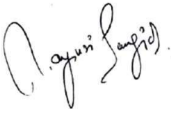




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Approved by [Name and Signature]	Jigar Mistry
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1.0	19/01/2023	Mayuri Jangid 	Sunita Mantri 	Jigar Mistry 	19/01/2023

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1. **Title**

Policy on Complaint Handling, Grievance Redressal & Dispute Resolution (“Policy”)

2. **Objective**

In the present competitive scenario, excellence in investor service is the most important tool for sustained business growth. Buoyant Capital Private Limited has always given high priority to investor satisfaction. Providing prompt and efficient response to any investor request/query/grievance/complaint is essential, not only to attract new investors, but also to retain the existing ones. This Policy aims at appropriately handling investor requests/queries/grievances/complaints through a framework of proper service delivery and review mechanism as well as to ensure prompt redressal of the same. In order to make redressal mechanism more meaningful and effective, a structured system should function, which should ensure that redressal sought is just and fair and within the given framework of rules and regulations.

3. **Regulatory Background**

- 3.1 SEBI Circular No. CIR/MIRSD/3/2014 dated August 28, 2014 Information regarding Grievance Redressal Mechanism
- 3.2 SEBI Circular No. CIR/OIAE/1/2014 dated Dec 18, 2014 (SCORES) Redressal of investor grievances through SEBI SCORES
- 3.3 SEBI Circular SEBI/HO/OIAE/IGRD/CIRP/2019/86 dated August 02, 2019 Streamlining issuance of SCORES Authentication for SEBI registered intermediaries

4. **Applicability**

This Policy is applicable to Buoyant Capital Private Limited which is acting as investment manager to various schemes of Alternative Investment Fund (AIF) Category III registered with SEBI. Buoyant Capital Private Limited is also registered to act as a Portfolio Manager under SEBI (Portfolio Managers) Regulations 2020. Further Buoyant Capital Private Limited undertakes Investment Advisory Services under SEBI (Investment Advisors) Regulations, 2013.

5. **Implementation / Process**

The Policy is essentially based on the below noted guiding principles:

- Our investors will be treated fairly at all times;
- Grievances/complaints raised by our investors will be dealt with promptly and with due courtesy;
- Our investors will be fully informed of avenues to escalate their complaints/grievances within the organization and of their rights to alternative remedy if they are not fully satisfied with the response received to their complaints.
- Investment Manager will deal with all complaints efficiently and fairly, being deeply cognizant of the fact that the smallest of complaints can damage the company’s reputation and standing, if not attended to properly; and
- The customer service executives / employees of Investment Manager will work in good faith and without prejudice to the interests of the investor.

The brief process to handle investor requests/queries/grievances/complaints is as stated below:

- a. If the Investor wants to make or register requests/queries/grievances/complaint, Investment Manager has made known all relevant mediums:
 - o Where to make the same
 - o When to expect a reply
 - o Whom to approach for redressal
 - o Escalation mechanism
- b. The Investment Manager will inform Investors where to find the details of procedures for handling requests/queries/grievances/complaints fairly and quickly.
- c. If the Investor requests/queries/grievances/complaint is received in writing, Investment Manager will provide an immediate acknowledgement. If an Investor requests/queries/grievances/complaint is received over phone or through email, Investment Manager will acknowledge the same and will keep the investor informed of the progress within a reasonable period. Investors can also lodge their complaints through SEBI's web based centralized grievance redress system called SEBI Complaint Redress System (SCORES) at <http://scores.gov.in>.
- d. After examining the matter, Investment Manager herein referred to as Buoyant Capital Private Limited will ensure to send out an interim reply as early as possible, but not later than 10 days and the final response within 30 days of receipt of complaint.
- e. As per SEBI circular CIR/MIRSD/3/2014 dated August 28, 2014, details on grievance redressal mechanism must be prominently displayed in their offices. The format is enclosed as **Annexure 1**.

PROCESS

In an endeavor to provide centralized management and tracking of investor grievances, the following process has been set for gathering information related to *service requests, queries, grievances and complaints* received – (a) directly from investors, (b) through distributors/ agents, (c) through regulators i.e., SEBI, etc., (d) any other source not specifically mentioned here.

A. Touch Points

The following are the touch points through which investors (existing or perspective) can seek clarifications & get their concerns addressed:

(a) Telephone Number for all the queries/complaints:

- (i) 022-66670655

(b) Email of Investment Manager

- (i) aif@buoyantcap.com

(c) Letter

Investors may also write to:

*Sunita Mantri
Compliance Officer
Office No. B-3501, B-Wing, Kohinoor Square,
N. C. Kelkar Marg, R. G. Gadkari Chowk,
Shivaji Park, Dadar West,
Mumbai-400028*

(d) SEBI SCORES Platform

Investors have the option to raise a grievance or complaint through the SEBI SCORES Platform at <http://scores.gov.in>.

B. Collation

The Compliance Officer will be responsible for collation of all service requests, queries, grievances, and complaints received from various touch points.

Any service requests, queries, grievances, and complaints received:

- at a **number** other than the designated telephone number or
- at an **email id** other than the designated email ids
- by way of a **letter** at an address other than the designated address should be immediately brought to the attention of the Compliance Officer.
- Any grievance or complaint received from **SEBI** (through the SCORES Portal) shall be promptly forwarded by the Compliance Team.

All service requests, queries, grievances, and complaints received will be recorded in the investor grievance register.

C. Complaints data

Data of all such queries, grievances, and complaints will be maintained by the Compliance officer. The lapses on any of the above ground need to be proved.

If such a lapse is due to the Investment Manager / Investment Manager's service provider, the same shall be treated as a complaint. If such a lapse is not due to the Investment Manager/ Investment Manager's service provider but due to investor / any external agency, the same shall be treated as a grievance.

In case of any doubt with respect to tagging / classification of a particular case the Compliance Team shall consult the Compliance Officer of Investment Manager.

D. Escalation matrix

If grievances and complaints are not resolved and the time limit exceeds 15 days from the receipt, the said will be escalated to Directors/Senior Personnel of Investment Manager.

E. Grievances or Complaint received through SCORES

The Compliance Officer will redress the grievance within 30 days from the date of receipt from SCORES failing which the complaint shall be registered in SCORES. The Compliance Officer shall update the action taken report (ATR) along with supporting documents, if any, electronically in SCORES. The proof of dispatch of the reply of the Compliance Officer to the concerned investor should also be uploaded in SCORES and preserved by the Compliance Officer for future reference.

A complaint shall be treated as resolved/disposed/closed only when SEBI disposes/closes the complaint in SCORES. Failure by Investment Manager to file ATR under SCORES within thirty days of date of receipt of the complaint shall not only be treated as failure to furnish information to SEBI but shall also be deemed to constitute non-redressal of investor complaint.

F. Complaint Review Process

- A quarterly review of complaints will be undertaken in liaison with the Compliance Officer / Director.

G. Disclosure

On a periodic basis the status of investor complaints shall be updated to the SEBI in Monthly / Quarterly Reports filed with SEBI, if applicable.

H. ARBITRATION & DISPUTE RESOLUTION

All disputes, differences, claims and questions whatsoever arising between the investor and Investment Manager and/or their respective representatives shall be settled in accordance with the provision of The Arbitration and Conciliation Act, 1996 or any statutory requirement, modification, or re-enactment thereof for the time being in force. Such arbitration proceedings shall be held at Mumbai or such other place as Investment thinks fit. The Arbitration shall be held in English. The Arbitration Award shall be treated as final and shall be binding on both parties. This arbitration clause is subject to the jurisdiction of courts in Mumbai only.

The arbitration will be presided over by three arbitrators: one each appointed by the disputing parties and the other chosen by the other 2 (two) arbitrators so nominated by the parties. The arbitrators shall be people of professional repute who are not directly or indirectly connected with any of the Parties to this Agreement. They shall have prior experience as arbitrators. Each party will bear the expenses / costs incurred by it in appointing the arbitrator and for the arbitration proceedings. However, the cost of appointing the presiding arbitrator will be borne equally by both the parties.

6. Responsibility

The Compliance Officer of Investment Manager will be responsible for the implementation of Policy.

7. Violation

If anyone is found in violation of this Policy, he/she will be liable for appropriate action by appropriate authority.

8. **Policy Review**

This Policy shall be reviewed as and when there are any regulatory changes introduced or as and when it is found necessary to change the Policy due to business needs. However, Policy shall be reviewed at least annually. The Director/(s) of Investment Manager will be approving authority for the Policy.

9. **Deviation to Framework**

Major deviations to the Policy shall be approved by the Director/(s) and all other deviations shall be approved by the Compliance officer of the Investment Manager.

10. **Power to Remove Difficulties**

To remove any difficulties in the application or interpretation of this Policy, the Compliance Officer of Investment Manager shall have the power to issue clarifications.

11. **Effective Date**

This Policy supersedes the earlier policy on this subject matter. This Policy shall be effective from 18 Day of November, 2022.

Dear Investor,

In case of any grievance / complaint against the Intermediary:

Please contact the Compliance Officer of the Intermediary on email-id (info@buoyantcap.com) and Phone No. 022-66670655.

If not satisfied with the response of the intermediary, you can lodge your grievances with SEBI at <http://scores.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.