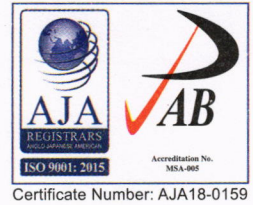




Republic of the Philippines
Department of Finance
INSURANCE COMMISSION
1071 United Nations Avenue
Manila



Certificate Number: AJA18-0159

Legal Opinion (L.O.) No.:	I0-2019-07
Date:	May 29, 2019

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**SUBJECT: BIMA's Proposed Business Model in Partnership
with Globe Telecommunications, Inc.**

Dear Attys. Acosta, Simundac, Samaco and Farcon:

This pertains to your letter dated 05 November 2018 regarding BIMA's proposed business model in partnership with Globe Telecommunications, Inc. (Globe).

Pursuant to your letter, your client, Milvik (Bima) Philippines Insurance Agency, Inc. ("BIMA"), intends to take full advantage of mobile technology, particularly for selling and distributing low cost Personal Accident ("PA") Microinsurance Covers issued by its principal — Pioneer Life, Inc. ("PIONEER") — with different amounts of coverage with the corresponding premium payment for such under a group insurance.

Further, your letter enumerates the different steps that BIMA will conduct in order to distribute and eventually sell the said product, including the different functions and roles of BIMA and its partner for this plan.

Your letter likewise mentions your legal bases and arguments for the non-applicability of the following IC Circular Letters, namely:

1. Circular Letter No. 2016-61 dated 16 November 2016 entitled "*Guidelines in Defining the Engagement of Telemarketing Services by Insurance Companies*,