



Anti-Spam and Email Communication Policy

Classification: Public

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Regulatory Basis	Internal CAMPL governance policy

Abbreviations

CMF	Capitalmind Mutual Fund
CAMPL	Capitalmind Asset Management Private Limited
CTPL	Capitalmind Trustee Private Limited
CFSPL	Capitalmind Financial Services Private Limited
SEBI	Securities and Exchange Board of India
AMC	Asset Management Company

CMF is a mutual fund constituted as a trust with CFSPL as Settlor, CTPL as Trustee, and CAMPL as Investment Manager (AMC).



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1. Purpose

This policy governs email and electronic messaging sent by CAMPL, by its employees, or by a third party sending on its behalf, where that messaging references capitalmindmf.com or any Capitalmind Mutual Fund scheme, product, or publication.

2. Scope

This policy applies to all such messaging, regardless of the sending platform, domain, or infrastructure used.

3. Definitions

Commercial or Promotional Email — email or electronic messaging that advertises or promotes capitalmindmf.com, or a Capitalmind Mutual Fund scheme, product, or publication.

Suppression List — the permanent list of addresses excluded from further commercial or promotional email following an unsubscribe or removal request.

Regulatory, Statutory, and Transactional Communications — communications CAMPL is required or entitled to send to investors, including account statements, transaction confirmations, and disclosures required under applicable SEBI requirements. These are not commercial or promotional messaging and fall outside the controls in this policy.



4. Policy Statements

Prohibition on Unsolicited Messages

- 4.1. CAMPL does not advertise or promote capitalmindmf.com, or any Capitalmind Mutual Fund scheme, through unsolicited commercial email or any other form of unsolicited electronic messaging. (CAMPL internal standard)
- 4.2. CAMPL, and any party sending on its behalf, sends commercial or promotional email only to a recipient with a valid basis for contact.
- 4.3. CAMPL does not use purchased, rented, leased, scraped, harvested, or other third-party-sourced address lists for commercial or promotional email.
- 4.4. CAMPL, and any party sending on its behalf, sends messages referencing capitalmindmf.com only through infrastructure that CAMPL or its authorised providers control, and not through open relays, open proxies, or compromised systems.
- 4.5. CAMPL does not falsify, forge, or obscure message headers, sender identity, return addresses, or routing information, and does not register domains or use redirection services to disguise the origin of a message or the destination of a link.
- 4.6. CAMPL stops sending commercial messages to a recipient who has withdrawn consent or requested removal.

Basis for Contact

- 4.7. CAMPL sends commercial and promotional email only to: (a) individuals or entities who have subscribed directly through a Capitalmind channel and whose subscription is on record; (b) registered investors in Capitalmind Mutual Fund schemes, for communications relating to their investment; or (c) registered distribution partners and intermediaries with an active business relationship with CAMPL.
- 4.8. CAMPL maintains a record of the basis for contact for each recipient on a commercial mailing list.

Consent Withdrawal and Unsubscribe

- 4.9. Every commercial or promotional email CAMPL sends includes a functioning unsubscribe mechanism and standard List-Unsubscribe headers.
- 4.10. CAMPL actions removal requests within 5 business days of receipt and adds removed addresses to its Suppression List. (CAMPL internal standard)

Sending Infrastructure and Authentication

- 4.11. CAMPL sends bulk and list-based email only through dedicated email platforms that support consent records, suppression lists, unsubscribe handling, and automated bounce processing. CAMPL does not send bulk email from individual employee mailboxes.
- 4.12. CAMPL maintains SPF, DKIM, and DMARC records for capitalmindmf.com, with DMARC enforcement in place, to limit unauthorised use of the domain by third parties.
- 4.13. CAMPL processes bounce and complaint data automatically and adds addresses that generate hard bounces or repeated complaints to its Suppression List.

Third Parties, Distributors, and Affiliates

- 4.14. CAMPL does not operate an affiliate, referral, or commission-based email marketing programme for capitalmindmf.com.
- 4.15. No third party sends email advertising capitalmindmf.com except under a written agreement that requires compliance with this policy.



- 4.16. Registered distribution partners and intermediaries who communicate about Capitalmind Mutual Fund schemes comply with this policy and with applicable SEBI requirements governing such communications.
- 4.17. CAMPL withdraws authorisation from any third party found to be in breach of this policy.

Internal Controls

- 4.18. A communication to more than 250 recipients requires documented internal approval before sending. (CAMPL internal standard)
- 4.19. CAMPL enforces outbound sending limits at the mail platform level. (CAMPL internal standard)
- 4.20. An employee who breaches this policy is subject to CAMPL's internal disciplinary process.

Reporting Abuse

- 4.21. CAMPL maintains security@capitalmindmf.com as a monitored mailbox for reports of email that appears to breach this policy, or that references capitalmindmf.com without authorisation, including from blocklist operators and mail providers.
- 4.22. CAMPL investigates all reports received at that mailbox and identifies and stops the source of any unauthorised sending it confirms.

5. Roles and Responsibilities

Role	Responsibility
Head of Marketing	Administers commercial mailing lists and the basis-for-contact record. Approves communications to more than 250 recipients. Maintains the unsubscribe mechanism and List-Unsubscribe headers.
Head of Technology	Maintains SPF, DKIM, and DMARC records for capitalmindmf.com. Operates the dedicated email platform, bounce and complaint processing, and the Suppression List. Enforces outbound sending limits.
Head of Compliance	Confirms that third-party and distributor agreements referencing capitalmindmf.com require compliance with this policy. Distinguishes commercial and promotional messaging from Regulatory, Statutory, and Transactional Communications.
Monitored mailbox owner (security@capitalmindmf.com)	Investigates abuse reports and unauthorised-sending reports and coordinates the response.
Employees and third parties sending on CAMPL's behalf	Comply with this policy. Subject to CAMPL's internal disciplinary process, or withdrawal of authorisation, on breach.



6. Regulatory References

This policy is a CAMPL internal governance policy adopted by Board decision. No provision of the SEBI (Mutual Funds) Regulations, 2026 or the Master Circular for Mutual Funds dated 20 March 2026 specifically mandates its controls; the obligations in Section 4 are CAMPL internal standards. Regulatory, Statutory, and Transactional Communications that CAMPL sends to investors remain governed by the applicable SEBI requirements referred to in Section 3 and clause 4.16, and are outside the scope of this policy's commercial-messaging controls.

7. Review and Amendment

- 7.1. This policy is reviewed at least once a year, and following any incident involving unauthorised or unsolicited sending referencing capitalmindmf.com.
- 7.2. Amendments to this policy require approval of the CAMPL Board and increment the version.

8. Version History

Version	Date	Change Summary
1.0	2026-08-12	Initial adoption.

Capitalmind Asset Management Private Limited is the Investment Manager to Capitalmind Mutual Fund.
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