



Genius Group Ltd
3 Temasek Avenue
#18-01, Centennial Tower
Singapore 039190

**Notice of Potential Market Manipulation and
Formal Demand to Reinstate Buy Button for Genius Group (GNS)**

November 17, 2025

TO:

Salim Ramji, Chief Executive Officer
The Vanguard Group, Inc.
100 Vanguard Blvd.
Malvern, PA 19355

CC:

- Natalie Lamarque, General Counsel
- Greg Davis, President & Chief Investment Officer
- Legal Department, Vanguard Brokerage Services
- Compliance Department, Vanguard Brokerage Services
- Eva Mantziou, Chief Legal Officer, Chief People Officer, Genius Group Ltd
- Magdalena Korzeniowska, Company Legal Counsel, Genius Group Ltd

**Re: Formal Notice and Demand Concerning Removal of “Buy” Functionality for
GNS (NYSE American: GNS)**

Mr. Ramji,

I write in my capacity as Founder & CEO of **Genius Group Ltd** (NYSE Amex: GNS).

Our company has received multiple investor complaints that Vanguard has **disabled the “Buy” button for GNS shares, requiring investors to call in their buys** while continuing to allow the “Sell” function with no explanation provided either to our company or to the investing public. This conduct, if accurate, imposes a **fundamentally unfair trading dynamic** for our investors.

While we recognise that Vanguard retains broad discretion under its Customer Agreement and policies to suspend or limit services, including trading functions, there is **no transparent or disclosed regulatory, clearing, margin or risk-based reason publicly associated with GNS** that would justify restricting buys alone.

Absent such justification, the selective disabling of the Buy button appears **arbitrary, discriminatory and potentially suppresses legitimate demand, amplifies sell-side pressure, potentially causing damage not just for your clients, but for all our GNS investors.**

Demand for Immediate Action

Accordingly, Genius Group hereby demands:

1. **Immediate reinstatement** of full Buy-side functionality for GNS shares on your platform.
2. A **written explanation**, provided within **five (5) business days**, identifying the legal, regulatory or operational basis if any (including any margin/clearing risk model) for disabling the Buy button for GNS.
3. Written confirmation that no communications or directives from any market makers, wholesalers, clearing firms, or other third parties influenced this restriction.
4. A commitment that Vanguard will provide **written advance notice** of any future trading restrictions placed on GNS (including limits, freezes, or buy/sell functionality changes).

Preservation of Records: Effective immediately, Vanguard is instructed to preserve ALL documents, communications and system logs relating to decisions affecting GNS trading functionality, including: internal memos, risk alerts, API logs, clearing-firm correspondence, market-maker communications, trade-flow data, customer-ticket records, Slack/Teams chat logs, SMS/WhatsApp messages or other internal communication platforms, and any compliance reviews or changes in system rules referencing GNS. Failure to preserve such materials may result in a claim for spoliation of evidence.

If Vanguard does not re-enable the Buy button within 24 hours of receipt of this letter and provide a satisfactory explanation within five (5) business-day deadline, **Genius Group will escalate this matter to our external litigation counsel and pursue referral to relevant regulators** (including the U.S. SEC and FINRA). We reserve all rights to initiate legal action for damages, injunctive relief, independent auditor reviews, public statements, and any remedies available under U.S. and international securities law.

Our company is committed to protecting our investors and ensuring GNS trades on a fair and transparent basis. Similarly, we expect Vanguard, as a major U.S. brokerage platform, to uphold its obligations to market access and investor fairness with the highest integrity.

This letter is being publicly shared with our shareholders and will be posted on the official Genius Group website and social-media channels. **We are soliciting further investor reports** and corroboration of platform limitations to include in any regulatory referrals or litigation enhancement efforts. Our shareholders must have unfettered access to fairly traded markets.

Sincerely,



Roger James Hamilton
Founder & CEO
Genius Group Ltd