Disclosure Statement - Crypto Assets

1. INTRODUCTION & DISCLOSURE

In complying with the requirements of the Financial Advisory and Intermediary Services Act, 2002 ("FAIS Act"), we wish to bring the following information to your attention:
Obsidian Wealth Asset Management (Pty) Ltd operates as a juristic representative under HODL OTC (Pty) Ltd (FSP 53723), an authorised Financial Services Provider regulated by the Financial Sector Conduct Authority (FSCA) within the South African crypto-asset environment. Through this structure, Obsidian Wealth is authorised to render intermediary and advisory services within the crypto-asset category, in accordance with the applicable FAIS licensing conditions and regulatory framework. Authorisation extends to the provision of intermediary services and associated financial services in the approved product categories and subcategories as defined under the FAIS licence held by HODL OTC.

About Obsidian Wealth Asset Management (PTY) Ltd	
Name	Obsidian Wealth Asset Management (PTY) Ltd
Company registration number	2025/672160/07
FSP number (HODL OTC)	53723
Physical address	Unit 207 2nd Floor Building 29 Marloth 29Marloth Street, Nelspruit, Mpumalanga, 1201
Telephone number	087 238 5922
Email	compliance@obsidianwealth.co.za
Website	www.obsidanwealth.co.za
Key Individual	Cindy Serfontein – cindy@hodlotc.com
Information Officer	Cindy Serfontein – info@hodlotc.com
Deputy Information Officer	Alex Winterburn – alex@hodlotc.com
FSP's legal status	Obsidian Wealth Asset Management (Pty) Ltd operates as a juristic representative of HODL OTC (Pty) Ltd (FSP 53723), an authorised Financial Services Provider in terms of the Financial Advisory and Intermediary Services Act, 2002 (FAIS Act). Accordingly, Obsidian Wealth is authorised to render intermediary services in respect of Category I, Subcategory 1.27 (Crypto Assets) under the licence of HODL OTC. HODL OTC retains full responsibility and liability for all financial services rendered by its juristic representatives in accordance with FAIS requirements.
Availability of professional indemnity insurance and fidelity guarantee	We do not hold professional indemnity insurance, guarantees or fidelity insurance. In the process of obtaining these as they are new in the Crypto space.
Complaints procedure details. *All complaints must be submitted in writing, and any of our representatives can provide you with a copy of our complaints procedure upon request.*	Department: Compliance Telephone number: 0825563705 Email: compliance@obsidianwealth.co.za *If your complaint is not resolved to your satisfaction, you may escalate it to Obsidian Wealth Asset Management using the contact details listed in Section 2 below.*
Details of the FSP's compliance framework	Masthead (Pty) Ltd, a FAIS-approved compliance practice, monitors compliance with the FAIS Act. Their contact details are: PO Box 765, Howard Place, 7450 Tel: 021 686 3588 Fax: 021 686 3589
Supplier agreements, including restrictions or conditions.	Obsidian Wealth, as a juristic representative of HODL OTC (FSP 53723), operates within its authorised mandate. All conflicts of interest are appropriately managed and disclosed in line with regulatory requirements.

A copy of HODL OTC's FSP license is available for inspection on quest.

Service Provider 1	
Name	Fireblocks
Company registration number	2066055
Physical address	441 Ninth Avenue, 15th Floor, New York 10001
Telephone number	+1 (866) 875 7755
Email	info@fireblocks.com
Website	www.fireblocks.com
Service Provider 2	
Name	True USD
Email	support@trueusd.com
Website	www.tusd.io
Fais Ombud	
Name	The FAIS Ombud
Postal address	PO Box 74571, Lynwood Ridge, 0040
Physical address	Sussex Office Park, Ground Floor, Block B, 473 Lynnwood Road Cnr Lynnwood Road & Sussex Ave, Lynnwood, 0081
Telephone number	+27 12 470 9080
Fax number	+27 12 348 3447
Email	info@faisombud.co.za
Website	www.faisombud.co.za

Obsidian Wealth Asset Management (Pty) Ltd maintains a current Conflict of Interest Management Policy and Disclosure Register in line with applicable legislation, detailing all financial interests, ownership structures, and relationships with associated parties and third-party service providers. This register is available for inspection on request and supports transparent and responsible conduct. All personal information is treated as strictly confidential and protected in accordance with POPIA, and will not be disclosed to third parties without your written consent unless required or permitted by law.

Registering claims or complaints

Claims and complaints must be submitted to Obsidian Wealth Asset Management (Pty) Ltd in writing within the prescribed timeframes, accompanied by full details of the matter and all relevant supporting documentation. All submissions will be assessed in accordance with our internal complaints management and resolution procedures. Should you remain dissatisfied with the outcome, you may escalate the matter to the Compliance Officer using the contact details provided in the statutory disclosure documentation. If the matter is still not resolved to your satisfaction, you are entitled to refer the complaint to the FAIS Ombud for independent review and resolution.

Important affairs

a. Never sign any blank or incomplete application forms.
c. Retain copies of all documents you receive.
d. Take notes on any discussions you have.
f. Do not allow yourself to be pressured into purchasing any product.
g. Providing inaccurate or incomplete information may impact you.
h. If your complaint is unresolved by the intermediary or insurer, you may send it to the FAIS Ombud.

Use of Your Personal Data

By engaging in Obsidian Wealth Asset Management (Pty) Ltd, you consent to the collection and processing of your personal information in accordance with POPIA. We take reasonable measures to safeguard your data and use it to provide services, verify your details, communicate with you, and meet regulatory obligations. Your information may be shared with affiliated entities or approved by third parties where necessary and will be retained in line with applicable legal requirements, including after termination of your relationship.

Waiving of rights

In accordance with the General Code of Conduct under the FAIS Act, 2002 (FAIS Act), Obsidian Wealth Asset Management (Pty) Ltd will not request, induce, or permit any client to waive any right or protection given to them under related legislation. Any such waiver, whether stated or implied, shall be regarded as invalid and unenforceable.

Conflict of Interest
Obsidian Wealth Asset Management (Pty) Ltd has assessed the Conflict-of-Interest provisions in terms of the Financial Advisory and Intermediary Services Act, 2002 (FAIS Act), and has not identified any actual or potential conflicts relating to ownership structures, financial interests, third-party relationships, or distribution channels that may materially impact the fair treatment of clients. The business adopts a principles-based and values-driven approach to managing conflicts of interest, aligned with both the letter and spirit of the legislation. This framework is subject to ongoing monitoring and is formally reviewed on at least an annual basis in line with regulatory expectations. A copy of the Conflict-of-Interest Management Policy is available to clients upon request.

2. RISKS

Engaging in crypto-asset transactions and related investment activities facilitated by Obsidian Wealth Asset Management (Pty) Ltd involves material risks that clients must fully understand and accept prior to participation. Obsidian Wealth provides advisory and intermediary services and does not guarantee performance or outcomes. By utilising our services, you acknowledge that you have considered these risks and accept full responsibility for your investment decisions. This disclosure is intended to provide a high-level overview of the key risks associated with crypto-asset exposure.

2.1 Irreversible Transactions

Crypto-asset transactions are generally irreversible once executed on the blockchain. Errors in transaction details, including incorrect wallet addresses or amounts, as well as exposure to fraud or scams, may result in permanent loss of funds. Obsidian Wealth cannot reverse or recover such transactions and accepts no liability for losses arising from client instruction errors or external fraudulent activity.

2.2 Volatility Risk

Crypto-asset markets are highly volatile and subject to rapid price fluctuations. Values may increase or decrease significantly over short periods, and clients may experience partial or total loss of capital. Past performance is not indicative of future results.

2.3 Counterparty and Product Risk

Certain opportunities facilitated by Obsidian Wealth may involve third-party counterparties, structures, or underlying transactions. Clients may have limited or no recourse against such counterparties in the event of default, failure, or dispute. No guarantee is provided that any counterparty will fulfil its obligations.

2.4 Regulatory Risk

The regulatory treatment of crypto assets remains evolving both within South Africa and internationally. Changes in legislation, FSCA guidance, tax treatment, or cross-border regulations may impact on the legality, accessibility, or value of crypto assets and related structures.

2.5 Custody and Security Risk

While Obsidian Wealth utilizes institutional-grade custody solutions and security protocols, including third-party providers, crypto assets remain susceptible to cybersecurity threats, including hacking, phishing, and unauthorised access. No system is entirely immune from risk, and losses may occur despite implemented safeguards.

2.6 Liquidity and Market Risk

The value of crypto assets is driven by market demand and liquidity. In certain market conditions, liquidity may be limited, which could delay execution, impact pricing, or restrict the ability to exit positions. A decline in demand may result in significant or permanent loss of value.

2.7 Tax and Regulatory Compliance Risk

Clients are solely responsible for ensuring compliance with all applicable tax laws and regulatory requirements relating to their crypto-asset activities. Failure to comply may result in penalties, fines, or other legal consequences.

2.8 Operational and Technology Risk

Obsidian Wealth relies on third-party infrastructure, platforms, and technology providers to facilitate services. System outages, delays, or technical failures may impact transaction processing, reporting, or access to funds.

2.9 Stablecoin and Peg Risk

Stablecoins are subject to risks related to the underlying reserves, issuer credibility, and market confidence. Any failure to maintain the intended peg or issues with the underlying assets may result in loss of value.

2.10 Suitability Risk

Crypto-asset investments and structured opportunities may not be suitable for all investors. Clients must ensure that any participation aligns with their financial position, risk tolerance, and investment objectives. Independent financial, tax, and legal advice should be considered where appropriate. Should you require further information or clarification regarding these risks, you may contact Obsidian Wealth using the details provided in this disclosure.