



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



Legal Opinion (LO) No.:	2019-10
Date:	29 October 2019

**MR. MASATO KANEKO**

General Manager, Project and Machinery Division  
Mitsui & Co. (Asia Pacific) Pte. Ltd.  
Manila Branch  
36/F, GT Tower International, 6815  
Ayala Avenue, 1200 Makati City

**SUBJECT: Request for Legal Opinion (Mitsui & Co. (Asia Pacific) Pte. Ltd.)**

Dear **Mr. Kaneko**:

This refers to your letter dated 28 June 2019 requesting for the Insurance Commission's legal opinion on the following:

- (1) Whether or not Mitsui & Co. (Asia Pacific) Pte. Ltd.'s (hereinafter "Mitsui") intended business activity is an "insurance business"; and
- (2) Whether or not Mitsui's intended business activity is regulated by the Insurance Commission.

Per your letter, you intend to provide used car dealers with certain services and warranty for such services, and enable such car dealers to pass on such warranty benefits to their customers, to wit:

**"Intended Business Activity:**

1. We will establish in the Philippines, a joint venture company ("Service Provider"), which will engage in the business of a) repair services for all kinds of motor vehicles, including the operation of a mobile or roving repair service; b) consultation, inspection, and certification on the quality of used motor vehicles; and c) assisting used car dealers in providing warranty to its consumers by conducting an inspection and certification of the quality of used motor vehicles and assisting such used car dealers in the processing of claims in relation to their warranty.