



ANTI - CORRUPTION POLICY

OF

GENESYS INTERNATIONAL CORPORATION LIMITED

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OBJECTIVE OF THE POLICY

Genesys International Corporation Limited (which expression shall mean and include the Company, its Subsidiaries, Associates and Group Companies. For the purpose of this policy, 'Associate' and 'Subsidiary' shall have the same meaning assigned to it under Section 2(6) and 2(87) of the Companies Act, 2013 respectively and 'Group Company' shall have meaning assigned to it under Foreign Exchange Management Act, 1999 as amended from time to time) is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is the Company's policy to conduct all of its business activities with honesty, integrity and the highest possible ethical standards and vigorously enforce its business practice of not engaging in bribery or corruption.

SCOPE AND APPLICABILITY

This Anti-corruption Policy (this "Policy") applies to all individuals working for the Company at all levels and grades, including Subsidiary & Associate Companies, Directors, Senior Executives, Officers, Employees, Consultants, Contractors, Agents, or any other person associated with Genesys either directly, indirectly or as a third party. In this Policy, "Third Party(ies)" means any individual or organization, who / which come into contact with Genesys or transact with Genesys and also includes actual and potential clients, suppliers, business contacts, consultants, intermediaries, representatives, subcontractors, agents, advisers and government & public bodies (including their advisers, representatives and officials).

POLICY DETAILS

A bribe is an illegal inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage.

A bribe may be anything of value and not just money gifts, inside information, favors, corporate hospitality or entertainment, offering employment to a relative, payment or reimbursement of travel expenses, charitable donation or social contribution, abuse of function and can pass directly or through a third party. Corruption includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral or incompatible with ethical standards. Corruption often results from patronage and is associated with bribery.

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It is not acceptable for any employee of Genesys (or someone on his / her behalf) to:

1. Accept an offer of a gift of any size from any Third Party which is in negotiation with, or is submitting a proposal with Genesys
2. Prohibit the offer, giving or receipt of gifts, hospitality or expenses whenever they could influence or reasonably be perceived to influence the outcome of business transactions.
3. Give, promise to give or offer, any payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
4. Accept or solicit any payment, advantage, gift or hospitality from a Third Party that you know or suspect is being offered with the expectation that it will obtain a business advantage for them
5. Threaten or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this Policy
6. Engage in any activity that might lead to a breach of this Policy.

The points stated above are illustrative in nature and in no way intend to limit the applicability of this Policy.

COMPANY'S PRINCIPLES FOR COUNTERING BRIBERY:

1. The Company has established and maintained an effective system of internal controls to counter bribery, comprising financial and organizational checks and balances over the Companies accounting and record keeping practices and other business processes.
2. The Company on regular basis review and audit the accounting and record keeping practice to provide assurance on its design, implementation and effectiveness.

RAISING A CONCERN

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Genesys or under the Company's control. Employees are required to avoid any activity that might lead to or suggest a breach of this Policy. Employees must notify his / her Manager and the Company Secretary as soon as possible if you believe or suspect that a breach of or conflict with this Policy has occurred or may occur in the future. Any employee who breaches this Policy will face disciplinary action, which could result in dismissal. The Company reserves a right to terminate the contractual relationship if there is a breach of this Policy. Any breach of this Policy would also result in imposition of large fines/

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imprisonment on the individual / prosecution of the Company as the case may be or termination of contract with a Third Party.

Every person, to whom this policy applies to, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage. If he / she is unsure whether a particular act constitutes bribery or corruption or if he / she has any other queries, these should be raised with their respective Manager or the Company Secretary.

PROTECTION

We are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corrupt activities or because of reporting their suspicion in good faith that an actual or potential bribery or other corruption offence has taken place or may take place in the future. If any employee believes that he / she has suffered any such treatment, he / she should inform the reporting Manager or the Company Secretary immediately.

RESPONSIBILITY OF THE POLICY

Every person to whom this policy applies is responsible for the success of this Policy and should ensure that he / she should use it to disclose any suspected activity or wrong-doing.

CHANNEL FOR COMPLAINT

Complaint can be made by any employee or any other person associated with our Company and such other persons, including those acting on behalf of our Company and includes directors, financial consultants, corporate agents, distributors, vendors, consultants, advisors, suppliers, contractors or other third parties.

The complainant may send a communication through email or directly in writing through a letter to,

The Compliance Officer

Genesys International Corporation limited
73/ A SDF- III, SEEPZ,
Andheri East, Mumbai, Maharashtra 400096

Or

Email at investors@igenesys.com

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WAIVERS AND AMENDMENTS OF THE POLICY

The Legal & Secretarial Department as and when required may amend the policy and will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Therefore, this document is subject to modification.. The Policy will be reviewed and audited from time to time which requires cooperation from all concerned.
