



January 11, 2016

**The Philippine Stock Exchange, Inc.**  
3F Philippine Stock Exchange Plaza  
Ayala Triangle, Ayala Avenue  
Makati City

**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,

A handwritten signature in black ink that reads 'Teresa Cecilia H. Reyes'.

**TERESA CECILIA H. REYES**  
Vice President – Finance

Cc: Issuer Compliance & Disclosure Department  
Philippine Dealing & Exchange Corp.

**SM Prime Holdings, Inc.**  
**Computation of Public Ownership as of December 31, 2015**

Number of Issued Shares			33,166,300,075											
Number of Treasury Shares			<u>4,287,068,381</u>											
Number of Issued and Outstanding Shares			28,879,231,694											
Less:														
	<table border="0"> <tr> <td align="center">%</td> <td align="center">to total</td> <td></td> </tr> <tr> <td align="center"></td> <td align="center">Outstanding</td> <td align="center">Number</td> </tr> <tr> <td align="center"></td> <td align="center">Shares</td> <td align="center">of Shares</td> </tr> <tr> <td align="center"></td> <td align="center"><u>          </u></td> <td align="center"><u>          </u></td> </tr> </table>	%	to total			Outstanding	Number		Shares	of Shares		<u>          </u>	<u>          </u>	
%	to total													
	Outstanding	Number												
	Shares	of Shares												
	<u>          </u>	<u>          </u>												
<b>Directors</b>														
Henry Sy, Sr.	0.3650%	105,395,579												
Jose L. Cuisia, Jr.	0.0017%	497,661												
Gregorio U. Kilayko	0.0007%	202,580												
Joselito H. Sibayan	0.0001%	36,375												
Hans T. Sy	2.3725%	685,163,512												
Henry T. Sy, Jr.	2.3575%	680,818,440												
Herbert T. Sy	2.3075%	666,389,522												
Jorge T. Mendiola	0.0047%	1,365,167												
Teresita T. Sy	2.3086%	666,708,532												
Elizabeth T. Sy	2.2650%	<u>654,115,892</u>	3,460,693,260											
<b>Officers</b>														
Jeffrey C. Lim	0.0002%	<u>50,000</u>	50,000											
<b>Principal Stockholders and Affiliates</b>														
SM Investments Corp.	49.6032%	14,325,013,606												
Grand China International Limited	2.3391%	675,505,412												
Oriental Land Development Limited	1.6123%	465,616,102												
Syntrix Holdings, Inc.	1.1005%	317,827,670												
Sysmart Corporation	1.1004%	317,775,948												
Mountain Bliss Resort and Developme	0.0974%	28,130,837												
Belle Corporation	0.3190%	92,138,513												
Sybase Equity Investments Corp	0.1813%	52,365,500												
SM Development Corporation	0.1580%	45,624,176												
Cutad, Inc.	0.0682%	19,694,544												
HSBB, Inc.	0.0682%	<u>19,694,400</u>	16,359,386,708											
<b>Total Number of Shares Owned by the Public</b>			<u><u><b>9,059,101,726</b></u></u>											

<b>PUBLIC OWNERSHIP PERCENTAGE</b>		
<u>Total Number of Shares Owned by the Public</u>		
<u>Total Issued and Outstanding Shares</u>		
9,059,101,726		
-----		<u>31.37%</u>
28,879,231,694		
Required Public Ownership % =	=	<u>10%</u>
<input type="checkbox"/> / <input type="checkbox"/>		<input type="checkbox"/>
Complied		Not Complied

Number of Issued Shares	33,166,300,075
Number of Issued and Outstanding Shares	28,879,231,694
Number of Treasury Shares	4,287,068,381
Number of Listed Shares	33,166,300,075
Number of Foreign-Owned Shares	6,680,189,323
Foreign Ownership Level (%)	23%
Foreign Ownership Limit (%)	40%
Number of Stockholders	2,487
Number of Shareholders owning at least one Board Lot each	2,436