



8 October 2020

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 2020.

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, 2020**

RANK	STOCKHOLDER NAME	OUTSTANDING SHARES	PERCENTAGE	TOTAL
1	AYALA CORPORATION	6,545,946,579	44.4383%	6,545,946,579
2	PCD NOMINEE CORPORATION (NON-FILIPINO)	5,437,591,306	36.9140%	5,437,591,306
3	PCD NOMINEE CORPORATION (FILIPINO)	2,446,548,535	16.6088%	2,446,548,535
4	ESOWN ADMINISTRATOR 2020	14,845,498	0.1007%	14,845,498
5	ESOWN ADMINISTRATOR 2012	13,685,969	0.0929%	13,685,969
6	ESOWN ADMINISTRATOR 2010	12,828,881	0.0870%	12,828,881
7	ESOWN ADMINISTRATOR 2015	12,793,419	0.0868%	12,793,419
8	ESOWN ADMINISTRATOR 2016	11,711,440	0.0795%	11,711,440
9	ESOWN ADMINISTRATOR 2013	10,989,766	0.0746%	10,989,766
10	ESOWN ADMINISTRATOR 2019	10,067,965	0.0683%	10,067,965
11	ESOWN ADMINISTRATOR 2017	9,862,182	0.0669%	9,862,182
12	ESOWN ADMINISTRATOR 2011	9,859,663	0.0669%	9,859,663
13	ESOWN ADMINISTRATOR 2014	9,664,717	0.0656%	9,664,717
14	ANTONINO T. AQUINO	8,973,208	0.0609%	8,973,208
15	ESOWN ADMINISTRATOR 2018	8,247,901	0.0559%	8,247,901
16	EMILIO LOLITO J. TUMBOCON	7,340,134	0.0498%	7,340,134
17	VINCENT Y. TAN	5,969,832	0.0405%	5,969,832
18	ESTRELLITA B. YULO	5,732,823	0.0389%	5,732,823
19	JOSE LUIS GERARDO YULO	5,062,624	0.0343%	5,062,624
20	MA. ANGELA Y. LA O'	3,728,620	0.0253%	3,728,620
21	LUCIO W. YAN	3,483,871	0.0236%	3,483,871
22	TELENGTAN BROTHERS & SONS INC.	3,480,000	0.0236%	3,480,000
23	MA. LOURDES G. LATONIO	3,124,650	0.0212%	3,124,650
24	JOSE RAMON ABREU YULO AND/OR ELVIRA LIBORO YULO	2,035,300	0.0138%	2,035,300
25	ARTURO G. CORPUZ	2,028,819	0.0137%	2,028,819
26	MAKATI SUPERMARKET CORPORATION	1,943,758	0.0131%	1,943,758
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	0.0095%	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	JOSE EMMANUEL H. JALANDONI	818,782	0.0055%	818,782
40	GONZALO PUYAT & SONS, INC.	810,292	0.0055%	810,292
41	ANTONINO AQUINO	807,130	0.0054%	807,130
42	LUIS A. YULO	772,100	0.0052%	772,100
43	ESOWN ADMINISTRATOR 2008	761,061	0.0051%	761,061
44	RAMON F.R. MEDINA	759,375	0.0051%	759,375
45	NIMFA ZAMORA YULO AND/OR JUAN BERNARDO ZAMORA YULO	754,940	0.0051%	754,940
46	JUAN BERNARDO ZAMORA YULO	752,465	0.0051%	752,465
47	SUNNYVALE DEVELOPMENT CORP.	729,924	0.0049%	729,924
48	TOMAS C. KAWPENG	715,900	0.0048%	715,900
49	HUI CHI HUNG	700,000	0.0047%	700,000
50	PAN MALAYAN MANAGEMENT AND INVESTMENT CORP.	667,124	0.0045%	667,124
51	DANIEL CHUA WOO KAWPENG	656,187	0.0044%	656,187
51	CHRISTOPHER CHUA WOO KAWPENG	656,187	0.0044%	656,187
51	EDWIN CHUA WOO KAWPENG	656,187	0.0044%	656,187
51	DAVID CHUA WOO KAWPENG	656,187	0.0044%	656,187
52	JOSEPH V. MENDOZA	654,480	0.0044%	654,480
53	RICKY M. CELIS	619,200	0.0042%	619,200
54	WONG KING LUN	612,480	0.0041%	612,480
55	LIM TAY	589,680	0.0040%	589,680
56	ERLYNN B. CAMPOS AND/OR JOSE K. CAMPOS JR.	560,188	0.0038%	560,188
57	JOSEPHINE NG LO	553,309	0.0037%	553,309
58	EDDIE HAO	548,640	0.0037%	548,640
59	ALBERTO G. MENDOZA AND/OR JEANIE MENDOZA	527,648	0.0035%	527,648
60	JOSEPHINE T. CHUA	526,040	0.0035%	526,040
61	JUAN MIGUEL V. YULO	521,106	0.0035%	521,106
62	RAMON MIGUEL ZAMORA YULO	513,372	0.0034%	513,372
63	PACITA L. TAN AND/OR EDWIN FRANCIS L. TAN	504,000	0.0034%	504,000
63	PACITA L. TAN AND/OR ERIC RUBEN L. TAN	504,000	0.0034%	504,000
64	FELIMON CHAN TE	480,025	0.0032%	480,025
65	CONCEPCION G. VILLAR	461,697	0.0031%	461,697
66	ESOWN ADMINISTRATOR 2009	444,175	0.0030%	444,175
67	EDWIN FRANCIS L. TAN	444,000	0.0030%	444,000
67	ERIC RUBEN L. TAN	444,000	0.0030%	444,000
68	O. LEDESMA & CO. INC.	437,805	0.0029%	437,805

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RANK	STOCKHOLDER NAME	OUTSTANDING SHARES	PERCENTAGE	TOTAL
69	ELPIDIO DUCA	432,000	0.0029%	432,000
69	AMERICAN WIRE & CABLE CO., INC	432,000	0.0029%	432,000
70	M.E. HOLDINGS CORPORATION	396,832	0.0026%	396,832
71	JETHANAND R. DASWANI	393,657	0.0026%	393,657
72	ANTONIO C. OPPEN	391,507	0.0026%	391,507
73	CYNTHIA D. CHING	389,448	0.0026%	389,448
74	ANTONIO BERNAS	388,800	0.0026%	388,800
75	JULIO JALANDONI AND/OR SYLVIA JALANDONI	388,000	0.0026%	388,000
76	THE ROMAN CATHOLIC ARCHBISHOP OF MLA.	373,740	0.0025%	373,740
77	MOTORTRADE NATIONWIDE CORP.	370,440	0.0025%	370,440
78	JAMES GO	368,000	0.0024%	368,000
79	BERNARDITO U. CHU	364,497	0.0024%	364,497
79	YOUNG BING CHUA	364,497	0.0024%	364,497
79	UNIVERSITY OF SANTO TOMAS	364,497	0.0024%	364,497
80	FILEMON T. BERBA JR.	360,326	0.0024%	360,326
81	TIONG KENG CHING	360,288	0.0024%	360,288
82	ELENA LAO	360,000	0.0024%	360,000
83	TERESITA B. CHOA	358,560	0.0024%	358,560
84	LEOVIGILDO D. ABOT	352,073	0.0023%	352,073
85	JOSE JUAN Z. JUGO	351,543	0.0023%	351,543
86	MICHAEL YAP	351,211	0.0023%	351,211
87	MICHAEL QUE	317,361	0.0021%	317,361
88	ESOWN ADMINISTRATOR 2007	316,583	0.0021%	316,583
89	RAFAEL RAMON L. PRATS JR.	311,748	0.0021%	311,748
90	CRISTINA S. ISON	298,500	0.0020%	298,500
91	VISAYAN SURETY & INS. CORPORATION	290,000	0.0019%	290,000
92	VICENTE HAO CHIN SR	288,000	0.0019%	288,000
93	CECILIA MITRA	280,370	0.0019%	280,370
94	FRANCIS O. MONERA	279,563	0.0018%	279,563
95	MA.CRISTINA G. ANGAN	277,145	0.0018%	277,145
96	FERNANDO JALLORINA	270,095	0.0018%	270,095
97	MERCEDES A. TUASON	268,128	0.0018%	268,128
98	LIPAVE MANAGEMENT CORP.	264,000	0.0017%	264,000
99	ANGELA D.V. LACSON	262,746	0.0017%	262,746
100	JETHANAND R. DASWANI AND/OR JANKI DASWANI	259,200	0.0017%	259,200
GRAND TOTAL				14,657,259,695

OUTSTANDING BALANCES FOR A SPECIFIC COMPANY

Company Code - ALI000000000

Business Date: September 30, 2020

BPNAME	HOLDINGS
UPCC SECURITIES CORP.	560,794
A & A SECURITIES, INC.	8,248,481
ABACUS SECURITIES CORPORATION	8,490,054
PHILSTOCKS FINANCIAL INC	3,044,201
A. T. DE CASTRO SECURITIES CORP.	1,310,294
ALL ASIA SECURITIES MANAGEMENT CORP.	131,306
ALPHA SECURITIES CORP.	420,068
BA SECURITIES, INC.	836,561
AP SECURITIES INCORPORATED	2,453,731
ANSALDO, GODINEZ & CO., INC.	2,516,695
AB CAPITAL SECURITIES, INC.	5,022,084
SARANGANI SECURITIES, INC.	830,921
SB EQUITIES, INC.	22,332,641
ASIA PACIFIC CAPITAL EQUITIES & SECURITIES CORP.	187,802
ASIASEC EQUITIES, INC.	5,001,469
ASTRA SECURITIES CORPORATION	652,422
CHINA BANK SECURITIES CORPORATION	2,350,102
MACQUARIE CAPITAL SECURITIES (PHILIPPINES), INC.	1,148,516
BELSON SECURITIES, INC.	2,367,213
BENJAMIN CO CA & CO., INC.	14,549
B. H. CHUA SECURITIES CORPORATION	203,279
JAKA SECURITIES CORP.	718,664
BPI SECURITIES CORPORATION	85,650,239
CAMPOS, LANUZA & COMPANY, INC.	1,263,867
SINCERE SECURITIES CORPORATION	77,078
CENTURY SECURITIES CORPORATION	205,381
BDO NOMURA SECURITIES INC	6,877,567
CTS GLOBAL EQUITY GROUP, INC.	1,244,515
TRITON SECURITIES CORP.	953,549
PHILEO ALLIED SECURITIES (PHILIPPINES), INC.	372
IGC SECURITIES INC.	4,468,635
CUALOPING SECURITIES CORPORATION	363,810
DBP-DAIWA CAPITAL MARKETS PHILPPINES, INC.	101,955
DAVID GO SECURITIES CORP.	632,546
DIVERSIFIED SECURITIES, INC.	423,723
E. CHUA CHIACO SECURITIES, INC.	1,788,398
EQUITABLE SECURIITES (PHILS.) INC.	235
EAST WEST CAPITAL CORPORATION	1,147,066
EASTERN SECURITIES DEVELOPMENT CORPORATION	1,577,791
EQUITIWORLD SECURITIES, INC.	380,606
EVERGREEN STOCK BROKERAGE & SEC., INC.	2,539,496
FIRST ORIENT SECURITIES, INC.	608,800
FIRST INTEGRATED CAPITAL SECURITIES, INC.	512,419
F. YAP SECURITIES, INC.	942,158
AURORA SECURITIES, INC.	1,865,428
GLOBALINKS SECURITIES & STOCKS, INC.	998,070
JSG SECURITIES, INC.	622,005
GOLDSTAR SECURITIES, INC.	602,597
GUILD SECURITIES, INC.	610,943
HDI SECURITIES, INC.	551,092
H. E. BENNETT SECURITIES, INC.	253,933

BPNAME	HOLDINGS
HIGHLAND SECURITIES PHIL., INC.	40,522
HK SECURITIES, INC.	63
I. ACKERMAN & CO., INC.	133,328
I. B. GIMENEZ SECURITIES, INC.	248,313
INVESTORS SECURITIES, INC.	6,309,611
IMPERIAL,DE GUZMAN,ABALOS & CO.,INC.	8,290,262
INTRA-INVEST SECURITIES, INC.	654,507
ASIAN CAPITAL EQUITIES, INC.	21,388
J.M. BARCELON & CO., INC.	292,903
VALUE QUEST SECURITIES CORPORATION	702,600
STRATEGIC EQUITIES CORP.	943,260
LARRGO SECURITIES CO., INC.	312,698
LIPPO SECURITIES, INC.	64
LITONJUA SECURITIES, INC.	591,364
LOPEZ, LOCSIN, LEDESMA & CO., INC.	142,281
LUCKY SECURITIES, INC.	1,066,540
LUYS SECURITIES COMPANY, INC.	35,406
MANDARIN SECURITIES CORPORATION	1,339,278
MARIAN SECURITIES, INC.	28
MARINO OLONDRIZ Y CIA	100,310
COL Financial Group, Inc.	76,285,537
DA MARKET SECURITIES, INC.	357,819
MERCANTILE SECURITIES CORP.	593,317
MERIDIAN SECURITIES, INC.	285,338
MDR SECURITIES, INC.	402,988
REGIS PARTNERS, INC.	1,201,346
MOUNT PEAK SECURITIES, INC.	5,059
NEW WORLD SECURITIES CO., INC.	36,137
OPTIMUM SECURITIES CORPORATION	667,704
RCBC SECURITIES, INC.	4,743,832
PAN ASIA SECURITIES CORP.	240,149
PAPA SECURITIES CORPORATION	7,652,965
MAYBANK ATR KIM ENG SECURITIES, INC.	32,849,436
PLATINUM SECURITIES, INC.	2,149,701
PNB SECURITIES, INC.	15,613,530
PREMIUM SECURITIES, INC.	421,455
PRYCE SECURITIES, INC.	81,797
SALISBURY BKT SECURITIES CORPORATION	503,419
QUALITY INVESTMENTS & SECURITIES CORPORATION	2,416,593
R & L INVESTMENTS, INC.	718
ALAKOR SECURITIES CORPORATION	50,112
R. COYIUTO SECURITIES, INC.	959,340
REGINA CAPITAL DEVELOPMENT CORPORATION	2,264,416
R. NUBLA SECURITIES, INC.	4,029,109
AAA SOUTHEAST EQUITIES, INCORPORATED	531,966
R. S. LIM & CO., INC.	2,022,631
RTG & COMPANY, INC.	1,100,021
S.J. ROXAS & CO., INC.	1,316,665
SECURITIES SPECIALISTS, INC.	128,037
FIDELITY SECURITIES, INC.	422,772
SUMMIT SECURITIES, INC.	2,594,636
STANDARD SECURITIES CORPORATION	1,357,441
SUPREME STOCKBROKERS, INC	485,901
TANSENGCO & CO., INC.	686,972
THE FIRST RESOURCES MANAGEMENT & SECURITIES CORP.	2,134,401
TOWER SECURITIES, INC.	2,322,590
TRANS-ASIA SECURITIES, INC.	12,800
APEX PHILIPPINES EQUITIES CORPORATION	48,365

BPNAME	HOLDINGS
TRENDLINE SECURITIES CORPORATION	4,388
TRI-STATE SECURITIES, INC.	1,253,752
UCPB SECURITIES, INC.	1,269,905
UOB KAY HIAN SECURITIES (PHILS.), INC.	10,000
E.SECURITIES, INC.	40,373
VENTURE SECURITIES, INC.	705,470
VICSAL SECURITIES & STOCK BROKERAGE, INC.	526
FIRST METRO SECURITIES BROKERAGE CORP.	16,287,382
WEALTH SECURITIES, INC.	51,639,952
WESTLINK GLOBAL EQUITIES, INC.	111,190
BERNAD SECURITIES, INC.	417,618
WONG SECURITIES CORPORATION	95,574
YAO & ZIALCITA, INC.	4,889,089
PHIL-PROGRESS SECURITIES CORPORATION	5,000
YU & COMPANY, INC.	2,071,056
BDO SECURITIES CORPORATION	18,838,852
EAGLE EQUITIES, INC.	244,729
GOLDEN TOWER SECURITIES & HOLDINGS, INC.	352,186
SOLAR SECURITIES, INC.	3,556,514
G.D. TAN & COMPANY, INC.	254,360
CLSA PHILIPPINES, INC.	1,046,103
PHILIPPINE EQUITY PARTNERS, INC.	4,862,066
UNICAPITAL SECURITIES INC.	6,582,567
SunSecurities, Inc.	396,426
COHERCO SECURITIES, INC.	62,000
ARMSTRONG SECURITIES, INC.	27,273
KING'S POWER SECURITIES, INC.	235,170
TIMSON SECURITIES, INC.	220,600
STAR ALLIANCE SECURITIES CORP.	16,100
VC SECURITIES CORPORATION	20,300
CHINA BANKING CORPORATION - TRUST GROUP	5,949,950
CITIBANK N.A.	1,159,043,786
DEUTSCHE BANK MANILA-CLIENTS A/C	23,352,643
THE HONGKONG & SHANGHAI BANKING CORP. LTD. -OWN ACCOUNT	195,165
UNITED COCONUT PLANTERS BANK-TRUST BANKING	4,629,261
BANCO DE ORO - TRUST BANKING GROUP	151,112,657
BANK OF COMMERCE - TRUST SERVICES GROUP	567,535
PNB TRUST BANKING GROUP	11,411,711
RCBC TRUST & INVESTMENT DIVISION	12,973,793
RCBC TRUST & INVESTMENT DIVISION - VARIOUS TAXABLE ACCTS	2,758,372
STERLING BANK OF ASIA TRUST GROUP	7,000
DEUTSCHE BANK MANILA-CLIENTS A/C	2,029,875,369
STANDARD CHARTERED BANK	793,509,410
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	2,210,780,939
UNITED COCONUT PLANTERS LIFE ASSURANCE CORPORATION	7,150,000
ASIA UNITED BANK - TRUST & INVESTMENT GROUP	1,179,200
MBTC - TRUST BANKING GROUP	93,309,258
SOCIAL SECURITY SYSTEM	68,742,760
GOVERNMENT SERVICE INSURANCE SYSTEM	415,815,281
AB CAPITAL & INVESTMENT CORP. - TRUST & INVESTMENT DIV.	1,708,630
BDO-TIG SECURITIES SERVICES	750,000
COCOPLANS, INC.	34,000
DEUTSCHE BANK MANILA-CLIENTS A/C	2
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	387,016,868
THE HONGKONG & SHANGHAI BANKING CORP. LTD. -OWN ACCOUNT	1
LAND BANK OF THE PHILIPPINES-TRUST BANKING GROUP	450,900

BPNAME	HOLDINGS
UCPB GENERAL INSURANCE CO., INC.	281,310
LBP-TBG THIRD PARTY CUSTODIANSHIP & REGISTRY DEPT	6,310,560
UNITED FUND, INC.	1,823,500
NATIONAL REINSURANCE CORPORATION OF THE PHILIPPINES	500,000
EASTWEST BANKING CORPORATION - TRUST DIVISION	50,000
SSS PROVIDENT FUND	115,880
LAND BANK OF THE PHILIPPINES	909,300
AYALA LAND, INC.	417
Total	7,884,139,841

If no written notice of any error or correction is received by PDTC within five (5) calendar days from receipt hereof, you shall be deemed to have accepted the accuracy and completeness of the details indicated in this report.