

October 9, 2012

PHILIPPINE STOCK EXCHANGE, INC. (PSE)

Disclosure Department 3rd Floor, Philippine Stock Exchange Center Ayala Triangle, Ayala Avenue Makati City

Attention: Ms. Janet A. Encarnacion

Head, Disclosure Department

Dear Ms. Encarnacion:

In compliance with PSE's Disclosure Rules, hereunder is Petron Corporation's list of top 100 stockholders (PPREF) as of September 30, 2012, duly submitted to us by our transfer agent, SMC Stock Transfer Service Corporation.

Thank you.

Very truly yours,

JOEL ANGELO C. CRUZ AVP - General Counsel & Corporate Secretary