

October 9, 2013

Disclosure Department Philippine Stock Exchange, Inc. 3/F Tower One and Exchange Plaza Ayala Triangle, Ayala Avenue Makati City

Attention: Ms. Janet A. Encarnacion Head

Gentlemen:

We submit herewith Empire East's Computation of Public Ownership Level as of September 30, 2013.

Very truly yours,

EVELYN G. CACHO
Vice President for Finance
and Corporate Information Officer

EMPIRE EAST LAND HOLDINGS, INC. Computation of Public Ownership Level as of September 30, 2013

Number of Issued Common Shares Less: Number of Treasury Shares 14,803,455,238 127,256,071

Number of Issued and Outstanding Common Shares

14,676,199,167

<u>o</u>	% to total outstanding Common Shares	Number of Common Shares	
Directors			
Chairman Andrew L. Tan	0.16542278%	24,277,777	
Dir. Gerardo Ç. Garcia	0.00433543%	636,277	
Dir. Anthony Charlemagne C.	Yu 0.0000001%	1	
Dir. Katherine L. Tan	0.0000001%	1	
Dir. Alejo L. Villanueva, Jr.	0.0000001%	1	
Dir. Enrique Santos L. Sy	0.00008103%	11,892	
Dir. Evelyn G. Cacho Sub-total	0.00024012% 0.17007938%	35,240	24,961,189
Officers			
Anthony Charlemagne C. Yu President	(0.0000001%)	(1)	
Ricky S. Libago SVP for Property Developme	(0%) ent	(0)	
Antonio E. Llantada, Jr. VP for Audit & Mgt. Services	0.00063049%	92,532	
Ricardo B. Gregorio VP for Human Resources /Admin. Services	(0%)	(0)	
Evelyn G. Cacho VP for Finance	(0.00024012%)	(35,240)	
Jhoanna Lyndelou T. Llaga VP for Marketing	(0%)	(0)	
Giovanni C. Ng Treasurer	(0%)	(0)	
Dennis E. Edaño	(0%)	(0)	
Corporate Secretary Celeste Z. Sioson Asst. Corporate Secretary	(0%)	(0)	
Sub-total	0.00063049%	·	92,532

EMPIRE EAST LAND HOLDINGS, INC. Computation of Public Ownership Level as of September 30, 2013

Principal/Substantial S	Stockholders
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Megaworld Corporation	80.875513%	11,869,451,438	
	80.875513%	11,869,451,43	38
Affiliates			
Gilmore Prop. Marketing Asso., Inc.	0.181621%	26,655,000	
The Andresons Group, Inc.	0.941210%	138,133,820	
_	1.122830%	164,788,82	20

82.1690537%

Total Number of Common Shares Owned by the Public

Total

12,059,293,979

2,616,905,188

PUBLIC OWNERSHIP PERCENTAGE Total Number of Common Shares Owned by the Public Total Issued and Outstanding Common Shares					
2,616,905,188	shares	17.8309%			
14,676,199,167	shares				
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Number of Issued and **Outstanding Shares** 14,676,199,167 Number of Outstanding Shares 14,676,199,167 Number of Treasury Shares 127,256,071 **Number of Listed Shares** 13,603,455,238 Number of Foreign-Owned Shares 675,780,149 4.6046% Foreign Ownership Level (%) 40% Foreign Ownership Limit (%) =