

<b>Control Point</b>	<b>Risks / Inefficiencies</b>	<b>Company Practice</b>	<b>Recommendations</b>
<b>Foreign Exchange – Spot Trades</b>			
1. Decision based upon accurate and complete information	Inaccurate or arbitrary decision made	Manager of Treasury Operations contacted by foreign location, as well as receiving business unit requests	None
2. Timely initiation of decision and/or transaction	Unable to execute spot trade at a favorable rate; delay in executing transaction	Spot trade rates researched with Reuters and two banks; once the most favorable rate is obtained, Manager of Treasury Operations arranges the transaction with the bank	None
3. System physical/location security controls	Unauthorized access to Reuters system	Information system only	None
4. Company record prepared and/or updated accurately and completely	Inaccurate and/or incomplete spot trade documentation; transaction audit trail incomplete	Spot trade documentation prepared by Manager of Treasury Operations is reviewed by the Treasury Administrator	None
5. Only authorized personnel can initiate spot trades	Unauthorized spot trades	Manager of Treasury Operations, as well as the Treasurer, the Treasury Administrator, and the Manager, Finance, are authorized to initiate spot trades	None
6. Review of document(s) for propriety and completeness	Unauthorized spot trades; trades not properly documented; delay in initiating spot trades	Treasury Administrator receives a phone call from the bank confirming spot trade details; documentation is initialed by the Treasury Administrator	None
7. Independent confirmation of transaction details	Verification of spot trade activity lacking; spot trade not initiated by the bank	Treasury Administrator receives a phone call from the bank confirming the spot trade details; bank sends a written trade confirmation	None
8. Transaction results are documented and/or filed	Transaction audit trail incomplete	Spot trade documentation and bank's written trade confirmation are filed	None

