



14 January 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.

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

Attention: Ms. Vina Vanessa M. Salonga
OIC - 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 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 DECEMBER 31, 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	5,415,723,705	36.7544%	5,415,723,705
3	16000559	PCD NOMINEE CORPORATION (FILIPINO)	FIL	A	2,136,612,156	14.5003%	2,136,612,156
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	10,238,821	0.0694%	10,238,821
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	13000253	MAKATI SUPERMARKET CORPORATION	FIL	A	1,943,758	0.0131%	1,943,758
24	13000890	RAMON F.R. MEDINA	FIL	A	1,883,216	0.0127%	1,883,216
25	15000371	ROBERT G. ONG	FIL	A	1,878,644	0.0127%	1,878,644
26	080000006	CHI HUNG HUI	CHN	A	1,762,100	0.0119%	1,762,100
27	19002669	RAMON C. SY JR.	FIL	A	1,664,304	0.0112%	1,664,304
28	04001684	BERNARD VINCENT O. DY	FIL	A	1,651,793	0.0112%	1,651,793
29	14000371	SHERISA P. NUESA	FIL	A	1,421,434	0.0096%	1,421,434
30	120000039	MA. ELENA YULO LORENZO	FIL	A	1,399,557	0.0094%	1,399,557
31	01000143	DANTE M. ABANDO	FIL	A	1,391,002	0.0094%	1,391,002
32	050000004	ESOWN ADMINISTRATOR 2008	FIL	A	1,305,655	0.0088%	1,305,655
33	16001333	PHILIPPINE REMNANTS COMPANY, INC.	FIL	A	1,238,551	0.0084%	1,238,551
34	03002675	ARTURO G. CORPUZ	FIL	A	1,214,795	0.0082%	1,214,795
35	25000651	LUCIO YAN	FIL	A	1,200,000	0.0081%	1,200,000
36	19002677	RICHMOND C. SY	FIL	A	1,066,788	0.0072%	1,066,788
37	08000086	EDDIE HAO	FIL	A	1,021,661	0.0069%	1,021,661
38	01001919	ANTONINO T. AQUINO	FIL	A	874,800	0.0059%	874,800
39	14000408	SHERISA P. NUESA	FIL	A	840,761	0.0057%	840,761
40	25000560	JORGE MANUEL B. YULO	FIL	A	825,716	0.0056%	825,716
41	14000372	SHERISA P. NUESA	FIL	A	815,938	0.0055%	815,938
42	07001025	GONZALO PUYAT & SONS, INC.	FIL	A	810,292	0.0054%	810,292
43	01002813	ANTONINO AQUINO	FIL	A	807,130	0.0054%	807,130
44	25000572	LUIS A. YULO	FIL	A	772,100	0.0052%	772,100

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AS OF DECEMBER 31, 2018**

RANK	STOCKHOLDER NUMBER	STOCKHOLDER NAME	NATIONALITY	CERTIFICATE CLASS	OUTSTANDING SHARES	PERCENTAGE	TOTAL
45	250000012	NIMFA ZAMORA YULO AND/OR JUAN BERNARDO ZAMORA	FIL	A	754,940	0.0051%	754,940
46	250000010	JUAN BERNARDO ZAMORA YULO	FIL	A	752,465	0.0051%	752,465
47	19002495	SUNNYVALE DEVELOPMENT CORP.	FIL	A	729,924	0.0049%	729,924
48	11000061	TOMAS C. KAWPENG	FIL	A	715,900	0.0048%	715,900
49	080000011	HUI CHI HUNG	CHN	A	700,000	0.0047%	700,000
50	16000218	PAN MALAYAN MANAGEMENT AND INVESTMENT CORP.	FIL	A	667,124	0.0045%	667,124
51	110000005	DANIEL CHUA WOO KAWPENG	FIL	A	656,187	0.0044%	656,187
51	110000008	CHRISTOPHER CHUA WOO KAWPENG	FIL	A	656,187	0.0044%	656,187
51	110000006	EDWIN CHUA WOO KAWPENG	FIL	A	656,187	0.0044%	656,187
51	110000007	DAVID CHUA WOO KAWPENG	FIL	A	656,187	0.0044%	656,187
52	13000980	JOSEPH V. MENDOZA	FIL	A	654,480	0.0044%	654,480
53	030000046	RICKY M. CELIS	FIL	A	619,200	0.0042%	619,200
54	23000075	WONG KING LUN	CHN	A	612,480	0.0041%	612,480
55	12000717	LIM TAY	FIL	A	589,680	0.0040%	589,680
56	03000327	ERLYNN B. CAMPOS AND/OR JOSE K. CAMPOS JR.	FIL	A	560,188	0.0038%	560,188
57	14000202	JOSEPHINE NG LO	FIL	A	553,309	0.0037%	553,309
58	08000085	EDDIE HAO	FIL	A	548,640	0.0037%	548,640
59	13000950	ALBERTO G. MENDOZA AND/OR JEANIE MENDOZA	FIL	A	527,648	0.0035%	527,648
60	03001757	JOSEPHINE T. CHUA	FIL	A	521,340	0.0035%	521,340
61	25000571	JUAN MIGUEL V. YULO	FIL	A	521,106	0.0035%	521,106
62	250000016	RAMON MIGUEL ZAMORA YULO	FIL	A	513,372	0.0034%	513,372
63	20000435	PACITA L. TAN AND/OR EDWIN FRANCIS L. TAN	FIL	A	504,000	0.0034%	504,000
63	20000436	PACITA L. TAN AND/OR ERIC RUBEN L. TAN	FIL	A	504,000	0.0034%	504,000
64	12001789	MA. ANGELA Y. LA O'	FIL	A	500,000	0.0033%	500,000
65	20000715	FELIMON CHAN TE	FIL	A	480,025	0.0032%	480,025
66	07000005	EDWARD T. GABALDON	FIL	A	470,200	0.0031%	470,200
67	22000591	CONCEPCION G. VILLAR	FIL	A	461,697	0.0031%	461,697
68	20001755	EDWIN FRANCIS L. TAN	FIL	A	444,000	0.0030%	444,000
68	20001754	ERIC RUBEN L. TAN	FIL	A	444,000	0.0030%	444,000
69	20000959	AGAPITO J. TIANGCO	FIL	A	443,471	0.0030%	443,471
70	10000554	JOSE EMMANUEL H. JALANDONI	FIL	A	437,808	0.0029%	437,808
71	15000004	O. LEDESMA & CO. INC.	FIL	A	437,805	0.0029%	437,805
72	04001524	ELPIDIO DUCA	FIL	A	432,000	0.0029%	432,000
72	01002820	AMERICAN WIRE & CABLE CO., INC	FIL	A	432,000	0.0029%	432,000
73	13000004	M.E. HOLDINGS CORPORATION	FIL	A	396,832	0.0026%	396,832
74	04000111	JETHANAND R. DASWANI	IND	A	393,657	0.0026%	393,657
75	15000447	ANTONIO C. OPPEN	FIL	A	391,507	0.0026%	391,507
76	03001459	CYNTHIA D. CHING	FIL	A	389,448	0.0026%	389,448
77	02000818	ANTONIO BERNAS	FIL	A	388,800	0.0026%	388,800
78	10000072	JULIO JALANDONI AND/OR SYLVIA JALANDONI	FIL	A	388,000	0.0026%	388,000
79	20000939	THE ROMAN CATHOLIC ARCHBISHOP OF MLA.	FIL	A	373,740	0.0025%	373,740
80	13001596	MOTORTRADE NATIONWIDE CORP.	FIL	A	370,440	0.0025%	370,440
81	07001498	JAMES GO	FIL	A	368,000	0.0024%	368,000

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RANK	STOCKHOLDER NUMBER	STOCKHOLDER NAME	NATIONALITY	CERTIFICATE CLASS	OUTSTANDING SHARES	PERCENTAGE	TOTAL
82	10000084	FERNANDO JALLORINA	FIL	A	365,880	0.0024%	365,880
83	25000353	YOUNG BING CHUA	FIL	A	364,497	0.0024%	364,497
83	21000236	UNIVERSITY OF SANTO TOMAS	FIL	A	364,497	0.0024%	364,497
83	03001558	BERNARDITO U. CHU	FIL	A	364,497	0.0024%	364,497
84	02002209	FILEMON T. BERBA JR.	FIL	A	360,326	0.0024%	360,326
85	20001029	TIONG KENG CHING	FIL	A	360,288	0.0024%	360,288
86	12001685	ELENA LAO	FIL	A	360,000	0.0024%	360,000
87	03001515	TERESITA B. CHOA	FIL	A	358,560	0.0024%	358,560
88	01002961	LEOVIGILDO D. ABOT	FIL	A	352,073	0.0023%	352,073
89	25000219	MICHAEL YAP	FIL	A	351,211	0.0023%	351,211
90	17000162	MICHAEL QUE	FIL	A	317,361	0.0021%	317,361
91	050000001	ESOWN ADMINISTRATOR 2007	FIL	A	316,583	0.0021%	316,583
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							14,659,079,800

BENEFICIAL OWNER REPORT

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

Business Date: December 28, 2018

BPNAME	HOLDINGS
UPCC SECURITIES CORP.	725,853
A & A SECURITIES, INC.	11,120,225
ABACUS SECURITIES CORPORATION	3,264,915
PHILSTOCKS FINANCIAL INC	2,046,742
A. T. DE CASTRO SECURITIES CORP.	833,485
ALL ASIA SECURITIES MANAGEMENT CORP.	131,306
ALPHA SECURITIES CORP.	364,868
BA SECURITIES, INC.	943,434
AP SECURITIES INCORPORATED	2,624,527
ANSALDO, GODINEZ & CO., INC.	2,431,879
AB CAPITAL SECURITIES, INC.	3,975,840
SARANGANI SECURITIES, INC.	528,421
SB EQUITIES, INC.	11,608,288
ASIA PACIFIC CAPITAL EQUITIES & SECURITIES CORP.	193,802
ASIASEC EQUITIES, INC.	3,094,509
ASTRA SECURITIES CORPORATION	190,722
CHINA BANK SECURITIES CORPORATION	497,433
MACQUARIE CAPITAL SECURITIES (PHILIPPINES), INC.	348,497
BELSON SECURITIES, INC.	2,393,781
BENJAMIN CO CA & CO., INC.	20,549
B. H. CHUA SECURITIES CORPORATION	909,037
JAKA SECURITIES CORP.	252,265
BPI SECURITIES CORPORATION	107,650,808
CAMPOS, LANUZA & COMPANY, INC.	3,894,779
SINCERE SECURITIES CORPORATION	187,248
CENTURY SECURITIES CORPORATION	205,381
BDO NOMURA SECURITIES INC	3,026,017
CITISECURITIES, INC.	1,109,459
TRITON SECURITIES CORP.	770,129
PHILEO ALLIED SECURITIES (PHILIPPINES), INC.	9,972
IGC SECURITIES INC.	3,112,734
CUALOPING SECURITIES CORPORATION	118,690
DBP-DAIWA CAPITAL MARKETS PHILPPINES, INC.	93,255
DAVID GO SECURITIES CORP.	565,676
DIVERSIFIED SECURITIES, INC.	201,523
E. CHUA CHIACO SECURITIES, INC.	1,516,054
EQUITABLE SECURIITES (PHILS.) INC.	235
EAST WEST CAPITAL CORPORATION	69,079
EASTERN SECURITIES DEVELOPMENT CORPORATION	1,329,548
EQUITIWORLD SECURITIES, INC.	338,506
EVERGREEN STOCK BROKERAGE & SEC., INC.	2,292,132
FIRST ORIENT SECURITIES, INC.	514,300
FIRST INTEGRATED CAPITAL SECURITIES, INC.	704,260
F. YAP SECURITIES, INC.	949,008
AURORA SECURITIES, INC.	1,162,128
GLOBALINKS SECURITIES & STOCKS, INC.	1,286,774
JSG SECURITIES, INC.	218,319

BPNAME	HOLDINGS
GOLDSTAR SECURITIES, INC.	465,379
GUILD SECURITIES, INC.	632,101
HDI SECURITIES, INC.	359,012
H. E. BENNETT SECURITIES, INC.	343,960
HIGHLAND SECURITIES PHIL., INC.	40,522
HK SECURITIES, INC.	63
I. ACKERMAN & CO., INC.	143,408
I. B. GIMENEZ SECURITIES, INC.	327,055
INVESTORS SECURITIES, INC,	6,557,684
IMPERIAL,DE GUZMAN,ABALOS & CO.,INC.	8,481,972
INTRA-INVEST SECURITIES, INC.	536,375
ASIAN CAPITAL EQUITIES, INC.	21,388
J.M. BARCELON & CO., INC.	296,981
VALUE QUEST SECURITIES CORPORATION	236,614
STRATEGIC EQUITIES CORP.	593,080
LARRGO SECURITIES CO., INC.	299,198
LIPPO SECURITIES, INC.	64
LITONJUA SECURITIES, INC.	525,464
LOPEZ, LOCSIN, LEDESMA & CO., INC.	134,081
LUCKY SECURITIES, INC.	967,296
LUYS SECURITIES COMPANY, INC.	99,406
MANDARIN SECURITIES CORPORATION	196,304
MARIAN SECURITIES, INC.	28
MARINO OLONDRIZ Y CIA	100,310
COL Financial Group, Inc.	64,563,331
DA MARKET SECURITIES, INC.	605,928
MERCANTILE SECURITIES CORP.	170,897
MERIDIAN SECURITIES, INC.	199,098
MDR SECURITIES, INC.	264,576
DEUTSCHE REGIS PARTNERS, INC.	3,878,848
MOUNT PEAK SECURITIES, INC.	17,163
NEW WORLD SECURITIES CO., INC.	22,437
NIEVES SECURITIES, INC.	590
OPTIMUM SECURITIES CORPORATION	626,554
RCBC SECURITIES, INC.	4,584,439
PAN ASIA SECURITIES CORP.	135,949
PAPA SECURITIES CORPORATION	6,515,080
MAYBANK ATR KIM ENG SECURITIES, INC.	7,727,338
PLATINUM SECURITIES, INC.	1,426,677
PNB SECURITIES, INC.	553,203
PREMIUM SECURITIES, INC.	523,918
PRYCE SECURITIES, INC.	81,797
SALISBURY BKT SECURITIES CORPORATION	285,366
QUALITY INVESTMENTS & SECURITIES CORPORATION	2,487,687
R & L INVESTMENTS, INC.	8,218
ALAKOR SECURITIES CORPORATION	50,112
R. COYIUTO SECURITIES, INC.	805,773
REGINA CAPITAL DEVELOPMENT CORPORATION	1,419,903
R. NUBLA SECURITIES, INC.	4,827,359
AAA SOUTHEAST EQUITIES, INCORPORATED	136,738
R. S. LIM & CO., INC.	1,677,031
RTG & COMPANY, INC.	699,628
S.J. ROXAS & CO., INC.	830,668

BPNAME	HOLDINGS
SECURITIES SPECIALISTS, INC.	398,437
FIDELITY SECURITIES, INC.	314,772
SUMMIT SECURITIES, INC.	2,451,596
STANDARD SECURITIES CORPORATION	474,624
SUPREME STOCKBROKERS, INC	500,701
TANSENGCO & CO., INC.	485,212
THE FIRST RESOURCES MANAGEMENT & SECURITIES CORP.	1,188,659
TOWER SECURITIES, INC.	1,018,790
TRANS-ASIA SECURITIES, INC.	8,520
APEX PHILIPPINES EQUITIES CORPORATION	38,145
TRENDLINE SECURITIES CORPORATION	4,388
TRI-STATE SECURITIES, INC.	1,804,052
UCPB SECURITIES, INC.	1,261,766
UOB KAY HIAN SECURITIES (PHILS.), INC.	453,000
E.SECURITIES, INC.	40,373
VENTURE SECURITIES, INC.	908,344
VICSAL SECURITIES & STOCK BROKERAGE, INC.	526
FIRST METRO SECURITIES BROKERAGE CORP.	10,544,292
WEALTH SECURITIES, INC.	53,897,772
WESTLINK GLOBAL EQUITIES, INC.	118,990
BERNAD SECURITIES, INC.	445,521
WONG SECURITIES CORPORATION	58,774
YAO & ZIALCITA, INC.	4,790,339
PHIL-PROGRESS SECURITIES CORPORATION	15,048
YU & COMPANY, INC.	2,000,993
BDO SECURITIES CORPORATION	16,157,733
EAGLE EQUITIES, INC.	170,729
GOLDEN TOWER SECURITIES & HOLDINGS, INC.	240,946
SOLAR SECURITIES, INC.	2,998,461
G.D. TAN & COMPANY, INC.	246,144
CLSA PHILIPPINES, INC.	352,149
PHILIPPINE EQUITY PARTNERS, INC.	4,469,905
UNICAPITAL SECURITIES INC.	3,491,582
SunSecurities, Inc.	91,376
COHERCO SECURITIES, INC.	45,000
ARMSTRONG SECURITIES, INC.	28,873
KING'S POWER SECURITIES, INC.	138,486
TIMSON SECURITIES, INC.	24,200
STAR ALLIANCE SECURITIES CORP.	6,100
AYALA LAND, INC.	417
BANCO DE ORO - TRUST BANKING GROUP	151,930,096
BANK OF COMMERCE - TRUST SERVICES GROUP	438,915
COCOPLANS, INC.	39,000
CHINA BANKING CORPORATION - TRUST GROUP	5,050,079
CITIBANK N.A.	1,095,739,926
DEUTSCHE BANK MANILA-CLIENTS A/C	1,802,430,023
DEUTSCHE BANK MANILA-CLIENTS A/C	10,569,999
GOVERNMENT SERVICE INSURANCE SYSTEM	387,982,081
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	2,506,148,746
THE HONGKONG AND SHANGHAI BANKING CORP. LTD. -CLIENTS' ACCT.	389,831,970
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	569,300

BPNAME	HOLDINGS
NATIONAL REINSURANCE CORPORATION OF THE PHILIPPINES	696,600
UCPB GENERAL INSURANCE CO., INC.	298,900
AB CAPITAL & INVESTMENT CORP. - TRUST & INVESTMENT DIV.	1,787,540
ASIA UNITED BANK - TRUST & INVESTMENT GROUP	1,175,400
UNITED COCONUT PLANTERS LIFE ASSURANCE CORPORATION	8,947,600
SSS PROVIDENT FUND	123,880
PNB TRUST BANKING GROUP	11,093,211
EASTWEST BANKING CORPORATION - TRUST DIVISION	391,300
SAN MIGUEL CORPORATION RETIREMENT PLAN-STP	940,000
RCBC TRUST & INVESTMENT DIVISION	10,507,975
RCBC TRUST & INVESTMENT DIVISION - VARIOUS TAXABLE ACCTS	2,241,942
STERLING BANK OF ASIA TRUST GROUP	8,000
STANDARD CHARTERED BANK	615,555,271
MBTC - TRUST BANKING GROUP	79,467,346
SOCIAL SECURITY SYSTEM	40,416,220
UNITED COCONUT PLANTERS BANK-TRUST BANKING	6,860,800
UNITED FUND, INC.	2,214,100
Credit Suisse Securities (Philippines), Inc.	97
BDO-TIG SECURITIES SERVICES	666,500
VC SECURITIES CORPORATION	21,700
TOTAL	7,552,335,861

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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