

ZEUS HOLDINGS, INC.

20/F LKG Tower, 6801 Ayala Avenue, Makati City
Tel. No. 884-1106 / Fax No. 884-1409

18 October 2011

PHILIPPINE STOCK EXCHANGE
3rd Floor Philippine Stock Exchange Plaza
Ayala Triangle, Ayala Avenue
Makati City


Attention : **MS. JANET A. ENCARNACION**
Head, Disclosure Department

Re : **ZEUS HOLDINGS, INC. ("ZHI")**
-- Computation of Public Ownership Level

Gentlemen,

In compliance with Philippine Stock Exchange Memorandum No. 2010-0598 dated 23 December 2010, we submit herewith ZHI's Computation of Public Ownership Level as of 30 September 2011.

Very truly yours,


DAISY L. PARKER / ALVIN T. PAGAYATAN
Corporate Secretary / Asst. Corporate Secretary

ZEUS HOLDINGS, INC

Computation of Public Ownership as of 30 September 2011

Number of Issued Shares	2,733,463,907
Less: Treasury Shares	<u>0</u>

Number of Issued and Outstanding Shares	2,733,463,907
Less:	

Directors	<u>% to total I/O Shares</u>	<u>Number of Shares</u>	<u>Total</u>
Felipe U. Yap			
Direct (thru F. Yap Securities, Inc. In Trust For Various Clients) ("FYSI-ITFVC")	0.00%	1	1
Yuen Po Seng			
Direct (thru FYSI-ITFVC)	0.00%	1	1
Jose G. Cervantes			
Direct (thru FYSI-ITFVC)	0.00%	1	1
Augusto C. Villaluna			
Direct (thru FYSI-ITFVC)	0.00%	1	1
Stephen Y. Yap			
Direct (thru FYSI-ITFVC)	0.00%	1	1
Daisy L. Parker			
Direct (thru FYSI-ITFVC)	0.00%	1	1
Ronald P. Sugapong			
Direct (thru FYSI-ITFVC)	0.00%	1	1
Jesus Clint O. Aranas			
Direct	0.00%	1	1
Oliver S. Faustino			
Direct	<u>0.00%</u>	<u>1</u>	<u>1</u>
Sub-total	0.00%	<u>9</u>	<u>9</u>
Officers	-	-	-
Principal Stockholders			
Zamcore Realty & Development Corp.	34.00%	929,377,728	929,377,728
F. Yap Securities, Inc. in trust for Horizon Resources Corporation	15.00%	410,019,586	410,019,586
F. Yap Securities, Inc. in trust for Lindsay Resources Corporation	15.00%	410,019,586	410,019,586
Sub-total	64.00%	1,749,416,900	1,749,416,900
Affiliates	-	-	-
Others	<u>-</u>	<u>-</u>	<u>-</u>
TOTAL	64.00%	1,749,416,909	1,749,416,909

Total Number of Shares Owned by the Public	984,046,998
	=====

PUBLIC OWNERSHIP PERCENTAGE
Total Number of Shares Owned by the Public

<u>984,046,998</u> shares	<u>35.99%</u>
2,733,463,907 shares	

Number of Issued and Outstanding Shares	=	2,733,463,907
Number of Outstanding Shares	=	2,733,463,907
Number of Treasury Shares	=	0
Number of Listed Shares	=	3,000,000,000
Number of Foreign-owned Shares	=	3,007,802
Foreign Ownership Level (%)	=	0.11%
Foreign Ownership Limit (%)	=	40.00%

(As of 30 September 2011)