

# RQCCA LAW OFFICE

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11 June 2024

SECURITIES AND EXCHANGE COMMISSION  
THE SEC HEADQUARTERS  
7907 Makati Avenue, Salcedo Village  
Bel Air, Makati City 1209

Gentlemen:

We refer to the Registration Statement and Prospectus of Allied Care Experts (ACE) Medical Center-Zamboanga City, Inc. (the "Issuer") relating to the registration of 54,000 common shares/initial issue at an Issue Price ranging from PhP 10,000.00 to PhP 26,666.67 per share.

As independent external counsel for the Issuer, we have examined the said Registration Statement and Prospectus, the relevant laws and regulations of the Republic of the Philippines, the originals or copies, photocopies, certified or otherwise identified to our satisfaction, of all such corporate and official records of the Issuer and all such documents and matters, as we have considered necessary or desirable in providing the opinions hereinafter expressed.

We have relied, as the basis for the opinion expressed herein, on the documents and information provided to us and do not assume any responsibility for any document which we have not been provided with, nor any matter not disclosed to us.

In such examination, we have assumed the genuineness of the signature and authenticity of all documents submitted to us as originals, and conformity with the originals of all documents submitted to us as copies thereof. As to any other matters of fact material to the opinion expressed herein, we have relied upon certificates and representations of officers and other representatives of the Issuer.

On the basis of such examination, we are of the opinion that:

1. The Issuer is a corporation duly incorporated and validly existing under the laws of the Republic of the Philippines.
2. Subject to the SEC approval, the proposed offering will not conflict with nor violate the Articles of Incorporation, By-laws or any law or administrative regulation applicable to the Issuer.

3. Subject to the SEC approval, the Registration Statement will, when sold and fully paid for as contemplated therein, be legally issued and non-assessable.

4. The statement set forth in the Registration Statement and the Prospectus will respect to Philippine Taxation and the applicability of tax laws with respect to the Issuer are accurate in all material respects as of the date indicated in the Registration Statement and the Prospectus.

We consent to the use of this opinion for purposes of the Registration Statement and Prospectus by the Allied Care Experts (ACE) Medical Center-Zamboanga City, Inc.

Very truly yours,

By:



ARTHUR IMANUEL N. ZAPANTA