



10 October 2019

Philippine Stock Exchange

6/F, PSE Tower
5th Avenue corner 28th Street,
Bonifacio Global City, Taguig City

Attention: Ms. Janet A. Encarnacion
Head, Disclosure Department

Philippine Dealing & Exchange Corp.

29th Floor, BDO Equitable Tower
8751 Paseo de Roxas, Makati City 1226

Attention: Atty. Marie Rose M. Magallen-Lirio
Head, Issuer Compliance and Disclosure Department

Subject: Report on the Top 100 Shareholders

Gentlemen:

This is in connection with the Exchange's Revised Disclosure Rules requiring Ayala Land, Inc. to submit a report on the Top 100 Shareholders of the Company.

In compliance therewith, we are submitting herewith a list of the Company's Top 100 Shareholders for the quarter-ending September 2019.

Thank you.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Michelle Marie T. Valbuena'.

Michelle Marie T. Valbuena
Senior Compliance Manager
Office of the Corporate Secretary

**BPI STOCK TRANSFER OFFICE
AYALA LAND, INC.
TOP 100 STOCKHOLDERS
AS OF SEPTEMBER 30, 2019**

RANK	STOCKHOLDER NAME	OUTSTANDING SHARES	PERCENTAGE	TOTAL
1	AYALA CORPORATION	6,545,946,579	44.4245%	6,545,946,579
2	PCD NOMINEE CORPORATION (NON-FILIPINO)	5,872,913,847	39.8570%	5,872,913,847
3	PCD NOMINEE CORPORATION (FILIPINO)	2,030,318,769	13.7789%	2,030,318,769
4	ESOWN ADMINISTRATOR 2012	13,887,535	0.0942%	13,887,535
5	ESOWN ADMINISTRATOR 2010	12,828,881	0.0870%	12,828,881
6	ESOWN ADMINISTRATOR 2015	12,818,814	0.0869%	12,818,814
7	ESOWN ADMINISTRATOR 2016	11,775,339	0.0799%	11,775,339
8	ESOWN ADMINISTRATOR 2013	10,989,766	0.0745%	10,989,766
9	ESOWN ADMINISTRATOR 2019	10,073,389	0.0683%	10,073,389
10	ESOWN ADMINISTRATOR 2017	9,928,688	0.0673%	9,928,688
11	ESOWN ADMINISTRATOR 2011	9,859,663	0.0669%	9,859,663
12	ESOWN ADMINISTRATOR 2014	9,730,553	0.0660%	9,730,553
13	ANTONINO T. AQUINO	8,973,208	0.0608%	8,973,208
14	ESOWN ADMINISTRATOR 2018	8,256,931	0.0560%	8,256,931
15	EMILIO LOLITO J. TUMBOCON	7,340,134	0.0498%	7,340,134
16	ESTRELLITA B. YULO	5,732,823	0.0389%	5,732,823
17	JOSE LUIS GERARDO YULO	5,162,624	0.0350%	5,162,624
18	ESOWN ADMINISTRATOR 2009	4,340,951	0.0294%	4,340,951
19	MA. ANGELA Y. LA O ¹	3,728,620	0.0253%	3,728,620
20	LUCIO W. YAN	3,483,871	0.0236%	3,483,871
21	TELENGTAN BROTHERS & SONS INC.	3,480,000	0.0236%	3,480,000
22	MA. LOURDES G. LATONIO	3,124,650	0.0212%	3,124,650
23	VINCENT Y. TAN	2,891,838	0.0196%	2,891,838
24	ARTURO G. CORPUZ	2,028,819	0.0137%	2,028,819
25	MAKATI SUPERMARKET CORPORATION	1,943,758	0.0131%	1,943,758
26	RAMON F.R. MEDINA	1,883,216	0.0127%	1,883,216
27	ROBERT G. ONG	1,878,644	0.0127%	1,878,644
28	CHI HUNG HUI	1,762,100	0.0119%	1,762,100
29	RAMON C. SY JR.	1,664,304	0.0112%	1,664,304
30	BERNARD VINCENT O. DY	1,651,793	0.0112%	1,651,793
31	DANTE M. ABANDO	1,613,280	0.0109%	1,613,280
32	MA. ELENA YULO LORENZO	1,399,557	0.0094%	1,399,557
33	PHILIPPINE REMNANTS COMPANY, INC.	1,238,551	0.0084%	1,238,551
34	LUCIO YAN	1,200,000	0.0081%	1,200,000
35	RICHMOND C. SY	1,066,788	0.0072%	1,066,788
36	EDDIE HAO	1,021,661	0.0069%	1,021,661
37	ANTONINO T. AQUINO	874,800	0.0059%	874,800

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38	JORGE MANUEL B. YULO	825,716	0.0056%	825,716
39	GONZALO PUYAT & SONS, INC.	810,292	0.0054%	810,292
40	ANTONINO AQUINO	807,130	0.0054%	807,130
41	LUIS A. YULO	772,100	0.0052%	772,100
42	ESOWN ADMINISTRATOR 2008	761,061	0.0051%	761,061
43	NIMFA ZAMORA YULO AND/OR JUAN BERNARDO ZAMORA YULO	754,940	0.0051%	754,940
44	JUAN BERNARDO ZAMORA YULO	752,465	0.0051%	752,465
45	SUNNYVALE DEVELOPMENT CORP.	729,924	0.0049%	729,924
46	TOMAS C. KAWPENG	715,900	0.0048%	715,900
47	HUI CHI HUNG	700,000	0.0047%	700,000
48	PAN MALAYAN MANAGEMENT AND INVESTMENT CORP.	667,124	0.0045%	667,124
49	DANIEL CHUA WOO KAWPENG	656,187	0.0044%	656,187
49	CHRISTOPHER CHUA WOO KAWPENG	656,187	0.0044%	656,187
49	EDWIN CHUA WOO KAWPENG	656,187	0.0044%	656,187
49	DAVID CHUA WOO KAWPENG	656,187	0.0044%	656,187
50	JOSEPH V. MENDOZA	654,480	0.0044%	654,480
51	RICKY M. CELIS	619,200	0.0042%	619,200
52	WONG KING LUN	612,480	0.0041%	612,480
53	LIM TAY	589,680	0.0040%	589,680
54	ERLYNN B. CAMPOS AND/OR JOSE K. CAMPOS JR.	560,188	0.0038%	560,188
55	JOSEPHINE NG LO	553,309	0.0037%	553,309
56	EDDIE HAO	548,640	0.0037%	548,640
57	ALBERTO G. MENDOZA AND/OR JEANIE MENDOZA	527,648	0.0035%	527,648
58	JOSEPHINE T. CHUA	523,340	0.0035%	523,340
59	JUAN MIGUEL V. YULO	521,106	0.0035%	521,106
60	RAMON MIGUEL ZAMORA YULO	513,372	0.0034%	513,372
61	PACITA L. TAN AND/OR EDWIN FRANCIS L. TAN	504,000	0.0034%	504,000
61	PACITA L. TAN AND/OR ERIC RUBEN L. TAN	504,000	0.0034%	504,000
62	FELIMON CHAN TE	480,025	0.0032%	480,025
63	CONCEPCION G. VILLAR	461,697	0.0031%	461,697
64	EDWIN FRANCIS L. TAN	444,000	0.0030%	444,000
64	ERIC RUBEN L. TAN	444,000	0.0030%	444,000
65	O. LEDESMA & CO. INC.	437,805	0.0029%	437,805
66	ELPIDIO DUCA	432,000	0.0029%	432,000
66	AMERICAN WIRE & CABLE CO., INC	432,000	0.0029%	432,000
67	M.E. HOLDINGS CORPORATION	396,832	0.0026%	396,832

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RANK	STOCKHOLDER NAME	OUTSTANDING SHARES	PERCENTAGE	TOTAL
68	JETHANAND R. DASWANI	393,657	0.0026%	393,657
69	ANTONIO C. OPPEN	391,507	0.0026%	391,507
70	CYNTHIA D. CHING	389,448	0.0026%	389,448
71	ANTONIO BERNAS	388,800	0.0026%	388,800
72	JULIO JALANDONI AND/OR SYLVIA JALANDONI	388,000	0.0026%	388,000
73	THE ROMAN CATHOLIC ARCHBISHOP OF MLA.	373,740	0.0025%	373,740
74	MOTORTRADE NATIONWIDE CORP.	370,440	0.0025%	370,440
75	JAMES GO	368,000	0.0024%	368,000
76	YOUNG BING CHUA	364,497	0.0024%	364,497
76	UNIVERSITY OF SANTO TOMAS	364,497	0.0024%	364,497
76	BERNARDITO U. CHU	364,497	0.0024%	364,497
77	FILEMON T. BERBA JR.	360,326	0.0024%	360,326
78	TIONG KENG CHING	360,288	0.0024%	360,288
79	ELENA LAO	360,000	0.0024%	360,000
80	TERESITA B. CHOA	358,560	0.0024%	358,560
81	LEOVIGILDO D. ABOT	352,073	0.0023%	352,073
82	JOSE JUAN Z. JUGO	351,543	0.0023%	351,543
83	MICHAEL YAP	351,211	0.0023%	351,211
84	MICHAEL QUE	317,361	0.0021%	317,361
85	ESOWN ADMINISTRATOR 2007	316,583	0.0021%	316,583
86	RAFAEL RAMON L. PRATS JR.	311,748	0.0021%	311,748
87	LETICIA CHAN GAPUZ TE	302,349	0.0020%	302,349
88	CRISTINA S. ISON	298,500	0.0020%	298,500
89	VISAYAN SURETY & INS. CORPORATION	290,000	0.0019%	290,000
90	VICENTE HAO CHIN SR	288,000	0.0019%	288,000
91	CECILIA MITRA	280,370	0.0019%	280,370
92	FRANCIS O. MONERA	279,563	0.0018%	279,563
93	MA.CRISTINA G. ANGAN	277,145	0.0018%	277,145
94	FERNANDO JALLORINA	270,095	0.0018%	270,095
95	MERCEDES A. TUASON	268,128	0.0018%	268,128
96	LIPAVE MANAGEMENT CORP.	264,000	0.0017%	264,000
97	ANGELA D.V. LACSON	262,746	0.0017%	262,746
98	JETHANAND R. DASWANI AND/OR JANKI DASWANI	259,200	0.0017%	259,200
99	TDG RETIREMENT FUND	258,000	0.0017%	258,000
100	DENNIS VILLAREAL	247,200	0.0016%	247,200
GRAND TOTAL				14,661,938,018

OUTSTANDING BALANCES FOR A SPECIFIC COMPANY
Company Code - ALI0000000000 - AYALA LAND, INC.

Business Date: September 30, 2019

BP NAME	HOLDING
UPCC SECURITIES CORP.	256,749
A & A SECURITIES, INC.	8,222,625
ABACUS SECURITIES CORPORATION	4,636,294
PHILSTOCKS FINANCIAL INC	1,115,737
A. T. DE CASTRO SECURITIES CORP.	1,202,456
ALL ASIA SECURITIES MANAGEMENT CORP.	131,306
ALPHA SECURITIES CORP.	89,968
BA SECURITIES, INC.	828,125
AP SECURITIES INCORPORATED	1,542,431
ANSALDO, GODINEZ & CO., INC.	1,964,878
AB CAPITAL SECURITIES, INC.	3,515,979
SARANGANI SECURITIES, INC.	858,421
SB EQUITIES, INC.	13,189,461
ASIA PACIFIC CAPITAL EQUITIES & SECURITIES CORP.	187,802
ASIASEC EQUITIES, INC.	2,616,469
ASTRA SECURITIES CORPORATION	324,722
CHINA BANK SECURITIES CORPORATION	630,002
MACQUARIE CAPITAL SECURITIES (PHILIPPINES), INC.	348,590
BELSON SECURITIES, INC.	2,186,513
BENJAMIN CO CA & CO., INC.	13,049
B. H. CHUA SECURITIES CORPORATION	108,679
JAKA SECURITIES CORP.	811,664
BPI SECURITIES CORPORATION	73,468,299
CAMPOS, LANUZA & COMPANY, INC.	2,505,946
SINCERE SECURITIES CORPORATION	83,078
CENTURY SECURITIES CORPORATION	205,381
BDO NOMURA SECURITIES INC	2,469,789
CTS GLOBAL EQUITY GROUP, INC.	1,033,615
TRITON SECURITIES CORP.	531,449
PHILEO ALLIED SECURITIES (PHILIPPINES), INC.	9,972
IGC SECURITIES INC.	3,872,575
CUALOPING SECURITIES CORPORATION	126,575
DBP-DAIWA CAPITAL MARKETS PHILIPPINES, INC.	78,255
DAVID GO SECURITIES CORP.	469,992
DIVERSIFIED SECURITIES, INC.	134,123
E. CHUA CHIACO SECURITIES, INC.	1,255,854
EQUITABLE SECURITIES (PHILS.) INC.	235
EAST WEST CAPITAL CORPORATION	69,079
EASTERN SECURITIES DEVELOPMENT CORPORATION	1,095,522
EQUITIWORLD SECURITIES, INC.	354,106
EVERGREEN STOCK BROKERAGE & SEC., INC.	1,789,832

FIRST ORIENT SECURITIES, INC.	477,500
FIRST INTEGRATED CAPITAL SECURITIES, INC.	722,419
F. YAP SECURITIES, INC.	703,898
AURORA SECURITIES, INC.	1,429,928
GLOBALINKS SECURITIES & STOCKS, INC.	841,810
JSG SECURITIES, INC.	244,819
GOLDSTAR SECURITIES, INC.	265,797
GUILD SECURITIES, INC.	593,943
HDI SECURITIES, INC.	256,492
H. E. BENNETT SECURITIES, INC.	277,446
HIGHLAND SECURITIES PHIL., INC.	40,522
HK SECURITIES, INC.	63
I. ACKERMAN & CO., INC.	143,408
I. B. GIMENEZ SECURITIES, INC.	221,805
INVESTORS SECURITIES, INC,	6,451,711
IMPERIAL,DE GUZMAN,ABALOS & CO.,INC.	7,086,942
INTRA-INVEST SECURITIES, INC.	462,020
ASIAN CAPITAL EQUITIES, INC.	21,388
J.M. BARCELON & CO., INC.	280,703
VALUE QUEST SECURITIES CORPORATION	149,200
STRATEGIC EQUITIES CORP.	1,040,680
LARRGO SECURITIES CO., INC.	286,698
LIPPO SECURITIES, INC.	64
LITONJUA SECURITIES, INC.	525,464
LOPEZ, LOCSIN, LEDESMA & CO., INC.	140,581
LUCKY SECURITIES, INC.	765,496
LUYS SECURITIES COMPANY, INC.	46,906
MANDARIN SECURITIES CORPORATION	38,333
MARIAN SECURITIES, INC.	28
MARINO OLONDRIZ Y CIA	100,310
COL Financial Group, Inc.	52,471,793
DA MARKET SECURITIES, INC.	148,846
MERCANTILE SECURITIES CORP.	398,317
MERIDIAN SECURITIES, INC.	77,498
MDR SECURITIES, INC.	244,988
DEUTSCHE REGIS PARTNERS, INC.	4,258,845
MOUNT PEAK SECURITIES, INC.	6,959
NEW WORLD SECURITIES CO., INC.	6,987
OPTIMUM SECURITIES CORPORATION	602,224
RCBC SECURITIES, INC.	2,884,899
PAN ASIA SECURITIES CORP.	96,149
PAPA SECURITIES CORPORATION	6,717,963
MAYBANK ATR KIM ENG SECURITIES, INC.	7,315,404
PLATINUM SECURITIES, INC.	1,382,557
PNB SECURITIES, INC.	617,203
PREMIUM SECURITIES, INC.	399,455
PRYCE SECURITIES, INC.	81,797

SALISBURY BKT SECURITIES CORPORATION	254,312
QUALITY INVESTMENTS & SECURITIES CORPORATION	2,145,789
R & L INVESTMENTS, INC.	718
ALAKOR SECURITIES CORPORATION	50,112
R. COYIUTO SECURITIES, INC.	771,840
REGINA CAPITAL DEVELOPMENT CORPORATION	1,060,600
R. NUBLA SECURITIES, INC.	3,686,469
AAA SOUTHEAST EQUITIES, INCORPORATED	152,108
R. S. LIM & CO., INC.	1,390,931
RTG & COMPANY, INC.	684,177
S.J. ROXAS & CO., INC.	428,088
SECURITIES SPECIALISTS, INC.	146,437
FIDELITY SECURITIES, INC.	328,472
SUMMIT SECURITIES, INC.	2,236,096
STANDARD SECURITIES CORPORATION	439,541
SUPREME STOCKBROKERS, INC	480,701
TANSENGCO & CO., INC.	470,472
THE FIRST RESOURCES MANAGEMENT & SECURITIES CORP.	1,540,645
TOWER SECURITIES, INC.	714,590
TRANS-ASIA SECURITIES, INC.	2,520
APEX PHILIPPINES EQUITIES CORPORATION	31,265
TRENDLINE SECURITIES CORPORATION	4,388
TRI-STATE SECURITIES, INC.	1,233,552
UCPB SECURITIES, INC.	654,269
E.SECURITIES, INC.	40,373
VENTURE SECURITIES, INC.	708,474
VICSAL SECURITIES & STOCK BROKERAGE, INC.	526
FIRST METRO SECURITIES BROKERAGE CORP.	8,115,570
WEALTH SECURITIES, INC.	55,946,575
WESTLINK GLOBAL EQUITIES, INC.	56,890
BERNAD SECURITIES, INC.	427,618
WONG SECURITIES CORPORATION	44,574
YAO & ZIALCITA, INC.	4,720,639
YU & COMPANY, INC.	1,816,419
BDO SECURITIES CORPORATION	13,426,952
EAGLE EQUITIES, INC.	125,309
GOLDEN TOWER SECURITIES & HOLDINGS, INC.	211,386
SOLAR SECURITIES, INC.	2,790,850
G.D. TAN & COMPANY, INC.	243,044
CLSA PHILIPPINES, INC.	411,674
PHILIPPINE EQUITY PARTNERS, INC.	4,784,750
UNICAPITAL SECURITIES INC.	4,270,893
SunSecurities, Inc.	92,826
COHERCO SECURITIES, INC.	48,000
ARMSTRONG SECURITIES, INC.	24,873
KING'S POWER SECURITIES, INC.	182,156
TIMSON SECURITIES, INC.	155,170

STAR ALLIANCE SECURITIES CORP.	7,100
AYALA LAND, INC.	417
BANCO DE ORO - TRUST BANKING GROUP	139,554,171
BANK OF COMMERCE - TRUST SERVICES GROUP	234,035
COCOPLANS, INC.	34,000
CHINA BANKING CORPORATION - TRUST GROUP	3,559,550
CITIBANK N.A.	1,105,158,354
DEUTSCHE BANK MANILA-CLIENTS A/C	1,898,314,999
DEUTSCHE BANK MANILA-CLIENTS A/C	32,954,798
GOVERNMENT SERVICE INSURANCE SYSTEM	385,363,581
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	2,708,718,041
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	361,167,149
THE HONGKONG & SHANGHAI BANKING CORP. LTD. -OWN ACCOUNT	195,165
THE HONGKONG & SHANGHAI BANKING CORP. LTD. -OWN ACCOUNT	1
LAND BANK OF THE PHILIPPINES-TRUST BANKING GROUP	370,900
UCPB GENERAL INSURANCE CO., INC.	186,010
AB CAPITAL & INVESTMENT CORP. - TRUST & INVESTMENT DIV.	1,540,240
ASIA UNITED BANK - TRUST & INVESTMENT GROUP	900,400
UNITED COCONUT PLANTERS LIFE ASSURANCE CORPORATION	5,720,000
SSS PROVIDENT FUND	3,880
PNB TRUST BANKING GROUP	9,918,511
RCBC TRUST & INVESTMENT DIVISION	11,509,953
RCBC TRUST & INVESTMENT DIVISION - VARIOUS TAXABLE ACCTS	2,158,662
STERLING BANK OF ASIA TRUST GROUP	5,500
STANDARD CHARTERED BANK	773,969,280
MBTC - TRUST BANKING GROUP	87,952,088
SOCIAL SECURITY SYSTEM	14,535,660
UNITED COCONUT PLANTERS BANK-TRUST BANKING	3,594,981
UNITED FUND, INC.	1,774,100
BDO-TIG SECURITIES SERVICES	600,000
VC SECURITIES CORPORATION	13,600
DEUTSCHE BANK MANILA-CLIENTS A/C	2
TOTAL	7,903,232,616