



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



Insurance Commission Rulings (ICR) No.:	05-2020
Date:	15 June 2020

**MR. MASA AKI IKUSHIMA**

President

**AEON Credit Service (Philippines) Inc.**

3<sup>rd</sup> Floor, Hanston Square, San Miguel Ave.,  
Ortigas Center, Pasig City

**ATTENTION** : **Attys. John Glim Gait e and Antonette Comia**  
Legal and Compliance Department

**SUBJECT** : **Inquiry on the Applicability or Non-Applicability of  
the License Requirement to Group Policyholders**

**Dear Mr. Ikushima:**

This refers to your letter dated 2 December 2019 requesting from this Commission a legal opinion on the applicability or non-applicability of the license requirement to a group policyholder and relevant consequent activities thereto.

In the said letter you stated that AEON Credit Service (Philippines) Inc. ("AEON") is a duly registered Philippine corporation that acts as a financing company as defined under Republic Act No. 8556 otherwise known as "Financing Company Act of 1998".

To protect AEON in case of accidental death or permanent disability of your borrowers, your management proposes that AEON enter into a group insurance contract with a licensed insurance provider. In the said group insurance contract, AEON will be named as the group policyholder and AEON's borrowers will be the members, wherein the latter will pay a fixed premium in addition to his first monthly installment.

To appropriately proceed with the proposed transaction and contract, your company would like to seek the opinion of this Commission on the following legal issues: