

**IN THE MATTER OF AN ARBITRATION UNDER THE ARBITRATION RULES OF
THE UNITED NATIONS COMMISSION ON INTERNATIONAL TRADE LAW**

AND

**PURSUANT TO THE AGREEMENT BETWEEN THE GOVERNMENT OF THE
REPUBLIC OF INDIA AND THE REPUBLIC OF MOZAMBIQUE FOR THE
RECIPROCAL PROMOTION AND PROTECTION OF INVESTMENT**

BETWEEN

PATEL ENGINEERING LTD (India)

Claimant

and

THE REPUBLIC OF MOZAMBIQUE

Respondent

**INDEX OF FACTUAL EXHIBITS ORGANISED
BY EXHIBIT NUMBER**

7 FEBRUARY 2022

Factual Exhibits Submitted with Claimant's Rejoinder on Objections to Jurisdiction		
Date	Number	Description
19 November 2021	C-343	360 Mozambique, <i>Ethos Asset Management Inc., USA announces major deal in Mozambique with Thai Mozambique Logistica, S.A., to finance the building of the Macuse port and rail infrastructure in the sum of \$400 million USD</i> , dated 19 November 2021
28 September 2021	C-344	PEL's Application to the Supreme Court of India for a case file copy, dated 28 September 2021
23 September 2021	C-345	Letter from CMS to the Tribunal regarding Respondent's Document Production Request No. 53, dated 23 September 2021
30 November 2021	C-346	Email from Daria Kuznetsova of CMS to the Tribunal attaching a copy of the response from the Supreme Court of India, dated 30 November 2021
Undated	C-347	Google Earth view of Macuse offloading ramp
May 2012	C-348	Video of Minster Zucula's visit on a future Macuse port's site, May 2012
Undated	C-349	PEL's video presentation
2022	C-350	Printout of Standard ICC Arbitration Clause https://iccwbo.org/dispute-resolution-services/arbitration/arbitration-clause/ (accessed 4 February 2022)
2012	C-351	Daniel Kahneman, <i>Thinking Fast and Slow</i> , Penguin Books 2012 (excerpt)
23 January 2012	C-352	Letter from Complainant (Brinhanmumbai Municipal Corporation) to Court of Mumbai, dated 23 January 2012
1 February 2022	C-353	NBM&CW Infra Construction & Equipment Magazine, <i>BMC with Patel Engineering completes tunnelling of MCGM Water Tunnel Project in record time</i> , dated 1 February 2022
2022	C-354	Printout of Collins Dictionary, definition of the word 'experience' https://www.collinsdictionary.com/dictionary/english/experience , (accessed 31 January 2022)
13 September 2021	C-355	AllAfrica, <i>Mozambique: Embraer Bribe - Ten Years for Former Transport Minister</i> , dated 13 September 2021
2022	C-356	Printout of Thai Mocambique Logistica S.A. Website team – TML (accessed 2 February 2022)
17 December 1999	C-357	The Strait Times, <i>New Bangkok airport can't take off yet</i> , dated 17 December 1999
11 November 2015	C-358	The Nation, <i>Supreme Court jails pair for 5 years each for Suvarnabhumi bid rigging</i> , dated 11 November 2015

9 August 2000	C-359	Bangkok Times, <i>Focus / Corruption at Nong Ngu Hao</i> , dated 9 August 2000
20 May 2004	C-360	Bangkok Post, <i>CENSURE DEBATE; 'Clear bias' in contracts for new airport</i> , dated 20 May 2004
27 December 1997	C-361	Bangkok Post, <i>TRANSPORT - Italian-Thai says it feels ill-treated</i> , dated 27 December 1997
3 February 1998	C-362	Bangkok Post, <i>TRANSPORT - City warns Ital-Thai about sites</i> , dated 3 February 1998
9 July 2004	C-363	Business Day Thailand, <i>NBIA to start on time, ITD receives warning</i> , dated 9 July 2004
13 January 2005	C-364	The Nation, <i>Slow-coaches at new airport told they face blacklisting</i> , dated 13 January 2005
3 August 2005	C-365	Thai News Service, <i>Thailand: Who will pay for the delay to the opening of the new airport?</i> , dated 3 August 2005
17 January 1997	C-366	Bangkok Post, <i>Development dispute – Ital-Thai denies fraud in Manila Bay Project</i> , dated 17 January 1997
2001	C-367	<i>Government Procurement, Bidding and Award of Contracts – The Amari and Benpres Scandals, The Industrial Anatomy of Corruption</i> , Vol 5, No. 1, January-June 2001 (excerpt)
11 November 2003	C-368	<i>Francisco I. Chavez, Petitioner, v. Public Estates Authority and Amari Coastal Bay Development Corporation</i> , Supreme Court Resolution G.R. No. 133250, dated 11 November 2003
11 June 2019	C-369	Khaosod, <i>Premchai sentenced to jail for bribery in black panther case</i> , dated 11 June 2019
8 December 2021	C-370	Bangkok Post, <i>Supreme Court sentences Premchai to 3 years 2 months in prison</i> , dated 8 December 2021
2 December 2016	C-371	Savana, <i>Xihivele (rouba-lhe a valer)</i> and Savana, <i>Zimba e Viegas nas malhas da corrupção internacional</i> , dated 2 December 2016
6 March 2020	C-372	Club of Mozambique, <i>Watch: Zimba's bank account closed for suspected fraud – AIM report</i> , dated 6 March 2020
21 February 2019	C-373	Carta de Moçambique, <i>A outra "maka" de Paulo Zucula</i> , dated 21 February 2019
25 March 2019	C-374	Deutsche Welle, <i>Moçambique: Ex-ministro dos Transportes condenado a 14 meses de prisão</i> , dated 25 March 2019
5 June 2019	C-375	Notícias, <i>"Subornos da Odebrecht": Paulo Zucula novamente detido</i> , dated 5 June 2019
7 June 2019	C-376	AllAfrica, <i>Mozambique: Zucula Remains in Preventive Detention</i> , dated 7 June 2019
8 June 2019	C-377	Portal de Angola, <i>Tribunal mantém prisão preventiva de Zucula</i> , dated 8 June 2019
21 December 2016	C-378	<i>United States of America v. Odebrecht S.A.</i> , Plea Agreement, United States District Court Eastern District of New York, Case 1:16-cr-00643-RJD, filed 21 December 2016

August 2012	C-379	The Ministry of Planning and Development Presentation regarding Rio Tinto's proposal with translation
Undated	C-380	Chronology of Events related to the dispute