



MAIDEN FORGINGS LIMITED

Formerly Known As Maiden Forgings (P) Ltd.

(AN ISO 9001: 2015 COMPANY)

Regd. Office : B-5 Arihant Tower, Block-D,

: Vivek Vihar, Delhi - 110092

Unit I : E-201-Sector-17, Industrial Area, Kavi Nagar,
Ghaziabad-201 002 (U.P.) India

Unit II : C-10, B.S. Road, Industrial Area, Ghaziabad

Unit III : C-118, B.S. Road, Industrial Area, Ghaziabad

FACT. : 0120-4331283

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Web. : www.maidenforgings.in

CIN No. U29810DL2005PLC132913

MFRS. : ALL TYPES OF BRIGHT STEEL BARS & WIRES OF FREE CUTTING ALLOY, MILD & STAINLESS STEEL & NAILS

Ref. No.

Date

MAIDEN FORGINGS LIMITED

CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY DESIGNATED PERSONS



MFRS. : ALL TYPES OF BRIGHT STEEL BARS & WIRES OF FREE CUTTING ALLOY, MILD & STAINLESS STEEL & NAILS

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CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY DESIGNATED PERSONS

1. INTRODUCTION

Maiden Forgings Limited ('Company') endeavors to preserve the confidentiality of Unpublished Price Sensitive Information (UPSI) and is committed to transparency and fairness in dealing with all its stakeholders and ensuring adherence to all laws and regulations. The Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Designated Persons and immediate relatives of Designated Persons ("Code of Conduct") is intended to serve as a guiding charter for all the concerned persons associated with the Company and defines the principles and the restrictions to be observed while dealing or proposing to deal in any transaction w.r.t. the securities of the Company and related matters.

This Code of Conduct has been framed in accordance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("**SEBI (PIT) Regulations, 2015**"). The Regulations prohibit an Insider from Trading in the securities of a Company listed on any stock exchange on the basis of any UPSI.

2. APPLICABILITY

This Code is applicable to all the Designated Persons and Immediate Relatives of Designated Persons.

Every Designated Persons must review this Code of Conduct. In case of any doubts or query regarding this Code of Conduct, it should be directed to the Compliance Officer.

3. DEFINITIONS

3.1 "Act" means the Securities and Exchange Board of India Act, 1992.

3.2 "Board" means the Board of Directors of the Company.

3.3 "Code of Conduct" shall mean the Code of Conduct for Regulating, Monitoring and Reporting of trading by Designated Persons and Immediate Relatives of Designated Persons of Maiden Forgings Limited as amended from time to time.

3.4 "Company" means Maiden Forgings Limited.

3.5 "Compliance Officer" mean any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.

3.6 "Connected Person" means:

- (i) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent



MFRS. : ALL TYPES OF BRIGHT STEEL BARS & WIRES OF FREE CUTTING ALLOY, MILD & STAINLESS STEEL & NAILS

Ref. No.

Date

communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -

- a) an immediate relative of connected persons specified in clause (i); or
- b) a holding company or associate company or subsidiary company; or
- c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
- d) an investment company, trustee company, asset management company or an employee or director thereof; or
- e) an official of a stock exchange or of clearing house or corporation; or
- f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
- g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
- h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
- i) a banker of the company; or
- j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;

3.7 “Dealing in Securities” means an act of subscribing, buying, selling or agreeing to subscribe to buy, sell or deal in these securities of the Company either as principal or agent.

3.8 “Designated Person(s)” shall include the following persons:-

- a) Directors of the Company;
- b) Key Managerial Personnel of the Company;
- c) Promoters including individual Promoters of the Company and Persons acting in Concert with them;
- d) Executive assistants/secretaries to all the above persons;
- e) Persons one level below the Key Managerial Personnel and
- f) Such other employees of the Company and persons as may be notified by the Compliance officer from time to time.

3.9 “Director” means a member of the Board of Directors of the Company.

3.10 “Employee” means every employee of the Company including the Directors in the employment of the Company.



MFRS. : ALL TYPES OF BRIGHT STEEL BARS & WIRES OF FREE CUTTING ALLOY, MILD & STAINLESS STEEL & NAILS

Ref. No.

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- 3.11 "Generally available Information"** means information that is accessible to the public on a non-discriminatory basis.
- 3.12 "Immediate Relative"** means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.
- 3.13 "Insider"** means any person who is:
- a connected person; or
 - in possession of or having access to unpublished price sensitive information.
- 3.14 "Key Managerial Personnel"** means person as defined in Section 2(51) of the Companies Act, 2013.
- 3.15 "Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof:
- 3.16 "Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
- 3.17 "Takeover Regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- 3.18 "Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- 3.19 "Trading Day"** means a day on which the recognized stock exchanges are open for trading.
- 3.20 "Trading Plan" (TP)** means a plan for dealing in securities of the Company for a period not less than 12 months by the persons who may be perpetually in possession of unpublished price sensitive information.
- 3.21 "Trading Window"** means the period during which trading may be carried out in Company's securities by Designated Persons.
- 3.22 "Unpublished Price Sensitive Information":** means any information, relating to a Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of these securities and shall, ordinarily including but not restricted to information relating to the following:
1. Financial Results;
 2. Dividends;
 3. Change in capital structure;
 4. Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
 5. Changes in key managerial personnel.

Words and expressions used and not defined in these regulations but defined in the

MFL_CODE OF CONDUCT _DESIGNATED PERSONS



MFRS. : ALL TYPES OF BRIGHT STEEL BARS & WIRES OF FREE CUTTING ALLOY, MILD & STAINLESS STEEL & NAILS

Ref. No.

Date

Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

4. ROLE OF COMPLIANCE OFFICER

- 4.1 The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, pre-clearing trading, monitoring of trading and the implementation of Code.
- 4.2 The Compliance Officer shall maintain the list of the Designated Persons & their Immediate Relatives and such other relevant records as may be deemed appropriate by the Compliance Officer for the purpose of compliance with this Code of Conduct. The Compliance Officer shall update such list based on the communication received from the Human Resources Department.
- 4.3 The Compliance Officer shall assist all Designated Persons in addressing any clarification regarding the SEBI (PIT) Regulations, 2015 and Code of Conduct.
- 4.4 The Compliance Officer shall report to the Board of Directors and in particular, shall provide requisite reports to the Chairman of the Audit Committee, or to the Chairman of the Board of Directors not less than once in a year.
- 4.5 In the event of any doubt on the interpretation of this Code of Conduct, the Compliance Officer shall also be entitled to approach external counsel for clarifications.
- 4.6 The Compliance Officers shall assist all employees in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct.

5. PRESERVATION OF "PRICE SENSITIVE INFORMATION"

- 5.1 All information shall be handled within the Company on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his/her legal obligations.

Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:-

- a. Entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company;

OR

- b. not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive



MFRS. : ALL TYPES OF BRIGHT STEEL BARS & WIRES OF FREE CUTTING ALLOY, MILD & STAINLESS STEEL & NAILS

Ref. No.

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information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.

However, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

5.2 Need to Know:

- I. "Need to Know" basis means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- II. All non-public information directly received by any employee should immediately be reported to the head of the department.

5.3 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.

6. PREVENTION OF MISUSE OF "UNPUBLISHED PRICE SENSITIVE INFORMATION"

Designated persons and Immediate Relative of Designated Persons in the Company shall be governed by an internal code of conduct governing dealing in securities.

6.1 Trading Plan

An insider shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

6.2 Trading Plan shall:

- I. Not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- II. not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
- III. entail trading for a period of not less than twelve months;
- IV. not entail overlap of any period for which another trading plan is already in existence;
- V. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- VI. Not entail trading in securities for market abuse.



MFRS. : ALL TYPES OF BRIGHT STEEL BARS & WIRES OF FREE CUTTING ALLOY, MILD & STAINLESS STEEL & NAILS

Ref. No.

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6.3 The Compliance Officer shall review the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.

6.4 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

6.5 Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

7. TRADING WINDOW

- I. The trading period, i.e. the trading period of the stock exchanges, called 'trading window' is available for trading in the Company's securities.
- II. The trading window shall be closed when the compliance officer determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information.
- III. When the trading window is closed, the Designated Persons and their Immediate Relatives shall not trade in the Company's securities in such period.
- IV. All Designated Persons and their Immediate Relatives shall conduct all their dealings in these securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed.

7.1 The Compliance Officers shall close the trading window when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.

7.2 The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market shall decide the timing for re-opening of the trading window, however in any event it shall not bear earlier than forty-eight hours after the information becomes generally available.



MFRS. : ALL TYPES OF BRIGHT STEEL BARS & WIRES OF FREE CUTTING ALLOY, MILD & STAINLESS STEEL & NAILS

Ref. No.

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- 7.3 When the trading window is open, trading by designated persons shall be subject to preclearance by the compliance officer, if the value of the proposed trades is above such thresholds as the board of directors may stipulate.

8. PRE-CLEARANCE OF TRADES

- 8.1 All Designate Persons, who intend to deal in the securities of the Company when the trading window is opened and if the value of the proposed trades is above Rs. 10 Lacs should pre-clear the transaction. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed and hence he shall not be allowed to trade. The pre-dealing procedure shall be hereunder:

- I. An application may be made in the prescribed Form (**Annexure 1**) to the Compliance officer indicating the estimated number of securities that the Designated Persons intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.
- II. An undertaking (**Annexure 2**) shall be executed in favour of the Company by such Designated Persons incorporating, *inter alia*, the following clauses, as may be applicable:
 - a. That the Designated Persons does not have any access or has not received "Price Sensitive Information" up to the time of signing the undertaking.
 - b. That in case the Designated Persons has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
 - c. That he/ she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
 - d. That he/ she has made a full and true disclosure in the matter.
- III. All Designated Persons shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. The Designated Persons shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed. (**Annexure 3**).
- IV. If the order is not executed within seven trading days after the approval is given, the Designated Persons must pre-clear the transaction again.
- V. All Designated Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six



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Ref. No.

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months following the prior transaction. The Compliance officer may be empowered to grant relaxation from strict application of such restrictions for reasons to be recorded in writing but such relaxation does not violate these regulations. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

9. OTHER RESTRICTIONS

- 9.1 The disclosures to be made by any person under this Code of Conduct shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- 9.2 The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.
- 9.3 The disclosures made under this Code of Conduct shall be maintained for a period of five years.

10. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

Initial Disclosure

- 10.1 Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter in the format as prescribed under Annexure 4.

Continual Disclosure

- 10.2 Every promoter, member of the promoter group, designated persons and director of every Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten Lakhs or such other values as may be specified in the format as prescribed under Annexure 5.

11. DISCLOSURE BY THE COMPANY TO THE STOCK EXCHANGE(S)

- 11.1 Within 2 days of the receipt of intimation under Clause 10.2, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.
- 11.2 The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors/ officers/ designated employees for a minimum period of five years.

12. PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT



MFRS. : ALL TYPES OF BRIGHT STEEL BARS & WIRES OF FREE CUTTING ALLOY, MILD & STAINLESS STEEL & NAILS

Ref. No.

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1. Every Designated Person shall be individually responsible for complying with the provisions of the Code of Conduct (including to the extent the provisions hereof are applicable to his/her dependents).
2. Any Designated Person who trades in securities in contravention of this Code of Conduct may be penalized and appropriate action may be taken by the Company.
3. Designated Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, recovery etc.
4. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

13. DISCLOSURE BY DESIGNATED PERSON

The Designated Person is required to disclose Name and PAN or any other identifier authorised by Law of the following persons to the Company on an annual basis and as and when the information changes:

- a) Immediate relatives;
- b) Persons with whom such designated person(s) shares a material financial relationship;
- c) Phone, Mobile and Cell Numbers which are used by them
- d) Names of the Educational Institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one time basis.

The term "material financial relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of loan or gift from a Designated Person during the immediately preceding 12 months, equivalent to at-least 25% of annual income of such Designated Person but shall exclude relationships in which the payment is based on an arm's length transactions.

14. CHINESE WALL AND CROSSING OVER THE CHINESE WALL

To prevent misuse of confidential information, the company has adopted a "Chinese Wall" policy which separates those areas of the organization which routinely have access to confidential information, considered "inside areas" from those areas which deal with sale/marketing or other departments providing support services, considered "public areas". The employees in the inside area shall not communicate any unpublished price sensitive information to anyone in public area or any one. In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the compliance officer. The Chinese wall shall be supported by-

- i. Separation of each department.
- ii. Limiting access on ERP system.
- iii. Keeping confidential information safe and secure under password protections/locks.



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iv. Any other possible way as deemed fit by the compliance officer.

15. AMENDMENT TO THE CODE

This Code and any subsequent amendment(s) thereto, shall be by way of a resolution by the Board of Directors and shall be circulated to Designated Persons as per the internal communication policy of the Company, if any.

This Code is subject to review from time to time.



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ANNEXURE-1 SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL

Date:

To,
The Compliance Officer
Maiden Forgings Limited

Dear Sir/ Madam,

Sub: Application for Pre-Dealing approval in Securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons, I....., seek approval to purchase/sale/subscription of..... Equity Shares of the Company as per details given below:

| | | | |
|-----|--|--|--|
| 1. | Name of the Applicant | | |
| 2. | Designation | | |
| 3. | Number of securities held as on date | | |
| 4. | Folio No./DPID/Client ID No.) | | |
| 5. | The proposal is for | (a) Purchase of securities (b) Subscription to securities (c) Sale of securities | |
| 6. | Proposed date of dealing in securities | | |
| 7. | Estimated number of securities proposed to be acquired/subscribed/sold | | |
| 8. | Price at which the transaction is proposed | | |
| 9. | Current market price (as on date of application) | | |
| 10. | Whether the proposed transaction will be through stock exchange or off-market deal | | |
| 11. | Folio No. / DP ID / Client ID No. where the securities will be credited/ debited | | |

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

Name of the Designated Person

(Signature of Designated Person)



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**ANNEXURE 2
FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE**

Undertaking

To,
The Compliance Officer,
Maiden Forgings Limited

Dear Sir,

I, of the Company residing at desirous of dealing in shares* of the Company as mentioned in my application dated for pre-clearance of the transaction.

If further declare that I am not in possession of otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons up to the time of signing this Undertaking. In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code of Conduct, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in these securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Code of Conduct as notified by the Company from time to time.

I undertake to submit the necessary report within four days of execution of the transaction/a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

Date: _____

Name: _____

Signature: _____

Address: _____

*Indicate number of shares



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ANNEXURE3

FORMAT FORDISCLOSURE OF TRANSACTIONS

(To besubmittedwithin2daysof transaction/dealing in securitiesoftheCompany)

To,
TheComplianceOfficer,
Maiden Forgings Limited

I herebyinformthatI:

- Havenotbought/sold/subscribed anysecuritiesoftheCompany.
- Havebought/ sold/ subscribed to securitiesasmentioned belowon _____ (date).

| Nameofholder | No. of securities dealtwith | Bought/sold/subscribed | DPID/ ClientID/ FolioNo. | Price(Rs.) |
|--------------|-----------------------------|------------------------|--------------------------|------------|
| | | | | |

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance officer/ SEBI any of the following documents:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/ statement (to be submitted in case of demat transactions).
4. Copy of Delivery Instruction Slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (Applicable in case of purchase/ subscription).

I declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Date:

Signature:
Name:

Designation:



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ANNEXURE4**FORMAT FORINITIALDISCLOSUREOF SECURITIES**

To,
TheComplianceOfficer,
Maiden Forgings Limited

I, inmycapacityasoftheCompanyherebysubmitthe followingdetailsofsecuritiesheldintheCompanyason (dateofbecoming a promoter or member of promoter group, director or Key managerial Personnel).

I. Details of securities held by me:

| Type of Securities | No. of securities held | Folio No. | Beneficiary A/c ClientID |
|--------------------|------------------------|-----------|--------------------------|
| | | | |

II. Details of dependent(s):

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons, I hereby declare that I have the following dependents:

| Sr. No. | Name of the dependent | Relation with Director/ Officer/ Designated Employee. |
|---------|-----------------------|---|
| | | |

III. Details of securities held by dependent(s):

| Name of Relative | Relationship | Type of securities | No.ofSecurities held | Folio No. | BeneficiaryA/c ClientID |
|------------------|--------------|--------------------|----------------------|-----------|-------------------------|
| | | | | | |

Date:

Signature: _____



MAIDEN FORGINGS LIMITED

Formerly Known As Maiden Forgings (P) Ltd.

(AN ISO 9001: 2015 COMPANY)

Regd. Office : B-5 Arihant Tower, Block-D,

: Vivek Vihar, Delhi - 110092

Unit I : E-201-Sector-17, Industrial Area, Kavi Nagar,
Ghaziabad-201 002 (U.P.) India

Unit II : C-10, B.S. Road, Industrial Area, Ghaziabad

Unit III : C-118, B.S. Road, Industrial Area, Ghaziabad

FACT. : 0120-4331283

0120-4221283

MOBILE : 9910321325

E-mail : maiden_forge@hotmail.com

Web. : www.maidenforgings.in

CIN No. U29810DL2005PLC132913

MFRS. : ALL TYPES OF BRIGHT STEEL BARS & WIRES OF FREE CUTTING ALLOY, MILD & STAINLESS STEEL & NAILS

Ref. No.

Date

ANNEXURE 5

DISCLOSURE OF CHANGE IN SHARE HOLDING

To,
The Compliance Officer,
Maiden Forgings Limited

I,, in my capacity as of the Company, hereby submit the following details of change in holding of securities of the Company:

| Name, PAN & address of shareholder | No. of securities held before the transaction | Receipt of allotment advice/ acquisition of/sale of securities | Nature of transaction & quantity | | | Trading member through whom the trade was executed with SEBI Registration No. of the TM | Exchange on which the trade was executed |
|------------------------------------|---|--|----------------------------------|------|--------|---|--|
| | | | Purchase | Sale | Others | | |
| | | | | | | | |

Details of change in securities held by dependent family members:

| Name, PAN & address of shareholder and relationship | No. of securities held before the transaction | Receipt of allotment advice/ acquisition of/sale of securities | Nature of transaction & quantity | | | Trading member through whom the trade was executed with SEBI Registration No. of the TM | Exchange on which the trade was executed |
|---|---|--|----------------------------------|------|--------|---|--|
| | | | Purchase | Sale | Others | | |
| | | | | | | | |

I/ We declare that I/ We have complied with the requirement of the minimum holding period of six months with respect to these securities purchased/ sold.

I hereby declare that the above details are true, correct and complete in all respects.

Date:

Signature: _____