

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

July 15, 2025

Roger James Hamilton Chief Executive Officer Genius Group Ltd. 8 Amoy Street, #01-01 Singapore 049950

Re: Genius Group Ltd.

Registration Statement on Form F-3

Filed July 7, 2025

File No. 333-288534

Dear Roger James Hamilton:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Lauren Pierce at 202-551-3887 or Larry Spirgel at 202-551-3815 with any questions.

Sincerely,

Division of Corporation Finance Office of Technology

cc: Jolie Kahn