



BugleRock Capital Private Limited
(Stock Broking & Depository Services)

POLICY & PROCEDURE FOR COMPLAINT HANDLING

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1. Introduction:

BugleRock Capital Private Limited has an established mechanism for investor service and grievance handling, the Compliance Officer appointed by BugleRock Capital Private Limited for this purpose, being the important functional node.

All client or third-party complaints are directed in the first instance to BugleRock Capital Private Limited Compliance Department. BugleRock Capital Private Limited will endeavour to resolve the complaint. Upon resolution of the complaint, BugleRock Capital Private Limited will send a final response letter, which sets out the nature of that resolution and any applicable remedy. If for any reason, the complainant is dissatisfied with BugleRock Capital Private Limited final response, he / she / they are entitled to refer complaint to the investor grievance cell of the respective stock exchange or the Securities and Exchange Board of India (SEBI) - Investor Grievance Cell.

Being a SEBI registered stock broker with National Stock Exchange of India Limited (NSE) and BSE Limited (BSE) and Depository Participant with Central Depository Services (India) Limited (CDSL).

BugleRock Capital Private Limited provides services as SEBI registered Portfolio Manager, AMFI registered Mutual Fund Distributors, distributor/ referrer of third-party investment products.

BugleRock Capital Private Limited would seek to redress the investor grievances as expeditiously as possible.

2. OBJECTIVES OF THE POLICY

BugleRock Capital Private Limited believes that Investor service is a vital element for sustained business growth. BugleRock Capital Private Limited believes that Prompt and efficient service is essential to retaining existing relationships and therefore Client satisfaction becomes critical for BugleRock Capital Private Limited. Client queries and complaints constitute an important voice of Client and this policy details grievance handling through a structured grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future.

Objective of this policy document is to ensure that:

- ✓ Issues raised by investors are dealt with courtesy and are resolved on time.
- ✓ The Company will treat all the complaints efficiently and fairly without any bias.

3. Compliant Handling Procedure

For STOCK BROKING & DEPOSITORY PARTICIPANT

REGISTRATION OF COMPLAINTS

For queries related to stock broking services, clients can register their complaints at below mentioned contact details:

1. Email - Clients can email us at helpdesk@buglerock.asia
2. Fax - + 91- 080 4241 0022
3. Letter - Prestige Takt, 1st Floor, No. 23, Kasturba Cross Road, Bangalore 560001
4. SEBI has launched a centralized web-based complaints redress system (SCORES), which enables investors to lodge and follow up their complaints and track the status of redressal of such complaints from anywhere. This also enables the market intermediaries and listed companies to receive complaints from investors against them, redress such complaints and report redressal. All the activities starting from lodging of a complaint till its disposal by SEBI would be carried online in an automated environment and the status of every complaint can be viewed online at any time. An investor, who is not familiar with SCORES or does not have access to SCORES, can lodge complaints in physical form. However, such complaints would be scanned and uploaded in SCORES for processing.

Link: <http://scores.gov.in>

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.

RESOLUTION OF COMPLAINTS

- General Turn Around Time (TAT) for response to complaint is 10 days from the receipt of the valid complaint in writing.
- Primary responsibility is with the Compliance Officer to resolve the complaint for which he would liaise with the other relevant departments (Like Operations Team, Dealing Team and Back office team etc.)
- If the issue cannot be resolved by the Compliance Officer, the same will be escalated to the Senior Management.
- All complaints received shall be recorded internally including how the same has been resolved.

ESCALATION MATRIX

1. Level 1 - If issue of client stands unresolved in 10 days, Client can contact the Compliance Officer for redressal of issues by sending email compliance@buglerock.asia or can call on +91 9820187555 between 9:30 a.m. to 6:00 p.m
2. Level 2 - If client is not satisfied with the resolution provided through the Level 1 method of

handling complaint; the investor / client can escalate the issues to the next higher level as per the escalation matrix which has been specified at the BugleRock Capital Private Limited website.

For Mutual Fund Distribution And Other Third-Party Investment Products

REGISTRATION OF COMPLAINTS

For queries related to mutual fund distribution and other third-party investment products, clients can register their complaints at below mentioned contact details:

1. Email - Clients can email us at grievance@buglerock.asia
2. Fax - + 91- 080 4241 0022
3. Letter - Prestige Takt, 1st Floor, No. 23, Kasturba Cross Road, Bangalore 560001

RESOLUTION OF COMPLAINTS

- General Turn Around Time (TAT) for response to complaint is 10 days from the receipt of the valid complaint in writing.
- Primary responsibility is with the Compliance Officer to resolve the complaint for which he would liaise with the other relevant departments (Like Operations Team of Mutual Fund Distribution, Sales Team etc)
- If the issue cannot be resolved by the Compliance Officer, the same will be escalated to the Senior Management.
- All complaints received shall be recorded internally including how the same has been resolved.

4.0 Reporting

4.1 BugleRock Capital Private Limited has a designated email id helpdesk@buglerock.asia for handling investor grievances (IG) on which the investor can make a complaint. This e-mail ID is mentioned on various communication being made by BugleRock Capital Private Limited such as Account Opening Forms, Contract Notes, Notice Board displayed in Company premise(s) etc. Grievances sent on this e-mail id are auto-forwarded to the Compliance Team as well as the Designated Director.

4.2 An Investor can also send the written complaint to the respective stock exchange and depository on the following email address.

Exchange	Website	Contact No.	E-Mail ID
BSE Limited (BSE)	www.bseindia.com	+91 22 2272 8097	dis@bseindia.com
National Stock Exchange of India Limited (NSE)	www.nseindia.com	+91 22 2659 8190	ignse@nse.co.in
Central Depository Services (India) Limited (CDSL)	www.cdslindia.com	1800 22 5533	complaints@cdslindia.com

- 4.2.1 Or on SEBI Complaints Redress System (SCORES) (SEBI vide Ref. No. SEBI/HO/MIRSD/MIRSD6/CIR/P/2017/20, dated March 10, 2017) Website: <http://scores.gov.in> or on Toll Free Helpline No. 1800 22 7575 / 1800 266 7575. Grievances received in such mode will be updated in the Complaint Tracker / Investor Grievance Register (Physical Register) by Compliance Officer who will ensure that all relevant fields are filled.
- 4.2.2 Investors can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at <https://smartodr.in/login>.
- 4.2.3 **The template of Physical Register is mentioned in Annexure A.**

4.3 Acknowledgement to Complainant

- A correspondence either by letter or E-mail along with the reference number / ticket number will be made to investor who has submitted a written or online complaint acknowledging the receipt of the complaint within 24 hours of subsequent business day.

4.4 Assessment / Investigation

- 4.4.1 The Compliance Officer shall obtain all information available on the complaint which is considered necessary for a proper investigation. It will look into all the necessary information and undertake to resolve them as soon as possible. Full details of the complaint are thereafter informed by the Compliance Officer to the Respective Department Officer in the Company as soon as the complaint is received.
- 4.4.2 The Respective Department Officer identifies whether support from other Departments is required to resolve the said complaint. In case support is required from the other Departments, then the Respective Department Officer shall send the details of the said complaint to the concerned Department and follow-up with them till all the details for resolving the complaint are received in completeness.
- 4.4.3 The Respective Department Officer shall then send the reply to the complaint received to the Compliance Officer via e-mail once the same is resolved.
- 4.4.4 The Compliance Officer will verify the reply received from the Respective Department Officer.
- 4.4.5 If the Compliance Officer is not satisfied with the reply then will do further follow up with the Respective Department Officer and take prudent steps to resolve the said complaint.

5.0 Response to Complainant

- If Compliance Officer is satisfied that no further investigation is required, then the reply for those complaints would be done through the registered Email or Letter or SCORES (for complaints received through SCORES) and acknowledging receipt of reply from the

investor.

- Compliance Officer to update the Complaint Tracker sheet / IG Register for date of resolving and status of complaint.
- BugleRock Capital Private Limited endeavours to address and resolve all complaints received from an aggrieved investor with 10 working days of receipt of the complaint or within such other time frame prescribed under the regulatory framework, whichever is earlier.
- Status of redressal of complaints received from BSE, NSE and CDSL is informed to them through Letters / email and if any telephonic enquiry is received from them, full details of the case and status of redressal are provided over phone.
- Details of the complaints received (resolved and open), if any, shall also be placed before the Board of Directors of the Company for information and record.

6.0 Annexure A:

Template of Physical Investor Grievance Register



Investor Grievance
Register