

INVESTOR CHARTER IN RESPECT OF INVESTMENT ADVISER

A. Vision and Mission Statements for investors

- Vision

Invest with knowledge & safety.

- Mission

Every investor should be able to invest in right investment products based on their needs, manage and monitor them to meet their goals, access reports and enjoy financial wellness.

B. Details of business transacted by the Investment Adviser with respect to the investors

- To enter into an agreement with the client providing all details including fee details, aspect of Conflict-of-interest disclosure and maintaining confidentiality of information.
- To do a proper and unbiased risk – profiling and suitability assessment of the client.
- To obtain registration with Know Your Client Registration Agency (KRA) and Central Know Your Customer Registry (CKYC).
- To conduct audit annually.
- To disclose the status of complaints on the website.
- To disclose the name, proprietor name, type of registration, registration number, validity, complete address with telephone numbers and associated SEBI regional/local Office details on the website.
- To employ only qualified and certified employees.
- To deal with clients only from official number.
- To maintain records of interactions, with all clients including prospective clients (before onboarding), where any conversation related to advice has taken place.
- To ensure that all advertisements are in adherence to the provisions of the Advertisement Code for Investment Advisers.

BUGLEROCK CAPITAL PRIVATE LIMITED
(Formerly known as o3 Securities Private Limited)

Reg Office: Prestige Takt, 1st Floor, 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India
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- Not to discriminate in terms of services provided, among clients opting for same/similar products/services offered by investment adviser.

C. Details of services provided to investors (No Indicative Timelines)

- Onboarding of Clients
 - Sharing of agreement copy
 - Completing KYC of clients
- Disclosure to Clients
 - To provide full disclosure about business, affiliations, compensation in the agreement.
 - To not access client's accounts or holdings for offering advice.
 - To disclose the risk profile to the client.
 - To disclose any conflict of interest of the investment advisory activities with any other activities of the investment adviser.
 - To disclose the extent of use of Artificial Intelligence tools in providing investment advisory services.
- To provide investment advice to the client based on the risk-profiling of the clients and suitability of the client.
- To treat all advisory clients with honesty and integrity.
- To make adequate disclosure to the investor of all material facts such as risks, obligations, costs, etc. relating to the products or securities advised by the adviser.
- To provide clear guidance and adequate caution notice to clients when providing investment advice for dealing in complex and high-risk financial products/services.
- To ensure confidentiality of information shared by clients unless such information is required to be provided in furtherance of discharging legal obligations or a client has provided specific consent to share such information.

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- To disclose the timelines for the various services provided by the investment adviser to clients and ensure adherence to the said timelines.

D. Details of grievance redressal mechanism and how to access it*

- In case of any grievance / complaint, an investor/clients should approach the concerned Investment Adviser through email at pmsassist@buglerock.asia and compliance@buglerock.asia and Buglerock Capital shall ensure that the grievance is resolved within 21 (twenty-one) calendar days of receipt of the same.
- Investors/clients can send letters to Buglerock Capital Private Limited or contact through telephone at:
No. 802, 8th Floor, South Annexe Tower 2,
One World Center, Senapati Bapat Marg,
Lower Parel, Mumbai - 400 013
+91 22 69251000
- If the investor/client's complaint is not redressed satisfactorily, one may lodge a complaint with SEBI or with Investment Adviser Administration and Supervisory Body (IAASB) on SEBI's 'SCORES 2.0'¹ portal which is a centralized web-based complaints redressal system. SEBI takes up the complaints registered via SCORES with the concerned intermediary for timely redressal. SCORES facilitates tracking the status of the complaint.

Mode of filing the complaint on SCORES or with Investment Adviser Administration and Supervisory Body (IAASB)

- SCORES 2.0 (a web based centralized grievance redressal system of SEBI for facilitating effective grievance redressal in time-bound manner) (<https://scores.sebi.gov.in>)

Two level review for complaint/grievance against investment adviser:

- First review done by designated body (IAASB)

¹ SEBI press release PR. No. 06/2024 dated April 01, 2024

- Second review done by SEBI.
- ii. Email to designated email ID of IAASB
- iv. With regard to physical complaints to SEBI, investors/clients may send their complaints to: Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan, Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051.
- v. After exhausting all aforementioned options for resolution, if the investor/client is not satisfied, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at <https://smartodr.in/login> for its resolution through online conciliation or arbitration.

Alternatively, the investor/client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with the Investment Adviser is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.

- vi. The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in SCORES guidelines or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law. The process on Online Dispute Resolution Mechanism is available at <https://www.buglerock.asia/asset-management/>

**Updated grievance resolution process as per SEBI Circular SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023*

E. Rights of investors

- Right to Privacy and Confidentiality.
- Right to Transparent Practices.
- Right to fair and Equitable Treatment.
- Right to Adequate Information.
- Right to Initial and Continuing Disclosure
- Right to receive information about all the statutory and regulatory disclosures.

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- Right to Fair & True Advertisement.
- Right to Awareness about Service Parameters and Turnaround Times.
- Right to be informed of the timelines for each service.
- Right to be Heard and Satisfactory Grievance Redressal.
- Right to have timely redressal.
- Right to Suitability of the Financial Products.
- Right to Exit from Financial product or service in accordance with the terms of agreement with the investment adviser.
- Right to receive clear guidance and caution notice when dealing in Complex and High-Risk Financial Products and Services.
- Additional Rights to vulnerable consumers
 - Right to get access to services in a suitable manner even if differently abled.
- Right to provide feedback on the financial products and services used.
- Right against coercive, unfair, and one-sided clauses in financial agreements.

F. Expectations from the investors/clients (Responsibilities of investors/clients)

- **Do's**
 - i. Always deal with SEBI registered Investment Advisers.
 - ii. Ensure that the Investment Adviser has a valid registration certificate.
 - iii. Check for SEBI registration number. Please refer to the list of all SEBI registered Investment Advisers which is available on SEBI website in the following link:
<https://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognisedFpi=yes&intmId=13>

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- iv. Pay only advisory fees to your Investment Adviser. Make payments of advisory fees through banking channels only and maintain duly signed receipts mentioning the details of your payments.
 - v. Always ask for your risk profiling before accepting investment advice. Insist that the Investment Adviser provides advisory strictly on the basis of your risk profiling and take into account available investment alternatives.
 - vi. Ask all relevant questions and clear your doubts with your Investment Adviser before acting on advice.
 - vii. Assess the risk–return profile of the investment as well as the liquidity and safety aspects before making investments.
 - viii. Insist on getting the terms and conditions in writing duly signed and stamped. Read these terms and conditions carefully particularly regarding advisory fees, advisory plans, category of recommendations etc. before dealing with any Investment Adviser.
 - ix. Be vigilant in your transactions.
 - x. Approach the appropriate authorities for redressal of your doubts / grievances.
 - xi. Inform SEBI about any instance where Investment Adviser is offering assured or guaranteed returns.
 - xii. Always be aware that you have the right to exit the service of an Investment Adviser.
 - xiii. Always be aware that you have the right to seek clarifications and clear guidance on advice.
 - xiv. Always be aware that you have the right to provide feedback to the Investment Adviser in respect of services received.
 - xv. Always be aware that you will not be bound by any clause, prescribed by the investment adviser, which is contravening any regulatory provisions
- **Don'ts**
 - i. Don't fall for stock tips offered under the pretext of investment advice.
 - ii. Do not provide funds for investment to the Investment Adviser.

- iii. Don't fall for the promise of indicative or exorbitant or assured returns by the Investment Advisers. Don't let greed overcome rational investment decisions.
- iv. Don't fall prey to luring advertisements or market rumors.
- v. Avoid doing transactions only based on phone calls or messages from any Investment adviser or its representatives.
- vi. Don't take decisions just because of repeated messages and calls by Investment Advisers.
- vii. Do not fall prey to a limited period discount or other incentive, gifts, etc. offered by Investment advisers.
- viii. Don't rush into making investments that do not match your risk-taking appetite and investment goals.
- ix. Do not share login credential and password of your trading and demat accounts with the Investment Adviser.
- x. Do not rely on any information received through social media links and platforms by unauthorized personnel.

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Document Control	
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Document/Policy Owner	Buglerock Capital Private Limited - Compliance and Legal Department
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