# **Relationship Summary (Form CRS)**

November 30, 2023

#### **ITEM 1: INTRODUCTION**

Buoyant Capital Private Limited ("BCPL") is a registered investment adviser ("RIA") registered with the U.S. Securities and Exchange Commission ("SEC"). It is important to note that BCPL is not a broker-dealer with the SEC. It is also important to note that brokerage and investment advisory services and fees differ among advisers –it is crucial for you to understand the difference. In addition, the SEC offers free and simple tools to research firms and financial professionals at investor.gov/CRS, which also provides information tailored to educate retail investors about financial professionals.

### **ITEM 2: MATERIAL CHANGES**

What Investment Services and Advice Can You Provide Me?

We offer investment advisory services, including Portfolio Management Services, to retail investors, just like you, who invest personal and/or family money.

#### Monitoring

We offer continuous and supervisory investment monitoring of its clients' portfolios and aims to conduct reviews of its clients' investments annually or more frequently, depending upon circumstances.

### Investment Authority

Our Portfolio Management Services will either be non-discretionary or discretionary depending upon what is agreed to at the beginning of the client relationship. For clients choosing to provide us with investment discretion, we may be able to determine the type and amount of securities to be transacted. We will exercise this discretion in a manner consistent with each client's stated investment objectives, risk tolerance, and time horizon. Our authority to trade securities may be limited by applicable legal and regulatory requirements in certain circumstances. In addition, clients are allowed to insist upon reasonable limits on our discretionary authority, including restrictions on investing in certain securities or types of securities. For our non-discretionary clients, it is ultimately up to you, the retail investor, to decide on the purchase or sale of investments.

### Investment Offerings

We do not limit our services only to proprietary investment products, or a limited menu of products, or types of investments.

### Account Minimum

Due to legal and regulatory requirements, our Portfolio Management Service has an account minimum requirement of \$60,000.

Additional information about our services can be found in our Form ADV Part 2A, items 4 and 8, available at <a href="https://adviserinfo.sec.gov/IAPD/default.aspx">https://adviserinfo.sec.gov/IAPD/default.aspx</a>.

# Conversation Starter: You May be Wondering....

- Given my financial situation, should I choose an investment advisory service?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Our fees vary across clients, depending upon the product or service received and the nature of the client's overall relationship with us. Generally, we charge more for Portfolio Management Services than for its Investment Advisory Services, given the nature of the services and our responsibility. Our fees are typically based on a percentage of the client's assets that we manage and in the case of certain discretionary services, based on a percentage of the returns achieved on behalf of the client, as well. For asset-based fee arrangements, the more assets the client has in its account(s) with us, the more fees the client will pay, and we may therefore have an incentive to encourage the client to increase the assets in their account. For performance-based fee arrangements, the greater the returns on a client's investment, the higher the fees we will receive, and we may therefore have an incentive to pursue a riskier investment strategy. We will deduct certain additional fees from client accounts, including, but not limited to depository fees, custody fees, brokerage commissions, transaction costs, fees paid to third-party service providers, fees and costs associated with account audits, or mutual fund fees and costs.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand the fees and costs you are paying. For more detailed information about our fees and costs, please review our Form ADV, Part 2A brochure (specifically Items 5.A., B., C., and D.), which can be found at <a href="https://www.adviserinfo.sec.gov/IAPD/default.aspx">https://www.adviserinfo.sec.gov/IAPD/default.aspx</a>.

## Conversation Starter: You May be Wondering....

• Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

- We receive more compensation when clients invest more through us when we earn an asset-based fee.
- We receive more compensation when a client's account achieves a higher rate of return when we earn a performance-based fee

### Conversation Starter: You May be Wondering....

How might your conflicts of interest affect me, and how will you address them?

Additional information about our conflicts of interest, including how we mitigate or avoid them, can be found in our firm brochure (Form ADV Part 2A), which can be found at <a href="https://www.adviserinfo.sec.gov/IAPD/default.aspx">https://www.adviserinfo.sec.gov/IAPD/default.aspx</a>.

### How do your financial professionals make money?

Our financial professionals receive a portion of the revenue that we earn from the financial professional's advisory services provided to you. The amount of revenue earned by the firm varies based on several factors, including your negotiated agreement with us, the total assets in your account, and in some cases the performance of your investments. Therefore, the financial professional has an incentive to increase the assets in your account and, in cases where performance-based fees are charged, to increase the performance of the investments in your account.

### **ITEM 4: DISCIPLINARY HISTORY**

No. Neither BCPL nor its investment professionals have any legal or disciplinary history to report. Please visit investor.gov/CRS for a free and simple search to research BCPL and our financial professionals.

## Conversation Starter: You May be Wondering ....

As a financial professional, do you have any disciplinary history? For what type of conduct?

### **ITEM 5: ADDITIONAL INFORMATION**

Additional information about BCPL and the services we offer can be found in our firm brochure (Form ADV Part 2A), which is available at <a href="https://adviserinfo.sec.gov/IAPD/default.aspx">https://adviserinfo.sec.gov/IAPD/default.aspx</a> or by emailing mayur.jangid@buoyantcap.com or calling us at 022-6931-9999 to receive up-to-date information. In addition, our relationship summary is available on request at www.buoyantcap.com.

# Conversation Starter: You May be Wondering ....

- Who is my primary contact person?
  - Is he or she a representative of an investment adviser or a broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?

BCPL's Investment Professionals Are Always Happy To Discuss Any Of Your Questions Or Concerns And To Find The Best Way To Help You With Your Investment Management Needs.