OBSIDIAN WEALTH

ASSET MANAGEMENT

A Juristic Representative of HODL OTC Company Registration No. 2020/773138/07 FSP 53723

Statutory FAIS Disclosure

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Company Reg: 2025 / 672160 / 07

STATUTORY FAIS DISCLOSURE

Obsidian Wealth | Juristic Representative of HODL OTC (Pty) Ltd, FSP 53723

1. INTRODUCTION & DISCLOSURE

In compliance with the Financial Advisory and Intermediary Services Act, 37 of 2002 (FAIS Act), this document records the statutory disclosure information applicable to Obsidian Wealth. Obsidian Wealth operates as a juristic representative under HODL OTC (Pty) Ltd, an authorised Financial Services Provider under the supervision of the Financial Sector Conduct Authority (FSCA), FSP number 53723.

Obsidian Wealth provides advisory, portfolio strategy, client-instructed implementation support and third-party facilitation services within the authorised FAIS framework of HODL OTC. Obsidian Wealth does not accept client deposits into its own accounts, does not take custody of client crypto assets or fiat funds, does not trade on behalf of clients without express instruction, and does not exercise discretionary control over client funds or investment decisions.

Obsidian Wealth applies a risk-aware and compliance-led service model aligned with HODL OTC's internal compliance framework, FSCA requirements and the Financial Intelligence Centre Act, 38 of 2001 (FIC Act), including customer due diligence, record-keeping, risk management and reporting obligations where applicable.

2. ABOUT OBSIDIAN

Disclosure item	Obsidian Wealth details
Name	Obsidian Wealth Asset Management (Pty) Ltd
Company registration number	2020/773128/07
Juristic representative status	Obsidian Wealth operates as a juristic representative under HODL OTC (Pty) Ltd.
Supervising FSP	HODL OTC (Pty) Ltd
FSP number	53723
Physical address	Unit G06, Ground Floor, Building 29 Marloth, 29 Marloth Street, Nelspruit, Mpumalanga, 1201
Telephone number	087 238 5922
Email	compliance@obsidianwealth.co.za
Key Individual & Information Officer	Cindy Serfontein compliance@obsidianwealth.co.za
Deputy Information Officer	Jacques Serfontein – jacques@obsidianwealth.co.za
FSP's legal status	HODL OTC (Pty) Ltd is an authorised Financial Services Provider in terms of the FAIS Act and is approved to render financial services in respect of Category I, including Sub-Categories 1.12 and 1.27: Crypto Assets. Obsidian Wealth renders services as a juristic representative under HODL OTC's supervision and authority. Obsidian Wealth's role is advisory and facilitative. It does not operate as a discretionary investment manager, does not receive client deposits into its own accounts, does not provide custody and does not execute any transaction without clear client instruction.
Availability of professional indemnity insurance and fidelity guarantee	Obsidian Wealth and HODL OTC do not currently hold professional indemnity insurance, guarantees or fidelity insurance specific to crypto-asset advisory or intermediary services. HODL OTC has conducted a risk assessment in line with FSCA expectations and continues to engage with insurers to obtain appropriate cover where available and suitable. This position is reviewed annually or upon material regulatory change.
Complaints procedure details	All complaints must be submitted in writing. Telephone: 087 238 5922. Email: complaints@hodlotc.com. Complaints relating to Obsidian Wealth are handled under HODL OTC's internal Complaints Management Framework, designed to ensure fair, transparent and timely resolution in line with Treating Customers Fairly principles and applicable FSCA conduct standards. Complaints are escalated internally where required and recorded for regulatory oversight and reporting purposes.
Details of the FSP compliance framework	Masthead (Pty) Ltd, a FAIS-approved compliance practice, monitors compliance with the FAIS Act. Contact details: PO Box 765, Howard Place, 7450. Tel: 021 686 3588. Fax: 021 686 3589. Email: info@masthead.co.za. Website: www.masthead.co.za.

3. FAIS OMBUD

FAIS Ombud item	Details
Name	The FAIS Ombud
Postal address	PO Box 41, Menlyn Park, 0063
Physical address	Menlyn Central Office Building, 125 Dallas Avenue, Waterkloof Glen, Pretoria, 0010
Telephone number	+27 12 762 5000 / 086 066 3274
Fax number	+27 12 348 3447
Email	info@faisombud.co.za
Website	www.faisombud.co.za

4. CONFLICT OF INTEREST

In compliance with legislation, Obsidian Wealth maintains and operates under an up-to-date Conflict of Interest Management policy and disclosure register. This register outlines financial interests, ownership interests, associate relationships and business relationships that may be relevant to services rendered to clients. The policy and register are available for inspection where required.

Obsidian Wealth reviews actual and potential conflicts of interest under the FAIS Act, the General Code of Conduct and HODL OTC's internal compliance framework. Where a potential conflict arises, it must be identified, disclosed, managed and recorded. Obsidian Wealth follows a value-based approach, in line with the spirit of the legislation, and its conflict-of-interest position is reviewed annually and made available to the FSCA upon request. The Conflict of Interest Management Policy is available on request.

5. USE OF PERSONAL DATA

Obsidian Wealth processes personal information in accordance with the Protection of Personal Information Act, 4 of 2013 (POPIA), and under HODL OTC's information governance and compliance framework where applicable. Personal information is collected and processed on lawful grounds, including contractual necessity, legal obligation, legitimate interest and consent where applicable. Information is used strictly for onboarding, verification, regulatory compliance, service delivery, advisory records, risk management and record-keeping purposes.

Personal information may be shared with regulated third-party service providers, compliance partners, product providers, platform providers and authorities where required by law or where necessary to deliver the requested service. All reasonable technical and organisational safeguards are implemented to protect personal information. Further details are contained in the applicable Privacy Policy, available on request or on the relevant website.

6. TREATING CUSTOMERS FAIRLY POLICY

Obsidian Wealth's Treating Customers Fairly approach is centred around the guidelines and conduct expectations of the Financial Sector Conduct Authority. Obsidian Wealth aims to deliver fair outcomes to clients by ensuring that services, explanations, disclosures, risk warnings, advice records and implementation support are clear, suitable, transparent and aligned with the client's stated objectives and risk profile.

As a business operating under the FAIS framework, Obsidian Wealth takes the requirements of the FSCA seriously, including the requirement to treat customers fairly, to communicate in a manner that is clear, fair and not misleading, and to ensure that clients understand the nature, limitations and risks of the services and opportunities presented to them.

7. WAIVING OF RIGHTS

The General Code of Conduct prohibits any financial services provider or representative from encouraging or requesting clients to waive rights or benefits conferred on them by the Code. Any such waiver is deemed invalid and unenforceable. Obsidian Wealth will not require a client to waive statutory rights as a condition of receiving advisory, facilitation or implementation-support services.

8. FICA

HODL OTC is registered as an accountable institution under the Financial Intelligence Centre Act, 38 of 2001, and maintains a risk-based Risk Management and Compliance Programme. Obsidian Wealth operates under this framework where client identification, verification, due diligence, record-keeping, sanctions screening, enhanced due diligence or reporting is required.

Obsidian Wealth may request identity, address, beneficial ownership, source-of-funds, source-of-wealth and other compliance information before any service or implementation step proceeds.

9. DOCUMENT STORAGE

Obsidian Wealth retains legal documents, client records, advisory records, needs analyses, records of advice, client instruction records, compliance records and communication records related to its financial services for the legally mandated periods. Electronic records are backed up regularly and retained in accordance with applicable FAIS, FIC Act, POPIA and internal record-retention requirements.

10. DISCLAIMER

Digital assets, crypto-asset exposure, alternative investments, third-party investment products and yield-focused opportunities carry significant financial, legal, regulatory, liquidity, market, operational, technology and cybersecurity risks, including volatility and the potential loss of capital. Crypto assets and third-party opportunities are not guaranteed or insured by Obsidian Wealth.

Obsidian Wealth may explain, introduce or facilitate access to selected strategies or third-party opportunities, but does not guarantee returns, does not guarantee capital preservation, does not provide custody, does not exercise discretionary control over client assets and does not execute transactions without clear client instruction. Clients should carefully consider all relevant risks, product documents, liquidity rules, fee disclosures, provider information and suitability considerations before instructing any implementation step.

CLIENT ACKNOWLEDGEMENT

This Statutory FAIS Disclosure is reviewed at least annually and updated promptly where there are material regulatory, legislative, supervisory or business-model changes affecting Obsidian Wealth, HODL OTC, the FSCA, the Financial Intelligence Centre or any other competent authority.

By using Obsidian Wealth's services, or by engaging with Obsidian Wealth under HODL OTC's authorised FAIS framework, you acknowledge that you have received, read and understood this Statutory FAIS Disclosure. You further confirm that you understand the nature of Obsidian Wealth's advisory and facilitation role, including that Obsidian Wealth does not take custody of client assets, does not exercise discretionary control over client funds and does not implement any transaction without clear client instruction.

Should you have any questions regarding this disclosure, please contact our offices before proceeding with any service, instruction or implementation step.