

AXIS Capital Holdings Limited

Group Statement on Modern Slavery and Human Trafficking

This statement is made pursuant to Section 54, Part 6, of the UK Modern Slavery Act 2015 and has been approved by the Corporate Governance and Nominating Committee and the Board of AXIS Capital Holdings Limited for the entities listed at the end of this statement.

AXIS Capital Holdings Limited and its global subsidiaries (hereinafter "AXIS Capital") are committed to respecting, protecting and advancing human rights. We have a zero-tolerance approach for any form of slavery, forced labour or human trafficking (collectively referred to as "modern slavery") in our business and supply chains. This statement sets out the steps we have taken to mitigate modern slavery risks. This statement applies to fiscal year 2020.

Our Organisation

AXIS Capital Holdings Limited is registered in Bermuda and publicly traded on the New York Stock Exchange under the symbol AXS.

AXIS Capital employs over 1,600 people in 32 offices worldwide; and we serve over 200 countries.

Our People

AXIS Capital is committed to maintaining a working environment in which the rights, freedom, diversity and dignity of all our employees is respected. As well as appropriately remunerating and rewarding our staff for the work they do, we strive to promote a collaborative and harmonious working culture. Our commitment to maintaining a positive work environment is supported by our Corporate Citizenship initiative, which considers the impact of our business decisions on AXIS employees, as well as external stakeholders, including vendors.

Our Supply Chains

Given the nature of our business, we believe the risks of modern slavery existing in our supply chain are low. Nonetheless, we take appropriate steps to ensure that we do business with parties who share our zero-tolerance approach to these activities. AXIS requires vendors to fully comply with applicable legal requirements of slavery, forced labour, and human trafficking laws, and expects vendors to enact practices to ensure compliance with such laws. Selective, risk-based due diligence is also performed on our vendors.

Our Policies

AXIS Capital is committed to promoting an open and transparent culture; where employees never feel afraid of 'speaking up' and doing the right thing. This is supported by our Whistleblowing Policy and procedures which allow employees to freely express genuine concerns to prevent unacceptable behaviour or misconduct. In addition, all AXIS Capital employees are expected to abide by AXIS Capital's Human Rights Policy, which also prohibits modern slavery.

Any business conducted with third parties is also subject to AXIS' Procurement Policy and Outsourcing Policy, which all employees can access.


All AXIS employees are expected to abide by AXIS' Business Ethics policies, including its Code of Conduct, which is a central reference point for making decisions involving ethical issues. These policies must be read by all employees upon starting at AXIS and holds employees to the highest standards of business conduct.

Training

AXIS conducts periodic Code of Conduct training, which must be completed and signed by all employees to confirm understanding of the Code's requirements and individual obligations.

This statement is reviewed annually.

Approved by and signed on behalf of AXIS Capital Holdings Limited.

AXIS Capital Holdings Limited:

Director: <u>Michael A. Butt</u>

Entities to which the statement applies: AXIS Capital Holdings Limited (Bermuda), AXIS Specialty Holdings Bermuda Limited (Bermuda), AXIS Specialty UK Holdings Limited (United Kingdom), AXIS Specialty Limited (Bermuda), AXIS Specialty Limited (Singapore Branch), AXIS Managing Agency Ltd (United Kingdom), AXIS Ventures Reinsurance Limited (Bermuda), AXIS Specialty Investments Limited (Bermuda), AXIS Corporate Capital UK Limited (United Kingdom), AXIS Syndicate 1686, AXIS Specialty Investments II Limited (Bermuda), Novae Group Limited (United Kingdom), AXIS Ventures Limited (Bermuda), AXIS UK Services Limited (United Kingdom), AXIS Corporate Capital UK II Limited (United Kingdom), AXIS Syndicate 2007, AXIS Specialty Finance PLC (United Kingdom), AXIS Reinsurance Managers Limited (Bermuda), AXIS Underwriting Limited (United Kingdom), Novae Holdings Limited (United Kingdom), Novae Syndicates Limited (United Kingdom), AXIS Specialty Holdings Ireland Limited (Ireland), AXIS Re SE (Ireland), AXIS Re SE, Dublin (Zurich Branch), AXIS Re SE Escritório de Representação No Brasil Ltda (Brazil), AXIS Specialty Europe SE (Ireland), AXIS Specialty Europe SE (UK Branch) Trading as AXIS Specialty London, AXIS Specialty Europe SE (Netherlands Branch), AXIS Specialty Europe SE (Belgium Branch), AXIS Reinsurance (DIFC) Limited (Dubai), AXIS Specialty Global Holdings Limited (Ireland), AXIS Specialty U.S. Holdings, Inc. (Delaware), AXIS Reinsurance Company (New York), AXIS Specialty Finance LLC (Delaware), AXIS Reinsurance Company (Canadian Branch), AXIS Group Services, Inc (Delaware), AXIS Specialty Underwriters, Inc. (Delaware), AXIS Specialty U.S. Services, Inc (Delaware), AXIS Specialty U.S. Services, Inc (UK Branch) UK Establishment, AXIS Specialty Insurance Company (Connecticut), AXIS Specialty Canada Services, ULC (British Columbia), AXIS Insurance Company (Illinois), AXIS Surplus Insurance Company (Illinois), Ternian Insurance Group LLC (Arizona)