



13 January 2021

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 December 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 DECEMBER 31, 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)	5,423,545,649	36.8187%	5,423,545,649
3	PCD NOMINEE CORPORATION (FILIPINO)	2,459,603,619	16.6974%	2,459,603,619
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	10,975,745	0.0745%	10,975,745
10	ESOWN ADMINISTRATOR 2019	10,064,002	0.0683%	10,064,002
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	9,654,256	0.0655%	9,654,256
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

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37	BERCK Y. CHENG OR ALVIN Y. CHENG OR DIANA Y. CHENG OR CHERYL Y. CHENG	975,000	0.0066%	975,000
38	ANTONINO T. AQUINO	874,800	0.0059%	874,800
39	JORGE MANUEL B. YULO	825,716	0.0056%	825,716
40	JOSE EMMANUEL H. JALANDONI	818,782	0.0055%	818,782
41	GONZALO PUYAT & SONS, INC.	810,292	0.0055%	810,292
42	ANTONINO AQUINO	807,130	0.0054%	807,130
43	LUIS A. YULO	772,100	0.0052%	772,100
44	ESOWN ADMINISTRATOR 2008	761,061	0.0051%	761,061
45	RAMON F.R. MEDINA	759,375	0.0051%	759,375
46	NIMFA ZAMORA YULO AND/OR JUAN BERNARDO ZAMORA YULO	754,940	0.0051%	754,940
47	JUAN BERNARDO ZAMORA YULO	752,465	0.0051%	752,465
48	SUNNYVALE DEVELOPMENT CORP.	729,924	0.0049%	729,924
49	TOMAS C. KAWPENG	715,900	0.0048%	715,900
50	HUI CHI HUNG	700,000	0.0047%	700,000
51	PAN MALAYAN MANAGEMENT AND INVESTMENT CORP.	667,124	0.0045%	667,124
52	DANIEL CHUA WOO KAWPENG	656,187	0.0044%	656,187
52	CHRISTOPHER CHUA WOO KAWPENG	656,187	0.0044%	656,187
52	EDWIN CHUA WOO KAWPENG	656,187	0.0044%	656,187
52	DAVID CHUA WOO KAWPENG	656,187	0.0044%	656,187
53	JOSEPH V. MENDOZA	654,480	0.0044%	654,480
54	RICKY M. CELIS	619,200	0.0042%	619,200
55	WONG KING LUN	612,480	0.0041%	612,480
56	LIM TAY	589,680	0.0040%	589,680
57	ERLYNN B. CAMPOS AND/OR JOSE K. CAMPOS JR.	560,188	0.0038%	560,188
58	JOSEPHINE NG LO	553,309	0.0037%	553,309
59	EDDIE HAO	548,640	0.0037%	548,640
60	ALBERTO G. MENDOZA AND/OR JEANIE MENDOZA	527,648	0.0035%	527,648
61	JOSEPHINE T. CHUA	526,040	0.0035%	526,040
62	JUAN MIGUEL V. YULO	521,106	0.0035%	521,106
63	RAMON MIGUEL ZAMORA YULO	513,372	0.0034%	513,372
64	PACITA L. TAN AND/OR ERIC RUBEN L. TAN	504,000	0.0034%	504,000
64	PACITA L. TAN AND/OR EDWIN FRANCIS L. TAN	504,000	0.0034%	504,000
65	FELIMON CHAN TE	480,025	0.0032%	480,025
66	CHS CAPITAL HOLDINGS CORP.	470,000	0.0031%	470,000
67	CONCEPCION G. VILLAR	461,697	0.0031%	461,697
68	ESOWN ADMINISTRATOR 2009	444,175	0.0030%	444,175

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69	EDWIN FRANCIS L. TAN	444,000	0.0030%	444,000
69	ERIC RUBEN L. TAN	444,000	0.0030%	444,000
70	O. LEDESMA & CO. INC.	437,805	0.0029%	437,805
71	ELPIDIO DUCA	432,000	0.0029%	432,000
71	AMERICAN WIRE & CABLE CO., INC	432,000	0.0029%	432,000
72	M.E. HOLDINGS CORPORATION	396,832	0.0026%	396,832
73	JETHANAND R. DASWANI	393,657	0.0026%	393,657
74	ANTONIO C. OPPEN	391,507	0.0026%	391,507
75	CYNTHIA D. CHING	389,448	0.0026%	389,448
76	ANTONIO BERNAS	388,800	0.0026%	388,800
77	JULIO JALANDONI AND/OR SYLVIA JALANDONI	388,000	0.0026%	388,000
78	THE ROMAN CATHOLIC ARCHBISHOP OF MLA.	373,740	0.0025%	373,740
79	MOTORTRADE NATIONWIDE CORP.	370,440	0.0025%	370,440
80	JAMES GO	368,000	0.0024%	368,000
81	BERNARDITO U. CHU	364,497	0.0024%	364,497
81	UNIVERSITY OF SANTO TOMAS	364,497	0.0024%	364,497
81	YOUNG BING CHUA	364,497	0.0024%	364,497
82	FILEMON T. BERBA JR.	360,326	0.0024%	360,326
83	TIONG KENG CHING	360,288	0.0024%	360,288
84	ELENA LAO	360,000	0.0024%	360,000
85	TERESITA B. CHOA	358,560	0.0024%	358,560
86	LEOVIGILDO D. ABOT	352,073	0.0023%	352,073
87	JOSE JUAN Z. JUGO	351,543	0.0023%	351,543
88	MICHAEL YAP	351,211	0.0023%	351,211
89	MICHAEL QUE	317,361	0.0021%	317,361
90	ESOWN ADMINISTRATOR 2007	316,583	0.0021%	316,583
91	RAFAEL RAMON L. PRATS JR.	311,748	0.0021%	311,748
92	CRISTINA S. ISON	298,500	0.0020%	298,500
93	VISAYAN SURETY & INS. CORPORATION	290,000	0.0019%	290,000
94	VICENTE HAO CHIN SR	288,000	0.0019%	288,000
95	CECILIA MITRA	280,370	0.0019%	280,370
96	FRANCIS O. MONERA	279,563	0.0018%	279,563
97	MA.CRISTINA G. ANGAN	277,145	0.0018%	277,145
98	FERNANDO JALLORINA	270,095	0.0018%	270,095
99	MERCEDES A. TUASON	268,128	0.0018%	268,128
100	LIPAVE MANAGEMENT CORP.	264,000	0.0017%	264,000
GRAND TOTAL				14,657,163,731

OUTSTANDING BALANCES FOR A SPECIFIC COMPANY

Company Code - ALI000000000

Business Date: December 29, 2020

BPNAME	HOLDINGS
UPCC SECURITIES CORP.	477,994
A & A SECURITIES, INC.	6,833,265
ABACUS SECURITIES CORPORATION	15,487,374
PHILSTOCKS FINANCIAL INC	2,350,867
A. T. DE CASTRO SECURITIES CORP.	1,251,894
ALL ASIA SECURITIES MANAGEMENT CORP.	131,306
ALPHA SECURITIES CORP.	213,868
BA SECURITIES, INC.	797,861
AP SECURITIES INCORPORATED	2,491,131
ANSALDO, GODINEZ & CO., INC.	2,430,702
AB CAPITAL SECURITIES, INC.	4,629,591
SARANGANI SECURITIES, INC.	730,521
SB EQUITIES, INC.	23,670,631
ASIA PACIFIC CAPITAL EQUITIES & SECURITIES CORP.	187,802
ASIASEC EQUITIES, INC.	5,438,469
ASTRA SECURITIES CORPORATION	479,422
CHINA BANK SECURITIES CORPORATION	1,117,802
MACQUARIE CAPITAL SECURITIES (PHILIPPINES), INC.	1,148,497
BELSON SECURITIES, INC.	2,204,413
BENJAMIN CO CA & CO., INC.	15,549
B. H. CHUA SECURITIES CORPORATION	188,279
JAKA SECURITIES CORP.	714,964
BPI SECURITIES CORPORATION	81,815,008
CAMPOS, LANUZA & COMPANY, INC.	1,346,967
SINCERE SECURITIES CORPORATION	77,078
CENTURY SECURITIES CORPORATION	205,381
CTS GLOBAL EQUITY GROUP, INC.	1,117,515
TRITON SECURITIES CORP.	951,849
PHILEO ALLIED SECURITIES (PHILIPPINES), INC.	372
IGC SECURITIES INC.	4,057,135
CUALOPING SECURITIES CORPORATION	369,410
DBP-DAIWA CAPITAL MARKETS PHILPPINES, INC.	18,600
DAVID GO SECURITIES CORP.	524,637
DIVERSIFIED SECURITIES, INC.	270,143
E. CHUA CHIACO SECURITIES, INC.	1,413,898
EQUITABLE SECURIITES (PHILS.) INC.	235
EAST WEST CAPITAL CORPORATION	129,066
EASTERN SECURITIES DEVELOPMENT CORPORATION	1,434,116
EQUITIWORLD SECURITIES, INC.	377,509
EVERGREEN STOCK BROKERAGE & SEC., INC.	2,465,696
FIRST ORIENT SECURITIES, INC.	761,037
FIRST INTEGRATED CAPITAL SECURITIES, INC.	512,419
F. YAP SECURITIES, INC.	787,958
AURORA SECURITIES, INC.	1,636,128
GLOBALINKS SECURITIES & STOCKS, INC.	1,047,170
JSG SECURITIES, INC.	143,682
GOLDSTAR SECURITIES, INC.	507,397
GUILD SECURITIES, INC.	578,443
HDI SECURITIES, INC.	438,592

BPNAME	HOLDINGS
H. E. BENNETT SECURITIES, INC.	230,433
HIGHLAND SECURITIES PHIL., INC.	40,522
HK SECURITIES, INC.	63
I. ACKERMAN & CO., INC.	133,328
I. B. GIMENEZ SECURITIES, INC.	239,613
INVESTORS SECURITIES, INC,	6,260,611
IMPERIAL,DE GUZMAN,ABALOS & CO.,INC.	5,611,001
INTRA-INVEST SECURITIES, INC.	802,562
ASIAN CAPITAL EQUITIES, INC.	21,388
J.M. BARCELON & CO., INC.	281,103
VALUE QUEST SECURITIES CORPORATION	643,600
STRATEGIC EQUITIES CORP.	770,760
LARRGO SECURITIES CO., INC.	294,698
LIPPO SECURITIES, INC.	64
LITONJUA SECURITIES, INC.	591,364
LOPEZ, LOCSIN, LEDESMA & CO., INC.	141,281
LUCKY SECURITIES, INC.	931,240
LUYS SECURITIES COMPANY, INC.	36,406
MANDARIN SECURITIES CORPORATION	1,387,178
MARIAN SECURITIES, INC.	28
MARINO OLONDRIZ Y CIA	100,310
COL Financial Group, Inc.	64,869,194
DA MARKET SECURITIES, INC.	47,523
MERCANTILE SECURITIES CORP.	567,317
MERIDIAN SECURITIES, INC.	298,938
MDR SECURITIES, INC.	369,808
REGIS PARTNERS, INC.	1,246,804
MOUNT PEAK SECURITIES, INC.	6,059
NEW WORLD SECURITIES CO., INC.	6,137
OPTIMUM SECURITIES CORPORATION	610,204
RCBC SECURITIES, INC.	3,552,233
PAN ASIA SECURITIES CORP.	280,049
PAPA SECURITIES CORPORATION	6,930,947
MAYBANK ATR KIM ENG SECURITIES, INC.	8,425,122
PLATINUM SECURITIES, INC.	2,172,701
PNB SECURITIES, INC.	1,463,430
PREMIUM SECURITIES, INC.	488,455
PRYCE SECURITIES, INC.	81,797
SALISBURY BKT SECURITIES CORPORATION	406,937
QUALITY INVESTMENTS & SECURITIES CORPORATION	2,476,463
R & L INVESTMENTS, INC.	718
ALAKOR SECURITIES CORPORATION	50,112
R. COYIUTO SECURITIES, INC.	835,900
REGINA CAPITAL DEVELOPMENT CORPORATION	1,981,239
R. NUBLA SECURITIES, INC.	2,914,409
AAA SOUTHEAST EQUITIES, INCORPORATED	373,148
R. S. LIM & CO., INC.	1,927,731
RTG & COMPANY, INC.	842,539
S.J. ROXAS & CO., INC.	1,152,722
SECURITIES SPECIALISTS, INC.	283,037
FIDELITY SECURITIES, INC.	352,772
SUMMIT SECURITIES, INC.	2,614,836
STANDARD SECURITIES CORPORATION	459,041
SUPREME STOCKBROKERS, INC	482,901
TANSENGCO & CO., INC.	521,972
THE FIRST RESOURCES MANAGEMENT & SECURITIES CORP.	1,580,901
TOWER SECURITIES, INC.	1,634,490

BPNAME	HOLDINGS
TRANS-ASIA SECURITIES, INC.	12,800
APEX PHILIPPINES EQUITIES CORPORATION	49,665
TRENDLINE SECURITIES CORPORATION	4,388
TRI-STATE SECURITIES, INC.	171,120
UCPB SECURITIES, INC.	758,015
UOB KAY HIAN SECURITIES (PHILS.), INC.	10,000
E.SECURITIES, INC.	40,373
VENTURE SECURITIES, INC.	691,570
VICSAL SECURITIES & STOCK BROKERAGE, INC.	526
FIRST METRO SECURITIES BROKERAGE CORP.	13,401,483
WEALTH SECURITIES, INC.	50,265,152
WESTLINK GLOBAL EQUITIES, INC.	60,590
BERNAD SECURITIES, INC.	417,618
WONG SECURITIES CORPORATION	49,574
YAO & ZIALCITA, INC.	4,841,949
PHIL-PROGRESS SECURITIES CORPORATION	5,000
YU & COMPANY, INC.	2,215,856
BDO SECURITIES CORPORATION	21,573,694
EAGLE EQUITIES, INC.	200,629
GOLDEN TOWER SECURITIES & HOLDINGS, INC.	175,386
SOLAR SECURITIES, INC.	2,130,414
G.D. TAN & COMPANY, INC.	251,060
CLSA PHILIPPINES, INC.	1,444,707
PHILIPPINE EQUITY PARTNERS, INC.	4,780,855
UNICAPITAL SECURITIES INC.	5,280,431
SunSecurities, Inc.	341,126
COHERCO SECURITIES, INC.	37,000
ARMSTRONG SECURITIES, INC.	27,262
TIMSON SECURITIES, INC.	192,500
STAR ALLIANCE SECURITIES CORP.	6,100
VC SECURITIES CORPORATION	126,600
CHINA BANKING CORPORATION - TRUST GROUP	6,081,850
CITIBANK N.A.	1,227,686,124
DEUTSCHE BANK MANILA-CLIENTS A/C	16,522,914
THE HONGKONG & SHANGHAI BANKING CORP. LTD. -OWN ACCOUNT	195,165
UNITED COCONUT PLANTERS BANK-TRUST BANKING	1,779,861
BANCO DE ORO - TRUST BANKING GROUP	178,284,877
BANK OF COMMERCE - TRUST SERVICES GROUP	605,535
PNB TRUST BANKING GROUP	10,808,381
RCBC TRUST & INVESTMENT DIVISION	8,885,783
RCBC TRUST & INVESTMENT DIVISION - VARIOUS TAXABLE ACCTS	2,770,772
STERLING BANK OF ASIA TRUST GROUP	7,000
DEUTSCHE BANK MANILA-CLIENTS A/C	2,047,126,196
STANDARD CHARTERED BANK	770,696,650
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	2,256,840,818
UNITED COCONUT PLANTERS LIFE ASSURANCE CORPORATION	6,695,000
ASIA UNITED BANK - TRUST & INVESTMENT GROUP	1,029,200
MBTC - TRUST BANKING GROUP	100,354,967
SOCIAL SECURITY SYSTEM	65,949,360
GOVERNMENT SERVICE INSURANCE SYSTEM	412,815,381
AB CAPITAL & INVESTMENT CORP. - TRUST & INVESTMENT DIV.	1,612,340
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.	337,656,399

BPNAME	HOLDINGS
THE HONGKONG & SHANGHAI BANKING CORP. LTD. -OWN ACCOUNT	1
LAND BANK OF THE PHILIPPINES-TRUST BANKING GROUP	450,900
NATIONAL REINSURANCE CORPORATION OF THE PHILIPPINES	250,000
UCPB GENERAL INSURANCE CO., INC.	286,310
LBP-TBG THIRD PARTY CUSTODIANSHIP & REGISTRY DEPT	7,670,060
UNITED FUND, INC.	1,723,500
MAA GENERAL ASSURANCE PHILS., INC.	880,600
EASTWEST BANKING CORPORATION - TRUST DIVISION	213,800
SSS PROVIDENT FUND	115,880
AYALA LAND, INC.	417
Total	7,883,149,268

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.