

# FX Hedging Policy

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## Policy · Treasury Policy · Enterprise tier

Policy covering FX exposure identification, hedge ratios, instruments and reporting.

### 1. Purpose

Defines transaction, translation and economic exposure; hedge horizons; permitted instruments; documentation and effectiveness testing.

### 2. Who should use this

- Treasurer
- Risk Committee

### 3. When to use it

- At the start of every policy cycle for the group.
- Whenever a material change occurs in the underlying business, regulation or risk profile.
- During quarterly management and board reviews.
- As part of internal audit and second-line assurance work.

### 4. Step-by-step usage

1. Confirm board sponsor and assign a policy owner (typically Group Treasurer or CFO).
2. Tailor scope, definitions and risk appetite statements to the group's structure and currencies.
3. Populate delegated authorities, counterparty tiers, limits and instrument lists.
4. Circulate to Risk Committee for review and capture comments in a decision log.
5. Approve at the Board and publish to the policy register; communicate to all affected teams.
6. Embed in operational procedures, system controls and limit configurations.
7. Test compliance through internal audit and refresh annually or on material change.

### 5. Controls and approval workflow

- Segregation of duties between preparer, reviewer and approver.
- Documented delegated authority with monetary and instrument limits.
- System-enforced limits where the toolkit drives downstream payments or trades.

- Quarterly independent review by Internal Audit or second-line Risk.
- Exception log retained for at least seven years for regulatory inspection.

## 6. Review frequency

Annual board review; immediate refresh on material change in regulation, capital structure or risk appetite.

## 7. Sample working template

Section	Owner	Authority Limit	Approval	Review
Cash investment	Treasurer	Up to NGN 5bn / counterparty	Treasury Committee	Quarterly
FX hedging	Head of FX	Up to 80% of forecast exposure	Risk Committee	Monthly
Debt issuance	CFO	Per approved funding plan	Board	Per facility
Bank account opening	Treasury Ops	Pre-approved bank panel only	Group Treasurer	Annual

## 8. Key topics covered

- Hedge ratio
- Instruments
- Effectiveness

## 9. Implementation notes

- Localise to your group's chart of accounts, currencies and entity structure before first use.
- Wire the outputs into existing treasury / FP&A reporting cadences rather than running in parallel.
- Capture data lineage so each figure can be traced back to its source system.
- Run a dry cycle with a small business unit before group-wide rollout.
- Pair with the related Outliers framework and assessment to track maturity uplift over time.