

Buglerock Bhuvi Investment Advisers Private Limited
(FORMERLY KNOWN AS o3 Bhuvi Advisers Private Limited)

DISCLOSURE DOCUMENT

INVESTMENT ADVISORY SERVICES

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

Disclaimers:

- Investments in securities markets are subject to market risks. Read all the related documents carefully before investing.
- Registration granted by SEBI, enlistment as IA with Exchange and certification from NISM in no way guarantee performance of the intermediary or provide any assurance of returns to investors. Reference SEBI circular no SEBI/HO/MIRSD/ MIRSD-PoD-2/P/CIR/2023/52 dated April 06, 2023
- This Key Information and Disclosure Document has been prepared inter-alia in pursuant to regulation 15 and 18 of the Securities and Exchange Board of India (Investment Advisers) Regulations, 2013, as amended from time to time (the Regulations) and the Circulars, Guidelines and instructions issued by SEBI thereunder from time to time.
- This document is intended only for the personal use of the prospective investors to whom it is addressed or delivered and must not be reproduced or redistributed in any form to any other person without prior written consent of Buglerock Bhuvu Investment Advisers Private Limited (Formerly known as o3 Bhuvu Advisers Private Limited) (the "Buglerock Bhuvu/Investment Adviser").
- This document does not purport to be all-inclusive / comprehensive, nor does it contain all the information which a prospective investor may desire for making decisions for engaging the Investment Advisor.

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

Important Disclosure

This Disclosure Document is intended solely for informational purposes and should not be construed as a distribution, endorsement, investment advice, offer, solicitation, or recommendation to buy, sell, or subscribe to any securities, financial instruments, investment products, or portfolios mentioned herein. The information provided does not constitute an attempt to influence the investment decisions or opinions of clients or prospective clients.

Clients and prospective clients are solely responsible for their investment decisions. Any reliance on the information contained in this document, or any investment decisions based on it, is at their own discretion and risk. The Investment Advisor shall not be liable for any direct or indirect consequences arising from investment actions taken by clients or prospective clients. Investments in securities and financial products are subject to market risks, and the value of investments may fluctuate due to various economic, regulatory, and market conditions.

Before making any investment decision, clients and prospective clients are strongly advised to independently assess their financial objectives, risk appetite, and personal circumstances. It is recommended that they seek professional advice from independent legal, tax, and investment advisors before acting on any information contained in this document or before making any investments.

Furthermore, changes in legal, tax, and regulatory frameworks—including, but not limited to, government policies, economic conditions, market volatility, and geopolitical events—may impact investment outcomes. Investments in securities, financial products, or portfolios carry inherent risks, including the potential loss of capital. Clients and prospective clients should be aware that they may lose a portion or the entirety of their investment.

The Investment Advisor does not guarantee returns or the performance of any investment product or portfolio. Past performance should not be considered indicative of future results.

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

Disclosure Document**Purpose**

This document has been prepared inter-alia in pursuant to regulation 15 and 18 of the Securities and Exchange Board of India (Investment Advisers) Regulations, 2013, as amended from time to time (the Regulations) and the Circulars, Guidelines and instructions issued by SEBI thereunder from time to time. This document is intended only for the personal use of the prospective clients and clients to whom it is addressed or delivered and must not be reproduced or redistributed in any form to any other person without prior written consent of Buglerock Bhuvi. This document does not purport to be all-inclusive / comprehensive, nor does it contain all the information which a prospective client may desire for making decisions for engaging the Investment Adviser.

The necessary information about the Investment Adviser is disclosed in this Disclosure Document and the Investor is advised to carefully read the entire document and is advised to retain it for future reference.

The Disclosure Document shall be provided to the existing client as and when there is a material change in the contents of Disclosure Document and the same shall be available at the Website of the Company at <https://www.buglerock.asia/advisory/>

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

DISCLOSURE DOCUMENT INVESTMENT ADVISORY SERVICES

About the Company:

Buglerock Bhuvu Investment Advisors Private Limited (Buglerock Bhuvu) is registered with the Securities and Exchange Board of India ("SEBI") as an Non Individual Investment Advisor under SEBI (Investment Advisers) Regulations, 2013 ("IA regulations") vide registration no. INA200012674 dated March 12, 2019 and BSE Enlistment ID 1183, pursuant to which it provides investment advisory services to its clients.

Investment Adviser Details

Name of the Company	BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED
Registered office	Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bengaluru - 560 001
SEBI Registration No. for Investment Advisor	INA200012674
Type of Registration	Non Individual
Validity of SEBI Registration	Mar 12, 2019 - Perpetual
BSE ID	1183
Corporate Identification Number (CIN)	U74999KA2016PTC095605
Name of compliance officer	Neha Sharma
Telephone number of compliance officer	+91 80 6902 9000
Email id of compliance officer	Compliance.ria@buglerock.asia
Name of grievance officer	Neha Sharma
Telephone number of grievance officer	+91 80 6902 9000
Name of principal officer	Pranav Shenoy
Telephone number of principal officer	+91 80 6902 9000
Email id of principal officer	Pranav.s@buglerock.asia
Investor grievance id	icg.grievance@buglerock.asia
Corresponding SEBI office address	SEBI Bhavan, Plot No.C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400051, Maharashtra, India.

Disclaimer

Registration granted by SEBI, membership of BSE and certification from NISM in no way guarantee performance of the intermediary or provide any assurance of returns to investors" Reference SEBI circular no SEBI/HO/MIRSD/ MIRSD-PoD-2/P/CIR/2023/52 dated April 06, 2023

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore - 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

Description

(i) **History, Present Business and Background of the Investment Adviser**

The Investment Adviser was initially incorporated on August 09, 2016, as o3 Bhuvu Advisers Private Limited, marking the beginning of its journey in the Advisory services. On March 12, 2019, the company obtained its Investment Advisory license from the Securities and Exchange Board of India (SEBI), with the registration number INA200012674. This license authorizes the company to offer a Investment Advisory Service to a diverse clientele, including High-Net-Worth Individuals (HNIs), institutional investors, corporate clients, and other eligible investor classes as permissible under SEBI regulations.

In alignment with its evolving business vision and growth strategy, the company underwent a change in control and formal name change, becoming Buglerock Bhuvu Investment Advisers Private Limited on December 27, 2024.

(ii) a) **Promoters of Investment Adviser, Directors and their background**

Mr. Shyam Sunder Shenthathar

Co-Founder, BugleRock Group | Director, BugleRock Bhuvu Investment Advisers Pvt. Ltd.

Mr. Shyam Sunder Shenthathar, Co-Founder of the BugleRock Group and Director of BugleRock Bhuvu Investment Advisers Private Limited, is an accomplished entrepreneur and distinguished investment banker with an illustrious career spanning over 25 years across capital markets, investment management, and corporate finance.

A visionary leader with a deep understanding of India's evolving financial landscape, Mr. Shenthathar has been instrumental in conceptualizing and steering the strategic direction of the BugleRock Group. His extensive experience in equity capital markets – covering IPOs, private placements, mergers and acquisitions, and structured funding – has been integral to the firm's growth and reputation in the investment management space.

Throughout his professional journey, Mr. Shenthathar has successfully led and advised several landmark transactions, fostering strong relationships with corporate houses, institutional investors, and regulatory bodies. His strategic foresight, combined with his commitment to governance, innovation, and client-centric values, continues to shape the organization's vision of delivering excellence in portfolio management and investment advisory services.

Mr. Shenthathar's leadership reflects a rare blend of entrepreneurial acumen, technical expertise, and strategic insight, making him a key driving force behind BugleRock's continued success and its mission to create sustainable value for investors and stakeholders alike.

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

b) Directors and their background:

Sr. No	Name	Age	Designation	Experience	Qualification
1	Mr. Shyam Sunder Shenthathar	51 yrs.	Director	Mr. Shyam Shenthathar is the Co-Founder and Director of Buglerock Capital Private Limited (Formerly known as o3 Securities Private Limited) and an accomplished entrepreneur and investment banker with over 30 years of experience in capital markets, investment management and corporate finance. Shyam has been instrumental in the setup, growth and success of the company. His extensive knowledge and expertise cover all aspects of the Equity Capital Markets. In his current role, Shyam focuses on the company's wealth and asset management platform and is responsible for driving its overall growth. Shyam co-founded o3 Capital Global Advisory Private Limited and led the firm as CEO and MD from January 2007 to August 2023, focusing on capital raise and cross-border M&A services for mid-market companies. He has a proven track record of delivering value to clients, partners, and stakeholders through his problem-solving abilities, analytical skills, and entrepreneurial mindset. His deep domain expertise and extensive network in emerging markets, particularly in India, drive his passion for creating opportunities and addressing challenges. Prior to this, Shyam was a Partner at Aventus Advisors and a Financial Analyst at i-flex Solutions. He began his career as a sub-broker for Sivan Securities.	MBA - IIM Bangalore
2	Mr. Sudeep Srikantaswamy	53 yrs	Whole-time Director	Mr. Sudeep is responsible for building the practice of securities brokerage, business development and servicing Corporate clients and Individuals. He has more than 30 years' of experience in capital markets including securities broking, Equity sales and Wealth Management.	B. Com
3	Mr. Pranav Shenoy	30	Principal Officer and Additional Director	The Principal Officer possesses over six years of comprehensive experience in the securities market, encompassing key functional areas across Stock Broking, Portfolio Management Services (PMS), and Investment Advisory.	Post Graduate Program in Securities Markets from National Institute of Securities Markets

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore - 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

About Business activities:

Scope of Services to be provided by the Advisor will be limited/ subject to the Advisory services which are permitted activity under SEBI (Investment Advisers) Regulations, 2013 including guidelines issued by SEBI and the Advisor shall act in a fiduciary capacity.

Services offered and terms of offerings:

- a. The Investment Adviser shall provide investment advice to the Clients relating to investing, purchasing, selling, or dealing in securities as shares, debentures, bonds, derivatives, securities instruments, structured products, mutual funds, money market instruments etc.
- b. The Investment Adviser provides advice on investment portfolio containing or any other investment product suitable to the Client's needs and on-going monitoring, periodic review, asset allocation and financial planning including analysis of Clients' financial position, identification of its financial goals and developing and recommending financial strategies to realise such goals.
- c. Investment Adviser undertakes that all such Investment Advisory services shall be offered to the client with no binding whatsoever and client shall be free to implement or execute the services with any distributor/broker/intermediary of his/her/its choice.
- d. The performance related information provided by the Investment Advisor from time to time is on a consolidated basis which has neither been verified nor approved by SEBI. The performance / returns of the stock across advised individual portfolios may vary significantly from the data depicted by the Investment Advisor. No claims may be made or entertained for any variances between the performance depictions and that of the stock within individual client portfolios. Neither the Investment Adviser, nor its Directors, employees, affiliates shall in any way be liable for any variation noticed in the returns of individual portfolios. Performance of Buglerock Bhuvu shall have no bearing on the expected performance of an Individual Client Portfolio. Buglerock Bhuvu also does not guarantee or assure any minimum or risk-free returns. Past performance of the financial products, instruments and the portfolio may or may not be sustained in future and should not be used as a basis for comparison with other investments.

Any other services as may be mutually agreed between the Advisor and the Client as per the applicable law for the time being in force.

TERMS & CONDITIONS FOR ADVISORY SERVICES

- i. Existing clients, who wish to take advisory services, will not be eligible for availing distribution services within the group of Buglerock Bhuvu. Similarly, existing clients who wish to take distribution services will not be eligible for availing advisory services within the group of Buglerock Bhuvu.
- ii. A new client will be eligible to avail either advisory or distribution services within the group of Buglerock Bhuvu. The option to avail either advisory services or distribution services shall be made available to each client at the time of on boarding.
- iii. Buglerock Bhuvu will provide Investment Advisory Services, for an agreed fee structure for a definite period of time and which may vary / change from time to time, entirely at the Client's risk.

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore - 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

- iv. Buglerock Bhuvu shall, wherever available, advice direct plans (non-commission based) of products only. The detailed terms and conditions are as per the Agreement executed between Client and Buglerock Bhuvu.

Investment Advisory Audits

“Disclosure with respect to compliance with Annual compliance audit requirement under Regulation 19(3) of SECURITIES AND EXCHANGE BOARD OF INDIA (INVESTMENT ADVISERS) REGULATIONS, 2013. for last and current financial year are as under :

Sr. No	Financial Year	Compliance Audit Status	Remarks, if any
4	FY 2025-26	Conducted	No major observation reported

AFFILIATIONS WITH OTHER INTERMEDIARIES

About Buglerock Bhuvu Investment Advisors Private Limited

Buglerock Bhuvu Investment Advisors Private Limited was incorporated on August 09, 2016 under the provisions of the Companies Act, 1956. The company is a wholly owned subsidiary of Buglerock Capital Private Limited and operates as an independent entity within the Buglerock group, aligning with its commitment to providing investment advisory services in compliance with regulatory standards.

About Buglerock Capital Private Limited

Buglerock Capital Private Limited is a Securities and Exchange Board of India (SEBI)-registered intermediary offering a comprehensive suite of financial services. The company holds multiple registrations under SEBI regulations –

- **Portfolio Manager (PM)** under SEBI (Portfolio Managers) Regulations, 2020, providing discretionary and non-discretionary portfolio management services with a strong emphasis on research-driven investment strategies;
- **Stock Broker** under SEBI (Stock Brokers) Regulations, 1992, enabling efficient and compliant trade execution across recognized stock exchanges; and
- **Depository Participant (DP)** under the Depositories Act, 1996, offering secure custodial and depository services to investors through Central Depository Services (India) Limited (CDSL).

In addition, Buglerock Capital Private Limited is registered with the **Association of Mutual Funds in India (AMFI)** as a **mutual fund distributor**, facilitating access to a wide range of mutual fund schemes for retail and institutional investors while ensuring adherence to regulatory guidelines and investor suitability norms.

To complement these services, the group operates through its wholly owned subsidiary, **Buglerock Bhuvu Investment Advisors Private Limited**, which is registered with SEBI as an **Investment Adviser (IA)** under the SEBI (Investment Advisers) Regulations, 2013. The subsidiary focuses on providing

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India
 Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605
 SEBI Registration No.: INA200012674 | BSE ID:- 1183

personalized and unbiased investment advisory services, aligning recommendations with the client's financial objectives, risk profile, and regulatory standards.

Together, Buglerock Capital Private Limited and its subsidiary form an integrated financial services platform—spanning **advisory, execution, distribution, and custody**—ensuring a seamless and compliant investment experience for clients while maintaining the highest standards of governance, transparency, and regulatory compliance.

DISCLOSURES

- i. **Disclosures with respect to receipt of any consideration by way of remuneration or compensation or in any other form whatsoever, received or receivable by WR or any of its associates or subsidiaries for any distribution or execution services in respect of the products or securities for which the investment advice is provided to the client.**

Buglerock Bhuvi do not have any distribution or execution arrangement with the issuers of the securities, that Buglerock Bhuvi advises on. The fellow group companies / associate companies of Buglerock Bhuvi may receive distribution commission/referral fee or similar income in respect of the product or securities for which investment advice is provided to the client by Buglerock Bhuvi.

- ii. **Disclosure of consideration by way of remuneration or compensation or in any form whatsoever with respect to recommending the services of a stock broker or other intermediary to a client.**

Buglerock Bhuvi does not recommend services of any stock broker or intermediary to a client. Buglerock Bhuvi does not have any commission sharing agreement with any intermediary for recommending the services either as a stock broker or as other intermediary.

- iii. **Disclosures with respect to Buglerock Bhuvi own holding position in financial products / securities.**

Although Buglerock Bhuvi is not registered as a broker with SEBI, it is not actively engaged into any proprietary trading. It might invest in financial products / securities in the future.

- iv. **Actual or potential conflicts of interest arising from any connection to or association with any issuer of products/ securities, including any material information or facts that might compromise its objectivity or independence in the carrying on of investment advisory services.**

Buglerock Bhuvi is a separate legal entity which has an independent activity of providing the Investment Advisory services. Buglerock Bhuvi does not provide any other services in stock broking, depository, research, portfolio management and distribution of mutual funds and third party products.

- v. **Disclosure of all material facts relating to the key features of the products or securities, particularly, performance track record, warnings, disclaimers etc.**

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

Clients are requested to go through the detailed key features, performance track record of the product, or security including warnings, disclaimers etc. before investing as and when provided by the Investment Advisor. Such product materials may also be available to www.sebi.gov.in or www.nseindia.com or www.bseindia.com.

vi. **Drawing client's attention to warnings, disclaimers in documents, advertising materials relating to investment products.**

Buglerock Bhuvu and the Investment Advisers of Buglerock Bhuvu who provide the investment advice to the clients, shall draw the client's attention to the warnings, disclaimers in documents, advertising materials relating to an investment product/s which he/she/they is/are recommending to the client/s.

Disciplinary History / Complaint Status

- i. No penalties / directions have been issued by SEBI under the SEBI Act or Regulations made there under against Buglerock Bhuvu or its Directors, or employees relating to Investment Advisory services.
- ii. There are no pending material litigations or legal proceedings, findings of inspections or investigations for which action has been taken or initiated by any regulatory authority against the Buglerock Bhuvu or its Directors, or employees.

Standard Risk Factors as perceived by Investment Adviser:

- i. Investments in equities, derivatives and mutual funds are subject to market risks and there is no assurance or guarantee that the objective of the investment / products will be achieved.
- ii. The past performance does not indicate its future performance. There is no assurance that past performances will be repeated. Investors are not being offered any guaranteed or indicative returns.
- iii. As with any investment in securities, the NAV of the portfolio can go up or down depending upon the factors and forces affecting the capital market.
- iv. The performance of the investments/products may be affected by changes in Government policies, general levels of interest rates and risks associated with trading volumes, liquidity and settlement systems in equity and debt markets.
- v. Investments in the products which the Clients have opted are subject to wide range of risks which inter alia also include but not limited to economic slow down, volatility & illiquidity of the stocks, poor corporate performance, economic policies, changes of Government and its policies, acts of God, acts of war, civil disturbance, sovereign action and /or such other acts/ circumstance beyond the control of WR or any of its fellow subsidiaries.
- vi. The names of the products/nature of investments do not in any manner indicate their prospects or returns. The performance in the equity products may be adversely affected by the performance of individual companies, changes in the market place and industry specific and macro-economic factors.
- vii. Investments in debt instruments and other fixed income securities are subject to default risk, liquidity risk and interest rate risk. Interest rate risk results from changes in demand and supply for money and other macroeconomic factors and creates price changes in the

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

value of the debt instruments. Consequently, the NAV of the portfolio may be subject to the fluctuation.

- viii. Investments in debt instruments are subject to reinvestment risks as interest rates prevailing on interest amount or maturity due dates may differ from the original coupon of the bond, which might result in the proceeds being invested at a lower rate.
- ix. The product may invest in non-publicly offered debt securities and unlisted equities. This may expose the investment/product to liquidity risks.
- x. Engaging in securities lending is subject to risks related to fluctuations in collateral value / settlement/ liquidity/counter party.
- xi. The product may use derivatives instruments like index futures, stock futures and options contracts, warrants, convertible securities, swap agreements or any other derivative instruments. Usage of derivatives will expose portfolio to certain risk inherent to such derivatives.
- xii. The use of derivative requires a high degree of skill, diligence, and expertise. Thus, derivatives are highly leveraged instruments. Small price movement in the underlying security could have a large impact on their value. Other risks in using derivatives include the risk of mis-pricing or improper valuation of derivatives and the inability of derivatives to correlate perfectly with underlying assets, rates, and indices.
- xiii. The NAV may be affected by changes in settlement periods and transfer procedures.
- xiv. The Investment Advisor may, considering the overall level of risk of the portfolio, advice for investment in lower rated/unrated securities offering higher yield. This may increase the risk of the portfolio. Such investments shall be subject to the scope of investments as laid down in the Agreement.

General Risks:

We trust that, before executing on the advice of the Investment Adviser, our Relationship Manager at Buglerock Bhuvu has provided the client with all the information about the products, risk factors etc. and you have gone through all the relevant information about the product being advised and have sought requisite clarification about the same.

Buglerock Bhuvu shall maintain complete confidentiality of all information provided by the client/s and shall not disclose any such information, without your prior consent except if such disclosure is required to be made in compliance with any applicable law or regulatory direction. Buglerock Bhuvu will obtain information pertaining to your orders/transactions/portfolio/fund's availability/securities availability etc. from the individual Investment Adviser to enable us to provide you with informed and appropriate advice.

Investors Services:

The detail of investor relation officer who shall attend to the investor queries and complaints is mentioned below:

Name of the person: Neha Sharma

Email: neha.s@buglerock.asia

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183

Address: Prestige Takt, 1st Floor, No. 23,
Kasturba Road Cross,
Bangalore – 560001, Karnataka, India

Contact details of Principal Officer

Mr. Pranav Shenoy
Phone no:- +91 80 6902 9000
Email id:- pranav.s@buglerock.asia

Contact Details of Compliance Officer and Grievance Redressal Officer

Ms. Neha Sharma
Phone no: - +91 80 6902 9000
Email id: - compliance.ria@buglerock.asia

Grievance Redressal and Dispute Settlement Mechanism

The Investment Adviser has in place a dedicated system for addressing all complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable manner and time. If the Investor remains dissatisfied with the remedies offered or the stand taken by the Investment Adviser, the Investor may approach the regulator under whose purview the product is being regulated.

All disputes, differences, claims and questions whatsoever arising between the Client and the Investment Adviser and/ or their respective representatives shall be settled in accordance with and subject to the provisions of The Arbitration and Conciliation Act, 1996, or any statutory requirement, modification or re-enactment thereof. Such Arbitration proceedings shall be held at Bangalore or such other place as the Investment Adviser thinks fit.

In case you are not satisfied with the response, or your grievance is still unresolved, you may register your complaints with SEBI through SEBI Complaint Redressal System (SCORES) at <http://scores.sebi.gov.in>.

or you may also write to any of the offices of SEBI. For any queries, feedback or assistance, please contact SEBI Office on Toll Free Helpline at 1800 22 7575 / 1800 266 7575.

ODR Portal could be accessed, if unsatisfied with the response. Your attention is drawn to the SEBI circular no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/131 dated July 31, 2023, on “Online Resolution of Disputes in the Indian Securities Market”.

After exhausting these options for resolution of the grievance, if you are still not satisfied with the outcome, you can initiate dispute resolution through the SMART Online Dispute Resolution Portal at <https://smartodr.in/login>.

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India
Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605
SEBI Registration No.: INA200012674 | BSE ID:- 1183

Alternatively, the 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 grievance redressal.

Any Dispute shall be redressed by the Investment Adviser within 21 (Twenty-one) calendar days from the date of receipt of the complaint.

Disclaimer:

This disclosure document has been prepared by Buglerock Bhuvu Investment Advisers Private Limited ("Buglerock Bhuvu" / "Investment Advisor"). This document is meant for assistance purpose only and does not constitute an offer or recommendation to buy or sell any products or services. The recipients should act and rely on the information/ data contained in this document only after understanding all associated risk parameters. The information/ data contained in this document is as of the date hereof. Buglerock Bhuvu and its Directors, Key Managerial Personnel, Employees and representative does not undertake any obligation to update such information/ data for any subsequent event(s) that may occur thereafter and does not explicitly or implicitly guarantee that information/ data provided herein is complete and accurate in all respects as of date hereof or that it will continue to be complete and accurate in future. This document is not intended to provide, and should not be relied on for, tax, legal or accounting advice. Recipient should consult own tax, legal and accounting advisors before engaging in any transaction. The Investment Advisor and its representatives disclaims any and all the liability that may arise to any person/ party from the use of the data/information contained herein.

Under no circumstance, Buglerock Bhuvu shall have any liability to you for any loss or damage of any kind incurred as a result of the use of this document or reliance on any information provided herein. Financial products and instruments are subject to market risks and yields may fluctuate depending on various factors affecting capital/debt markets. There is no assurance or guarantee that the objectives of the portfolio/ Investment Advisory Services will be achieved. Please note that past performance of the financial products, instruments and the portfolio does not necessarily indicate the future prospects and performance thereof. Such past performance may or may not be sustained in future. Investment Advisor's decisions may not be always profitable, as actual market movements may be at variance with anticipated trends. The investors are not being offered any guaranteed or assured returns. Investors are also advised to refer to the risk factors, disclaimers and other disclosures associated with Investment Advisory Services and read the Issue Offer Document (including latest credit rating and financial soundness) of the Issuer before taking decisions of investment.

BUGLEROCK BHUVI INVESTMENT ADVISERS PRIVATE LIMITED

Regd Office: Prestige Takt, 1st Floor, No. 23, Kasturba Road Cross, Bangalore – 560001, Karnataka, India

Tel: +91 80 6902 9000 | CIN: U74999KA2016PTC095605

SEBI Registration No.: INA200012674 | BSE ID:- 1183