



July 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 June 30, 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:	

	%	to total	Number of
	Outstanding	Shares	Shares*
<b>Directors</b>			
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

<b>Officer</b>			
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

<b>Principal Stockholders and Affiliates</b>			
Shoemart, Inc.	42.5102%		5,666,324,593
SM Investments Corp.	20.6879%		2,757,559,722
Grand China International Limited	4.0542%		540,404,330
Oriental Land Development Limited	2.7945%		372,492,882
			9,336,781,527
			<u>9,344,261,458</u>
<b>Total Number of Shares Owned by the Public</b>			<b><u>3,985,072,909</u></b>

<b>PUBLIC OWNERSHIP PERCENTAGE</b>	
<u>Total Number of Shares Owned by the Public</u>	3,985,072,909
<u>Total Issued and Outstanding Shares</u>	----- 13,329,334,367
	<u>29.90%</u>
Required Public Ownership % =	10%
<u>          /          </u>	<u>          </u>
Complied	Not Complied

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	4,029,179,713
Foreign Ownership Level (%)	30%
Foreign Ownership Limit (%)	40%
Number of Stockholders	2,698
Number of Shareholders owning at least one Board Lot each	2,658