

Document Control	
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Policy Owner	Compliance Department
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Reviewed by	Mayuri Jangid
Checked and approved by	Board of Directors
Adopted on	31/08/2024

Sr. No.	Details of Change	Date of circulation	Author	Version no.	Approved by
1	First Policy	18.11.2022	Legal Compliance Team &	V1.1	Board of Directors
2	Periodic review	15.06.2023	Legal Compliance Team &	V1.2	Board of Directors
3	Revised as per SEBI Circular for redressal of investor grievances and Online Resolution of Disputes	01.09.2023	Legal Compliance Team &	V1.3	Board of Directors
4	Yearly Review	31.08.2024	Legal Compliance Team &	V1.4	Board of Directors

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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
- 3.4 SEBI Master circular SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/145 for Online Dispute Resolution dated Jul 31, 2023, updated on Aug 11, 2023

4. **Applicability**

This Policy is applicable to Buoyant Capital Private Limited (herein after referred to as Buoyant) which is acting as Investment Manager to various schemes of Alternative Investment Fund (AIF) Category III registered with SEBI, as Portfolio Manager under SEBI (Portfolio Managers) Regulations 2020 and as Investment Adviser under SEBI (Investment Advisors) Regulations, 2013 through its division Buoyant Capital Investment Advisers.

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.

- Buoyant 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 Buoyant 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, Buoyant has made known all relevant mediums:
 - Where to make the same
 - When to expect a reply
 - Whom to approach for redressal
 - Escalation mechanism
- b. Buoyant 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, Buoyant will provide an immediate acknowledgement. If an Investor requests/queries/grievances/complaint is received over phone or through email, Buoyant 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 <https://scores.sebi.gov.in/scores-home>
- d. After examining the matter, Buoyant will ensure to send out an interim reply as early as possible, but not later than 10 days and the final response within 21 days of receipt of complaint without any intervention of SEBI.
- 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.

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 prospective) can seek clarifications & get their concerns addressed:

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

- (i) +91-22-6931-9999/+91-22-6931-9912

(b) Email of Portfolio Manager/Investment Manager/Investment Adviser:

care@buoyantcap.com / mayuri.jangid@buoyantcap.com

(c) Letter

Investors may also write to:

Ms. Mayuri Jangid
Compliance Officer/Grievance Redressal 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 2.0 Platform at <https://scores.sebi.gov.in/scores-home>

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. Display of Complaints Data:

The details of the complaints including SCORES 2.0 complaints related to PMS, AIF and RIA shall be disclosed on the website on monthly basis by 7th of the succeeding month in the format provided in **Annexure 1** as may be prescribed by SEBI from time to time.



The details of complaints shall also be provided in the private placement memorandum of the schemes of Company AIF within one month of end of each financial year.

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

D. Escalation matrix

In case the Investors are unsatisfied or haven't received a reply within 10 business days of writing the complaint, the investor may reach out to head of the Compliance department at mayuri.jangid@buoyantcap.com/care@buoyantcap.com. The Investor can expect a reply within 10 business days of approaching the Compliance department.

In case an Investor is still not satisfied with the response, grievance can be lodged with SEBI at SCORES 2.0 <https://scores.sebi.gov.in/scores-home> or one may also write to any of the offices of SEBI or contact SEBI Office on Toll Free Helpline at [1800 266 7575](tel:18002667575)/ [1800 22 7575](tel:1800227575). The complaint shall be lodged on SCORES within one year from the date of cause of action, where,

- The complainant has approached Buoyant, for redressal of the complaint and,
- Buoyant has rejected the complaint or,
- The complainant has not received any communication from Buoyant or,
- The complainant is not satisfied with the reply received or the redressal action taken by Buoyant.

Alternatively, Investor may use SCORES (<https://scores.sebi.gov.in/scores-home>) to submit the complaint or grievance directly to Buoyant for resolution.

Buoyant shall endeavour to redress the Investor complaint(s) within 21 days without any intervention of SEBI, failing which the complaint shall be registered on SCORES. It is mandatory for the Investor having grievance to take up the matter directly with Buoyant.

SCORES 2.0 may be accessed through SCORES 2.0 mobile application as well, same can be downloaded from below link:
<https://play.google.com/store/apps/details?id=com.ionicframework.sebi236330>
<https://apps.apple.com/in/app/sebiscores/id1493257302>

If the investor is not satisfied with the extent of redressal of grievance by Buoyant, 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.

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>.

Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with the Portfolio Manager is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.

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.

Master Circular for Online Dispute Resolution: [SEBI 2.0 | Master Circular for Online Resolution of Disputes in the Indian Securities Market](#)

E. Grievances or Complaint received through SCORES

The Compliance Officer will redress the grievance within 21 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 Buoyant to file ATR under SCORES within 21 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.

6. Responsibility

The Compliance Officer of Buoyant 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 Buoyant 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 Buoyant.

10. **Power to Remove Difficulties**

To remove any difficulties in the application or interpretation of this Policy, the Compliance Officer of Buoyant 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 31st Day of August, 2024.

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

Sr.No	Year	Carried forward From previous year	Received	Resolved**	Pending##
1	2021-2022				
2	2022-2023				
3	2023-2024				
	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.

Complaint data of IA

Sr no.	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					
