

# FORM NO. MGT-7

[Pursuant to sub-Section(1) of section 92 of the Companies Act, 2013 and sub-rule (1) of rule 11of the Companies (Management and Administration) Rules, 2014]



## Annual Return (other than OPCs and Small Companies)

Form language ☒ English ☐ Hindi

Refer the instruction kit for filing the form.

### I. REGISTRATION AND OTHER DETAILS

(i) \* Corporate Identification Number (CIN) of the company

U74999KA2012FTC066881

Pre-fill

Global Location Number (GLN) of the company

\* Permanent Account Number (PAN) of the company

(ii) (a) Name of the company

WILLIAM O'NEIL INDIA PRIVATE

(b) Registered office address

Akshay Tech Park, Unit No 302, 3rd Floor, Plot 72 & 73, EPIP  
Area, Hoodi Village, Hobli, Whitefield, Krishnarajapura, EPIP  
Bangalore  
Bangalore  
Karnataka  
560066

(c) \*e-mail ID of the company

AC\*\*\*\*\*@IA.COM

(d) \*Telephone number with STD code

08\*\*\*\*\*00

(e) Website

(iii) Date of Incorporation

23/11/2012

(iv)	Type of the Company	Category of the Company	Sub-category of the Company
	Private Company	Company limited by shares	Subsidiary of Foreign Company

(v) Whether company is having share capital

☒ Yes

☐ No

(vi) \*Whether shares listed on recognized Stock Exchange(s)

☐ Yes

☒ No

(vii) \*Financial year From date  (DD/MM/YYYY) To date  (DD/MM/YYYY)

(viii) \*Whether Annual general meeting (AGM) held ☒ Yes ☐ No

(a) If yes, date of AGM

(b) Due date of AGM

(c) Whether any extension for AGM granted ☐ Yes ☒ No

## II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

\*Number of business activities

S.No	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the company
1	J	Information and communication	J8	Other information & communication service activities	100

## III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

\*No. of Companies for which information is to be given

Pre-fill All

S.No	Name of the company	CIN / FCRN	Holding/ Subsidiary/Associate/ Joint Venture	% of shares held
1	William O Neil and Co Incorpor		Holding	99.99
2	ONEIL CAPITAL MANAGEMENT	U74999KA2018PTC117075	Associate	50

## IV. SHARE CAPITAL, DEBENTURES AND OTHER SECURITIES OF THE COMPANY

### (i) \*SHARE CAPITAL

#### (a) Equity share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Total number of equity shares	100,000	18,405	18,405	18,405
Total amount of equity shares (in Rupees)	1,000,000	184,050	184,050	184,050

Number of classes

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Equity shares having a face value of Rs.10 each				

Number of equity shares	100,000	18,405	18,405	18,405
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	1,000,000	184,050	184,050	184,050

**(b) Preference share capital**

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid-up capital
Total number of preference shares	0	0	0	0
Total amount of preference shares (in rupees)	0	0	0	0

Number of classes

0

Class of shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Number of preference shares				
Nominal value per share (in rupees)				
Total amount of preference shares (in rupees)				

**(c) Unclassified share capital**

Particulars	Authorised Capital
Total amount of unclassified shares	0

**(d) Break-up of paid-up share capital**

Class of shares	Number of shares			Total nominal amount	Total Paid-up amount	Total premium
<b>Equity shares</b>	Physical	DEMAT	Total			
<b>At the beginning of the year</b>	18,405	0	18405	184,050	184,050	
<b>Increase during the year</b>	0	0	0	0	0	0
i. Public Issues	0	0	0	0	0	0
ii. Rights issue	0	0	0	0	0	0
iii. Bonus issue	0	0	0	0	0	0
iv. Private Placement/ Preferential allotment	0	0	0	0	0	0
v. ESOPs	0	0	0	0	0	0

vi. Sweat equity shares allotted	0	0	0	0	0	0
vii. Conversion of Preference share	0	0	0	0	0	0
viii. Conversion of Debentures	0	0	0	0	0	0
ix. GDRs/ADRs	0	0	0	0	0	0
x. Others, specify <div></div>						
<b>Decrease during the year</b>	0	0	0	0	0	0
i. Buy-back of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify <div></div>						
<b>At the end of the year</b>	18,405	0	18405	184,050	184,050	

## Preference shares

<b>At the beginning of the year</b>	0	0	0	0	0	
<b>Increase during the year</b>	0	0	0	0	0	0
i. Issues of shares	0	0	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0	0	0
iii. Others, specify <div></div>						
<b>Decrease during the year</b>	0	0	0	0	0	0
i. Redemption of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify <div></div>						
<b>At the end of the year</b>	0	0	0	0	0	

ISIN of the equity shares of the company

(ii) Details of stock split/consolidation during the year (for each class of shares)

0

Class of shares		(i)	(ii)	(iii)
Before split / Consolidation	Number of shares			
	Face value per share			
After split / Consolidation	Number of shares			
	Face value per share			

**(iii) Details of shares/Debentures Transfers since closure date of last financial year (or in the case of the first return at any time since the incorporation of the company) \***

☒ Nil

[Details being provided in a CD/Digital Media]

☐ Yes ☐ No ☐ Not Applicable

Separate sheet attached for details of transfers

☐ Yes ☐ No

Note: In case list of transfer exceeds 10, option for submission as a separate sheet attachment or submission in a CD/Digital Media may be shown.

Date of the previous annual general meeting			
Date of registration of transfer (Date Month Year)			
Type of transfer		1 - Equity, 2 - Preference Shares, 3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred		Amount per Share/ Debenture/Unit (in Rs.)	
Ledger Folio of Transferor			
Transferor's Name			
	Surname	middle name	first name
Ledger Folio of Transferee			

Transferee's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)	<input type="text"/>
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Type of transfer	<input type="text"/>	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
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Number of Shares/ Debentures/ Units Transferred	<input type="text"/>	Amount per Share/ Debenture/Unit (in Rs.)	<input type="text"/>
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Ledger Folio of Transferor	<input type="text"/>
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Transferor's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

Ledger Folio of Transferee	<input type="text"/>
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Transferee's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

**(iv) \*Debentures (Outstanding as at the end of financial year)**

Particulars	Number of units	Nominal value per unit	Total value
Non-convertible debentures	0	0	0
Partly convertible debentures	0	0	0
Fully convertible debentures	0	0	0
<b>Total</b>			0

**Details of debentures**

Class of debentures	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Non-convertible debentures	0	0	0	0
Partly convertible debentures	0	0	0	0
Fully convertible debentures	0	0	0	0

**(v) Securities (other than shares and debentures)**

0

Type of Securities	Number of Securities	Nominal Value of each Unit	Total Nominal Value	Paid up Value of each Unit	Total Paid up Value
Total					

**V. \*Turnover and net worth of the company (as defined in the Companies Act, 2013)**

**(i) Turnover**

596,180,997

**(ii) Net worth of the Company**

124,330,278

**VI. (a) \*SHARE HOLDING PATTERN - Promoters**

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	0	0	0	
	(ii) Non-resident Indian (NRI)	0	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	

6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	18,405	100	0	
10.	Others	0	0	0	
	<b>Total</b>	18,405	100	0	0

**Total number of shareholders (promoters)**

2

**(b) \*SHARE HOLDING PATTERN - Public/Other than promoters**

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	0	0	0	
	(ii) Non-resident Indian (NRI)	0	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	
6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	0	0	0	
10.	Others	0	0	0	



	<b>Total</b>	0	0	0	0
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**Total number of shareholders (other than promoters)**

0

**Total number of shareholders (Promoters+Public/  
Other than promoters)**

2

**VII. \*NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS**  
(Details, Promoters, Members (other than promoters), Debenture holders)

Details	At the beginning of the year	At the end of the year
Promoters	2	2
Members (other than promoters)	0	0
Debenture holders	0	0

**VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL**

**(A) \*Composition of Board of Directors**

Category	Number of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
<b>A. Promoter</b>	0	0	0	0	0	0
<b>B. Non-Promoter</b>	1	3	1	3	0	0
(i) Non-Independent	1	3	1	3	0	0
(ii) Independent	0	0	0	0	0	0
<b>C. Nominee Directors representing</b>	0	0	0	0	0	0
(i) Banks & FIs	0	0	0	0	0	0
(ii) Investing institutions	0	0	0	0	0	0
(iii) Government	0	0	0	0	0	0
(iv) Small share holders	0	0	0	0	0	0
(v) Others	0	0	0	0	0	0
<b>Total</b>	1	3	1	3	0	0

**Number of Directors and Key managerial personnel (who is not director) as on the financial year end date**

4

**(B) (i) \*Details of directors and Key managerial personnel as on the closure of financial year**

Name	DIN/PAN	Designation	Number of equity share(s) held	Date of cessation (after closure of financial year : If any)
ANUPAM SINGHI	06920805	Director	0	
STEVEN LAWRENCE	06399272	Director	0	
WILLIAM SCOTT O NE	06399289	Director	0	
DAVID JOHN BLANTON	10515940	Additional director	0	

**(ii) Particulars of change in director(s) and Key managerial personnel during the year**

2

Name	DIN/PAN	Designation at the beginning / during the financial year	Date of appointment/ change in designation/ cessation	Nature of change (Appointment/ Change in designation/ Cessation)
Terry Chan	07031019	Director	11/12/2023	Cessation as Director
David John Blanton	10515940	Additional director	14/03/2024	Appointment as Additional Director

**IX. MEETINGS OF MEMBERS/CLASS OF MEMBERS/BOARD/COMMITTEES OF THE BOARD OF DIRECTORS****A. MEMBERS/CLASS /REQUISITIONED/NCLT/COURT CONVENED MEETINGS**

Number of meetings held

1

Type of meeting	Date of meeting	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Annual General Meeting	30/09/2023	2	2	100

**B. BOARD MEETINGS**

\*Number of meetings held

4

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	09/06/2023	4	3	75
2	25/09/2023	4	2	50
3	12/12/2023	3	3	100
4	14/03/2024	3	2	66.67

**C. COMMITTEE MEETINGS**

Number of meetings held

0

S. No.	Type of meeting	Date of meeting	Total Number of Members as on the date of the meeting	Attendance	
				Number of members attended	% of attendance
1					

**D. \*ATTENDANCE OF DIRECTORS**

S. No.	Name of the director	Board Meetings			Committee Meetings			Whether attended AGM held on
		Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	30/09/2024
								(Y/N/NA)
1	ANUPAM SIN	4	4	100	0	0	0	Yes
2	STEVEN LAW	4	4	100	0	0	0	No
3	WILLIAM SCC	4	2	50	0	0	0	No
4	DAVID JOHN	0	0	0	0	0	0	No

**X. \*REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL**☐ Nil

Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered

1

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Anupam Singhi	Executive Direct	36,674,500	0	0	0	36,674,500
	Total		36,674,500	0	0	0	36,674,500

Number of CEO, CFO and Company secretary whose remuneration details to be entered

0

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1							0
	Total						

Number of other directors whose remuneration details to be entered

0

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
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S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1							0
	Total						

#### XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

\* A. Whether the company has made compliances and disclosures in respect of applicable provisions of the Companies Act, 2013 during the year ☒ Yes ☐ No

B. If No, give reasons/observations

#### XII. PENALTY AND PUNISHMENT - DETAILS THEREOF

(A) DETAILS OF PENALTIES / PUNISHMENT IMPOSED ON COMPANY/DIRECTORS /OFFICERS ☒ Nil

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order	Name of the Act and section under which penalised / punished	Details of penalty/ punishment	Details of appeal (if any) including present status

(B) DETAILS OF COMPOUNDING OF OFFENCES ☒ Nil

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order	Name of the Act and section under which offence committed	Particulars of offence	Amount of compounding (in Rupees)

#### XIII. Whether complete list of shareholders, debenture holders has been enclosed as an attachment

☒ Yes ☐ No

#### XIV. COMPLIANCE OF SUB-SECTION (2) OF SECTION 92, IN CASE OF LISTED COMPANIES

In case of a listed company or a company having paid up share capital of Ten Crore rupees or more or turnover of Fifty Crore rupees or more, details of company secretary in whole time practice certifying the annual return in Form MGT-8.

Name

NEHA PODDAR

Whether associate or fellow

☒ Associate ☐ Fellow

Certificate of practice number

12190

**I/We certify that:**

- (a) The return states the facts, as they stood on the date of the closure of the financial year aforesaid correctly and adequately.
- (b) Unless otherwise expressly stated to the contrary elsewhere in this Return, the Company has complied with all the provisions of the Act during the financial year.
- (c) The company has not, since the date of the closure of the last financial year with reference to which the last return was submitted or in the case of a first return since the date of the incorporation of the company, issued any invitation to the public to subscribe for any securities of the company.
- (d) Where the annual return discloses the fact that the number of members, (except in case of a one person company), of the company exceeds two hundred, the excess consists wholly of persons who under second proviso to clause (ii) of sub-section (68) of section 2 of the Act are not to be included in reckoning the number of two hundred.

**Declaration**

I am Authorised by the Board of Directors of the company vide resolution no. ...  dated

(DD/MM/YYYY) to sign this form and declare that all the requirements of the Companies Act, 2013 and the rules made thereunder in respect of the subject matter of this form and matters incidental thereto have been complied with. I further declare that:

1. Whatever is stated in this form and in the attachments thereto is true, correct and complete and no information material to the subject matter of this form has been suppressed or concealed and is as per the original records maintained by the company.
2. All the required attachments have been completely and legibly attached to this form.

**Note: Attention is also drawn to the provisions of Section 447, section 448 and 449 of the Companies Act, 2013 which provide for punishment for fraud, punishment for false statement and punishment for false evidence respectively.**

**To be digitally signed by**

Director

ANUPAM SINGHI  
Digitally signed by  
ANUPAM SINGHI  
Date: 2024.11.28  
11:16:15 +05'30'

DIN of the director

**To be digitally signed by**

Neha Poddar  
Digitally signed by  
Neha Poddar  
Date: 2024.11.28  
13:04:27 +05'30'

- ☐ Company Secretary
- ☒ Company secretary in practice

Membership number Certificate of practice number **Attachments**

1. List of share holders, debenture holders
2. Approval letter for extension of AGM;
3. Copy of MGT-8;
4. Optional Attachement(s), if any

**List of attachments**

List of Shareholders\_WON\_DSC.pdf  
MGT-7 Clarification letter\_WON\_DSC.pdf  
WON\_Clarification letter 2\_Revised\_26112  
MGT-7\_UDIN.pdf  
MGT-8\_William\_2023-24\_27112024.pdf

**This eForm has been taken on file maintained by the Registrar of Companies through electronic mode and on the basis of statement of correctness given by the company**



LIST OF SHAREHOLDERS  
WILLIAM O'NEIL INDIA PRIVATE LIMITED  
AS ON 31 MARCH 2024

Sl. No	Ledger Folio	Name of Shareholder	Address	Number of shares held	% of shares held
1	1	William O'Neil and Co. Inc	12655, Beatrice Street, Los Angeles, CA 90066	18,404	99.99%
2	2	O'Neil Capital Management Inc.	12655, Beatrice Street, Los Angeles, CA 90066	1	0.01%
Total				18,405	100

Yours sincerely,  
For William O'Neil India Private Limited  
ANUPAM SINGHI  
Digitally signed by ANUPAM SINGHI  
Date: 2024.11.11 17:49:40 +05'30'  
Anupam Singhi  
Director  
DIN: 06920805

Date: 11<sup>th</sup> November 2024  
Address: #76 Skylark Arcadia, 1st Cross Sri Shakti Layout  
Sadarmangla, Kadugodi Plantation, Kadugodi, Bengaluru-560067,  
Karnataka, INDIA



***Neha Poddar***

**Company Secretary**

129 Bangur Avenue  
Block "A", Opposite Reliance Fresh  
Kolkata – 700 055  
Phone: + 91 99030 48692  
[csneha.poddar2710@gmail.com](mailto:csneha.poddar2710@gmail.com)

**FORM NO. MGT-8**

*[Pursuant to section 92(2) of the Companies Act, 2013 and rule 11(2) of Companies (Management and Administration) Rules, 2014]*

**CERTIFICATE BY THE COMPANY SECRETARY IN PRACTICE**

I have examined the registers, records, books and papers of **WILLIAM O'NEIL INDIA PRIVATE LIMITED** (CIN: U74999KA2012FTC066881) ("**The Company**") as required to be maintained under the Companies Act, 2013 ("**The Act**") and the rules made thereunder and also the provisions contained in the Memorandum and Articles of Association of the Company, for the financial year ended on March 31, 2024

In my opinion and to the best of my information and according to the examinations carried out by me and explanations furnished to me by the Company, its officers and agents, I certify the following:

- A. The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.
- B. During the aforesaid financial year, the Company has complied with provisions of the Act and Rules made there under in respect of following matters:
  1. Its status under the Act.
  2. Maintenance of registers/records and making entries therein within the time prescribed therefor.
  3. Filing of forms and returns as stated in the annual return, with the Registrar of Companies, ~~Regional Director, Central Government, the Tribunal, Court,~~ or other authorities within the prescribed time
  4. Calling/ convening/ holding meetings of Board of Directors or its committees, if any, and the meetings of the members of the Company on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings including the resolutions ~~by circulation and resolutions passed by postal ballot,~~ if any, have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed.
  5. Closure of Register of Members/Security holders, as the case may be.  
  
Not applicable.
  6. Advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act.

Not applicable as the Company has not provided any advances/ loans to its directors and/or persons or firms or companies referred in section 185 of the Act.





***Neha Poddar***

**Company Secretary**

129 Bangur Avenue  
Block "A", Opposite Reliance Fresh  
Kolkata – 700 055  
Phone: + 91 99030 48692  
[csneha.poddar2710@gmail.com](mailto:csneha.poddar2710@gmail.com)

7. Contracts/arrangements with related parties as specified in section 188 of the Act.

All the transactions with the related parties are in compliance with section 188 of the Act, where applicable and the details of such transactions have been disclosed in the financial statements as required by the applicable accounting standards.

8. Issue or allotment or transfer or transmission or buy back of securities/redemption of preference shares or debentures/alteration or reduction of share capital/conversion of shares/securities and issue of security certificates in all instances.

Not applicable as there were no securities issued during the year.

9. Keeping in abeyance the rights to dividend, right shares and bonus shares pending registration of transfer of shares in compliance with the provision of the Act.

Not applicable as there were no instances for the Company to keep in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of share under the provisions of the Act.

10. Declaration/ payment of dividend; transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act.

Not applicable as there were no declaration/payment of dividend and hence, the company has not transferred any unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act.

11. Signing of audited financial statement as per the provisions of section 134 of the Act and Report of Directors is as per sub-section (3), (4) and (5) thereof.

12. Constitution/ appointment/ ~~re-appointments/~~ retirement/ ~~filling up casual vacancies/~~ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them.

The Composition of the Board, Key Managerial Personnel, the Disclosures of Directors, and remuneration paid to the Board and Key Managerial Personnel are in compliance with the provisions of the Act

13. Appointment/ reappointment/-filling up casual vacancies of auditors is as per the provisions of section 139 of the Act.

There was no such transaction during the year.

14. Approvals required to be taken from the Central Government, ~~Tribunal, Regional Director,~~ Registrar, ~~Court~~ or such other authorities under the various provisions of the Act



***Neha Poddar***

**Company Secretary**

129 Bangur Avenue  
Block "A", Opposite Reliance Fresh  
Kolkata – 700 055  
Phone: + 91 99030 48692  
[csneha.poddar2710@gmail.com](mailto:csneha.poddar2710@gmail.com)

15. Acceptance/ renewal/ repayment of deposits.

Not applicable as the Company has not accepted/renewed/repaid deposits.

16. Borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable.

Not applicable as the Company has not taken any borrowings from any lender.

17. Loans and investments or guarantee given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Act.

The Company complied with Section 186 of the Act.

18. Alteration of the provisions of the Memorandum and/ or Articles of Association of the Company.

The Company has not altered its Memorandum and/or Articles of Association during the year.

**NEHA PODDAR**

**Practicing Company Secretary**

**Place: Kolkata**

**Date: 27.11.2024**

**Neha  
Poddar**

Digitally signed  
by Neha Poddar  
Date:  
2024.11.27  
23:31:01 +05'30'

**Mem No: A33026**

**CP No : 12190**

**UDIN: A033026F002857221**

**Peer Review No: 2389/2022**

To,

**The Registrar of Companies**

'E Wing' 2<sup>nd</sup> Floor, Kendriya Sadana  
Koramangala, Bangalore-560034.

Dear Sir/Madam,

**Sub:** Clarification with respect to person designated for furnishing, extending co-operation, providing information to the Registrar of Companies or any other authorized officer with respect to beneficial interest in shares of **William O'Neil India Private Limited**.

**Ref:** Notification No. G.S.R. 801(E) dated 27 October 2023 issued by the Ministry of Corporate Affairs

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In line with the requirement under the captioned notification issued by the Ministry of Corporate Affairs, every company is required to designate a person (Designated Person) for furnishing, extending co-operation, providing information to the Registrar of Companies or any other authorized officer with respect to beneficial interest in shares and further disclose the same in the Annual Return of the Company. Accordingly, we wish to inform that William O'Neil India Private Limited ("the Company") has appointed me i.e., Anupam Singhi, Director of the Company, as the Designated Person. Currently, we understand that the e-Form Annual Return (i.e., Form MGT-7) does not contain a field for this purpose and therefore, we are attaching this clarification letter to ensure abundant compliance with aforementioned requirement.

We request your good office to take note of the above and we are happy to provide any further information you may require in this regard.

For **William O'Neil India Private Limited**

**ANUPAM  
SINGHI**

Digitally signed by  
ANUPAM SINGHI  
Date: 2024.11.11  
17:48:31 +05'30'

**Anupam Singhi**

**Director**

**DIN: 06920805**

Date: 11<sup>th</sup> November 2024

Address: #76 Skylark Arcadia, 1st Cross Sri Shakti Layout  
Sadarmangla, Kadugodi Plantation, Kadugodi, Bengaluru-560067,  
Karnataka, INDIA

To  
**The Registrar of Companies,**  
'E' Wing, 2nd Floor, Kendriya Sadana,  
Kormangala, Bangalore-560034

**Subject: Attendance particulars of Mr. Terry Chan (DIN: 07031019) for FY 2023-24**

**Reference: William O'Neil India Private Limited (CIN: U74999KA2012FTC066881) – Form MGT-7 for the FY 2023-24**

With respect to the above-mentioned caption, kindly note that Mr. Terry Chan (DIN: 07031019) ceased to a Director of the Company effective 11 December 2023 (before March 31, 2024).

There is no provision in the form to enter the attendance particulars of Mr. Terry Chan as he ceased to be a Director before the end of financial year, i.e., March 31, 2024. However, as a better corporate governance practice and to provide full particulars with your good office, we are providing below the relevant attendance particulars of Terry Chan below:

## IX. MEETINGS OF MEMBERS / CLASS OF MEMBERS/BOARD/COMMITTEES OF THE BOARD OF DIRECTORS

### D. ATTENDANCE OF DIRECTORS

Name of the Director	Board Meetings			Committee Meetings			Whether attended the AGM held on
	Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	30/09/2024 (Y/N/NA)
TERRY CHAN	2	0	0	-	-	-	NA

We request your good office to take these additional details on record and approve the Form MGT-7 being filed for the FY 2023-24.

For **William O'Neil India Private Limited**

ANUPAM SINGHI  
Digitally signed by ANUPAM SINGHI  
Date: 2024.11.26 22:12:37 +05'30'

**Anupam Singhi**  
**Director**  
**DIN: 06920805**

Date: 26 November 2024

Address: 76 Skylark Arcadia, 1st Cross Sri Shakti Layout, Sadarmangla, Kadugodi Plantation, Kadugodi, Bengaluru-560067, Karnataka, INDIA