just have a look at one of these. If
8 we go to {MET00053183/300}, this is within one of your
9 exhibits.
10 So here what we can see is an email, this is dated
11 14 June 2017, from you to Veronika Deffontaine, who was
12 your line manager at this point; yes?
13 A. Yes, she was, yes.
14 Q. You said, "Please see my report attached", and if we
15 look at page 301 {MET00053183/301}, the next page in
16 this exhibit, here we can see from the top:
17 "Please find as follows my weekly report for your
18 review."
19 And you begin with the Grenfell Tower disaster in
20 this particular report.
21 Now, I don't want to ask you about the detail of
22 this report, but I want to understand how in practice
23 this worked.
24 Is it right that you were required to write these
25 weekly reports to Merxheim throughout your time as UK

159

1 sales manager?
2 A. Yes, I guess when I — when Lionel Marconnet became the
3 sales manager, we started reporting to him on a weekly
4 basis of things that were happening within the UK. You
5 see the different topics on that report, and it was
6 a standard thing. It wasn't very in-depth, but it just
7 gives them an idea of what was happening.
8 Q. What information would those reports usually contain?
9 A. Sorry, you'll have to bear with me, I'm trying to go
10 back to — do we have — well, the report would be what,
11 for instance, my fabricators are doing, what projects
12 they have coming up. I don't think there was
13 necessarily any serious figures on there, you know,
14 where it comes to, you know, square metre figures.
15 I think the projects were probably on there saying,
16 "This project's due to come in July", and also,
17 you know, what projects we've lost, you know, what
18 projects we can't hold on to because we don't have the
19 right materials.
20 Q. Do you ever remember writing in one of these weekly
21 reports, "We've lost this project because we don't have
22 an A2 product"? Do you remember writing that?
23 A. I do remember, yeah, on several occasions, and you've
24 probably got the reports to hand, hopefully.
25 Q. I don't think I've got them as part of this plan at the

160

1 moment, but I'll be corrected if we do have them.
 2 I think we've got other reports, but I'm not sure we've
 3 seen that.
 4 What was your understanding of what the purpose was
 5 of you sending back these reports to Merxheim?
 6 A. I think it was just to give them the --- you know,
 7 enlighten them that what's happening --- remember, I'm
 8 the ears and eyes for --- the middleman, if you like, for
 9 France, I'm here and, you know, I just give them
 10 an insight into why we're losing the projects and
 11 perhaps what we need to win projects, and obviously the
 12 A2 would have been a massive benefit to us for larger
 13 projects, you know, to go forward and win some good
 14 projects. We lost an awful lot, as I said, due to not
 15 having this product, so it's something I would have put
 16 in the report quite regularly and, you know, "Where are
 17 we with the A2? Are we progressing with it? Are we
 18 going to go any further with it?" And then we wouldn't
 19 really necessarily get any sort of information back,
 20 you know, it would be one-sided, whereas you would
 21 sort of perhaps send a report emphasising what we need
 22 or where we are, and then that would be put together and
 23 then perhaps, by a half-yearly sales meet or a yearly
 24 sales meet, something may sort of be mentioned, but ...
 25 Q. I see. That was my next question: was this part of

161

1 a two-way dialogue on a weekly basis with Merxheim, but
 2 I think what you have just told us is effectively you
 3 would be submitting these reports on a weekly basis, you
 4 wouldn't necessarily get any response, but you would
 5 expect some sort of response at the half-yearly sales
 6 meetings; is that right?
 7 A. Yes. It would be --- you would have the progress on
 8 where we are with certain projects, you know, or where
 9 we are with certain materials and development of
 10 materials and moving forward with certain things that
 11 they've been working on, but there wouldn't be
 12 necessarily any reply to that actual report on a weekly
 13 basis. You wouldn't get any returned.
 14 Q. Were Claude Wehrle's team always there as part of those
 15 half-yearly sales meetings?
 16 A. Claude Wehrle's team were --- they attended the
 17 meeting --- usually on a yearly meeting they would attend
 18 for a session of an hour or so, remembering these are
 19 two-day sales meets, so he would be present at the sales
 20 meet, the --- Claude Wehrle, or most of the sales
 21 meetings, and he would present probably for an hour or
 22 two throughout the two --- you know, at some stage
 23 throughout the two days, with maybe colleagues
 24 presenting certain things to the team now and again.
 25 Q. Right.

162

1 Did you ever have more frequent dialogue with
 2 Claude Wehrle and his team, and if so, how?
 3 A. As in would I speak to them on a regular basis, do you
 4 mean?
 5 Q. Yes.
 6 A. I guess Claude I would email quite regularly throughout
 7 the week with issues if I needed to, asking him to get
 8 back to me, with queries from customers. Obviously
 9 a very busy man and he may not have got back to me
 10 immediately, because he has other clients that he was
 11 dealing with. But, yeah, I would be emailing him for
 12 comments or, yeah, I need him to look at this photograph
 13 and give me some response on what he thinks it may be.
 14 He was used quite a bit, I think, for me on a technical
 15 side, because that's what I was told to do at the early
 16 stages of my employment, that's what they're there for.
 17 Q. Yes.
 18 We also heard evidence from Deborah French about her
 19 inputting information into something called a CRM,
 20 a customer relationship management database.
 21 A. Yes.
 22 Q. Is it right that that then changed in 2018 to be known
 23 as something called a Salesforce database; is that
 24 right?
 25 A. That's correct, yes.

163

1 Q. Yes. You mention this CRM system in your statement.
 2 I don't think we need to turn it up, it's at
 3 paragraph 40, page 13 {MET00053164/13}. You say there
 4 that the system allows you to store customer details and
 5 the details of particular projects for which the
 6 company's been asked to quote; is that correct?
 7 A. That's correct, remembering that the internal staff as
 8 well can use that CRM and did input most of the projects
 9 onto the CRM. The only projects that I would have put
 10 on would have been the ones that I physically had ---
 11 you know, if I'd seen the client, I'd got that project,
 12 I would then download it or put it on to the CRM. Even
 13 though my name would come up by the CRM, it would
 14 generally be --- it could have been generated by anybody
 15 the Merxheim. So, as I mentioned before, we don't
 16 always know what that project is. So if there is a new
 17 project on there, there is the correct information on
 18 the CRM, because a lot of the time there wasn't, it
 19 wasn't given the correct information, you would do your
 20 research and try and find out what this project was that
 21 was on there so you could take it further and go and see
 22 the client and have a chat.
 23 So, yes. Sorry to go round in circles, yeah.
 24 Q. So did you use it regularly to update the system when
 25 there were potential developments about sales?

164

1 A. The project — it should have been used on a daily
2 basis, we were told it should be updated on a daily
3 basis, but it was probably realistically updated by
4 myself once every three or four days, maybe once every
5 week. That was like most of my colleagues, we did
6 a similar thing. But it was looked at, surely, and if
7 there was — if it needed to be updated, it would be
8 updated.

9 Q. Yes, and I think you have already mentioned, it's right,
10 isn't it, you were supported by the inside sales team at
11 Merxheim; is that correct?

12 A. That's correct, yes, yeah.

13 Q. Was that normally Gwenaelle Derrendinger?

14 A. That was Gwen, yes, yes, she — initially, and then it
15 changed to Anna, Anna Klein.

16 Q. And sometimes Marie—Claude Jordan as well?

17 A. Yes, Marie would be sometimes there as well.

18 Q. Is it right that from time to time people from Merxheim
19 would come over to visit the UK?

20 A. They would come over on a technical basis, Claude or
21 Nicolas Remy, whenever they needed to. A lot of the
22 time photographs would be taken and sent back to France
23 for them to do some sort of assessment on what I thought
24 the project — or the issue might be, and they would
25 give me their advice, if you like, on what the issue

165

1 might be with delamination or whatever it may be. But,
2 yeah, they came over, but not very often.

3 Q. Right, yes. I think we're going to come later to
4 a couple of specific visits I want to ask you about, but
5 that was one of my questions: were these routine visits
6 or were they always in relation to some specific problem
7 or issue that had arisen that they needed to attend for?

8 A. No, we would have — our sales manager,
9 Lionel Marconnet, would visit now and again to see — go
10 round customers, just to introduce himself again and
11 sort of keep things fresh, and explain that we are here,
12 what new developments we've got, what things we're
13 working on, where we are within the industry. So, yeah,
14 now and again, every, I guess, three or four months,
15 I may — he may come over to the UK for a day or two
16 just to have a look round the customers with me, but
17 that would be about it, really.

18 Q. I see, yes.

19 Was it your understanding that people at management
20 level at Merxheim were kept well informed of potential
21 and ongoing projects in the UK?

22 A. With my projects, I like — I try to keep them up to
23 date as much as possible and give them as much
24 information on projects that were coming up in the UK.
25 As I said, I — the — it was a weekly reporting system,

166

1 so they were updated every week, and anything that
2 I found that may be relevant or may have some
3 information for them would be forwarded on to France.

4 Q. Yes.

5 I want to ask you now about something that's been
6 referred to as the toolbox, and I want to start by
7 looking at Claude Wehrle's witness statement,
8 {MET00053190/34}. I want to look at paragraph 116. I'm
9 just going to read the first half of this paragraph with
10 you. He says there:

11 "Many people within [Arconic] would be aware of the
12 results of fire tests and/or certifications for
13 [Arconic's] products, including Reynobond PE. Those who
14 work within the sales teams would all have access to an
15 internal database referred to as the 'Toolbox'. This
16 contains technical information in respect of [Arconic's]
17 products including reaction to fire classifications for
18 relevant jurisdictions. When a new or updated
19 classification report or certification is obtained by
20 myself or others within my team, it would be added to
21 the 'Toolbox' by that team and sometimes an e-mail would
22 be sent to the Sales and Marketing Department email
23 distribution list (referred to as 'RAF Liste Interne'
24 and 'RAF Liste Externe') confirming that changes had
25 been made to the Toolbox or that new classification

167

1 reports had been obtained."

2 Now, just pausing there, were you aware of something
3 called the toolbox from the outset of your involvement?

4 A. Yes, the toolbox was introduced later in my employment,
5 much later. I don't know if you have a date there to
6 when it was actually introduced, but it was a very —
7 relatively new thing to Arconic. It was something that
8 they had put together with the — in the technical team,
9 and introduced to us much later on in my employment,
10 where you could go online and have a look at the
11 updates. I think I used it a few times, but it was also
12 for customers to use, I'm not sure if you're aware of
13 that. They could go into the toolbox and look to see,
14 you know, what updates had been made in there or any
15 sort of literature that might be handy to them. They
16 were — they had access to that.

17 So I was aware of it, but it was a relatively new
18 tool to us.

19 Q. Give us some help about the timeframe when this was
20 introduced. You have said much later in your
21 employment. Can you help us as to what year this was
22 introduced?

23 A. Just bear with me, I'm trying to think when it would
24 have — it would have been some time — I can't quite
25 give you an exact date, but I would ... I would be

168

1 guessing. I mean, I'm sure you could find out. I'm
 2 sure they would tell you at Merxheim. I'm not 100%
 3 sure. But I would say it was in the last -- a year
 4 before, maybe, or six months before the disaster,
 5 Grenfell fire. So it was relatively new.
 6 Q. So is it right that this was not something that was in
 7 operation when you began your role as UK sales manager,
 8 but in the year before the Grenfell fire it was
 9 introduced, during your time as UK sales manager; is
 10 that correct?
 11 A. I understand they had something similar to it many years
 12 ago called a toolbox of some type, but this was
 13 a completely different and new thing that they'd done
 14 online. So, yes, it wasn't there for me when I'd
 15 started with the company.
 16 Q. You said that you'd used it just a few times; what had
 17 you used it for, once it was introduced?
 18 A. I think, curiosity, I looked at the documentation that
 19 was in there and some of the literature when it first
 20 begun, but it really was -- it was not relevant to me as
 21 such at the beginning. I'm not sure if they carried on
 22 with it, I don't know if it carried on, but I knew it
 23 was a -- as I say, it was relatively new, so I think it
 24 was a customer needed some literature of some type and
 25 I explained that, "It's in the toolbox, if you go in

169

1 there, you can find it". Because we had problems with
 2 sometimes getting back to customers quickly, in fact
 3 that was one of our weaknesses at Arconic, that our
 4 turnaround between dealing with a customer when they
 5 needed a sample or some literature did take quite
 6 a while, so we could lose business over this. So
 7 I think this is one of the reasons why we introduced
 8 this -- or the technical team introduced this toolbox,
 9 so it was -- it had access -- they had access to that
 10 system quite quickly, from what I understand.
 11 Q. Prior to that toolbox being introduced, how were you
 12 kept apprised of changes in relevant technical
 13 classifications, certifications?
 14 A. I can't ever remember being notified about any changes
 15 within the toolbox. I don't know if there was an email
 16 that you had to go online to see, but there was nothing
 17 that was sent to me personally or on some sort of email
 18 saying that we've updated this in the toolbox. I think
 19 it was up to the individual to log on and just have
 20 a look. Although reading what you'd said prior to us
 21 talking, there was an alert or something that they'd
 22 sent out, I don't know if I read that wrong maybe, but
 23 yeah, I don't remember any ...
 24 Q. Sorry, just thinking back to the time, though, prior to
 25 the toolbox being introduced, how would you be kept up

170

1 to date with any changes in relevant technical
 2 information relevant to the products you were selling?
 3 A. That would be done more or less on a six-month/yearly
 4 basis. There wouldn't be any immediate updates given to
 5 you. You wouldn't get an email or an alert immediately
 6 if there was a change within a document or something ...
 7 I can't recall ever getting a personal email saying,
 8 "This is a document, this has been changed, you need to
 9 look at this, you know, this is important". It would
 10 have been something that would have been discussed at
 11 a quarterly meeting, because towards the end of my
 12 employment -- I say the end, the end of -- after the
 13 fire, we were having quarterly meetings, so we were
 14 there every quarter, so it would introduce new things
 15 and tell you new things, but there was nothing
 16 personally sent.
 17 Q. Was your understanding that the reason the toolbox was
 18 introduced because of this problem with delay in getting
 19 technical information to customers? Is that the reason
 20 why it was introduced?
 21 A. That was my take on it, because we had so much problems
 22 with getting back to customers as quickly and as
 23 efficiently as what we should have been doing, so this
 24 toolbox was not only for the internal staff, the sales
 25 external staff and the customer, so they could get some

171

1 drawings, wind uplift drawings or whatever they might
 2 need on there as quickly as they possibly can and they
 3 can download it. That was my take on it, yes.
 4 Q. Once it was introduced, did you ever explore within it
 5 the documents relevant to the UK fire testing regime?
 6 A. No, I'm sorry, I didn't. No, I didn't look to see there
 7 was any change, I -- no.
 8 Q. So Mr Wehrle -- you have touched on this already -- says
 9 that generally an email would be sent to members of the
 10 sales team when there was a new certificate or document
 11 to be aware of, but I think what you've said is that
 12 wasn't your experience; is that right?
 13 A. Absolutely completely honest, I can never remember any
 14 document being sent to me via an email saying, "This
 15 document has now change in the UK". But, you know,
 16 there may have been an instance that something was sent
 17 and I genuinely just cannot remember that being sent to
 18 me, but I think if it was done on a regular basis, then
 19 I certainly would have remembered emails that were
 20 coming through, changes on fire regulations and things.
 21 But I can't recall ever seeing any.
 22 Q. Yes.
 23 We saw just now in Claude Wehrle's statement
 24 reference to email distribution lists, RAF liste interne
 25 and liste externe, and I just want to show you as well

172

1 something in Mr Schmidt's witness statement about this,
 2 {MET00053187/15}, paragraph 48.
 3 So this is the second witness statement of
 4 Claude Schmidt, and I just want to look at what he says
 5 at paragraph 48, he says this:
 6 "In relation to awareness within [Arconic] of the
 7 results of fire performance testing and certification,
 8 a number of people within [Arconic] would have been
 9 aware including the sales team and the technical sales
 10 support team. Members of the sales team would be aware
 11 of results as they are made available to them through an
 12 online system referred to as the 'toolbox'."
 13 We have talked about that. He says
 14 {MET00053187/16}:
 15 "Claude Wehrle and the technical sales support team
 16 would upload to the toolbox a new or updated
 17 classification report or certification and would notify
 18 the sales team via email of any such changes. Such
 19 emails were sent to two mail distribution lists: 'RAF
 20 Liste Commercial Interne' which includes all members of
 21 the Sales and Marketing Department that are based in
 22 Merxheim including those working in 'internal sales',
 23 'outside sales' and 'technical support' and 'RAF Liste
 24 Commercial Externe' which includes all members of the
 25 Sales and Marketing Department that are based outside of

173

1 Merxheim and either employed by [Arconic] or are its
 2 agents, including for example, Deborah French and
 3 Vince Meakins."
 4 Do you see that there?
 5 Now, we've talked about the toolbox; I now want to
 6 ask you about these email distribution lists.
 7 Is it right that you would receive emails on the
 8 RAF liste commerciale externe, on that group email list?
 9 A. I can't recall having an email on this email that you
 10 mentioned. I just don't understand how Deborah French
 11 would be sent that email, because she no longer worked
 12 for the company, so --
 13 Q. No, sorry, just to interrupt you, I think there he is
 14 just saying, "For example, while she was working for us,
 15 Deborah French would have had that email", and then --
 16 A. And then me, I understand, sorry.
 17 Q. So what I'm asking is: are you ever aware of receiving
 18 emails from RAF liste commerciale externe?
 19 A. I can't honestly remember ever getting an email from
 20 this -- is this an email address that we're talking
 21 about here or is it a -- yeah.
 22 Q. It's said to be a group email address. I'm going to
 23 show you an example in just a moment, so that might
 24 help.
 25 A. Right.

174

1 Q. What we're interested in asking you is whether you ever
 2 remember receiving any emails via that group list about
 3 the testing and certification of Reynobond products?
 4 A. I'm sorry, I can't remember ever receiving an email.
 5 I hope I'm not wrong, but I can't remember ever seeing
 6 one.
 7 Q. Let's look at that example, {MET00077771/10}.
 8 (Pause)
 9 So if we look right at the top of that page,
 10 Mr Meakins, we can see this is an email from
 11 Nicolas Remy. It's dated 23 September 2015, it's sent
 12 then, and it's to this address at the top, "RAF Liste
 13 Commercial interne" and "Liste Commercial Externe", you
 14 can see those. So they are these email distribution or
 15 mailing lists.
 16 A. Sorry, I think we've got this slightly mixed where --
 17 from what I can understand, there were two toolbox,
 18 there was an old toolbox that was used many years ago,
 19 and then that wasn't used for quite a few years from --
 20 into my employment, and they reintroduced a toolbox in
 21 about, I would guess, 2017, as I said, 2018, something
 22 like that, and I remember it being launched as the
 23 toolbox. This is just before my time -- or just after
 24 my time, I should say, and this wasn't a toolbox that
 25 I was familiar with at all. There are two.

175

1 Q. This seems to be some form of email distribution list.
 2 So this is from September 2015, and Mr Schmidt, as we've
 3 just seen in his evidence, said that you would have been
 4 on that distribution list.
 5 A. Two months into my employment or three months into my
 6 employment, I guess, something like that. The one that
 7 I was talking about is the one they introduced much
 8 later on. It was called -- it was a new toolbox, from
 9 what I understand. I didn't know they'd previously had
 10 a toolbox, so I'd never even seen this one.
 11 Q. I see.
 12 A. It's quite confusing, yeah.
 13 Q. But just focusing on this email and this format of
 14 email, do you ever remember receiving an email that had
 15 come to you via a generic list at Arconic?
 16 A. No, I don't. I can't remember that at all. Remembering
 17 it was just not long after my employment, so I just
 18 don't remember that.
 19 Q. Well, you start in the May, and this is four months in,
 20 in September that year.
 21 A. Yeah, from what I'm seeing, yeah.
 22 Q. If we read the email, we can see what it says. We've
 23 got some English translation and the French, but we can
 24 see under the beginning of the email, in the first
 25 paragraph, it says:

176

1 "Following the modification of our core recipe
 2 (Translucide → black) for Reynobond Architecture PE,
 3 please find below the updated links to the fire
 4 classification reports."
 5 Then in bold and underlined, it's said:
 6 "The ratings stay the same! Please avoid
 7 duplicating files!"
 8 Then what we can see a little bit further on is
 9 we've got the PE riveted system, and we can see that
 10 it's getting a rate or "classement" of C, and
 11 then s2, d0, but we can see there it has a C, and then
 12 the Reynobond PE cassette system we can see is getting
 13 a class E; do you see that there?
 14 A. I can see that, yes. Yes.
 15 Q. So is it your evidence that not only do you not recall
 16 receiving emails like this, but that you also can't
 17 recall receiving this specific email?
 18 A. Yeah, there's a few things. First of all, I don't
 19 remember ever seeing this. I really can't remember it.
 20 Secondly, definitely not this version, and I just
 21 can't -- I wouldn't have understood it at that stage of
 22 my employment, if it had have come through, because
 23 I just wouldn't have understood the difference or the
 24 terminology.
 25 Q. I see. So even if you had got this, this wouldn't have

177

1 meant anything to you?
 2 A. It wouldn't -- I would have understood the F, as we
 3 mentioned before, if I'd have studied it, and the E, but
 4 I just literally started to see customers at that stage,
 5 I was not really aware of the products, they were very
 6 new to me, so to have a document sent like this to me
 7 and not ... it not being explained, if you understand
 8 what I mean, what it actually means, then it would have
 9 been -- yeah, I wouldn't have understood it, to be
 10 honest.
 11 Q. Yes.
 12 Would you have understood what was being referred to
 13 in that first paragraph about there being a modification
 14 of the core recipe from translucide to black? Did you
 15 know about that?
 16 A. I wouldn't have understood that at the time, but we did
 17 change the colours of the panels throughout my
 18 employment from black to translucent, you know, later on
 19 as well. So this -- I would have -- I understood that
 20 later on, that the core had been changed from black to
 21 a translucent, but that would have been some years on.
 22 But at this time I would not -- I wouldn't have
 23 understood why or ... yeah, I wouldn't have really
 24 understood it, I'm sorry.
 25 Q. Okay, I understand.

178

1 Just moving on now to ask you about sales meetings,
 2 we've talked about the twice-yearly sales meetings. Can
 3 we just have a look at Claude Wehrle's witness statement
 4 at this point, {MET00053190/36}, paragraph 125. I just
 5 want to read some of this paragraph with you. He says:
 6 "The sales teams also receive information from my
 7 team as part of their sales team meetings that usually
 8 occur twice a year. I or one of my colleagues would
 9 usually provide an update often taking the form of the
 10 provision of statistics such as the amount of requests
 11 the team has addressed, a general update on technical
 12 points known in the marketplace and a discussion of
 13 a specific technical subject which could relate to fire
 14 or any other technical matter such as wind-loading,
 15 mechanical behaviour or any claims that have been raised
 16 in relation to product matters."
 17 Just pausing there, I think you have already
 18 confirmed that you do recall those twice-yearly sales
 19 meetings; yes?
 20 A. Yes, I do, yeah, yeah.
 21 Q. Would you always attend those sales meetings?
 22 A. I didn't miss very many. I think most of the sales
 23 meetings I would have attended. So, yes, most of them
 24 would have been attended.
 25 Q. Were they held in Merxheim in France?

179

1 A. Yes, they were all in Merxheim, usually a two-day
 2 sort of thing.
 3 Q. Then he goes on and he says:
 4 "Examples of such presentations where fire
 5 classification information was provided include the
 6 February 2014 presentation ..."
 7 And he goes on and talks about that. Now, that's
 8 before your involvement, but he says this:
 9 "... include the February 2014 presentation 'Fire
 10 Tests: Norms and Classification Criteria' which
 11 confirmed that the PE Class B was no longer valid and
 12 that PE was now Class E, as well as providing
 13 information relating to types of fire testing and
 14 certification in different countries and the July 2015
 15 'Technical Quiz' which was presented by
 16 Philippe Vonthron. This presentation suggests that
 17 I manage product/system certifications while Philippe
 18 manages fire certifications -- in reality I manage
 19 certification processes and Philippe manages the
 20 maintenance and distribution of fire certificates ..."
 21 Now, that July 2015 technical quiz presented by
 22 Philippe Vonthron would have been during your tenure as
 23 UK sales manager. Do you remember participating in that
 24 technical quiz?
 25 A. I can't remember participating in the technical quiz,

180

1 but something's telling me that I was invited to that
2 sales meet and I was quite new so I was a little
3 apprehensive, because I'd just started a few weeks prior
4 to that, so it would have been May, June, about four or
5 five, whatever it was, weeks. But I may have gone to
6 the sales meet, but I'm really sorry, I can't be certain
7 that I was at the sales meet. I don't remember taking
8 part in any technical quiz, that's for sure.
9 MS GRANGE: Okay.
10 Well, I want to take you to that technical quiz,
11 but, Mr Chairman, that would take us over 4.30, and
12 therefore I think it may be an appropriate moment for
13 a break.
14 SIR MARTIN MOORE-BICK: Well, I was going to ask you whether
15 it would make better sense to do that later on. You
16 obviously think it would.
17 MS GRANGE: I would rather do that in one go.
18 SIR MARTIN MOORE-BICK: Yes, of course.
19 Mr Meakins, I don't know whether anyone has warned
20 you that we might need to ask you to come back, so to
21 speak, on Monday.
22 THE WITNESS: Yes, they have, sir, yes.
23 SIR MARTIN MOORE-BICK: I'm sorry, I'm sure that's
24 inconvenient for you, but I think we will have to ask
25 you to do that.

181

1 THE WITNESS: That's fine, sir, absolutely fine.
2 SIR MARTIN MOORE-BICK: That's good of you, thank you very
3 much.
4 So we will break now, we will resume at 10 o'clock
5 on Monday morning, and I know there are quite a few days
6 between now and Monday, but I have to remind you,
7 please, not to talk to anyone about your evidence or
8 anything relating to it over the weekend.
9 THE WITNESS: Of course, absolutely, sir, yes.
10 SIR MARTIN MOORE-BICK: Okay. Well, thank you very much.
11 We will look forward to seeing you on Monday.
12 THE WITNESS: Thank you, sir.
13 SIR MARTIN MOORE-BICK: Good, thank you very much.
14 10 o'clock on Monday, then, please.
15 THE WITNESS: Thank you, sir.
16 (4.30 pm)
17 (The hearing adjourned until 10 am
18 on Monday, 15 February 2021)
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21
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24
25

182

| | PAGE |
|----|---|
| 1 | INDEX |
| 2 | |
| 3 | MS DEBORAH FRENCH (continued)1 |
| 4 | |
| 5 | Questions from COUNSEL TO THE INQUIRY3 |
| 6 | (continued) |
| 7 | |
| 8 | MR VINCE MEAKINS (affirmed)62 |
| 9 | |
| 10 | Questions from COUNSEL TO THE INQUIRY65 |
| 11 | |
| 12 | |
| 13 | |
| 14 | |
| 15 | |
| 16 | |
| 17 | |
| 18 | |
| 19 | |
| 20 | |
| 21 | |
| 22 | |
| 23 | |
| 24 | |
| 25 | |

183

184

| | | | | | | |
|---|--|--|---|---|---|---|
| <p>A</p> <p>a1 (1) 140:12</p> <p>a13b (1) 22:23</p> <p>a2 (32) 81:15,19,21,22 109:22 130:24 131:11 132:14 133:1,22 141:1,4,5,6,8,10,10,10,11 142:12 145:22 152:6 153:21,24 154:2 158:2,17,20,23 160:22 161:12,17</p> <p>a2rated (1) 157:16</p> <p>aasaps (1) 67:5</p> <p>able (15) 3:23 29:10 32:24 44:5 59:2 60:19 61:8 64:10 92:3 120:16 130:22 131:15 136:20 138:7 158:21</p> <p>above (9) 16:17 19:19 22:14 38:20,22 51:21 143:22,25 144:5</p> <p>absence (1) 27:2</p> <p>absolutely (11) 69:6 76:11 77:1 122:24 142:11 146:4 154:20 157:25 172:13 182:19</p> <p>accept (4) 23:16 25:16 29:12 103:16</p> <p>acceptable (1) 121:14</p> <p>access (4) 167:14 168:16 170:9,9</p> <p>accordance (5) 11:20 12:19 43:17,20 126:23</p> <p>according (1) 45:21</p> <p>account (2) 45:9 60:14</p> <p>achieve (4) 17:1 23:23 25:6 78:8</p> <p>achieved (5) 12:18 43:21 46:7 81:20 142:14</p> <p>achieving (1) 158:6</p> <p>acm (31) 49:15 53:22 68:18,20,24 69:8 70:1,3,7,24 72:22 73:10,13 74:10 83:10 88:24 90:1 91:21 92:4,5,7,19 94:12 105:23 114:1 131:7 134:25 148:21 149:21 150:4,22</p> <p>across (6) 26:23 60:20 73:14 95:24 134:12 137:22</p> <p>acted (1) 76:25</p> <p>active (3) 1:9 85:22 87:17</p> <p>actual (2) 85:25 162:12</p> <p>actually (6) 4:12 24:15 32:16 60:15 77:14 106:24 112:6 113:23 120:17 126:22 130:10 146:16 158:24 159:1 168:6 178:8</p> <p>adb (1) 120:9</p> <p>add (1) 90:20</p> <p>added (1) 167:20</p> <p>additional (3) 20:2 65:1 88:19</p> <p>address (4) 29:2 174:20,22 175:12</p> <p>addressed (4) 42:20 43:12 44:13 179:11</p> <p>adhered (1) 83:12</p> <p>adjourned (1) 182:17</p> <p>adjournment (1) 98:1</p> <p>administration (1) 58:20</p> <p>advice (6) 4:3 59:2 60:20,21 143:24 165:25</p> <p>advise (3) 3:24 151:17 152:2</p> <p>advised (1) 49:5</p> <p>affirmation (2) 63:11,14</p> <p>affirmed (2) 63:16 183:8</p> <p>afraid (6) 70:25 102:3 121:21 122:10 125:16 142:10</p> <p>after (23) 7:4 27:9,17,22 31:2 33:5 39:19 44:4 46:16 55:9 58:20 77:12 82:9 85:7 86:17 97:11 99:6 109:17 137:17 154:8 171:12 175:23 176:17</p> <p>aftermath (1) 41:2</p> <p>afternoon (4) 64:25 66:1</p> | <p>98:3 146:21</p> <p>afterwards (1) 23:11</p> <p>ag (1) 49:3</p> <p>again (52) 4:17 9:1 11:5 12:5,5 13:19 14:24 15:23 17:17 18:14,24 21:14 24:13 27:12 30:5 31:20 32:1 35:3 37:17 39:12 42:11 44:20,23 46:4,22 50:5,20,23 51:20 57:19 61:10 65:1 75:18 85:4 94:9 97:21 98:18 113:22 116:23 117:21 120:1 122:24 126:11 127:16 137:10 140:3,8 143:18 162:24 166:9,10,14</p> <p>agency (2) 74:22,22</p> <p>agents (1) 174:2</p> <p>ago (7) 13:24,25 26:9 51:22 106:8 169:12 175:18</p> <p>agree (3) 121:7 156:12,25</p> <p>agreed (3) 3:11 26:11 58:12</p> <p>agricultural (1) 69:14</p> <p>ah (1) 63:3</p> <p>akbor (2) 1:5,7</p> <p>alain (3) 82:2 108:25 109:4</p> <p>albeit (1) 42:22</p> <p>alcoa (13) 25:22 26:6,15 30:10,10,11,21,24 43:5 52:15 67:10 84:8 148:11</p> <p>alert (5) 18:4,10 31:7 170:21 171:5</p> <p>alerting (1) 19:16</p> <p>ali (1) 1:5</p> <p>alike (1) 112:16</p> <p>allows (1) 164:4</p> <p>almost (1) 13:24</p> <p>alone (2) 1:24 63:22</p> <p>along (12) 6:21 31:20 32:1 52:23 69:23 79:7 110:19 135:21,24 137:12 146:15 153:5</p> <p>alongside (1) 12:13</p> <p>alpolc (1) 156:15</p> <p>already (15) 2:19 51:16,17,17 86:9 91:9 93:1 106:16 133:6 141:2 146:17 159:7 165:9 172:8 179:17</p> <p>also (28) 16:13,15,20 34:6 35:20 38:25 54:5 71:8,11,13 72:12 73:10 76:13 79:5 83:7 86:20 115:11 130:5 139:11 145:19 148:20 155:7 158:11 160:16 163:18 168:11 177:16 179:6</p> <p>alternative (1) 152:15</p> <p>although (4) 18:11 76:7 95:6 170:20</p> <p>alucabond (4) 48:8,15 49:1 52:2</p> <p>alucabondsic (1) 48:5</p> <p>alucobond (15) 49:14,23 52:19 53:2 73:16 95:23 152:13 153:25,25 156:7,13,14 158:5,8,10</p> <p>alucobonds (1) 158:4</p> <p>alucolui (1) 156:17</p> <p>aluminium (21) 68:17 69:8 70:8 72:10 73:3,4,7,8,9 83:1,4,12,13,18 91:25 92:21 131:8 135:1,10,12 137:18</p> <p>always (7) 112:15 153:10 157:5 162:14 164:16 166:6 179:21</p> <p>amount (6) 17:14,15 104:22 105:5 143:4 179:10</p> <p>amounts (1) 61:11</p> <p>andor (3) 104:6 125:2 167:12</p> <p>anna (2) 165:15,15</p> <p>annual (1) 77:17</p> <p>another (7) 2:7 32:3 62:9 64:4 71:9 82:17 159:2</p> <p>answer (39) 4:7 11:5,15 12:6 15:8 18:9 19:11 24:13</p> | <p>26:15,23 29:16 50:2 55:24 56:3,7,25 59:24 66:6 72:16 99:22,24 100:9,11 102:1 106:10 112:1,25 113:19 119:6 136:12,17,20,22 138:11,12 141:22 144:15 145:3</p> <p>answering (1) 7:15</p> <p>anticipate (1) 127:11</p> <p>anybody (16) 18:21 21:23 45:15 55:20 56:10 108:16 113:21 121:12 126:7 135:22 142:18,20 146:8,12 154:17 164:14</p> <p>anyone (21) 2:20 54:14 65:6 75:23 83:21 94:16 96:3 97:18 102:14 104:8 105:2,13 106:1 112:22 133:12 138:1 142:5 146:6 147:1 181:19 182:7</p> <p>anyones (1) 106:14</p> <p>anything (36) 2:23 19:4 32:16 35:6 38:8 41:18 48:16 61:4 65:6,11,23 75:15 80:11 87:13 93:13 96:23 97:1,18 104:25 105:20 110:9 114:13 116:13 119:5 121:1 135:25 139:22 140:4 145:21 147:1 153:2 154:14 158:25 167:1 178:1 182:8</p> <p>anyway (2) 54:8 152:8</p> <p>aokay (1) 121:15</p> <p>apart (2) 35:7 121:10</p> <p>apologies (1) 75:22</p> <p>apologise (2) 33:18 129:16</p> <p>apparent (3) 15:21 39:19,20 apparently (1) 76:18</p> <p>appear (2) 124:16 135:4 52:23 69:23 79:7 110:19 135:21,24 137:12 146:15 153:5</p> <p>applications (6) 70:13 108:5,6 144:6</p> <p>applications (6) 70:13 108:4,23 109:13 158:13,13</p> <p>appraised (1) 170:12</p> <p>appreciate (15) 13:23 21:2 45:19 47:1,11 84:3 99:2,4,20 100:6 110:24 124:14,19 125:18 141:3 109:15</p> <p>apprehensive (1) 181:3</p> <p>appropriate (3) 4:4 146:20 181:12</p> <p>appropriately (1) 126:23</p> <p>approved (8) 22:23 51:1 118:23 119:4,8,12,17 120:9</p> <p>approximately (1) 85:22</p> <p>aprilmay (1) 49:16</p> <p>arc0000699 (1) 43:8</p> <p>architect (5) 16:9 110:21 149:15 151:16 152:9</p> <p>architects (2) 128:12 145:20</p> <p>architectural (14) 70:9 79:5,10 84:17 97:4,5 110:17 111:21 117:7 155:11,14,20,21,23</p> <p>architecture (2) 111:3 177:2</p> <p>arconic (103) 4:3,22 6:6,19,20 7:5 15:18 16:1 26:18 27:18 31:24 37:8,21 38:4 39:16 41:19 44:5 45:11,14,15 46:11 51:13 53:1 55:10 56:11 59:5,11,18 60:4 61:2,6 67:2,5,7,10,13,15,18 68:4,5,11 73:13,14,18,19 74:17 76:8,14,21,25 79:21 81:25 82:2,8,17 83:24,25 84:8,11 85:1,11,21 90:1 91:3 93:1 95:1,12 96:15 102:25 104:13 105:2,13 108:16 114:15 115:11,15 124:14,20 133:23 134:15 135:19 138:1,2 141:15,24</p> | <p>142:5 143:23 146:7,9 147:22,24 148:11,24,25 153:1 157:15 167:11 168:7 170:3 173:6,8 174:1 176:15</p> <p>arconics (6) 4:21,25 45:20 156:11 167:13,16</p> <p>area (3) 72:11 91:10 149:1</p> <p>areas (1) 153:6</p> <p>arent (2) 53:14 117:2</p> <p>arisen (1) 166:7</p> <p>around (19) 13:20 14:19 49:1,15,20 50:23 52:2 80:1 82:6 88:12 91:2 122:7 124:3 126:10 130:19 141:7 152:19 153:9 157:7</p> <p>arrangement (4) 76:10,12,24 79:16</p> <p>arrangements (2) 1:23 62:9</p> <p>ash (9) 70:17,20 71:12,17,25 73:10,13 74:4 95:21</p> <p>ashzip (2) 72:8 73:1</p> <p>ask (39) 3:2 5:15 15:2,9 18:24 23:9,15,19 24:6 44:5 45:18 46:11 54:4 55:13 60:25 62:24 63:13,21 65:11,24 84:25 87:15,21 91:11 92:3 103:3 124:20 127:10 136:7 144:3 150:10 159:21 166:4 167:5 174:6 179:1 181:14,20,24</p> <p>asked (36) 5:3 10:2,17 11:2,22 12:14 26:12,23 55:18,20 56:19 64:12 75:9,12,15 81:12,17 83:17 88:2 99:20 100:16 101:24,25 103:2 112:11 113:9 115:11 126:5 136:9,11,21 138:18 144:12 150:25 153:7 164:6</p> <p>asking (13) 4:7 10:18 23:11,24 26:6 66:22 83:21 104:19 113:14 141:18 163:7 174:17 175:1</p> <p>aspect (1) 95:8</p> <p>aspects (3) 78:25 88:18,24</p> <p>assess (1) 22:15</p> <p>assessment (2) 151:11 165:23</p> <p>assist (1) 138:16</p> <p>assistance (1) 124:18</p> <p>assisting (2) 61:18 65:21</p> <p>assume (11) 29:8 91:15 105:6 114:23 129:25 133:6 134:1 137:21 138:11 149:23 152:8</p> <p>assumed (8) 91:15 121:14 122:18 123:6 126:11 134:15 140:19 154:23</p> <p>assumption (2) 29:18 130:9</p> <p>assurance (1) 86:2</p> <p>attached (4) 7:18,20 20:1 159:14</p> <p>attaches (2) 7:11 19:21</p> <p>attachment (4) 8:3,5 20:6,11</p> <p>attachments (2) 7:13 8:3</p> <p>attend (3) 162:17 166:7 179:21</p> <p>attended (3) 162:16 179:23,24</p> <p>attendees (1) 90:21</p> <p>attending (1) 65:21</p> <p>attention (3) 2:16 64:19 103:19</p> <p>attract (2) 2:15 64:19</p> <p>authorisation (1) 80:12</p> <p>automatically (2) 148:20 152:11</p> <p>available (7) 18:20,23 61:23 80:24 85:15 154:19 173:11</p> <p>average (1) 143:11</p> <p>avoid (1) 177:6</p> <p>aware (73) 34:22 35:1,4,6 37:9,14,17 40:22 67:23 70:18 73:13 77:24 81:15 83:5 96:7 99:7 102:16</p> | <p>111:20 113:13 114:17,20 117:9,11 119:23 122:4,7 123:9 125:15 128:1,8 129:20 130:8,16,23 131:1,3 132:5,7,11 133:9,11 134:20 137:8,15,23 138:25 141:15 142:2,4,7,10,14 148:12 150:12 154:4,7,7 156:8,9 157:9 158:4,7,8,15 167:11 168:2,12,17 172:11 173:9,10 174:17 178:5</p> <p>awareness (1) 173:6</p> <p>away (7) 8:11 34:14 77:17 78:2,18 89:4 153:23</p> <p>awful (11) 49:10 61:11 83:19 95:20 110:19 139:14,17 166:16 157:14,16 161:14</p> | <p>93:1 95:24 96:22 98:15 107:8 111:4 112:9 113:24 120:14 121:8 122:16 124:14 125:15 128:4 132:8 141:7 145:18 151:4 152:4 153:13 154:24 155:13 158:25 164:15 169:4,4,8 175:23 178:3 180:8</p> <p>begin (6) 67:2 85:1 104:13 148:23,25 169:7</p> <p>begin (4) 1:8 66:24 68:15 159:19</p> <p>beginning (7) 24:23 46:1 73:24 141:20 145:9 169:21 176:24</p> <p>begun (2) 105:18 169:20</p> <p>behaved (1) 143:1</p> <p>behavior (1) 43:19</p> <p>behaviour (1) 179:15</p> <p>behind (1) 131:2</p> <p>being (27) 13:5,22 14:17 68:1 29:22 31:4 41:19 45:6 46:5 47:6 58:8 67:24 76:23 85:8 101:6,25 103:2,9 105:16,24 106:10 107:1 109:9,10 110:13,23,24 111:4 112:23 113:16 115:17 116:19,24 118:14 119:5 121:10 123:13 124:7 125:12,13 126:20,23 129:7 131:25 133:23 139:4,5 140:3,4 141:8,23 144:23 155:7 156:22 157:20,21 170:11,14,25 172:14,17 175:22 178:7,12,13</p> <p>belief (1) 30:3</p> <p>believe (30) 4:15 6:8,21 7:8 17:24 18:14 19:9 21:18 22:7 24:9 26:4 27:16,19 33:25 37:6,11 44:3 46:15 50:2,5,6 57:12 58:7 67:21 75:17 82:1 90:22,25 93:15 106:14</p> <p>believed (1) 107:19</p> <p>below (6) 16:4 41:21 80:11 90:19 113:24 177:3</p> <p>benefit (1) 161:12</p> <p>best (4) 41:23 52:25 56:5 151:23</p> <p>better (8) 1:22 46:2 129:2 130:25 140:16,19 150:8 181:15</p> <p>between (41) 3:22,23 4:10 15:25 17:5,22 19:8,14 23:25 33:3 34:7 43:15 52:9,10 83:2 86:7,10 93:10 96:22 102:13 105:22 107:11 112:21 118:11,13 119:9,13 132:6,23 133:1 136:24 137:1 143:11,14,17 145:13 148:6 154:16 159:5 170:4 182:6</p> <p>beyond (1) 102:20</p> <p>big (2) 38:20 148:1</p> <p>binder (2) 118:8,9</p> <p>bit (16) 26:16 38:19 39:24 56:17 58:4 84:5 86:5 88:9 92:13 122:21 132:18 134:12,22 135:5 163:14 177:8</p> <p>black (6) 37:5 102:10 177:2 178:14,18,20</p> <p>blanket (1) 138:23</p> <p>block (1) 88:16</p> <p>blow (1) 39:24</p> <p>board (2) 61:12 81:14</p> <p>body (1) 143:24</p> <p>bold (1) 177:5</p> <p>bombarding (1) 93:21</p> <p>bonded (1) 92:21</p> <p>bonfire (1) 48:4</p> <p>bonus (2) 79:17,18</p> <p>books (1) 84:2</p> <p>booth (3) 68:21,24 70:4</p> <p>boss (1) 90:13</p> | <p>both (14) 16:11 17:2 23:12 32:15 42:23 43:16 48:10 81:4 108:9 121:18,19,23 122:2,8</p> <p>bottom (14) 5:7 8:18 9:1 16:2 20:14 22:19 24:20,22,24 41:24 91:4 118:19 124:23 143:20</p> <p>bound (2) 15:16 28:12</p> <p>boxes (2) 86:21 87:10</p> <p>brain (1) 117:23</p> <p>brand (3) 7:25 8:19 9:2</p> <p>break (25) 53:25 54:4,8,14,20 62:9,15 64:18,24,25 65:1 66:1,2 97:11,15,19 98:15 109:23 146:21,23 147:2,8 159:2 181:13 182:4</p> <p>breaking (1) 94:18</p> <p>breaks (2) 65:3,8</p> <p>briefed (1) 140:1</p> <p>briefing (7) 89:14,19 92:2 93:3,5,9 116:25</p> <p>briefly (1) 3:10</p> <p>bring (3) 88:7 148:9 158:21</p> <p>bringing (2) 38:16 148:13</p> <p>british (1) 43:14</p> <p>broadly (2) 69:3 140:12</p> <p>brochures (6) 86:21 87:1,10 117:21,24 118:4</p> <p>broke (1) 156:24</p> <p>broken (2) 79:11,13</p> <p>brought (4) 48:16 57:5 103:19 123:3</p> <p>bs (3) 20:7 22:15,21</p> <p>bs1 (3) 8:14 140:21 158:6</p> <p>bs1d0 (1) 43:23</p> <p>bs476 (1) 43:14</p> <p>budget (1) 107:20</p> <p>building (34) 3:12 22:24 32:8 53:20 92:11 108:10 111:8,8 112:12,13,18,18 118:12,22 119:3 122:8 126:13 128:3 138:10 144:8,10,11,13,14 145:4 149:14,17 150:5,11 151:1,1,9,15 152:12 119:15 120:10 121:6 138:4 145:16 153:7 157:19,19</p> <p>buildup (1) 107:2</p> <p>bullet (2) 91:7 127:9</p> <p>burn (1) 16:15</p> <p>business (8) 71:11,13 76:14 85:7 88:7 105:8 157:17 170:6</p> <p>businesses (2) 74:2 85:16</p> <p>busy (1) 163:9</p> <p>butting (1) 129:15</p> <p>buy (1) 30:21</p> <p>buying (1) 30:22</p> <p>bye (2) 147:5,5</p> <p>byrne (2) 25:1,11</p> |
|---|--|--|---|---|---|---|

41:21 51:21 67:1 68:2
71-9.23 73:23 75:18 76:1.2
84:15 85:3.4 89:23,24 90:6
91:7 94:8,10 103:24 104:1
113:22 115:8,9 118:17,20
119:14 121:12 122:21
124:13,23 127:6 130:17,19
134:17 143:18 149:14,14
150:6 151:13 158:16
159:7,15 163:12 166:16
167:8 168:10,13 170:20
171:9 172:6 173:4 175:7,9
179:3 182:11
looked (8) 18:2 49:17 113:24
123:5,17 140:25 165:6
169:18
looking (30) 3:18 12:12 14:2
16:9 17:7 26:22 35:21
37:6,12 38:15,25 39:15
47:6,10 51:21 58:20
61:2,5,5 66:24 84:13 95:23
107:17 113:24 125:21
126:1 143:18 148:13
154:20 167:7
looks (1) 23:14
looped (1) 75:23
lose (2) 153:22 170:6
losing (6) 157:16,18,22
158:3,16 161:10
lost (4) 157:14 160:17,21
161:14
lot (23) 36:1 46:2 49:10
61:11 83:19 84:13 96:20
110:20 112:25 123:5 129:7
137:2 139:14,17 145:1
149:4 155:10,16 157:14,17
161:14 164:18 165:21
lots (3) 28:5 59:22,22
love (1) 153:20
lunch (2) 64:24 97:16

M

mail (1) 173:19
mailing (1) 175:15
main (10) 73:17 89:12 93:5
103:13,19 108:20,23
152:10 156:20,25
mainly (9) 72:14 73:2,16
81:6 90:4 91:22 105:7
155:18,24
maintain (1) 60:2
maintenance (1) 180:20
major (1) 27:22
majority (2) 58:18 111:15
makes (4) 78:20 97:11 111:8
151:3
making (5) 29:18 52:15
61:12,23 130:9
male (2) 34:3.6
man (1) 163:9
manage (2) 180:17,18
managed (1) 80:2
management (2) 163:20
166:19
manager (25) 50:17 58:13
67:3,14 71:12 74:18 78:22
79:21 80:13,19 81:24
84:22 85:22 86:11 119:10
131:22 154:9 156:4 159:12
160:1,3 166:8 169:7,9
180:23
managers (2) 80:7,14
manages (2) 180:18,19
managing (1) 108:25
manner (1) 6:9
manufacture (3) 86:1 109:23
156:23
manufactured (4) 85:11
104:19 143:6 156:13
manufacturer (1) 68:16
manufacturers (7) 58:25
59:5,23 60:17,18,19 154:1
manufacturing (5) 51:18
85:24 86:4 111:17 143:7
many (16) 6:25 7:1,1 17:21
27:9 29:20 30:13 47:5 88:8

wehrls (10) 91:12 92:2
104:11 115:10 139:21
162:14,16 167:7 172:23
179:3
welcome (5) 1:3 54:22 62:17
98:3 147:10
went (21) 30:20,24 83:19
88:11 92:12 98:18 102:20
103:7 108:2 117:17 128:1
130:7 131:7 132:10,19
134:23 140:12 149:19
150:18 153:3 158:23
werent (18) 12:2 28:16
35:14,14 37:9 44:5,6 70:1
83:15 93:21 97:6 110:3
113:1,10 128:5 142:14
145:20 154:14
weve (26) 9:15 15:10 23:14
24:4 29:20 37:18 42:8
59:20 63:19 86:9 90:16
92:15 106:16 139:12
160:17,21 161:2,2 166:12
170:18 174:5 175:16
176:2,22 177:9 179:2
whatever (8) 95:16 123:5
132:14 152:14,17 166:1
172:1 181:5
whats (5) 38:13 42:10 84:3
146:10 161:7
whatsoever (2) 86:15 89:21
whenever (2) 45:20 165:21
whereas (3) 68:20 80:8
161:20
whichever (1) 123:19
whilst (2) 73:21 85:23
whoever (4) 9:17 80:12
125:6 156:7
whole (2) 72:3 153:14
wholly (1) 126:9
whom (2) 7:3 18:4
whose (1) 71:12
widespread (1) 147:22
wild (1) 153:5
win (2) 161:11,13
wind (2) 95:8 172:1
windloading (1) 179:14
withdraw (4) 49:14,22 53:1
55:10
withdrawing (2) 51:19 56:12
withdrawn (6) 18:16 31:22
34:24 35:5,6 57:11
withdrew (1) 62:7
withstand (1) 48:4
witness (58) 1:17,20
2:1,5,10,25 29:1,20 36:14
54:17 55:2 61:10
62:6,7,10,12,19
63:2,6,8,12,15,16,24
64:2,6,22 65:2,10,13
66:9,10,25 85:3 89:22 94:8
97:20,23 98:9 103:25
115:7,10 118:17 130:17
143:18 147:3,5,12,15
167:7 173:1,3 179:3
181:22 182:1,9,12,15
wonder (1) 6:17
wont (2) 25:8 113:4
wording (3) 119:20
125:16,19
wordings (1) 135:13
work (22) 17:25 58:18,25
69:4,7,10 71:17 80:7
83:24,25 85:8 88:8
95:12,20 96:15 112:15
145:6 148:15 152:20 153:1
158:17 167:14
worked (20) 68:5,10,20
69:24 70:17 71:8 73:2 74:1
78:10,13,16,16 85:16 93:1
102:24 119:9 128:13
148:10 159:23 174:11
working (32) 5:22,23 6:6,9
16:8 28:1 61:14 67:2 71:11
73:21 74:3 79:2 82:16,18
85:2,17 87:17 88:3 104:13
112:12 127:2,24 147:24

148:8,11,23,25 158:20
162:11 166:13 173:22
174:14
works (2) 2:17 112:10
world (1) 56:16
worried (1) 113:5
worse (2) 103:22 140:16
wouldnt (40) 5:2 11:24
18:15 20:22,23 38:15 47:7
80:20 100:3,9 103:16
120:16 136:19 138:20
139:20 145:10,10,11,15,25
149:8 150:10,17,25 152:25
156:8 161:18 162:4,11,13
171:4,5 177:21,23,25
178:2,9,16,22,23
write (1) 159:24
writing (4) 106:25 133:17
160:20,22
written (1) 103:15
wrong (5) 39:17 55:17
146:12 170:22 175:5
wrote (1) 50:25

Y

yeah (116) 28:13 30:13
34:12,12 36:11 37:2
40:4,17 42:8,20,21,24
48:1,4,9,10,12,15 49:25
56:7 57:12 59:20 63:8
67:9,22,25,25 68:9 70:18
71:16 72:21 73:9,9,12,12
74:11,11 75:7 77:15
78:4,6,6,9,9 81:4,6,12,22
82:9,12,12,21 83:1,1,17,23
84:23,23 86:23 89:12
91:15,15,19,19 92:5 94:22
95:10,14,16 96:17,21
102:22 110:3 111:6,9
114:4 116:15 118:9 120:14
122:4,13 128:6 129:6,24
130:16 135:12,17,18,24
137:7 140:8,14 143:16
151:23 155:10
156:14,16,25 157:25
160:23 163:11,12 164:23
165:12 166:2,13 170:23
174:21 176:12,21,21
177:18 178:9,23 179:20,20
year (16) 44:4 78:19,20
84:10 96:17 109:18,25
120:5 124:19 136:14
137:12 168:21 169:3,8
176:20 179:8
yearly (6) 77:17,18 94:2
158:1 161:23 162:17
years (25) 6:20 7:1 13:24,25
17:21 27:10 61:7 69:24
71:19,20,20 77:9 95:1
96:5,21 101:9 133:24,25
154:24 158:24,25 169:11
175:18,19 178:21
yesterday (13) 3:10,11,15
4:9 7:1 13:2 14:8 16:23
49:17 52:13 55:18 59:16
60:9
yesterdays (1) 55:13
youd (4) 64:8 99:20 169:16
170:20
youll (2) 75:2 160:9
youre (34) 2:20 15:12 29:18
35:3 36:15 41:14 51:6
53:13 59:4,6 63:22 70:17
74:7 81:14 83:5 84:3 95:11
96:3,8,9,9 97:13 106:11
117:11 125:15 130:9
135:5,6 147:14,17 148:12
150:12 152:21 168:12
yourself (7) 4:2 5:25 18:25
45:11 61:23 108:18 122:23
youve (10) 6:25 19:13
44:17,24 45:8 76:23 88:10
92:18 160:23 172:11

Z

zcm (2) 83:16,17
zero (1) 114:24
zinc (2) 83:15,17
zipped (1) 73:5

0

0 (69) 12:4,11,19 13:5 14:22
15:10 17:1 20:7,12 22:23
23:2,23,25 24:3 25:6,17,25
26:2,10,18,22,24
27:2,4,10,14,25 28:1,15,21
29:6,9,23,25 31:10,19
32:17 34:23 43:16 115:1
131:4,10,24 133:9,21
134:3,4,21 135:3,8,14,25
136:5,7,12,24
137:3,6,9,16,19
138:3,5,9,13,16 139:3,9
142:13

1

1 (3) 67:2 85:7 183:3
10 (3) 182:4,14,17
100 (5) 67:21 69:22 79:25
111:25 169:2
1000 (1) 1:2
101 (1) 97:25
11 (3) 1:1 94:9 113:23
1116 (1) 54:19
1130 (1) 54:12
1135 (1) 54:21
1146 (1) 62:14
116 (1) 167:8
1212 (1) 62:16
124 (1) 115:9
125 (1) 179:4
13 (2) 51:1 164:3
135 (1) 5:6
13501 (1) 43:21
14 (4) 41:23 43:9 118:17
159:11
140 (1) 8:11
143 (1) 8:21
148 (1) 9:4
15 (7) 29:1 42:9,14 130:17
134:18 143:19 182:18
152 (1) 15:24
154 (1) 20:10
155 (1) 22:9
158 (2) 24:23,25
159 (3) 24:17 25:3,14
16 (4) 73:23 85:5 88:10
92:15
18 (24) 96:17,21
120:11,15,20 121:9 128:10
129:5,11 130:2,4
143:22,25 144:5,13,18
145:5,12,17,21 146:9
151:19 152:3 158:25
18metre (7) 121:10 128:3
144:8,11 152:21,24 153:2

2

2 (12) 34:9,10 36:19 43:18
66:25 68:4 75:18 76:1
89:22 97:21 98:19 143:16
200 (1) 98:2
2000 (1) 22:25
2008 (1) 68:11
2012 (2) 8:1 20:15
2013 (5) 32:6 49:16 50:24
57:20 158:4
2014 (10) 8:18 9:2 32:7
37:8,16 67:19 124:13,18
180:6,9
2015 (49) 4:20 5:7,9 8:25
15:23,25 16:3 17:4 18:5
19:12,23 20:20 21:9 25:2
29:24 31:2,12,13 42:19
43:2,9 67:2,20 68:12 74:19
85:2,7,23 86:7,7,25 90:8,9
91:3 96:15 98:19 101:9,17
119:9,13 127:20 128:17,23
132:15 139:6 175:11 176:2
180:14,21

2016 (17) 67:11 79:24 80:2
99:21 101:9,17 128:25
129:3,4,23 130:3,7 132:16
139:6 149:6,22 153:4
201617 (1) 153:5
20162017 (1) 150:7
2017 (17) 33:3,8 44:9 77:12
82:4,6 119:9,13 127:21
129:18,23,24,24 139:7
155:15 159:11 175:21
2018 (3) 53:16 163:22
175:21
2019 (1) 66:12
2021 (2) 1:1 182:18
21 (2) 33:3,8
22052015 (1) 90:15
23 (1) 175:11
27 (2) 7:25 90:9

3

3 (3) 5:9 39:22 183:5
30 (7) 16:3,18,19 19:23
20:20 107:4 133:25
301 (1) 159:15
31 (2) 25:2 31:2
317 (1) 147:7
321 (2) 94:10 113:24
322 (2) 113:22,24
33 (1) 66:11
335 (3) 146:24 147:4,9
36 (2) 124:22 127:7
3a (2) 53:2 156:13

4

4 (5) 8:18 9:2 42:10 66:12
91:3
40 (1) 164:3
42 (1) 118:18
43 (2) 130:18 134:18
430 (2) 181:11 182:16
45 (1) 143:19
476 (1) 20:7
476part (2) 22:15,21
48 (2) 173:2,5
Amm (1) 16:12

5

5 (6) 20:15 42:13 66:24
73:22 76:2 85:4
5050 (4) 148:2,5 149:18
155:22
53 (2) 29:2,4
55 (31) 4:13 6:7 8:20 9:3
11:10,19 12:18 16:12
18:19 19:1,6,16 26:19 27:9
28:22 31:3,9,19 32:7,18
45:22 46:6,19 53:11 55:21
56:12 57:11,21 61:3
139:2,8

6

6 (8) 22:15,21 35:10 47:23
68:2,14 71:7 89:23
62 (1) 183:8
65 (1) 183:10
67 (1) 43:14

7

7 (2) 22:16,21
70 (1) 107:3

9

9 (2) 7:10 8:25
94 (1) 104:1