BEFORE THE MADURAI BENCH OF MADRAS HIGH COURT
DATED: 27.02.2019
CORAM :
THE HONOURABLE MR.JUSTICE G.R.SWAMINATHAN

WP(MD)No.9681 of 2018
and
WMP(MD)Nos.8927, 12530 & 14298 of 2018

R.K.Elango ... Petitioner

Vs.

1.Insurance Regulatory and Development Authority (IRDA),
Rep.by its Chairman, Parishram Bhavan,
3rd Floor, Basheer Bagh, Hyderabad - 500 004.

2.The Oriental Insurance Company Limited,
Rep.by its Deputy General Manager,
Motor OD Claims Department,
88, Janpath, Connaught Place,
New Delhi - 110001.

3.Vortex Loss Assessors,
Rep.by its Partner S.Prabakaran,
90/12 A, Thammanan Road,
Arisipalayam, Salem - 636 009.

4.M/s.Innovative Valuers and Engineers Consultant Private Limited,
Rep.by its Director, Vidya Bhushan Seghal,
Property No.218, Khasra No.218/1,
3rd Floor, Naharpura Village,
Sector - 7, Rohini Delhi,
North West Delhi - 110 085.

5.M/s.Kensecure Technical Services Private Limited,
Shop No.3, Plot 3,
Deepak Plaza, D C Chowk,
Sector 9, Rohini Delhi,
North West Delhi - 110 085.

6.M/s.Eminent Support Services Private Limited,
No.5/200, Sunder, Vihar,
Paschim Vihar, New Delhi - 110 087.

7.M/s.Mutneja Tech Insurance Surveyors
and Loss Assessors Private Limited,
Rep.by its Principal Shyam Sunder Mutneja,
No.58, Gandhi Nagar,
near Bal Niketan School, Sri Ganaga Nagar,
Rajasthan – 335 001.

8.M/s.IAR Surveyors and Loss Assessors
Private Limited,
Rep.by its Managing Director,
Manu Mehta, No.1105, 11th Floor,
Pearl Omaxe Netaji Subhash Place,
Pitampura, New Delhi – 110 034. ... Respondents

(3rd respondent is impleaded vide
court order dated 27.02.2019 in
WMP(MD)No.14297 of 2018)

(4 to 8th respondents are impleaded
vide court order dated 27.02.2019
in WMP(MD)No.22395 of 2018)

PRAYER : Writ Petition is filed under Article 226 of the Constitution of India, to issue a Writ of Mandamus, to forbear the second respondent from engaging unauthorised personnel for carrying out survey and assessment of motor own damage loss in respect of claims up to Rs.50,000/- under the guise of empanelment of loss assessment agency and direct the first respondent to issue direction to insurers to engage only surveyors loss assessors for carrying out survey and loss assessment in respect of all claims.

For Petitioner	:	Mr.N.Dilipkumar
For R1	:	Mr.S.Anwar Sameem
For R2	:	Mr.S.Srinivasa Ragavan
For R3	:	Mr.Hemakarthikeyan
For R4 to R8	:	Mr.B.Saravanan

ORDER

The writ petitioner is a licensed Surveyor and Loss Assessor. He is a fellow member in Institute of Insurance Surveyors and Loss Assessors (IIISLA). He was also its office bearer. He wants this Court to restrain the second respondent from engaging unauthorised personnel for carrying out survey and assessment of own damage loss in respect of motor claims upto Rs.50,000/- through empaneled loss assessment agencies. He also wants this Court to direct the first respondent to issue direction to insurers to engage only approved surveyors and loss assessors for carrying out survey and loss assessment in respect of all claims. While entertaining the writ petition, interim injunction was granted on 26.04.2018. To vacate the same, the second and third respondents have filed vacate stay petitions.

2.The Insurance Act, 1938 is a consolidating statute and contains the law relating to the business of insurers. As per Section 64-UM (4), if the claim in respect of a loss is Rs.50,000/- or more, the insurer can settle the claim only after he obtains a report on the said loss from a person who holds the license issued under Section 64 – UM to act as a surveyor or loss assessor. But, in the case of a claim of less than Rs.50,000/-, if it is not practicable for the insurer to employ an approved surveyor or loss assessor without incurring expenses disproportionate to the amount of the claim, the insurer may employ any other person (not being a person disqualified for the time being for being employed as a surveyor or loss assessor) for surveying such loss and may pay such reasonable fee or remuneration to the person so employed as he may think fit.

3.The second respondent issued a notification on 18.07.2017 requesting expression of interest (EOI) for empanelment of loss assessment agencies for assessment of motor own damage losses upto Rs.50,000/-. Without formally questioning the said notification, the petitioner has filed this writ petition seeking the relief set out earlier. The learned counsel appearing on either side filed their written submissions and they reiterated the contentions setout therein.

4.The core contention of the learned counsel appearing for the writ petitioner is that while the second respondent insurer is not obliged to engage an approved surveyor or loss assessor in respect of claims below Rs.50,000/-, the persons engaged by them cannot be a person disqualified for the time being for being employed as a surveyor or loss assessor. Disqualification for such "any other person" is provided under Section 42-D(5) of the Insurance Act, 1938. Section 42(3) also speaks about disqualification. Since these provisions refer to the regulations issued by the first respondent, one has to necessarily refer to Insurance Regulatory and Development Authority of India (Insurance Surveyors and Loss Assessors) Regulations, 2015. The regulations specifically provide that the approved surveyor or loss assessor will have to carry out the work himself and he cannot delegate the job of survey and loss assessment. In other words, the code of conduct stipulates personal performance of the work and does not admit of any outsourcing.

5.The learned counsel appearing for the writ petitioner submitted that firms engaged by the second respondent though will be headed by the approved surveyor or loss assessors will actually get the job done through lay persons and the report alone will be signed by the approved surveyor and loss assessors. He submitted that though the Hon'ble Division Bench of the Delhi High Court in the decision reported in ***1996(36) DRJ 296 (Surveyors' Welfare Association (Regd.) vs. Union of India)*** held that the expression "not being a person disqualified" cannot mean "not being qualified', the said decision cannot come to the rescue of the second respondent and the other respondents because the regulations referred to in Section 42-D (5) and 42(3) were introduced only in the year 2000. He emphatically contended that if the second respondent is allowed to have their way, that would clear fall foul of the Insurance Regulatory and Development Authority of India (Insurance Surveyors and Loss Assessors) Regulations, 2015.

6.I am unable to agree with the submissions of the learned counsel appearing for the writ petitioner. Section 64-UM of the Insurance Act, 1938 reads as follows :

> "**64-UM.Surveyors or loss assessors.** -(1) Save as otherwise provided in this section, no person shall act as a surveyor or loss assessor in respect of general insurance business after the expiry of a period of one year from the commencement of the Insurance Laws (Amendment) Act, 2015, unless he—
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> (a)possesses such academic qualifications as may be specified by the regulations made under this Act; and
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> (b)is a member of a professional body of surveyors and loss assessors, namely, the Indian Institute of Insurance Surveyors and Loss Assessors:
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> Provided that in the case of a firm or company, all the partners or directors or other persons, who may be called upon to make a survey or assess a loss reported, as the case may be, shall fulfill the requirements of clauses (a) and (b).
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> (2)Every surveyor and loss assessor shall comply with the code of conduct in respect of his duties, responsibilities and other professional requirements, as may be specified by the regulations made under the Act.
>
> (3)Notwithstanding anything contained in the foregoing provisions, a class or class of persons acting as a licensed surveyor or loss assessor prior to the commencement of the Insurance Laws (Amendment) Act, 2015 shall continue to act as such for such period as may be specified by the regulations made under this Act:
>
> Provided that the surveyor or loss assessor shall, within the period as may be notified by the Authority, satisfy the requirements of clause (a) and clause (b) of sub-section (1), failing which, the surveyor or loss assessor shall be automatically disqualified to act as a surveyor or loss assessor.
>
> (4)No claim in respect of a loss which has occurred in India and requiring to be paid or settled in India equal to or exceeding an amount specified in the regulations by the Authority in value on any policy of insurance, arising or intimated to an insurer at any time after the expiry of a period of one year from the commencement of the Insurance Laws (Amendment) Act, 2015 (5 of 2015), shall, unless

otherwise directed by the Authority, be admitted for payment or settled by the insurer unless he has obtained a report, on the loss that has occurred, from a person who holds a licence issued under this section to act as a surveyor or loss assessor (hereafter referred to as "approved surveyor or loss assessor"):

Provided that nothing in this sub-section shall be deemed to take away or abridge the right of the insurer to pay or settle any claim at any amount different from the amount assessed by the approved surveyor or loss assessor.

(5)The Authority may, at any time, in respect of any claim of the nature referred to in sub-section (4), call for an independent report from any other approved surveyor or loss assessor specified by him and such surveyor or loss assessor shall furnish such report to the Authority within such time as may be specified by the Authority or if no time limit has been specified by him within a reasonable time and the cost of, or incidental to, such report shall be borne by the insurer.

(6)The Authority may, on receipt of a report referred to in sub-section (5), issue such directions as it may consider necessary with regard to the settlement of the claim including any direction to settle a claim at a figure less than, or more than, that at which it is proposed to settle it or it was settled and the insurer shall be bound to comply with such directions:

Provided that where the Authority issues a direction for settling a claim at a figure lower than that at which it has already been settled, the insurer shall be deemed to comply with such direction if he satisfies the Authority that all reasonable steps, with due regard to the question whether the expenditure involved is not disproportionate to the amount required to be recovered, have been taken with due dispatch by him:

Provided further that no direction for the payment of a lesser sum shall be made where the amount of the claim has already been paid and the Authority is of opinion that the recovery of the amount paid in excess would cause undue hardship to the insured:

Provided also that nothing in this section shall relieve the insurer from any liability, civil or criminal, to which he would have been subject but for the provisions of this sub-section.

(7)No insurer shall, after the expiry of a period of one year from the commencement of the Insurance Laws (Amendment) Act, 2015 (5 of 2015) pay to any person any fee or remuneration for surveying, verifying or reporting on a claim of loss under a policy of insurance unless the person making such survey, verification or report is an approved surveyor or loss assessor.

(8)Where, in the case of a claim of less than the amount specified in sub-section (4) in value on any policy of insurance it is not practicable for an insurer to employ an approved surveyor or loss assessor without incurring expenses disproportionate to the amount of the claim, the insurer may employ any other person (not being a person disqualified for the time being for being employed as a surveyor or loss assessor) for surveying such loss and may pay such reasonable fee or remuneration to the person so employed as he may think fit.

(9)The Authority may in respect of any claim of value of less than the amount specified in sub-section (4) on an insurance policy, if the claim has not been or is not proposed to be reported upon by a surveyor or loss assessor, direct that such claim shall be reported upon by an approved surveyor or loss assessor and where the Authority makes such direction, the provisions of sub-sections (5) and (6) shall apply in respect of such claim.

(10)Where, in relation to any class of claims, the Authority is satisfied that it is customary to entrust the work of survey or loss assessment to any person other than a licensed surveyor or loss assessor, or it is not practicable to make any survey or loss assessment, it may, by an order, exempt such class of claims from the operation of this section."

Section 42-D of the Act reads as follows :

"**42-D. Issue of registration to intermediary or insurance intermediary. —** (1) The Authority or an officer authorised by it in this behalf shall, in the manner determined by the regulations made by the Authority and on payment of the fees determined by the regulations made by the Authority, issue to any person making an application in the manner determined by the regulations, and not suffering from any of the disqualifications herein mentioned, a registration to act as an intermediary or an insurance intermediary under this Act:

Provided that,-

(a)in the case of an individual, he does not suffer from any of the disqualifications mentioned in sub-section (3) of section 42, or

(b)in the case of a company, or firm, any of its directors or partners does not suffer from any of the said disqualifications.

(2)A registration made under this section shall entitle the holder thereof to act as an intermediary or insurance intermediary.

(3)A registration made under this section shall remain in force for a period of three years only from the date of issue, but shall, if the applicant, being an individual does not, or being a company or firm any of its directors or partners or one or more of its officers or other employees so designated by it and in the case of any other person, the chief executive by whatever name called, or one or more of his employees designated by him does not suffer from any of the disqualifications mentioned in clauses (b), (c), (d), (e) and (g) of sub-section (3) of section 42 and the application for renewal of registration reaches the issuing authority at least thirty days before the date on which the registration ceases to remain in force, be renewed for a period of three years at any one time on payment of the fee, determined by the regulations made by the Authority and additional fee for an amount determined by the regulations, not exceeding one hundred rupees by way of penalty, if the application for renewal of the registration does not reach the issuing authority at least thirty days before the date on which the license ceases to remain in force.

(4)No application for the renewal of a registration under this section shall be entertained if the application does not reach the issuing authority before the registration ceases to remain in force:

Provided that the Authority may, if satisfied that undue hardship would be caused otherwise, accept any application in contravention of this sub-section on payment by the application of a penalty of seven hundred and fifty rupees.

(5)The disqualifications above referred to shall be the following: -

(a)that the person is a minor;

(b)that he is found to be of unsound mind by a Court of competent jurisdiction;

(c)that he has been found guilty of criminal misappropriation or criminal breach of trust or cheating or forgery or an abetment of or attempt to commit any such offence by a Court of competent jurisdiction:

Provided that, where at least five years have elapsed since the completion of the sentence imposed on any person in respect of any such offence, the Authority shall ordinarily declare in respect of such person that his conviction shall cease to operate as a disqualification under this clause;

(d)that in the course of any judicial proceeding relating to any policy of insurance of the winding up of an insurance company or in the course of an investigation of the affairs of an insurer it has been found that he has been guilty of or has knowingly participated in or connived at any fraud dishonestly or misrepresentation against an insurer or an insured;

(e)that he does not possess the requisite qualifications and practical training for a period not exceeding twelve months, as may be specified by the regulations made by the Authority in this behalf;

(f)that he has not passed such examinations as may be specified by the regulations made by the Authority in this behalf;

(g)that he violates the code of conduct as may be specified by the regulations made by the Authority.

(6) If it be found that an intermediary or an insurance intermediary suffers from any of the foregoing is qualifications, without prejudice to any other penalty to which he may be liable, the Authority shall, and if the intermediary or an insurance intermediary has knowingly contravened any provision of this Act, may cancel the license issued to the intermediary or insurance intermediary under this section .

(7) The Authority may issue a duplicate license to replace a registration lost, destroyed or mutilated, on payment of such fee, as may be determined by the regulations made by the Authority.

(8) Any person who acts as an intermediary or an insurance intermediary without being registered under this section to act as such, shall be liable to a penalty which may extend to ten lakh rupees and any person who appoints as an intermediary or an insurance intermediary or any person not registered to act as such or transacts any insurance business in India through any such person, shall be liable to a penalty which may extend to one crore rupees.

(9) Where the person contravening sub-section (8) is a company or a firm, then, without prejudice to any other proceedings which may be taken against the company or firm, every director, manager, secretary or other officer of the company, and every partner of the firm who is knowingly a party to such contravention shall be liable to a penalty which may extend to ten lakh rupees."

Section 42 of the Act reads as follows :

42. Appointment of insurance agents. —(1) An insurer may appoint any person to act as insurance agent for the purpose of soliciting and procuring insurance business:

Provided that such person does not suffer from any of the disqualifications mentioned in sub-section (3).

(2) No person shall act as an insurance agent for more than one life insurer, one general insurer, one health insurer and one of each of the other mono-line insurers:

Provided that the Authority shall, while framing regulations, ensure that no conflict of interest is allowed to arise for any agent in representing two or more insurers for whom he may be an agent.

(3) The disqualifications referred to in the proviso to sub-section (1) shall be the following:-

(a) that the person is a minor;

(b) that he is found to be of unsound mind by a court of competent jurisdiction;

(c) that he has been found guilty of criminal misappropriation or criminal breach of trust or cheating or forgery or an abetment of or attempt to commit any such offence by a court of competent jurisdiction:

Provided that where at least five years have elapsed since the completion of the sentence imposed on any person in respect of any such offence, the Authority shall ordinarily declare in respect of such person that his conviction shall cease to operate as a disqualification under this clause;

(d)that in the course of any judicial proceeding relating to any policy of insurance or the winding up of an insurer or in the course of an investigation of the affairs of an insurer, it has been found that he has been guilty of or has knowingly participated in or connived at any fraud, dishonesty or misrepresentation against an insurer or insured;

(e)that in the case of an individual, who does not possess the requisite qualifications or practical training or passed the examination, as may be specified by the regulations;

(f)that in the case of a company or firm making, a director or a partner or one or more of its officers or other employees so designated by it and in the case of any other person the chief executive, by whatever name called, or one or more of his employees designated by him, do not possess the requisite qualifications or practical training and have not passed such an examination as required under clauses (e) and (g);

(g)that he has not passed such examination as may be specified by the regulations;

(h)that he has violated the code of conduct as may be specified by the regulations.

(4)Any person who acts as an insurance agent in contravention of the provision of this Act, shall be liable to a penalty which may extend to ten thousand rupees and any insurer or any person acting on behalf of an insurer, who appoints any person as an insurance agent not permitted to act as such or transacts any insurance business in India through any such person shall be liable to penalty which may extend to one crore rupees.

(5)The insurer shall be responsible for all the acts and omissions of its agents including violation of code of conduct specified under clause (h) of sub-section (3) and liable to a penalty which may extend to one crore rupees."

Though the relevant provisions have been extracted in their entirety, the material provisions are Section 64-UM(8), Section 42-D (5) and Section 42(3) of the Act.

7.As rightly pointed out by the learned counsel appearing for the second respondent, the issue in the writ petition turns on the interpretation of Section 64-UM and in particular its sub-section (4) and sub-section (8) read with the IRDAI (Insurance Surveyors and Loss Assessors) Regulations, 2015. The surveyor or loss assessor must possess the academic qualification as may be specified by the Regulations and be a member of a professional body of surveyors. As per sub-section (4) no claim in respect of a loss equal to or exceeding an amount specified in the regulations by the authority in value on any policy of insurance, arising or the intimated to an insurer shall be admitted for payment or settled by the insurer unless the insurer has obtained a report from an approved surveyor or loss assessor.

8.The "Regulations by the Authority" referred to in sub-section (4) of Section 64-UM means IRDAI (Insurance Surveyors and Loss Assessors) Regulations, 2015 which are made in exercise of powers under Section 114A read with Section 42D, 42E and 64-UM of the Insurance Act, 1938 and Sections 14 and 26 of the IRDA Act, 1999. Regulation 12 of the Regulations provides for appointment of Surveyors and Loss Assessors. It is clear from a reading of sub-section (4) of Section 64-UM read with IRDAI (Insurance Surveyors and Loss Assessors) Regulations that in the case of claim in respect of a motor insurance loss, an approved surveyor or loss assessor shall be appointed by the insurer or the insured to assess the loss under a policy of insurance which is above Rupees Fifty Thousand. In "other than motor insurance", the figure would be above Rupee One Lakh. Sub-Regulation (3) provides that the above mentioned limit shall be reviewed every three years by IRDAI.

9.But, on a reading of sub-section 4 of 64-UM, one can come to the safe conclusion that there is absolutely no legislative mandate to the insurers to necessarily employ an approved surveyor or loss assessor to assess loss under a policy of insurance in respect of Motor insurance upto Rupees Fifty Thousand. The learned counsel appearing for the second respondent insurer has highlighted the legislative wisdom behind the incorporation of sub-section (8). The "expenses" referred to in sub-section (8) is the survey fee payable to the licensed / approved surveyor and loss assessor which is fixed by the Authority and irrespective of the amount of claim/loss assessed, an insurer is obliged to pay and conversely, the approved surveyor is entitled to receive the said pre-determined fee. Thus, even if the assessed loss is a very low figure, insurer is liable/mandated to pay the full fee as pre-determined which would be disproportionate to the amount of claim. Since the claims in respect of motor insurance are in large numbers, the cumulative effect of the disproportionate expenses to be incurred will be huge. It is to avoid such a situation ie., incurring expenses disproportionate to the amount of the claim that the legislature in its wisdom thought it necessary to enact sub-section (8) of Section 64-UM.

10.On a careful reading of the relevant provisions, I hold that the expression "any other person (not being a person disqualified for the time being for being employed as a Surveyor or Loss Assessor)" can only refer to a person other than an approved Surveyor or Loss Assessor but who should not have been a disqualified Surveyor or Loss Assessor. There are persons who were once approved Surveyors or Loss Assessors and who have subsequently incurred a disqualification. Such persons obviously will have to kept out of the field and cannot gain a back door entry. Since the expression "any other person" has been employed by the statute, it can only mean that the insurer is entitled to employ any person other than an approved Surveyor or Loss Assessor. The expression "other" in this context means "different", i.e., different from the thing or person already mentioned (Cambridge Advanced Learner's Dictionary, 3rd Edition). The statute has already mentioned the class of approved Surveyors or Loss Assessors. Hence, the expression "any other person" can only denote those who fall outside this class of approved Surveyors or Loss Assessors. Reading the provisions in this manner alone would give effect to the legislative intention underlying the statutory scheme. If the contention of the writ petitioner is to be accepted, one will go back to square one and the very object of Section 64-UM (8) would be defeated.

11. Courts will have to adopt a purposive construction. If literal meaning would lead to absurd consequences, it is open to the court to construe the provision appropriately. The Hon'ble Division Bench of the Delhi High Court in the decision reported in ***1998 SCC Online Del 80 (Shubhi Khandelwal vs. University of Delhi and Ors)***, observed as follows :

> "27.Mr. Sanghi, learned counsel for the appellant also placed reliance on M/s Girdhari Lal & Sons vs. Balbir Nath Mathur and others, [1986]1SCR383 , in which the Court held as under:-.
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> "The primary and foremost task of a court in interpreting a statute is to ascertain the intention of the legislature, actual or imputed. Having ascertained the intention, the Court must then strive to so interpret the statute as to promote and advance the object and purpose of the enactment. For this purpose, where necessary the court may even depart from the rule that plain words should be interpreted according to their plan meaning. There need be no meek and mute submission to the plainness of the language. To avoid patent injustice, anomaly or absurdity or to avoid invalidation of a law, the court would be well justified in departing from the so called golden rule of construction so as to give effect to the object and purpose of the enactment by supplementing, the written word if necessary.
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> 28.On a close scrutiny and analysis of the aforesaid cases of the Supreme Court, it is clear that in interpreting the statute, rule, or enactment, the paramount consideration should always be to gather the intention of legislature or purpose for which that statute, rule or enactment has been incorporated. The court cannot be indifferent to the consequences flowing from such construction. Irrespective of the words used in the enactment, the court's powers to interpret the provisions in order to gather the legislative intention always remain unimpaired."

12. As rightly pointed out by the learned counsel for the contesting respondents, the issue now canvassed by the writ petitioner was the subject matter of adjudication before the Hon'ble

Division Bench of the Delhi High Court in the decision reported in 1996 (36) DRJ 296 (Surveyors' Welfare Association (Regd.) vs. Union of India and Oriental Insurance Company Ltd.) It was held that the expression "disqualified" does not mean not being qualified. It was observed that the expression occurring in sub-section 6 of Section 64-UM must be given the same meaning as given to the said expression appearing in Section 42(4). It was held that it was not required that all claims should be surveyed by an approved surveyor and loss assessor and that Section 64-UM of the Act does not place any restriction on the settlement of the claims where the value of the claim is less than Rs.20,000/- (the figure that then obtained). It was also held that the policy to have such claims settled by an insurer without seeking a report from an approved surveyor or loss assessor could not be said to be arbitrary or violative of Article 14 of the Constitution of India. I sustain the contention of the learned counsel appearing for the contesting respondents that notwithstanding the statutory developments, the case on hand is covered by the aforesaid decision of the Hon'ble Division Bench of the Delhi High Court.

13. The writ petition lacks merit and it is accordingly dismissed. No costs. Consequently, all the connected miscellaneous petitions are also stand dismissed.

Sd/-

Assistant Registrar (CO)

/ True Copy /

Sub Assistant Registrar(CS-III)

Skm
To
1. The Chairman,
The Insurance Regulatory and Development Authority (IRDA), Parishram Bhavan,
3rd Floor, Basheer Bagh, Hyderabad - 500 004.

2.The Deputy General Manager,
The Oriental Insurance Company Limited,
Motor OD Claims Department,
88, Janpath, Connaught Place, New Delhi - 110001.

+1 CC to M/s.N.DILIP KUMAR,Advocate(SR-50426[F] dated 28/02/2019)
+1 CC to Mr.T.ANTONY ARUL RAJ,Advocate(SR-50618[F]dated 28/02/2019)
+1 CC to Mr.K.HEMAKARTHIKEYAN, Advocate(SR-50641[F]dated 28/02/2019)
+3 CC to M/s.B.SARAVANAN, Advocate(SR-50791[F] dated 01/03/2019)
+1CC to Mr.S.SRINIVASA RAGHAVAN,Advocate(SR-51195,dated 01/03/2019)

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ES/26.06.2019/12P/10C