Buglerock Bhuvi Investment Advisers Private Limited

(FORMERLY KNOWN AS o3 Bhuvi Advisers Private Limited)

Code of Conduct for Investment Advisers

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Buglerock Bhuvi Investment Advisers Private Limited (Buglerock Bhuvi) is registered with the **Securities and Exchange Board of India (SEBI)** as an **Investment Advisor** under the **SEBI (Investment Advisers) Regulations, 2013**, holding **registration number INA200012674**. BUGLEROCK BHUVI is also a member of **BSE Administration and Supervision Ltd (BASL)**, with **BSE Enlistment No. 1183**.

As a SEBI-registered Investment Advisor, **BUGLEROCK BHUVI is committed to upholding the highest ethical and professional standards** in its advisory services. To ensure transparency, integrity, and client-centricity in its operations, BUGLEROCK BHUVI has adopted the following **Code of Conduct**, which must be **strictly adhered to** by all its officials and representatives:

1. Honesty and Fairness

BUGLEROCK BHUVI officials shall act with **honesty, fairness, and transparency** in all interactions with clients. They must prioritize the best interests of clients and uphold the integrity of the securities market. Any advice provided must be free from **bias, undue influence, or conflicts of interest**.

2. Diligence and Professionalism

BUGLEROCK BHUVI officials shall exercise **due skill, care, and diligence** while providing investment advice. Investment recommendations shall be based on a **comprehensive analysis** of available data, taking into account market conditions, financial instruments, and clients' specific needs.

3. Competence and Capabilities

BUGLEROCK BHUVI officials must possess and **effectively utilize the necessary knowledge, expertise, resources, and systems** to efficiently perform their duties. Regular **training and upskilling** shall be encouraged to stay updated with regulatory developments and industry best practices.

4. Client Suitability and Information Gathering

BUGLEROCK BHUVI officials must collect and document **detailed information** about their clients, including:

- Financial position
- Investment experience
- Risk appetite
- Investment objectives
- Any other relevant financial details

This information shall be used to offer investment advice that is **suitable, appropriate, and aligned with the client's financial goals**. The confidentiality of all client information shall be strictly maintained, in compliance with **SEBI and regulatory guidelines**.

5. Transparency and Disclosure

BUGLEROCK BHUVI officials shall provide **clear, accurate, and adequate disclosures** of all material information to clients, including:

- Risks associated with investments
- Costs and charges applicable
- Any potential conflicts of interest
- Assumptions and limitations in financial models used

Investment recommendations must be communicated in a manner that allows clients to make **informed decisions**.

6. Fair and Reasonable Fees

Fees charged by BUGLEROCK BHUVI shall be **fair, transparent, and reasonable**, ensuring compliance with **SEBI-specified ceilings and regulations**. Any changes to the fee structure shall be communicated to clients **well in advance**, along with appropriate justifications.

7. Avoidance and Management of Conflicts of Interest

BUGLEROCK BHUVI officials shall take all reasonable steps to **identify, prevent, and manage conflicts of interest** that may arise in the course of providing investment advice. When conflicts are unavoidable, BUGLEROCK BHUVI shall ensure:

- **Full disclosure** of such conflicts to clients.
- Equitable treatment of all clients.
- No preferential treatment that could disadvantage any client.

8. Regulatory Compliance

BUGLEROCK BHUVI officials, including representatives, shall strictly comply with **all applicable laws, regulations, and guidelines** issued by **SEBI, BASL, and other relevant authorities**. Compliance includes but is not limited to:

- SEBI (Investment Advisers) Regulations, 2013
- Prevention of Insider Trading Regulations
- Anti-Money Laundering (AML) and Know Your Customer (KYC) norms
- SEBI's Code of Conduct for Investment Advisers

Non-compliance may result in disciplinary action, penalties, or regulatory scrutiny.

9. Responsibility of Senior Management

BUGLEROCK BHUVI's senior management is responsible for **ensuring the effective implementation and enforcement of this Code of Conduct**. They shall:

- Establish internal policies and controls to **maintain ethical standards**.
- Conduct **regular audits and reviews** to ensure adherence to compliance requirements.
- Provide necessary **training and guidance** to employees.
- Take appropriate actions against violations of the Code of Conduct.

Conclusion

This **Code of Conduct** serves as a guiding framework for all BUGLEROCK BHUVI officials in maintaining ethical business practices, safeguarding client interests, and upholding regulatory integrity. Any deviation from these principles shall be subject to **strict review and necessary corrective action** in line with SEBI and BASL requirements.