

GRIEVANCE REDRESSAL POLICY

of

BUGLEROCK CAPITAL PRIVATE LIMITED

(Formerly known as o3 Securities Private Limited)

*Registered with the Securities and Exchange Board of India as a Portfolio Manager with effect from May 16, 2017
Registration No. INP000005430*

Introduction

Buglerock Capital Private Limited (hereinafter referred to as '**Buglerock Capital**) acts as a Portfolio Manager under SEBI (Portfolio Managers) Regulations, 2020.

The Grievance Redressal policy outlines the grievance handling process through a structured grievance redressal framework. Investor inquiries and complaints are a significant voice for the Investors and a prompt and effective service is crucial for maintaining existing partnerships. Buglerock Capital has established principles and framework to handle both queries and grievances to ensure that.

- a. All Investors are treated in a fair and equitable manner.
- b. Complaints raised by Investors are dealt in a timebound manner.
- c. Investors are provided with information on how to raise their issues and complaints and escalate if they are not satisfied with the resolution or handling.
- d. A dedicated Customer Services Team is in place to handle customer queries and complaints. The process is supervised by a senior resource.

B. Grievance Raising Mechanism

Investors are entitled to make a complaint in writing, orally or telephonically directly to Buglerock Capital. Investors that are serviced by their independent advisors or distributors can also raise their complaints through their advisors and distributors.

1. It is mandatory for the Client having grievance to take up the matter directly with Buglerock Capital.
2. The below personnel of Buglerock Capital shall attend to and address any Client query or concern as soon as practicably possible:

Please contact the Compliance Officer

Name	Mr. Bharat M Sharda
Address	One World Center, Tower 2, Office No 802, 8th Floor, Senapati Bapat Marg, Elphinstone Road West, Mumbai - 400 013, India
Telephone	91 22 6925 1024
Email	bharat.sharda@buglerock.asia

You may also approach the Principal officer:

Name	Mr. Rajesh Keswani
Address	One World Center, Tower 2, Office No 802, 8th Floor, Senapati Bapat Marg, Elphinstone Road West, Mumbai - 400 013, India
Telephone	91 22 6925 1000
Email	compliance@buglerock.asia

3. Buglerock Capital shall redress the grievance within 21 (Twenty-one) calendar days from the date of receipt of the complaint.
4. If Client/s are still not satisfied with the response from Buglerock Capital, they can lodge their grievances with SEBI at <https://scores.gov.in/scores/Welcome.html> or may also write to any of the offices of SEBI or contact SEBI Office on Toll Free Helpline at 1800 266 7575 / 1800 22 7575. SCORES may be accessed through SCORES mobile application as well, same can be downloaded from below link:
<https://play.google.com/store/apps/details?id=com.ionicframework.sebi236330> and <https://apps.apple.com/in/app/sebiscores/id1493257302>. If the Client is not satisfied with the extent of redressal of grievance by Buglerock Capital, there is a one-time option for "Compliant review Facility" of the extent of the redressal, which can be exercised within 15 days from the date of closure of the complaint on SCORES. Thereafter, the complaint shall be escalated to the supervising official of the dealing officer of SEBI.
5. After exhausting all aforementioned options for resolution, if the client is not satisfied, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at <https://smartodr.in/login>.
6. Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with Buglerock Capital is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.
7. 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.
8. The process on Online Dispute Resolution Mechanism is available at <https://buglerock.asia/assetmanagement/investor-grievance.html>

C. Process to register a complaint

- Investors who wish to lodge a complaint on SCORES (complainant) are required to register themselves on www.scores.gov.in by clicking on "Register here" under the "Investor Corner".
- While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email Id, Aadhaar card number(optional), Central KYC (CKYC) ID (optional) etc. are required to be provided for effective communication and speedy redressal of the grievances.
- Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgement email to the complainant.
- If the Investor is unsatisfied, then he may register the same on ODR portal. The Investor will have to register themselves on <https://smartodr.in/login> by clicking "Create one here" under "Investor Login".
- While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email Id, Address are required to be provided.

- Upon successful registration, you will receive an email at the registered email address with a link to verify your account.

D. Display of Complaints Data:

The details of the complaints including SCORES complaints shall be disclosed on the Buglerock Capital website on monthly basis by 7th of the succeeding month in the format provided in **Annexure A** or such other format as may be prescribed by SEBI from time to time.

E. Management Information System (MIS) report of Investor Complaints:

A MIS report of the complaints received, pending, and resolved will be placed before the Board of directors of the Buglerock Capital, at regular intervals for their review and information.

F. Maintenance of Records:

The Register of complaint and Grievance shall be maintained and updated with details of complaints and their resolution thereof with time take for resolution.

The soft copies / hard copies of the complaints received from the Investor shall be preserved by the Customer Services team for future reference, if required.

A detailed report of complaints received and resolved and reasons for delay if any for resolution will be recorded.

The Register of complaint and grievance will be maintained for such a period as prescribed by regulatory authority from time to time.

G. Review of Policy

The Policy should be placed before the management and if any changes in the policy are warranted, the revised policy should be placed before the management for review and approval.

Annexure A

Data for the month ending - _____

Sr no.	Received from	Pending at the end of last month	Received	Resolved*	Total Pending#	Pending complaints > 3 months	Average Resolution time^ (in days)
1	Directly from Investors						
2	SEBI (SCORES)						
3	Other Sources (if any)						
	Grand Total						

^ Average Resolution time is the sum total of time taken to resolve each complaint in days, in the current month divided by total number of complaints resolved in the current month.

Trend of monthly disposal of complaints

Sr No	Month	Carried forward from previous month	Received	Resolved*	Pending#
1	April YYYY				
2	May YYYY				
3	June YYYY				
4					
5	March YYYY				
	Grand Total				

*Inclusive of complaints of previous months resolved in the current month.

#Inclusive of complaints pending as on the last day of the month.

Trend of annual disposal of complaints

SN	Year	Carried forward From previous year	Received	Resolved**	Pending##
1	2019-2020				
2	2020-2021				
3	2021-2022				
	Grand Total				

**Inclusive of complaints of previous years resolved in the current year.

##Inclusive of complaints pending as on the last day of the year.