



April 19, 2010

The Philippine Stock Exchange, Inc.
Phil. Stock Exchange Center, Exchange Road
Ortigas Center, Pasig City, Metro Manila

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

Gentlemen:

This is in compliance with your request requiring all public companies to submit their computation of public ownership level quarterly. Attached therewith is our report for your record.

Thank you and we trust that you find everything in order.

Very truly yours,


JEFFREY C. LIM
Executive Vice President

SM Prime Holdings, Inc.
Computation of Public Ownership as of March 31, 2010

Number of Issued Shares	13,348,191,367
Number of Treasury Shares	<u>18,857,000</u>
Number of Issued and Outstanding Shares	13,329,334,367

Less:

	%	Number of
	to total	Shares*
	Outstanding	
	Shares	
Directors		
Henry Sy, Sr.	0.0330%	4,394,894
Jose L. Cuisia, Jr.	0.0025%	326,827
Gregorio U. Kilayko	0.0001%	10,000
Henry Sy, Jr.	0.0001%	12,522
Senen T. Mendiola	0.0048%	638,575
Herbert T. Sy	0.0029%	388,103
Hans T. Sy	0.0001%	<u>12,522</u>
		5,783,443

Officer		
Elizabeth T. Sy	0.0122%	1,626,488
Jeffrey C. Lim	0.0003%	40,000
Christopher S. Bautista	0.0002%	<u>30,000</u>
		1,696,488

Principal Stockholders and Affiliates

Shoemart, Inc.	44.6021%	5,945,158,593
SM Investments Corp.	20.6879%	2,757,559,722
Grand China International Limited	4.0542%	540,404,330
Oriental Land Development Limited	2.7945%	<u>372,492,882</u>
		9,615,615,527
		<u>3,706,238,909</u>

Total Number of Shares Owned by the Public

Number of Issued Shares	13,348,191,367
Number of Issued and Outstanding Shares	13,329,334,367
Number of Treasury Shares	18,857,000
Number of Listed Shares	13,348,191,367
Number of Foreign-Owned Shares	4,006,803,786
Foreign Ownership Level (%)	30%
Foreign Ownership Limit (%)	40%
Number of Stockholders	2,717
Number of Shareholders owning at least one Board Lot each	2,235

PUBLIC OWNERSHIP PERCENTAGE

Total Number of Shares Owned by the Public
Total Issued and Outstanding Shares

3,706,238,909	

13,329,334,367	<u>27.81%</u>

Required Public Ownership % =

10%

/	

Complied	Not Complied