

PROGRESSIVE MORTGAGE COMPANY LIMITED

ABN 88 000 192 012 AFSL 269822

DEBENTURE STOCK - Benchmark Report at March 31 2010

1.1 ASIC BENCHMARKS FOR UNLISTED DEBENTURES

Table 1 lists the ASIC benchmarks applicable to unlisted debenture issues and whether they are met for this reporting period and where they are referred to in this report.

| Benchmark | Issue meets benchmark? | Refer to item: |
|----------------------------|-------------------------------|-----------------------|
| Equity capital | Yes | 1.3 |
| Liquidity | Yes | 1.4 |
| Rollovers | Yes | 1.2 |
| Credit ratings | No | 1.5 |
| Loan portfolio | Yes | 1.6 |
| Related party transactions | Yes | 1.7 |
| Valuations | Yes | 1.8 |
| Lending principles | Yes | 1.9 |

1.2 ROLLOVERS BENCHMARK – RENEWAL ON MATURITY

On or about the maturity of a Fixed Term deposit, a written notice is sent to the Investor:

- Inviting the investor's instructions for reinvestment;
- Advising the current interest rates applying to our investment options; and
- Informing availability of current Prospectus and any other relevant disclosure.

If no instructions are received we assume the investor wishes to reinvest under the same terms at the then current rate.

If an investment is not renewed, interest will cease at the expiration of the term and the money will be repaid to the investor in the prescribed manner within one working day of such advice.

Repayment of a mature investment is subject to the surrender of the relevant Record of Investment.

1.3 EQUITY CAPITAL BENCHMARK

Progressive follows the ASIC Equity Capital benchmark whereby a minimum 8% equity ratio is maintained to ensure prudent capitalisation of its mortgage financing business; and if and when more than a minor part of lending were to be directly or indirectly for property development this minimum ratio would increase to 20%.

At **March 31, 2010** Progressive's equity ratio was **13.96%** and **0.0%** of its lending was related to property development.

1.4 LIQUIDITY BENCHMARK

Progressive follows the ASIC Liquidity benchmark whereby a cash balance is maintained on a rolling basis at least equal to its estimated cash requirement for the next 3 months. In calculating this requirement a rollover of **90%** of Fixed Term investments is assumed. Progressive's cash balance requirement at **March 31, 2010** was **\$315,155** as against a 'stress tested' requirement of **\$3,266,518** if the rollover percentage was to fall to 0%; and the actual available cash of **\$35,120,178**.

Progressive also ensures that assets maturing within 1 year are always at least equal to liabilities maturing within 1 year (included in liabilities payable within 1 year are No Fixed Term deposits for which the investment terms and conditions provide for an orderly repayment in sequence out of funds available) - see Table 2 overleaf.

This balancing of maturities is aided by a policy that all mortgage loans other than loans under the Credit Code are subject to recall after 3 years

1.4 LIQUIDITY BENCHMARK CONTINUED

| Table 2 - Maturities at March 31, 2010 | | |
|--|---|---------------------|
| Matures: | Cash & Mortgages due &/or Subject to Recall | Liabilities Payable |
| Within 1 Year | \$60,875,738 | \$44,135,859 |
| After 1 Year | \$447,876 | \$8,561,486 |

1.5 CREDIT RATINGS BENCHMARK

The Credit Ratings benchmark is not followed, and Progressive has not sought a credit rating of this debenture issue, which would provide an independent assessment about the risk of Investors losing all or part of their principal investment in the issue.

Progressive does not follow this benchmark because the Company has issued debentures and conducted its mortgage finance business since 1953 without seeking a credit rating, and considers that, whilst the nature of its issue and its business model (including following the other 7 ASIC benchmarks) are maintained, credit risk for Investors is effectively managed.

Investors or their representative by appointment can inspect Progressive's records and securities.

1.6 LOAN PORTFOLIO BENCHMARK

To meet the ASIC Loan Portfolio disclosure benchmark, details of Progressive's current loan portfolio and related policies are set out below and in Tables 3.1, 3.2, 3.3 and 3.4.

Progressive's policies are that:

- All loans are secured by registered mortgage over real estate which is assessed to be readily saleable or income earning.
- Loans are made within New South Wales and the Australian Capital Territory and predominantly within the greater Sydney Metropolitan area.
- All securities are valued by independent experienced valuers.
- Loans can be made to natural persons, companies or a trust provided they are not associates of Progressive.
- All mortgage loans other than Credit Code loans are subject to full repayment on written notice no later than three years from execution.
- Not more than 8% of total loan funds can be advanced to any one borrower.
- Experienced officers of Progressive appraise all loan proposals. No loan is made without:
 - the written consent of the Loans Manager and a Director of the Company;
 - a Valuer's certificate;
 - a Solicitor's certificate that the title is in order;
 - a registrable mortgage; and
 - satisfactory proof that the property to be mortgaged has been insured.
- Loans that require loan insurance are not made.
- Particulars of each loan and its security are entered into Progressive's database and the loans are monitored for performance. Daily exceptions reports are generated to identify any accounts requiring maintenance such as insurance renewal, a review of interest rates or follow up on late payment.
- Loans in default or arrears are considered on an individual basis. Reasonable proposals for the borrower to normalise the account are allowed and scope for restructuring the loan is investigated. When the loan is clearly no longer viable it will be called in and any actions thereafter necessary for recovery taken.

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| Security | Number loans | Outstanding Loans value | Weight | Security Valuation | Actual Loan/Value Ratio | Maximum Loan/Value Ratio |
|--------------------------|--------------|-------------------------|--------|--------------------|-------------------------|--------------------------|
| Owner Occupied Homes | 89 | 17,249,023 | 53.9% | 58,526,000 | 29.5% | 80% |
| Rental Property | 31 | 14,766,807 | 46.1% | 31,627,002 | 46.7% | 80% |
| Construction/Development | 0 | 0 | 0.0% | 0 | N/A | 70% |
| Totals | 120 | 32,015,830 | 100% | 90,153,002 | 35.5% | 80% |
| Averages | | 266,799 | | 751,275 | 35.5% | |

| Region | Inner West | Southern | City and East | Upper North Shore | Outside Sydney | Canterbury / Bankstown | Lower North Shore | West | North West | Northern Beaches | South West | Total |
|--------|------------|----------|---------------|-------------------|----------------|------------------------|-------------------|------|------------|------------------|------------|-------|
| Number | 22 | 17 | 14 | 19 | 9 | 8 | 7 | 10 | 6 | 3 | 5 | 120 |
| Weight | 19 % | 24 % | 11 % | 12 % | 7 % | 4 % | 4 % | 11 % | 3 % | 2 % | 3 % | 100 % |

| Type of Loan or Security | Number | Total Outstanding Loans value | Weight | Security Valuation | Loan/Value Ratio |
|---|--------|-------------------------------|--------|--------------------|------------------|
| Business Purpose Loans | 40 | 16,296,328 | 50.9 % | 40,374,173 | 40.4 % |
| Investment Housing Purpose Loans | 23 | 7,670,443 | 24.0 % | 19,239,472 | 39.9 % |
| Personal Purpose Loans | 57 | 8,049,060 | 25.1 % | 30,539,356 | 26.4 % |
| Loans secured or part secured by Second mortgage | 2 | 567,154 | 1.8 % | 1,783,002 | 31.8 % |
| Loans in Arrears | 0 | 0 | 0 | 0 | N/A |
| Loans Impaired | 0 | 0 | 0 | 0 | N/A |
| 10 largest loans | 10 | 13,381,502 | 41.8 % | 22,872,002 | 58.5 % |
| Securities of 5% or more of total value of property secured | 0 | 0 | 0 | 0 | N/A |
| Loans to related parties (Progressive does not lend to related parties) | 0 | N/A | N/A | N/A | N/A |

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| Table 3.4 - Loans at March 31, 2010 - Loans of 5% or more of loan book value (Weight) | | | | | |
|---|--------------------|-------------------------|--------------------|--------------------|--------|
| Loan value | Purpose of Loan | Securities | Security valuation | Loan / Value Ratio | Weight |
| 2,396,963 | Investment Housing | Total: | 4,940,000 | 48.5 % | 7.5 % |
| | | 1) Rental Property | 535,000 | | |
| | | 2) Owner Occupied Home | 700,000 | | |
| | | 3) X3 Rental Properties | 960,000 | | |
| | | 4) X5 Rental Properties | 2,210,000 | | |
| | | 5) Rental Property | 535,000 | | |
| 2,282,728 | Business | Total: | 3,225,000 | 70.8 % | 7.1 % |
| | | 1) Rental Property | 600,000 | | |
| | | 2) Owner Occupied Home | 600,000 | | |
| | | 3) Rental Property | 355,000 | | |
| | | 4) X2 Rental Properties | 1,170,000 | | |
| | | 5) Rental Property | 500,000 | | |

1.7 RELATED PARTY BENCHMARK

Progressive does not lend to related parties.

1.8 VALUATIONS BENCHMARK

- Real estate is valued on an “as is” and (for development property) an “as if complete” basis.
- Progressive uses independent licensed valuers and ensures that no single valuer conducts more than 1/3 of its valuations. The Company intends to obtain consent from the Trustee on the appointment of valuers. The Trustee has not consented to the appointment of a valuer at this stage.
- Before any property is mortgaged a current valuation is required.
- New valuation of a mortgaged property is required whenever it is considered that the most recent valuation is:
 - insufficient for a new loan or further advance sought; or
 - inadequate because of changed circumstances.

1.9 LENDING PRINCIPLES – LOAN-TO-VALUATION RATIOS BENCHMARK

Progressive meets the ASIC Lending Principles benchmark by:

- Maintaining the following loan-to-valuation ratios:
 - where the loan relates to property development a maximum of 70% on the basis of the latest ‘as if complete’ valuation; and
 - In all other cases – 80% on the basis of the latest market valuation.
- Requiring for any property development loan, that funds may only be advanced in stages based on external evidence of the progress of the development.

Leo James Lynch – Director

Judith Beswick - Director