



12 October 2018

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.

37/F Tower 1, The Enterprise Center
6766 Ayala Avenue corner Paseo de Roxas
Makati City

Attention: Ms. Vina Vanessa S. Salonga
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 2018.

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, 2018**

RANK	STOCKHOLDER NUMBER	STOCKHOLDER NAME	NATIONALITY	CERTIFICATE CLASS	OUTSTANDING SHARES	PERCENTAGE	TOTAL
1	01002629	AYALA CORPORATION	FIL	A	6,891,880,451	46.7725%	6,891,880,451
2	16000560	PCD NOMINEE CORPORATION (NON-FILIPINO)	NOF	A	5,468,296,526	37.1112%	5,468,296,526
3	16000559	PCD NOMINEE CORPORATION (FILIPINO)	FIL	A	2,082,239,041	14.1313%	2,082,239,041
4	050000018	ESOWN ADMINISTRATOR 2009	FIL	A	16,480,097	0.1118%	16,480,097
5	050000015	ESOWN ADMINISTRATOR 2012	FIL	A	14,629,575	0.0992%	14,629,575
6	050000029	ESOWN ADMINISTRATOR 2015	FIL	A	13,169,178	0.0893%	13,169,178
7	050000012	ESOWN ADMINISTRATOR 2010	FIL	A	13,158,784	0.0893%	13,158,784
8	050000034	ESOWN ADMINISTRATOR 2016	FIL	A	12,363,048	0.0839%	12,363,048
9	050000017	ESOWN ADMINISTRATOR 2013	FIL	A	11,380,361	0.0772%	11,380,361
10	050000013	ESOWN ADMINISTRATOR 2011	FIL	A	10,279,971	0.0697%	10,279,971
11	050000046	ESOWN ADMINISTRATOR 2017	FIL	A	10,244,673	0.0695%	10,244,673
12	050000027	ESOWN ADMINISTRATOR 2014	FIL	A	9,989,115	0.0677%	9,989,115
13	050000049	ESOWN ADMINISTRATOR 2018	FIL	A	8,316,310	0.0564%	8,316,310
14	200000031	EMILIO LOLITO J. TUMBOCON	FIL	A	7,340,134	0.0498%	7,340,134
15	25000557	ESTRELLITA B. YULO	FIL	A	5,732,823	0.0389%	5,732,823
16	25000564	JOSE LUIS GERARDO YULO	FIL	A	5,326,367	0.0361%	5,326,367
17	12000007	MA. ANGELA Y. LA O'	FIL	A	3,728,620	0.0253%	3,728,620
18	25000038	LUCIO W. YAN	FIL	A	3,483,871	0.0236%	3,483,871
19	20000770	TELENGTAN BROTHERS & SONS INC.	FIL	A	3,480,000	0.0236%	3,480,000
20	12000288	MA. LOURDES G. LATONIO	FIL	A	3,124,650	0.0212%	3,124,650
21	20000508	VINCENT Y. TAN	FIL	A	2,891,838	0.0196%	2,891,838
22	01001920	ANTONINO T. AQUINO	FIL	A	2,168,697	0.0147%	2,168,697
23	050000001	ESOWN ADMINISTRATOR 2007	FIL	A	2,022,769	0.0137%	2,022,769
24	13000253	MAKATI SUPERMARKET CORPORATION	FIL	A	1,943,758	0.0131%	1,943,758
25	13000890	RAMON F.R. MEDINA	FIL	A	1,883,216	0.0127%	1,883,216
26	15000371	ROBERT G. ONG	FIL	A	1,878,644	0.0127%	1,878,644
27	080000006	CHI HUNG HUI	CHN	A	1,762,100	0.0119%	1,762,100
28	19002669	RAMON C. SY JR.	FIL	A	1,664,304	0.0112%	1,664,304
29	04001684	BERNARD VINCENT O. DY	FIL	A	1,651,793	0.0112%	1,651,793
30	14000371	SHERISA P. NUESA	FIL	A	1,421,434	0.0096%	1,421,434
31	120000039	MA. ELENA YULO LORENZO	FIL	A	1,399,557	0.0094%	1,399,557
32	01000143	DANTE M. ABANDO	FIL	A	1,391,002	0.0094%	1,391,002
33	050000004	ESOWN ADMINISTRATOR 2008	FIL	A	1,305,655	0.0088%	1,305,655
34	16001333	PHILIPPINE REMNANTS COMPANY, INC.	FIL	A	1,238,551	0.0084%	1,238,551
35	03002675	ARTURO G. CORPUZ	FIL	A	1,214,795	0.0082%	1,214,795
36	25000651	LUCIO YAN	FIL	A	1,200,000	0.0081%	1,200,000
37	19002677	RICHMOND C. SY	FIL	A	1,066,788	0.0072%	1,066,788
38	08000086	EDDIE HAO	FIL	A	1,021,661	0.0069%	1,021,661
39	01001919	ANTONINO T. AQUINO	FIL	A	874,800	0.0059%	874,800
40	14000408	SHERISA P. NUESA	FIL	A	840,761	0.0057%	840,761
41	25000560	JORGE MANUEL B. YULO	FIL	A	825,716	0.0056%	825,716
42	14000372	SHERISA P. NUESA	FIL	A	815,938	0.0055%	815,938
43	07001025	GONZALO PUYAT & SONS, INC.	FIL	A	810,292	0.0054%	810,292
44	01002813	ANTONINO AQUINO	FIL	A	807,130	0.0054%	807,130

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AYALA LAND, INC.
TOP 100 STOCKHOLDERS
AS OF SEPTEMBER 30, 2018**

RANK	STOCKHOLDER NUMBER	STOCKHOLDER NAME	NATIONALITY	CERTIFICATE CLASS	OUTSTANDING SHARES	PERCENTAGE	TOTAL
45	25000572	LUIS A. YULO	FIL	A	772,100	0.0052%	772,100
46	250000012	NIMFA ZAMORA YULO AND/OR JUAN BERNARDO ZAMORA	FIL	A	754,940	0.0051%	754,940
47	250000010	JUAN BERNARDO ZAMORA YULO	FIL	A	752,465	0.0051%	752,465
48	19002495	SUNNYVALE DEVELOPMENT CORP.	FIL	A	729,924	0.0049%	729,924
49	11000061	TOMAS C. KAWPENG	FIL	A	715,900	0.0048%	715,900
50	080000011	HUI CHI HUNG	CHN	A	700,000	0.0047%	700,000
51	16000218	PAN MALAYAN MANAGEMENT AND INVESTMENT CORP.	FIL	A	667,124	0.0045%	667,124
52	1100000005	DANIEL CHUA WOO KAWPENG	FIL	A	656,187	0.0044%	656,187
52	1100000008	CHRISTOPHER CHUA WOO KAWPENG	FIL	A	656,187	0.0044%	656,187
52	1100000006	EDWIN CHUA WOO KAWPENG	FIL	A	656,187	0.0044%	656,187
52	1100000007	DAVID CHUA WOO KAWPENG	FIL	A	656,187	0.0044%	656,187
53	13000980	JOSEPH V. MENDOZA	FIL	A	654,480	0.0044%	654,480
54	030000046	RICKY M. CELIS	FIL	A	619,200	0.0042%	619,200
55	23000075	WONG KING LUN	CHN	A	612,480	0.0041%	612,480
56	12000717	LIM TAY	FIL	A	589,680	0.0040%	589,680
57	03000327	ERLYNN B. CAMPOS AND/OR JOSE K. CAMPOS JR.	FIL	A	560,188	0.0038%	560,188
58	14000202	JOSEPHINE NG LO	FIL	A	553,309	0.0037%	553,309
59	08000085	EDDIE HAO	FIL	A	548,640	0.0037%	548,640
60	13000950	ALBERTO G. MENDOZA AND/OR JEANIE MENDOZA	FIL	A	527,648	0.0035%	527,648
61	25000571	JUAN MIGUEL V. YULO	FIL	A	521,106	0.0035%	521,106
62	03001757	JOSEPHINE T. CHUA	FIL	A	518,840	0.0035%	518,840
63	2500000016	RAMON MIGUEL ZAMORA YULO	FIL	A	513,372	0.0034%	513,372
64	20000435	PACITA L. TAN AND/OR EDWIN FRANCIS L. TAN	FIL	A	504,000	0.0034%	504,000
64	20000436	PACITA L. TAN AND/OR ERIC RUBEN L. TAN	FIL	A	504,000	0.0034%	504,000
65	12001789	MA. ANGELA Y. LA O'	FIL	A	500,000	0.0033%	500,000
66	20000715	FELIMON CHAN TE	FIL	A	480,025	0.0032%	480,025
67	07000005	EDWARD T. GABALDON	FIL	A	470,200	0.0031%	470,200
68	22000591	CONCEPCION G. VILLAR	FIL	A	461,697	0.0031%	461,697
69	20001755	EDWIN FRANCIS L. TAN	FIL	A	444,000	0.0030%	444,000
69	20001754	ERIC RUBEN L. TAN	FIL	A	444,000	0.0030%	444,000
70	20000959	AGAPITO J. TIANGCO	FIL	A	443,471	0.0030%	443,471
71	10000554	JOSE EMMANUEL H. JALANDONI	FIL	A	437,808	0.0029%	437,808
72	15000004	O. LEDESMA & CO. INC.	FIL	A	437,805	0.0029%	437,805
73	04001524	ELPIDIO DUCA	FIL	A	432,000	0.0029%	432,000
73	01002820	AMERICAN WIRE & CABLE CO., INC	FIL	A	432,000	0.0029%	432,000
74	13000004	M.E. HOLDINGS CORPORATION	FIL	A	396,832	0.0026%	396,832
75	04000111	JETHANAND R. DASWANI	IND	A	393,657	0.0026%	393,657
76	15000447	ANTONIO C. OPPEN	FIL	A	391,507	0.0026%	391,507
77	03001459	CYNTHIA D. CHING	FIL	A	389,448	0.0026%	389,448
78	02000818	ANTONIO BERNAS	FIL	A	388,800	0.0026%	388,800
79	10000072	JULIO JALANDONI AND/OR SYLVIA JALANDONI	FIL	A	388,000	0.0026%	388,000
80	20000939	THE ROMAN CATHOLIC ARCHBISHOP OF MLA.	FIL	A	373,740	0.0025%	373,740
81	13001596	MOTORTRADE NATIONWIDE CORP.	FIL	A	370,440	0.0025%	370,440

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AS OF SEPTEMBER 30, 2018**

RANK	STOCKHOLDER NUMBER	STOCKHOLDER NAME	NATIONALITY	CERTIFICATE CLASS	OUTSTANDING SHARES	PERCENTAGE	TOTAL
82	07001498	JAMES GO	FIL	A	368,000	0.0024%	368,000
83	10000084	FERNANDO JALLORINA	FIL	A	365,880	0.0024%	365,880
84	25000353	YOUNG BING CHUA	FIL	A	364,497	0.0024%	364,497
84	21000236	UNIVERSITY OF SANTO TOMAS	FIL	A	364,497	0.0024%	364,497
84	03001558	BERNARDITO U. CHU	FIL	A	364,497	0.0024%	364,497
85	02002209	FILEMON T. BERBA JR.	FIL	A	360,326	0.0024%	360,326
86	20001029	TIONG KENG CHING	FIL	A	360,288	0.0024%	360,288
87	12001685	ELENA LAO	FIL	A	360,000	0.0024%	360,000
88	03001515	TERESITA B. CHOA	FIL	A	358,560	0.0024%	358,560
89	01002961	LEOVIGILDO D. ABOT	FIL	A	352,073	0.0023%	352,073
90	25000219	MICHAEL YAP	FIL	A	351,211	0.0023%	351,211
91	17000162	MICHAEL QUE	FIL	A	317,361	0.0021%	317,361
92	16001844	RAFAEL RAMON L. PRATS JR.	FIL	A	311,748	0.0021%	311,748
93	0700000067	LETICIA CHAN GAPUZ TE	FIL	A	302,349	0.0020%	302,349
94	01001694	NENITA T. ANG	FIL	A	298,887	0.0020%	298,887
94	25000185	GEORGE T. YAP	FIL	A	298,887	0.0020%	298,887
95	0900000010	CRISTINA S. ISON	FIL	A	298,500	0.0020%	298,500
96	25000206	LETICIA T. YAP	FIL	A	291,600	0.0019%	291,600
97	2200000012	VISAYAN SURETY & INS. CORPORATION	FIL	A	290,000	0.0019%	290,000
98	08000078	VICENTE HAO CHIN SR	FIL	A	288,000	0.0019%	288,000
99	13001371	CECILIA MITRA	FIL	A	280,370	0.0019%	280,370
100	0100000010	MA.CRISTINA G. ANGAN	FIL	A	277,145	0.0018%	277,145
GRAND TOTAL							14,658,989,044

BENEFICIAL OWNER REPORT

Company Code - ALI0000000 & Company Name - AYALA LAND, INC.

Business Date: September 28, 2018

BPNAME	HOLDINGS
UPCC SECURITIES CORP.	807,107
A & A SECURITIES, INC.	12,167,858
ABACUS SECURITIES CORPORATION	2,672,199
PHILSTOCKS FINANCIAL INC	1,963,814
A. T. DE CASTRO SECURITIES CORP.	813,345
ALL ASIA SECURITIES MANAGEMENT CORP.	131,306
ALPHA SECURITIES CORP.	370,768
BA SECURITIES, INC.	1,004,534
AP SECURITIES INCORPORATED	2,877,684
ANSALDO, GODINEZ & CO., INC.	2,128,879
AB CAPITAL SECURITIES, INC.	3,786,340
SARANGANI SECURITIES, INC.	528,421
SB EQUITIES, INC.	11,069,071
ASIA PACIFIC CAPITAL EQUITIES & SECURITIES CORP.	193,802
ASIASEC EQUITIES, INC.	3,186,809
ASTRA SECURITIES CORPORATION	241,722
CHINA BANK SECURITIES CORPORATION	498,533
MACQUARIE CAPITAL SECURITIES (PHILIPPINES), INC.	348,497
BELSON SECURITIES, INC.	2,370,881
BENJAMIN CO CA & CO., INC.	20,549
B. H. CHUA SECURITIES CORPORATION	906,037
JAKA SECURITIES CORP.	262,265
BPI SECURITIES CORPORATION	108,106,767
CAMPOS, LANUZA & COMPANY, INC.	3,945,814
SINCERE SECURITIES CORPORATION	221,748
CENTURY SECURITIES CORPORATION	205,381
BDO NOMURA SECURITIES INC	2,256,511
CITISECURITIES, INC.	1,265,234
TRITON SECURITIES CORP.	709,129
PHILEO ALLIED SECURITIES (PHILIPPINES), INC.	9,972
IGC SECURITIES INC.	2,845,814
CUALOPING SECURITIES CORPORATION	83,290
DBP-DAIWA CAPITAL MARKETS PHILPPINES, INC.	83,255
DAVID GO SECURITIES CORP.	466,012
DIVERSIFIED SECURITIES, INC.	94,523
E. CHUA CHIACO SECURITIES, INC.	1,509,054
EQUITABLE SECURITIES (PHILS.) INC.	235
EAST WEST CAPITAL CORPORATION	69,079
EASTERN SECURITIES DEVELOPMENT CORPORATION	1,445,048
EQUITIWORLD SECURITIES, INC.	337,606
EVERGREEN STOCK BROKERAGE & SEC., INC.	2,328,132
FIRST ORIENT SECURITIES, INC.	507,747
FIRST INTEGRATED CAPITAL SECURITIES, INC.	704,260
F. YAP SECURITIES, INC.	1,341,008
AURORA SECURITIES, INC.	1,263,128
GLOBALINKS SECURITIES & STOCKS, INC.	1,292,074
JSG SECURITIES, INC.	208,819

BPNAME	HOLDINGS
GOLDSTAR SECURITIES, INC.	342,879
GUILD SECURITIES, INC.	642,101
HDI SECURITIES, INC.	360,812
H. E. BENNETT SECURITIES, INC.	339,460
HIGHLAND SECURITIES PHIL., INC.	40,522
HK SECURITIES, INC.	63
I. ACKERMAN & CO., INC.	143,408
I. B. GIMENEZ SECURITIES, INC.	331,915
INVESTORS SECURITIES, INC,	6,549,811
IMPERIAL,DE GUZMAN,ABALOS & CO.,INC.	8,549,472
INTRA-INVEST SECURITIES, INC.	539,490
ASIAN CAPITAL EQUITIES, INC.	21,388
J.M. BARCELON & CO., INC.	298,581
VALUE QUEST SECURITIES CORPORATION	363,200
STRATEGIC EQUITIES CORP.	586,180
LARRGO SECURITIES CO., INC.	298,198
LIPPO SECURITIES, INC.	64
LITONJUA SECURITIES, INC.	547,664
LOPEZ, LOCSIN, LEDESMA & CO., INC.	134,081
LUCKY SECURITIES, INC.	965,296
LUYS SECURITIES COMPANY, INC.	99,706
MANDARIN SECURITIES CORPORATION	184,404
MARIAN SECURITIES, INC.	28
MARINO OLONDRIZ Y CIA	100,310
COL Financial Group, Inc.	61,447,197
DA MARKET SECURITIES, INC.	694,128
MERCANTILE SECURITIES CORP.	178,697
MERIDIAN SECURITIES, INC.	213,758
MDR SECURITIES, INC.	264,576
DEUTSCHE REGIS PARTNERS, INC.	3,913,566
MOUNT PEAK SECURITIES, INC.	2,163
NEW WORLD SECURITIES CO., INC.	56,937
NIEVES SECURITIES, INC.	590
OPTIMUM SECURITIES CORPORATION	621,954
RCBC SECURITIES, INC.	4,400,414
PAN ASIA SECURITIES CORP.	127,349
PAPA SECURITIES CORPORATION	6,602,734
MAYBANK ATR KIM ENG SECURITIES, INC.	7,403,837
PLATINUM SECURITIES, INC.	1,336,077
PNB SECURITIES, INC.	497,403
PREMIUM SECURITIES, INC.	522,918
PRYCE SECURITIES, INC.	81,797
SALISBURY BKT SECURITIES CORPORATION	255,417
QUALITY INVESTMENTS & SECURITIES CORPORATION	2,649,439
R & L INVESTMENTS, INC.	8,555
ALAKOR SECURITIES CORPORATION	50,112
R. COYIUTO SECURITIES, INC.	798,373
REGINA CAPITAL DEVELOPMENT CORPORATION	1,398,733
R. NUBLA SECURITIES, INC.	4,588,348
AAA SOUTHEAST EQUITIES, INCORPORATED	136,738
R. S. LIM & CO., INC.	1,009,931
RTG & COMPANY, INC.	645,428
S.J. ROXAS & CO., INC.	819,868

BPNAME	HOLDINGS
SECURITIES SPECIALISTS, INC.	601,037
FIDELITY SECURITIES, INC.	299,772
SUMMIT SECURITIES, INC.	2,453,996
STANDARD SECURITIES CORPORATION	448,624
SUPREME STOCKBROKERS, INC	500,701
TANSENGCO & CO., INC.	522,442
THE FIRST RESOURCES MANAGEMENT & SECURITIES CORP.	1,304,659
TOWER SECURITIES, INC.	978,190
TRANS-ASIA SECURITIES, INC.	2,520
APEX PHILIPPINES EQUITIES CORPORATION	38,145
TRENDLINE SECURITIES CORPORATION	4,388
TRI-STATE SECURITIES, INC.	1,804,052
UCPB SECURITIES, INC.	1,269,966
UOB KAY HIAN SECURITIES (PHILS.), INC.	10,000
E.SECURITIES, INC.	40,373
VENTURE SECURITIES, INC.	914,344
VICSAL SECURITIES & STOCK BROKERAGE, INC.	526
FIRST METRO SECURITIES BROKERAGE CORP.	9,945,493
WEALTH SECURITIES, INC.	52,519,872
WESTLINK GLOBAL EQUITIES, INC.	118,990
BERNAD SECURITIES, INC.	445,521
WONG SECURITIES CORPORATION	58,774
YAO & ZIALCITA, INC.	4,784,839
PHIL-PROGRESS SECURITIES CORPORATION	15,048
YU & COMPANY, INC.	1,968,089
BDO SECURITIES CORPORATION	15,863,980
EAGLE EQUITIES, INC.	160,429
GOLDEN TOWER SECURITIES & HOLDINGS, INC.	238,946
SOLAR SECURITIES, INC.	2,985,801
G.D. TAN & COMPANY, INC.	261,144
CLSA PHILIPPINES, INC.	320,624
PHILIPPINE EQUITY PARTNERS, INC.	4,475,992
UNICAPITAL SECURITIES INC.	3,690,082
SunSecurities, Inc.	80,076
COHERCO SECURITIES, INC.	39,000
ARMSTRONG SECURITIES, INC.	28,873
KING'S POWER SECURITIES, INC.	133,486
TIMSON SECURITIES, INC.	25,200
STAR ALLIANCE SECURITIES CORP.	35,100
AYALA LAND, INC.	417
BANCO DE ORO - TRUST BANKING GROUP	147,189,687
BANK OF COMMERCE - TRUST SERVICES GROUP	366,015
COCOPLANS, INC.	36,000
CHINA BANKING CORPORATION - TRUST GROUP	4,631,179
CITIBANK N.A.	985,828,525
DEUTSCHE BANK MANILA-CLIENTS A/C	1,871,310,933
DEUTSCHE BANK MANILA-CLIENTS A/C	9,108,314
GOVERNMENT SERVICE INSURANCE SYSTEM	385,660,481
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	2,496,560,411
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	376,768,370
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	499,300

BPNAME	HOLDINGS
NATIONAL REINSURANCE CORPORATION OF THE PHILIPPINES	1,396,600
UCPB GENERAL INSURANCE CO., INC.	295,900
AB CAPITAL & INVESTMENT CORP. - TRUST & INVESTMENT DIV.	1,969,040
ASIA UNITED BANK - TRUST & INVESTMENT GROUP	1,332,600
UNITED COCONUT PLANTERS LIFE ASSURANCE CORPORATION	8,695,000
SSS PROVIDENT FUND	58,880
PNB TRUST BANKING GROUP	10,580,411
EASTWEST BANKING CORPORATION - TRUST DIVISION	391,300
SAN MIGUEL CORPORATION RETIREMENT PLAN-STP	1,480,000
RCBC TRUST & INVESTMENT DIVISION	8,890,921
RCBC TRUST & INVESTMENT DIVISION - VARIOUS TAXABLE ACCTS	1,848,742
STERLING BANK OF ASIA TRUST GROUP	8,000
STANDARD CHARTERED BANK	695,379,058
MBTC - TRUST BANKING GROUP	82,373,448
SOCIAL SECURITY SYSTEM	36,125,920
UNITED COCONUT PLANTERS BANK-TRUST BANKING	7,442,624
UNITED FUND, INC.	2,214,100
BDO-TIG SECURITIES SERVICES	666,500
VC SECURITIES CORPORATION	26,500
TOTAL	7,550,535,567

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.

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