OBSIDIAN WEALTH

ASSET MANAGEMENT

A Juristic Representative of HODL OTC
Company Registration No. 2020/773138/07

Complaints Procedure

37 Merlin Circle
Silbury Hill
Nelspruit, 1201

jacques@obsidianwealth.co.za
0825563705
FSP 53723

Should you wish to pursue a complaint against a key individual or representative of Obsidian Wealth Asset Management, you should address the complaint in writing to us at complaints@obsidianwealth.co.za
If you cannot settle your complaint with us, you are entitled to refer it to the Office of the FAIS Ombud, at info@faisombud.co.za or telephone number 0860 663 274. The Ombud has been created to provide you with a redress mechanism for any inappropriate financial advice that you feel may have been given to you by a financial advisor.

Process Step	Step Details
1. Lodge/Receive a Complaint	• The client is to submit the complaint to the FSP **in writing** to the contact details that appear in the Complaints Management Framework. The complaint can be submitted by: ○ Hand ○ Post ○ Fax ○ Email *(If a complaint is submitted telephonically, the FSP will send the client an email to request the relevant details regarding the complaint. The client needs to respond and provide the requested information in writing (e.g. hand, post, fax or email).* • The client must submit sufficient detail of the complaint, this includes their: ○ Name and surname ○ Policy number ○ ID number ○ Postal address ○ Financial Advisor ○ Product Supplier ○ Product Type: Risk, Investment, Short term, Endowment, Employee Benefits, Disability, Medical Aid, Unit Trust, Wills etc. ○ Complaint Category: Product features and charges; Information Disclosures; Advice; Product performance; Client Services; Access; Changes or Switches; Complaints Handling; Claims; or other complaints. ○ Brief detail of the complaint
2. Acknowledge	The FSP will: • Acknowledge all complaints within 24 hours of receipt. • Clearly and transparently communicate the availability and contact details of the relevant Ombud services to complainants (clients) at all relevant stages of the relationship with a client, including at the start of the relationship and in relevant periodic communications. • Ensure all communication with a complainant is in plain language. • Provide, wherever feasible, clients with a single point of contact for submitting complaints. • Promptly inform a complainant of the process to be followed in handling the complaint, including- ○ Contact details of the person or department that will be handling the complaint. ○ indicative and, where applicable, prescribed timelines for addressing the complaint. ○ details of the internal complaints escalation and review process if the complainant is not satisfied with the outcome of a complaint. ○ details of escalation of complaints to the office of a relevant Ombud and any applicable timeline; and ○ details of the duties of the provider and rights of the complainant as set out in the rules applicable to the relevant Ombud • Follow up telephonic acknowledgments with a written response either by SMS or email. • Despatch a complaint reference number to the complainant on the acknowledgment of the complaint. • Disclose to the client: ○ the type of information required from a complainant. ○ where, how, and to whom a complaint and related information must be submitted. ○ expected turnaround times concerning complaints; and ○ any other relevant responsibilities of a complainant. • Despatch the details of the person allocated to the complaint to the complainant within 48 hours from receipt.
3. Allocate a Responsible person	The FSP will ensure that: • The complaint is allocated and dealt with by a trained staff member. • The person responsible for the clients' complaint will furnish the client with his/her contact details and the reference number of the complaint (if applicable) • The Complaints Manager/Key Individual has oversight over the complaints allocated to Jedske Serfontein.

<table>
<tr><th>Process Step</th><th>Step Details</th></tr>
<tr><td>4. Classify</td><td>The FSP will:
Ensure that all potential issues are captured and classified for escalation, review, and action, as required
Reduce any complaint, issue or negative client interaction to writing then log and classify for action
Where a third party is acting on behalf of a complainant, the FSP will ensure that such third party delivers a certified or original consent or power of attorney to act on behalf of a complainant:
no further dealings will be pursued with such a third party until the proper authority is obtained, however
the complaint will be taken up directly with the complainant on whose behalf the complaint is made
Formally log all complaints using a relevant process / Complaints Register (whether manual or via computer database system)</td></tr>
<tr><td>5. Investigate</td><td>The FSP will:
Analyse the root cause of the complaint to enable the complaint to be appropriately dealt with and avoid, if possible, its re-occurrence
Identify and clarify internal and external key facts.
Escalate complaints relating to product features or services handled solely by a Product Supplier.
Whenever a complaint is escalated or reviewed ensure that:
A balanced approach is followed, bearing in mind the legitimate interests of all parties involved including the fair treatment of clients
Internal escalation of complex or unusual complaints at the instance of the initial complaint handler is provided for.
Clients may escalate complaints not resolved to their satisfaction
the escalation is allocated to an impartial, senior functionary within the provider or appointed by the provider for managing the escalation or review process of the provider.
Ensure that procedures within the complaints escalation and review process are not overly complicated or impose unduly burdensome paperwork or other administrative requirements on complainants (clients)
Document all areas of interaction and communication.
Ensure accurate, efficient, and secure recording of complaints and complaints-related information
In respect of each reportable complaint, keep a record of:
All relevant details of the complainant and the subject matter of the complaint
Copies of all relevant evidence, correspondence, and decisions
The complaint categorisation
The progress and status of the complaint, including whether such progress is within or outside any set timelines
Concerning reportable complaints categorised on an ongoing basis the number of complaints:
Received,
Upheld,
Rejected and their reasoning,
Referred by clients through the internal complaints escalation procedure,
Referred to an Ombud and their outcomes.
and amounts of Compensation payments made,
and amounts of goodwill payments made,
the total number of complaints outstanding.
Ensure complaints information recorded is scrutinised and analysed on an ongoing basis and utilised to manage conduct risks and effect improved outcomes and processes for clients, and to prevent recurrences of poor outcomes and errors
Obtain consent from the complainant to ensure that no personal information is divulged or processed without the complainant’s knowledge or consent.
Keep the complainant appropriately updated on the progress of the investigation.
A balanced approach is followed, bearing in mind the legitimate interests of all parties involved including the fair treatment of clients
Internal escalation of complex or unusual complaints at the instance of the initial complaint handler is provided for.</td></tr>
</table>

Process Step	Step Details
	○ Clients may escalate complaints not resolved to their satisfaction ○ the escalation is allocated to an impartial, senior functionary within the provider or appointed by the provider for managing the escalation or review process of the provider. • Ensure that procedures within the complaints escalation and review process are not overly complicated or impose unduly burdensome paperwork or other administrative requirements on complainants (clients) • Document all areas of interaction and communication. • Ensure accurate, efficient, and secure recording of complaints and complaints-related information • In respect of each reportable complaint, keep a record of: ○ All relevant details of the complainant and the subject matter of the complaint ○ Copies of all relevant evidence, correspondence, and decisions ○ The complaint categorisation ○ The progress and status of the complaint, including whether such progress is within or outside any set timelines • Concerning reportable complaints categorised on an ongoing basis the number of complaints: ○ Received, ○ Upheld, ○ Rejected and their reasoning, ○ Referred by clients to the internal complaints escalation process, ○ Referred to an Ombud and their outcomes. ○ and amounts of Compensation payments made, ○ and amounts of goodwill payments made, ○ the total number of complaints outstanding. • Ensure complaints information recorded is scrutinised and analysed on an ongoing basis and utilised to manage conduct risks and effect improved outcomes and processes for clients, and to prevent recurrences of poor outcomes and errors • Obtain consent from the complainant to ensure that no personal information is divulged or processed without the complainant's knowledge or consent.
6. Resolve and confirm	The FSP will: • Ensure that the proposed resolution meets the Treating Customers Fairly Outcomes, does not prejudice the FSP or complainant, and does not involve any unnecessary legal or financial implications. • Document and assess the proposed action agreed upon with the Complaints Manager and/or affected Key Individual and Representative. • Discuss and review the signed off resolution with the complainant to ensure fairness and clarity and to further ensure that the resolution deals with the root cause of the complaint. • Include recognition and documentation of any underlying issues that have contributed to the complaint and recommendations for actions to prevent the further occurrence in the review.
7. Respond to Client	The FSP will: • Ensure the complaint process is accessible through channels that are appropriate to the FSP's clients • Ensure there are no charges for making use of the complaint process • Ensuring communication is in plain language • Clearly explain the details of the findings and proposed resolution to the client - within the agreed timeframes. • Where a complaint is upheld, if there has been any commitment by the FSP to make a compensation payment, goodwill payment, or to take any other action ensure it is carried out without undue delay and within the agreed timeframes • Where a complaint is rejected, the complainant must be provided with clear and adequate reasons for the decision and must be informed of any applicable escalation or review processes, including how to use them and any relevant time limits. • Send a written acknowledgment of the complaint to the complainant, with contact details of the FAIS Ombud, if the complaint cannot be addressed within three weeks and a single point of contact for submitting complaints.

Process Step	Step Details
	If within six weeks of receipt of a complaint the FSP has been unable to resolve the complaint to the satisfaction of a complainant, the complainant may: • refer the complaint to the Office of the FAIS Ombud if he/she wishes to pursue the matter; and • the complainant must do so within six months of receipt of such notification. • Appropriate processes for engagement with the Ombud
8. Follow up and review	The FSP will: • Diarise complaints to ensure it remains within the appropriate turnaround times. • Keep complainant appropriately informed of the progress of their complaint, • Keep complainant appropriately informed of causes of any delay in the finalisation of a complaint and revised timelines, should a complaint exceed the turnaround time due to unforeseen and reasonable circumstances. • Keep complainant appropriately informed throughout the complaints process of the resolution being sought. • Conduct a follow-up on the resolution of the complaint, to ascertain whether the client was satisfied with the complaints-handling process and the resolution sought and whether the resolution was proper and fair. • Action any negative responses in the review of complaints.
9. Regulatory References	This policy shall be read in conjunction with the Financial Intelligence Centre Act (FIC Act), applicable FIC guidance and directives including GN7A (Revised 2025), Directive 9 (Travel Rule), and any future directives such as Draft Directive 10 on location reporting. Policies will be updated to reflect the final versions of these instruments.
10. FSCA Obligations and Conduct Standards	The Firm shall align its governance and compliance frameworks with the FSCA Regulatory Strategy 2025–2028 and all applicable FSCA conduct standards, including Conduct Standard 3 of 2025 where relevant.