

Genesys International Corporation Limited

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

This code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) is adopted by Genesys International Corporation Limited (“the Company”). This code is in compliance with Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) read with Schedule A of the Regulations.

1. The Company shall make fair and prompt disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary shall function as chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make fair and prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities on timely basis.
6. The Company shall ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall develop and follow best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall ensure handling of all unpublished price sensitive information on a need-to-know basis.
9. The Code is subject to review by the Board from time to time



10. The Board of directors of the Company may amend, modify or revise any or all clauses of this Code from time to time.
11. Sharing of information with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, shall be considered as “Legitimate purposes” for the purpose of sharing unpublished price sensitive information in the ordinary course of business by an insider, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the regulations.
12. A structured digital database shall be maintained containing the name of such persons or entities as the case may be with whom information is shared for legitimate purposes along with the Permanent Account number or any other identifier authorized by law where Permanent Account Number is not available. Adequate and effective system of internal controls will also be laid out to ensure the compliance of maintenance of a digital database for sharing the information for said legitimate purposes.
13. Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purpose of Regulations and such persons are also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with Regulations.

(Note: Clauses 11, 12, and 13 incorporated pursuant to SEBI (prohibition of Insider trading) (Amendment) Regulations, 2018 shall come into effect from 1st April, 2019.)

(Code approved by the Board of Directors on 30th May, 2015 and further revised on March 29, 2019.)

