

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 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 2021.

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 1,800 people in 28 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.

AXIS Capital has implemented measures to support staff and assist with their wellbeing during the COVID-19 pandemic.

Our Supply Chains

Given the nature of our business, we believe the risks of modern slavery or human trafficking existing in our supply chain are extremely 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 Code of Business Conduct which sets forth the guiding principles for conducting our business with integrity and in compliance with all applicable laws and regulations to uphold the Company's commitment to best business practices. Our Whistleblower Policy sets out the procedures that enable employees to openly or confidentially express concerns about actual or potential violations relating to laws, regulations and Company policies.

Retaliation against employees raising violations or concerns is strictly prohibited. Additionally, AXIS Capital employees are also required to abide by our Human Rights Policy, prohibiting modern slavery.

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


Training

Periodic training and annual certification of our Code of Business Conduct, Whistleblower Policy and other business ethics policies is required to be completed by all employees.

This statement is reviewed annually.

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

AXIS CAPITAL HOLDINGS LIMITED

By:  _____
Henry B. Smith, Director

AXIS Capital Holdings Limited Subsidiaries

<u>Subsidiary</u>	<u>Jurisdiction of Incorporation</u>
AXIS Specialty Holdings Bermuda Limited	Bermuda
AXIS Specialty Limited	Bermuda
AXIS Specialty Investments Limited	Bermuda
AXIS Specialty Investments II Limited	Bermuda
AXIS Ventures Limited	Bermuda
AXIS Reinsurance Managers Limited	Bermuda
AXIS Re SE	Ireland
AXIS Specialty Europe SE	Ireland
AXIS Specialty Global Holdings Limited	Ireland
AXIS Specialty Holdings Ireland Limited	Ireland
Ternian Insurance Group LLC	Arizona
AXIS Specialty Insurance Company	Connecticut
AXIS Group Services, Inc.	Delaware
AXIS Specialty Finance LLC	Delaware
AXIS Specialty U.S. Holdings, Inc.	Delaware
AXIS Specialty U.S. Services, Inc.	Delaware
AXIS Specialty Underwriters, Inc.	Delaware
AXIS Insurance Company	Illinois
AXIS Surplus Insurance Company	Illinois
AXIS Reinsurance Company	New York
AXIS Managing Agency Ltd.	United Kingdom
AXIS Specialty Finance PLC	United Kingdom
AXIS Specialty UK Holdings Limited	United Kingdom
AXIS Corporate Capital UK Limited	United Kingdom
AXIS Corporate Capital UK II Limited	United Kingdom
Novae Group Limited	United Kingdom
AXIS UK Services Limited	United Kingdom
Novae Holdings Limited	United Kingdom

Novae Syndicates Limited	United Kingdom
AXIS Underwriting Limited	United Kingdom
Contessa Limited	United Kingdom
AXIS Re SE Escritório de Representação No Brasil Ltda.	Brazil
AXIS Specialty Canada Services, ULC	British Columbia
AXIS Reinsurance (DIFC) Limited	Dubai