

AXIS Re SE

Solvency and Financial Condition Report

Year Ended 31 December 2024

AXIS Re SE
YEAR ENDED 31 DECEMBER 2024
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As used in this report, references to 'we', 'us', 'our', or 'Company' refers to AXIS Re SE. The Solvency and Financial Condition Report is presented in thousands of US Dollars (USD'000) unless otherwise stated. Amounts in tables may not reconcile due to rounding differences.

AXIS Re SE
YEAR ENDED 31 DECEMBER 2024
EXECUTIVE SUMMARY

AXIS Re SE ("the Company") has prepared this Solvency and Financial Condition Report ("SFCR") in compliance with the public disclosure requirements under the Commission Delegated Regulation (EU) 2015/235 of the European Parliament supplementing Directive 2009/138/EC, known as the Solvency II Directive, which was transposed into Irish Law effective 1 January 2016. This transposition took the form of secondary Irish legislation in the form of a Statutory Instrument, the European Union (Insurance and Reinsurance) Regulations 2015, which together with the Solvency II Directive are collectively referred to as "Solvency II" in this report.

This report covers the business and performance of the Company, its system of governance, risk profile, valuation for solvency purposes and capital management process of the Company. The Board of Directors ("the Board") of the Company is ultimately responsible for these matters. The Board use the assistance of various governance and control functions that it has put in place to manage the business and monitor risk.

The Company is regulated by the Central Bank of Ireland ("the Central Bank") and complies with the Corporate Governance Requirements for Insurance Undertakings, 2015 and all related regulatory requirements and codes.

Business and Performance

The Company operates from its Head Office at 20 Kildare Street, Dublin 2.

The Company has a branch office in Zurich, Switzerland, which trades as "AXIS Re Europe". The Company has a Representative office in Brazil.

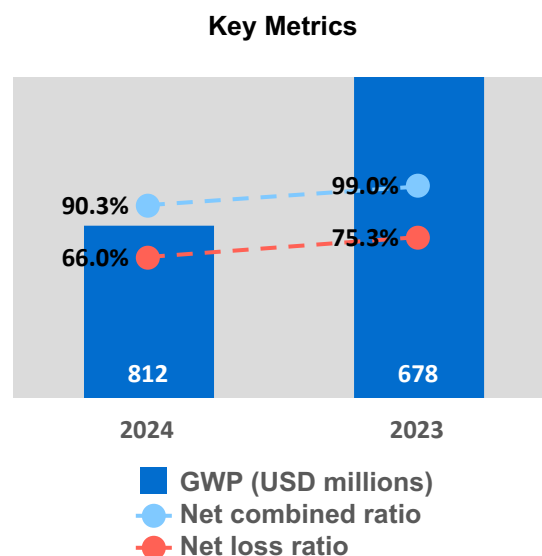
The Company is a part of the AXIS Capital Holdings Limited ("AXIS Capital") group. AXIS Capital is a Bermuda-based holding company. At 31 December 2024, Axis Capital had common shareholders' equity of USD 5.5 billion, total capital of USD 7.4 billion and total assets of USD 32.5 billion.

The principal activity of the Company is the transaction of treaty and facultative reinsurance business in respect of the risks of third parties, primarily in the marine, transit, property (including energy), liability, accident and health, motor and credit and surety classes of business.

Gross premiums written in 2024 of USD 812.3 million was USD 134 million higher than prior year (2023: USD 678.3 million) due to new business in Credit & Surety and Agriculture along with positive underlying rate increase within the Motor portfolio.

Profit for the year was USD 75.8 million compared to USD 101.9 million profit in 2023, primarily due to lower investment performance.

The Company's net combined ratio was 90.3% (2023: 99.0%) representing a net loss ratio of 66.0% (2023: 75.3%) and a net operating expense ratio of 24.3% (2023: 23.7%). The improvement in the net loss ratio is primarily driven by prior year development releases in Agriculture and Property lines. The increase in net operating expenses ratio is attributable to change in business mix and higher profit commissions.



During 2024, the Company paid interim dividends of USD 60 million (2023: USD 38 million) with a final dividend of USD 115 million paid post year end (2023: USD 16 million).

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Business and Performance (continued)

On December 13, 2024, the Company entered into a retrospective reinsurance agreement with Cavello Bay Reinsurance Limited ("Cavello Bay"), a wholly-owned subsidiary of Enstar Group Limited to retrocede a portfolio of reinsurance business related to 2021 and prior underwriting years. The transaction is subject to regulatory approvals and other customary conditions and is expected to close during the first half of 2025.

The transaction is structured as a 75% ground-up quota share retrocession of net reserves for losses and loss expenses of approximately USD 299 million at 30 September 2024 (USD 3.1 billion at an Axis Group level) and is subject to 140% limit, also at an AXIS Group level. In addition to Cavello Bay's "A" rating, 102% collateral will be provided to the Company.

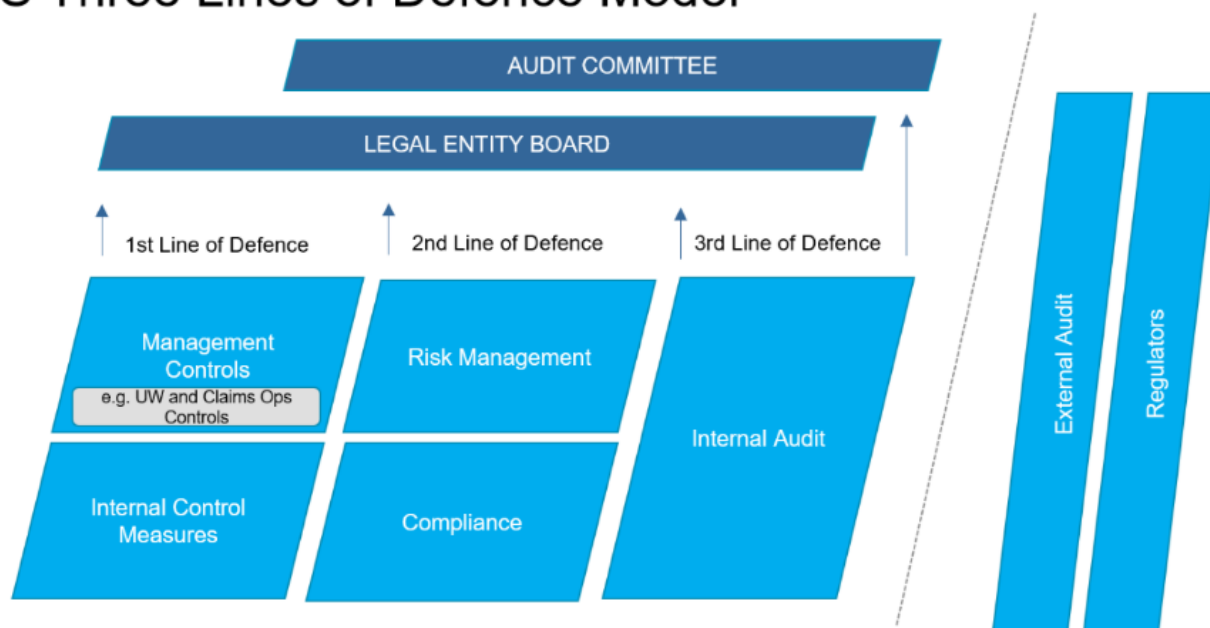
Refer to [Section A](#) for further detail relating to business and performance.

System of Governance

The Board of Directors ("the Board") is ultimately responsible for the good governance, strategy, and oversight of the conduct of performance of the Company. The Company is subject to the relevant requirements set out by the Central Bank, including the Corporate Governance Requirements for Insurance Undertakings, 2015. The Board recognizes that an effective system of governance is essential for appropriate management of the Company and adheres to the principle that good corporate governance is founded on a solid framework which delivers security and protection for policyholders and value for shareholders through the diligent oversight of policies, processes and decision making.

The Company implements the "three lines of defence" model which is used to structure roles and responsibility for risk and control activity. The key functions within the second and third of the three lines of defence are Risk, Compliance, Actuarial and Internal Audit. These key functions are delegated responsibility to monitor and independently challenge the business and to report their findings to the relevant oversight Committee and/or the Board itself. The three lines of defence model is as follows:

AXIS Three Lines of Defence Model*



Refer to [Section B](#) for further detail on the Company's system of governance.

Risk Profile

The Company's risk profile comprises insurance, credit, market, operational, liquidity, strategic and other risks that arise as a result of doing business. Ongoing risk identification activities are in place to identify new, emerging and changing risks to the achievement of the Company's strategy and business objectives. Risk assessment activities are carried out on a regular basis in order to understand the Company's exposure to each risk, through quantitative and/or qualitative measures and inform the Company's own view of risk. The following sections provide definitions of the above risk categories as well as the Company's related risk management practices.

Refer to [Section C](#) for further detail on the Company's risk profile.

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Valuation for Solvency Purposes

The Company's financial statements including the balance sheet have been prepared under the historical cost convention, as modified by the inclusion of certain investments at fair value and in accordance with FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" ("FRS 102") and FRS 103 "Insurance Contracts" ("FRS 103") issued by the Financial Reporting Council and promulgated by the Institute of Chartered Accountants in Ireland, and comply with the Companies Act 2014 and the European Union (Insurance Undertakings: Financial Statements) Regulations, 2015.

As used in this report, references to 'GAAP' refer to the accounting standards and regulations under which the financial statements have been prepared.

The Solvency II Balance Sheet recognises assets and liabilities in conformity with the international accounting standards adopted by the Commission in accordance with Regulation (EC) No 1606/2002 (IFRS as adopted by the EU) unless otherwise stated within Solvency II.

The valuation of assets and liabilities for GAAP is the same as Solvency II except for:

- valuation of technical provisions and associated reinsurance recoverables,
- valuation of property, plant and equipment including operating leases,
- recognition of approved dividend; and
- deferred tax calculated on the expected tax impact once the valuation adjustments from GAAP to Solvency II unwind.

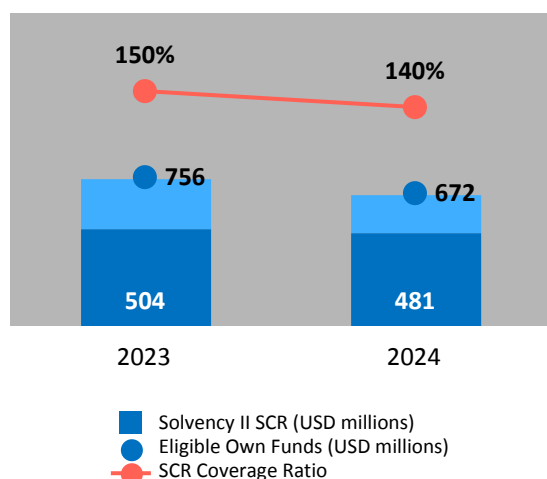
Refer to [Section D](#) for further detail on valuation for Solvency purposes.

Capital Management

The Company's Capital Management objective is to ensure that the Company maintains an appropriate level of capital, in terms of both quantity and quality, at all times, in line with its risk appetite and capital requirements, and that it fulfils its obligations to monitor, manage and report its capital position, both required and available, internally and externally as required, in accordance with relevant regulatory requirements. A business plan is prepared annually to support the capital management objective and includes a three year projection of expected performance.

For Solvency II, own funds are divided into levels of quality, known as tiers, depending on their loss absorbency. Tier 1 unrestricted, which is not subject to a limit, is of the highest quality, Tier 3 the lowest. At 31 December 2024, 99.9% (2023: 100%) of the Company's own funds are classified as Tier 1.

Solvency II SCR Coverage



The Company applies the Standard Formula approach in calculating the Solvency II Solvency Capital Requirement ("SCR").

The SCR at 31 December 2024 was USD 481.1 million (2023: USD 503.9 million) with a coverage ratio of 140% (2023: 150%). The reduction in coverage ratio is largely attributable to a dividend proposed and paid in quarter one 2025 for USD 115 million (2023: USD 16 million). The coverage ratio is anticipated to increase above 150% in the first half of 2025 once the retrospective reinsurance agreement referenced above is completed.

The Minimum Capital Requirement ("MCR") at 31 December 2024 was USD 120.3 million (2023: USD 126.0 million) with a coverage ratio of 558.7% (2023: 599%)

The final SCR and MCR amounts remain subject to supervisory assessment. The Company was compliant with Solvency II capital requirements throughout the year.

Refer to [Section E](#) for further detail on Capital Management.

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BUSINESS & PERFORMANCE

A. BUSINESS AND PERFORMANCE

A.1 Business and Performance

Company Profile

AXIS Re SE (the "Company") was incorporated in Ireland on 12 February 2002 as a limited liability company. On 26 November 2007, the Company was approved by the Central Bank of Ireland as a Composite Reinsurance Company, authorized to carry on non-life and life reinsurance business. On 10 September 2012 the Company re-registered as a Societas Europaea ("SE") having received Irish High Court approval.

The principal activity of the Company is the transaction of treaty and facultative reinsurance business in respect of the risks of third parties, primarily in the marine, transit, property (including energy), liability, accident and health, motor and credit and surety classes of business.

The Company is 100% owned by AXIS Specialty Holdings Ireland Limited ("ASHIL"), an Irish registered company which is 100% owned by AXIS Capital, a company incorporated in Bermuda. The Bermuda Monetary Authority acts as the group supervisor of AXIS Capital.

At 31 December 2024, AXIS Capital had common shareholders' equity of USD 5.5 billion (2023: USD 4.7 billion), total capital of USD 7.4 billion (2023: USD 6.6 billion) and total assets of USD 32.5 billion (2023: USD 30.2 billion).

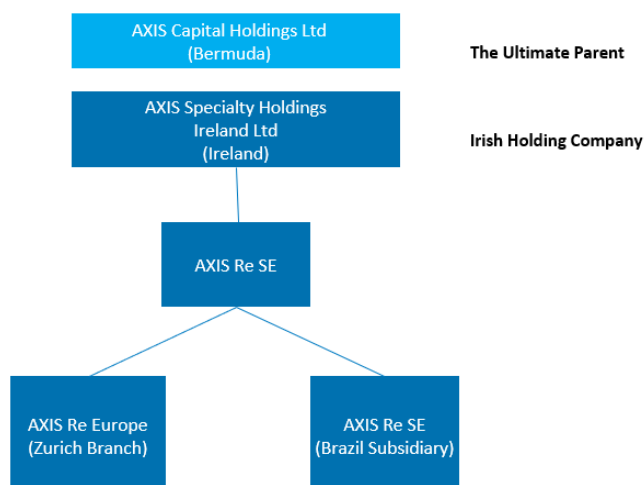
During 2024, AXIS Re SE operated from its Head Office at 6th Floor, 20 Kildare Street, Dublin 2. The Company has a branch office in Zurich, Switzerland, which trades as "AXIS Re Europe". The Zurich branch has a registered office address at Alfred Escher-Strasse 50, CH-8002 Zurich, Switzerland.

The Company is regulated by the Central Bank of Ireland ("the Central Bank") and complies with the Corporate Governance Requirements for Insurance Undertakings, 2015 and all related regulatory requirements and codes.

In December 2010, the Company established a subsidiary in Brazil to provide marketing services for the Company. AXIS Re Limited Escritorio de Representação No Brasil Ltda (the "Brazil Subsidiary") is registered at the Chamber of Commerce in Brazil with a registered address at Alameda Santos, No. 74, Alameda Santos, Nº 74, 7º Floor, Suite 72, Room 41, Cerqueira Cesar, Zip Code 01418-000, São Paulo, Brazil. The Company was granted its license by the Superintendence of Private Insurance ("SUSEP") as an admitted reinsurer in Brazil in March 2011.

Additionally, ARE hold a number of registrations to write reinsurance business on a cross-boarder admitted basis in India, China, Mexico, Argentina, Bolivia, Chile, Colombia, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, Mexico, Nicaragua, Panama, Paraguay and Peru.

Simplified Group Structure



Refer to [Appendix I](#) for the AXIS Capital group structure including the Company and its related undertakings.

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Shared Services within the AXIS Group

The AXIS Group ("Group") operates a global business providing a range of speciality (re)insurance products and services. Business segments and legal entities within the Group rely on the breadth of support functions offered by the Group, such as Finance, Actuarial, Human Resources ("HR"), Business Technology Solutions ("BTS"), Treasury & Investments, Corporate Risk and Risk Funding. Certain functions have centralised support, such as HR and BTS, with a dedicated representative within the business segment. This also applies to the legal entities where many of the business and support function leaders have a shared responsibility, with some of those having obligations at both business segment and legal entity level.

Supervision and External Audit

The Company is regulated by the Central Bank of Ireland ("CBI"), New Wapping Street, North Wall Quay, Dublin 1, D01 F7X3.

Deloitte Ireland LLP resigned as statutory auditors 1 June 2024 upon conclusion of the 2023 statutory audit, and have confirmed, in accordance with Section 400 of the Companies Act 2014, that there are no circumstances connected with their resignation which should be brought to the attention of the members or creditors of the Company. The auditors, Forvis Mazars, Chartered Accountants and Statutory Audit Firm were appointed auditors on 6 June 2024 under Article 17 of Regulation (EU) no 537/2014 for the financial year ended 31 December 2024. Forvis Mazars have indicated their willingness to continue in office in accordance with Section 383 (2) of the Companies Act 2014.

Performance

On a GAAP basis, the profit for the year ended 31 December 2024 was USD 75.8 million (2023: USD 101.9 million loss).

	2024	2023
	USD'000	USD'000
Gross written premium	812,326	678,322
Technical result	16,621	1,958
Net investment gains/(loss)	47,354	108,810
Foreign exchange (loss)/gains	12,269	(10,059)
Profit on ordinary activities before taxation	<u>76,244</u>	<u>100,709</u>
Taxation on profit/(loss) on ordinary activities	<u>(436)</u>	<u>1,187</u>
Profit on ordinary activities after taxation	<u>75,808</u>	<u>101,896</u>

The Company's underwriting performance improved in the year despite significant global challenges, with the reinsurance industry affected by macro economic impacts of high inflation and volatile interest rates, continuing geopolitical turmoil and another year of above average losses arising from natural catastrophes.

The increase in written premiums of USD 134.0 million against prior year was mainly attributable to new business in Credit & Surety and Agriculture along with material rate increases achieved in the Motor portfolio.

The Company's investment portfolio generated gains from investments of USD 47.4 million 2024 (2023: USD 108.8 million). This translated to a total gain on average cash and investments (pre-tax) of 3.8% in 2024 (2023: 6.9% gain). The gain comprises of USD 59.1 million of investment income (2023: USD 49.1 million), USD 37.1 million of realised losses (2023: USD 8.0 million losses), USD 27.8 million of unrealised gains (USD 70.2 million gains) and USD 2.4 million of investment expenses and charges (2023: USD 2.5 million). Investment income was positively impacted by portfolio yield, the rally in the equity markets, and spread tightening. This was partially offset by the weakening of the Euro and GBP against the US dollar.

Pricing momentum in non-proportional reinsurance continues to be strong while its proportional reinsurance business is benefiting from rate increases in the underlying business. These market conditions are expected to persist in the near term. The Company will continue to focus on underwriting discipline and driving targeted profitable growth among the specialty and casualty reinsurance lines offered. With a strengthened book of business, and a growing footprint in the specialty markets the Company is well positioned to drive profitable growth within the current environment.

During 2024, the Company paid interim dividends of USD 60 million (2023: USD 38 million) with a final dividend of USD 115 million paid post year end (2023: USD 16 million).

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A.2 Performance from Underwriting activities

	2024	2023
	USD'000	USD'000
Gross written premium	812,326	678,322
Net premiums written	175,868	144,188
Gross premiums earned	762,340	712,693
Net premiums earned	163,778	152,456
Other technical income (net)	805	505
Net losses and loss expenses	(108,095)	(114,805)
Net operating expenses	(39,867)	(36,198)
Technical result	<u>16,621</u>	<u>1,958</u>
 Net combined ratio	 <u>90.3 %</u>	 <u>99.0 %</u>

The Company's net combined ratio which relates net losses and other expenses incurred to net premiums earned, is the primary indicator of the underwriting and therefore, company performance.

The Company's net combined ratio was 90.3% (2023: 99.0%) representing a net loss ratio of 66.0% (2023: 75.3%) and a net operating expense ratio of 24.3% (2023: 23.7%). The improvement in net loss ratio is attributable to a lower current accident year loss ratio due to a change in mix of business with an increase in Credit and Surety plus increased diversification by geography for the Agriculture business. Positive prior accident year releases on Agriculture, Property (COVID-19) and Credit and Surety have also contributed to the net loss ratio.

The increase in net operating expense ratio is attributable to higher acquisition costs due to the impact of business mix, and the relatively higher acquisition costs associated with the Credit and Surety business. The administration expenses remained relatively flat during the year. No significant changes have been projected for the net combined ratio and is projected to be 92% by 2027.

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Premiums

The following table provides premium written and net premium earned by line of business:

	Gross premiums written 2024 USD'000	Gross premiums written 2023 USD'000	Net premiums earned 2024 USD'000	Net premiums earned 2023 USD'000
Direct business and accepted proportional reinsurance				
Medical Expense	1	30	—	6
Income Protection	28,910	28,901	6,704	6,654
Motor vehicle liability	32,325	55,596	10,619	18,271
Other Motor	15,735	28,870	5,169	9,488
Fire and other damage to property	170,314	129,987	33,433	31,232
General liability	50,597	47,777	11,752	10,422
Credit and suretyship	198,426	152,948	32,452	23,911
Assistance	391	(2)	(17)	(1)
Accepted non-proportional reinsurance				
Health	22,942	19,334	5,042	4,223
Casualty	264,677	187,144	53,963	42,356
Marine, aviation and transport	4,859	5,807	779	1,376
Property	23,150	21,933	3,881	4,517
Total	812,326	678,324	163,778	152,456

Analysis of gross premiums written by geographic location of Cedents

	2024 USD'000	2023 USD'000
Europe	234,488	216,102
UK	289,137	190,314
Asia	140,569	144,416
Central & South America	81,636	63,948
North America	50,967	47,619
Africa	9,861	6,536
Oceania	5,668	9,387
	812,326	678,322

Refer to [Appendix II S.04.05.21](#) for further detail on the top five countries by gross written premium.

Gross premiums written in 2024 increase by USD 134.0 million against prior year due to new business in Credit & Surety and Agriculture along with material rate increases achieved in Motor portfolio.

Ceded retrocessions

The Company purchases both proportional and non-proportional retrocessions to reduce the risk of exposure to loss, from both third parties and other AXIS Capital group companies. The Company shares its third party retrocessions with a number of other AXIS Capital group companies.

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Ceded retrocessions(continued)

Ceded premiums written in 2024 increased to USD 636.5 million, compared to USD 534.1 million. The increase is primarily related to the increase in gross written premiums. There has been no material changes to retrocession strategy in the year.

Other technical income (net)

Other technical income recognised in 2024 net of reinsurance was USD 0.8 million (2023: USD 0.5 million).

Other gross technical income:

- USD 2.6 million (2023: USD 2.0 million) related to performance based fees and reimbursement arrangements with third party capital providers;
- USD 17.5 thousand (2023: USD 14.2 thousand) relating to the performance of administrative services on behalf of certain reinsurance intermediaries/brokers; and
- USD 160.6 thousand (2023: USD 10.4 thousand) relating to the amortisation of deferred gain on retroactive contracts.

Net losses and loss expenses

	Net losses and loss expenses 2024 USD'000	Net loss ratio 2024 %	Net losses and loss expenses 2023 USD'000	Net loss ratio 2023 %
Direct business and accepted proportional reinsurance				
Medical expense	—	—	(159)	—
Income protection	6,572	98.0 %	5,861	88.0 %
Motor vehicle liability	8,472	79.8 %	21,596	118.2 %
Other motor	4,124	79.8 %	11,214	118.2 %
Fire and other damage to property	22,916	69.4 %	24,401	79.6 %
General liability	9,355	79.6 %	9,657	92.7 %
Credit and suretyship	12,611	38.9 %	10,989	46.0 %
Assistance	360	—	(89)	—
Accepted non-proportional reinsurance				
Health	1,361	27.0 %	659	15.6 %
Casualty	44,759	82.9 %	29,472	69.6 %
Marine, aviation and transport reinsurance	(1,591)	(204.2)%	1,579	114.7 %
Property	(843)	—	(373)	—
Total	108,096	66.0 %	114,805	75.2 %

The Company's net loss ratio was 66.0% (2023: 75.2%).

The improvement in the net loss ratio on the prior year is driven by a lower current accident year loss ratio due to a change in mix of business with an increase in Credit and Surety business plus increased diversification by geography within the Agriculture portfolio. Positive prior accident year releases on Agriculture, Property (COVID-19) and Credit and Surety have also contributed to an improvement in the net loss ratio.

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Net operating expenses

Net operating expenses include net acquisition costs and net general and administrative expenses incurred during the year. Net general and administrative expenses are allocated across the different lines of business based on gross earned premium.

Net operating expenses by line of business

	Net operating expenses 2024 USD'000	Net operating expenses 2023 USD'000
Direct business and accepted proportional reinsurance		
Medical expense	—	(3)
Income protection	811	1,154
Motor vehicle liability	3,069	3,818
Other motor	1,579	1,983
Marine, aviation and transport	88	120
Fire and other damage to property	6,805	5,792
General liability	3,562	3,399
Credit and suretyship	15,488	12,849
Assistance	10	(36)
Accepted non-proportional reinsurance		
Health	717	611
Casualty	7,064	5,679
Marine, aviation and transport reinsurance	255	505
Property	419	328
Total	39,867	36,198
	2024	2023
Net operating expense ratio	24.3 %	23.7 %

The increase in the 2024 net operating expense ratio versus prior year is attributable to change in business mix primarily driven by growth in the Credit & Surety portfolio which has a higher acquisition costs ratio relative to other lines of business plus the impact of profit commissions arising from the favorable loss ratios.

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A.3 Performance from Investment activities

The Company's investment portfolio comprises debt, equity, cash and cash equivalents, investment funds and derivatives (used only for hedging foreign currency exposure). The portfolio includes investments in securitisations of USD 2.7 million (2023: USD 3.1 million).

	Dividends	Interest	Realised gains/(losses)	Unrealised gains/(losses)	Total
	2024	2024	2024	2024	2024
	USD'000	USD'000	USD'000	USD'000	USD'000
Government Bonds	—	13,699	(5,056)	3,351	11,994
Corporate Bonds	—	23,598	(11,115)	13,731	26,214
Equity instruments	8,560	—	(13,585)	9,177	4,152
Collateralised securities	—	4,214	(6,648)	5,136	2,702
Cash and deposits	—	5,470	(1)	—	5,469
Mortgages and loans	—	3,538	(648)	—	2,890
Other investments	—	—	—	(3,622)	(3,622)
	8,560	50,519	(37,053)	27,773	49,799

	Dividends	Interest	Realised gains/(losses)	Unrealised gains/(losses)	Total
	2023	2023	2023	2023	2023
	USD'000	USD'000	USD'000	USD'000	USD'000
Government Bonds	—	11,244	(5,382)	17,364	23,226
Corporate Bonds	—	20,186	(11,066)	33,000	42,120
Equity instruments	7,880	—	8,674	19,721	36,275
Collateralised securities	—	3,509	(275)	2,178	5,412
Cash and deposits	—	2,920	—	—	2,920
Mortgages and loans	—	3,398	—	—	3,398
Other investments	—	—	—	(2,085)	(2,085)
	7,880	41,257	(8,049)	70,178	111,266

Investment Performance

The Company's investment portfolio generated a gain from investments of USD 47.4 million (including investment expenses and charges) in 2024 (2023: USD 108.8 million gain). The pre-tax total return on average cash and investment was favourable at 3.8% inclusive of foreign exchange losses that hedge liabilities (2023: 6.9% Profit). Investment performance was positively impacted by the portfolio yield, the rally in equity markets and spread tightening partially offset by the weakening of the Euro and GBP against US dollar.

	2024	2023
	USD'000	USD'000
Investment expenses and charges	2,445	2,455

Investment expenses and charges relate to costs associated with the management of the investment portfolio including custodian fees and third party investment manager fees. It is not practicable to allocate investment management costs between the different investment classes.

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A.4 Performance of other activities

In the normal course of its operations, the Company has entered into a "Central Services Agreement" within the AXIS group and performs services on behalf of other AXIS companies. There have been no other significant activities undertaken by the Company.

Operating leasing arrangements

The Company leases office space in Dublin and Zurich.

The Company entered into a new agreement to lease office space at 20 Kildare Street, Dublin. The lease expires in April 2026, with no option to terminate during the lease term.

The Company rents two floors (Levels 5 and 6) of office space for its Swiss branch in Zurich, under a lease agreement that runs until 28 February 2027 with no option to terminate the lease. Charges relating to lease obligations of USD 1.3 million (2023: USD 1.3 million) are included in net operating expenses.

Future minimum rentals payable under non-cancellable operating leases are as follows:

	2024	2023
	USD '000	USD '000
Lease commitments payable:		
Within 1 year	1,466	1,580
Within 2 to 5 years	1,710	3,423
	3,176	5,003

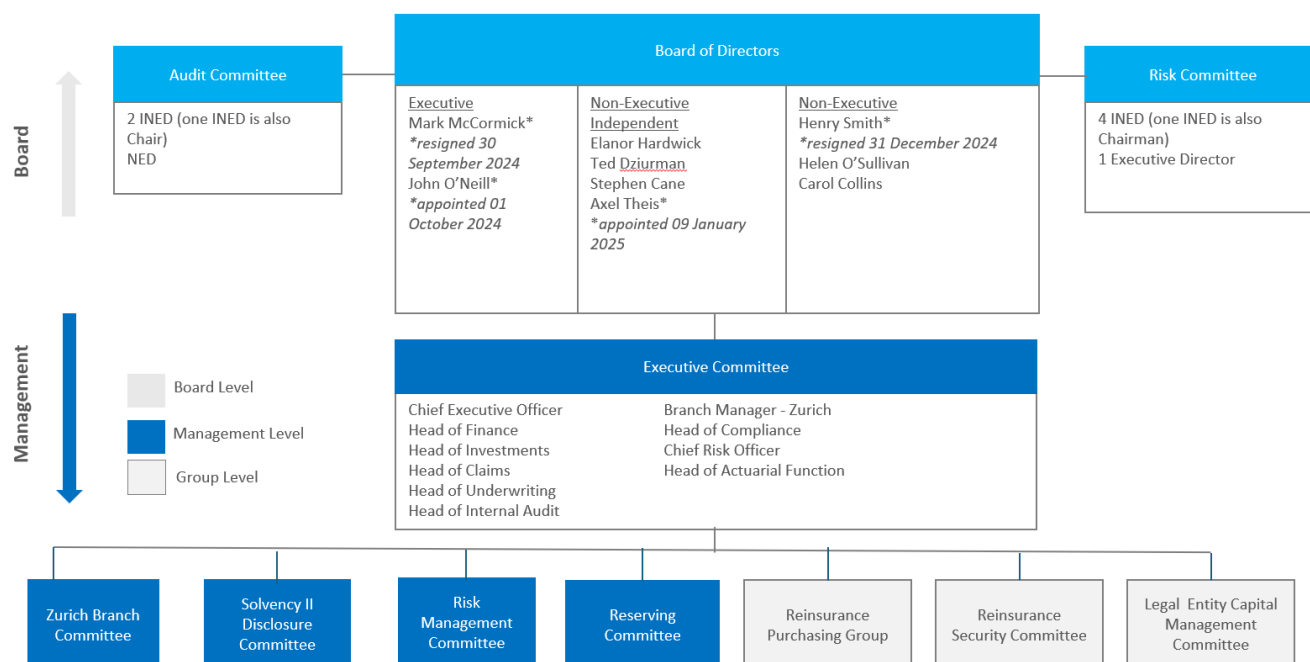
The Company is not party to any finance leases as at 31 December 2024.

A.5 Any other information

All material information regarding business and performance has been disclosed in Sections A.1 - A. 4 above.

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SYSTEM OF GOVERNANCE

B. SYSTEM OF GOVERNANCE



B.1 General governance arrangements

The Board believes an effective system of governance is essential for the appropriate management of the Company and is responsible for the prudent, effective and ethical oversight of the Company. The Company's system of governance reflects the nature, scale and complexity of the Company and implemented in compliance with Solvency II, the Central Banks Corporate Governance Requirements for Insurance Undertakings 2015, and related regulations and codes. The Company adheres to the principle that good corporate governance is founded on a solid framework which delivers security and protection for policyholders and value for shareholders, through long term diligence in oversight of policy, process and decisions.

The key control functions within the Company's system of governance, Compliance, Risk, and Internal Audit have developed and documented oversight monitoring strategies which are reported on to the relevant oversight Committee and/or Board. Responsibility for business decisions and governance rests with the Board who may delegate authority to Board sub-Committees and Management to act on behalf of the Board in respect of certain matters. As such, the Board considers the system of governance to be appropriate and effective. There were no changes in the system of governance over the reporting period. The material components of the system of governance are outlined below.

Board of Directors

The Company has established a Board of Directors comprising a minimum of five directors including at least two non-executive directors. As at 31 December 2024, the Board comprised 7 Directors, a majority of 6 being independent or Group non-executive directors and one Executive Director. All Group non-executive directors are deemed independent directors who exercise sound judgement and decision making, independent of the views of management or outside interests. The Company considers the independence of a majority of its Board members to be a key component of good governance.

During the reporting period, Mark McCormick resigned as Executive Director and Chief Executive Office, and Henry Smith resigned as Independent Non-Executive Director. On the 1st October 2024, John O'Neill was appointed as Executive Director and Chief Executive Officer. On the 9th January 2025 Axel Theis was appointed to the Board as an Independent Non-Executive Director.

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B.1 General governance arrangements (continued)
Board of Directors (continued)

The Board is responsible for the following:

- Setting and overseeing the long-term objectives, purpose, values and business strategy for the Company and considering the impact of such strategy on the stakeholders of the Company.
- Monitoring and oversight of the business activities of the Company.
- Corporate, regulatory and compliance governance.
- Compliance with all legal and regulatory requirements, including in particular the requirements of the Central Bank of Ireland Corporate Governance Requirements for Insurance Undertakings 2015, the Central Bank of Ireland Fitness and Probity regime ("F&P Regime"), the Solvency II Directive (Directive 2009/138/EC) as amended by the Omnibus II Directive (2014/51/EC) and the European Communities (Insurance and Reinsurance) Regulations 2015.
- Effective, prudent and ethical oversight of the Company, including oversight of the amounts, types and distribution of internal capital and own funds adequate to cover risks.
- Oversight of Board Committees.
- Overseeing the internal control framework, including the operational resilience framework and the financial reporting and accounting framework, and ensuring key control functions including risk, internal audit and compliance are properly managed, are independent of business units and have adequate resources and authority to operate effectively.
- Appointment, monitoring and removal of persons performing Pre-approval Controlled Functions on behalf of the Company.
- Reviewing and approving the criteria for critical or important business services, including reviewing impact tolerances and reviewing scenario testing on critical or important business services.
- Defining and documenting the responsibilities of Directors, Board Committees and senior management to ensure that no single person has unfettered control of the business.
- Succession planning for the Board and senior management.
- Monitoring the performance of outsourced providers.
- Reviewing and approving the pre-emptive recovery plan prepared in accordance with the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Recovery Plan Requirements for Insurers) Regulations 2021.
- Ensuring the Company has a robust and transparent organisational structure with effective communication and reporting channels.
- Ensuring the Company has a remuneration framework that is in line with the risk strategies of the Company.
- Oversight of diversity and inclusion policies designed to promote diversity within the workforce.

The Board is enabled to discharge its responsibilities through receipt and review of appropriate management information, regular oversight of the business and the participation in on-going training and briefings. The Board shall meet as often as is appropriate to fulfil its responsibilities effectively and prudently, reflective of the nature, scale and complexity of the Company's activities. The Board will meet at least four times a year.

The Board is responsible for ensuring that the system of governance is internally reviewed on a regular basis and should determine the appropriate scope and frequency of the reviews, taking into account the nature, scale and complexity of the business. The Board is also responsible for determining who within the Company should conduct the review and should ensure that they are suitably independent.

The Board reserves certain key matters for itself and delegates certain matters to Board sub-Committees and to the Chief Executive Officer, who in turn delegates authority to the Executive Committee and Management. The Board Terms of Reference specify what decisions are reserved for the Board and which decision-making powers it has chosen to delegate.

The Board has established Board and Management Committees as required by law or regulation and as it deems appropriate given the nature, scale and complexity of the Company. The roles and responsibilities of the Committees are further described in this section.

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B.1 General governance arrangements (continued)

Board Audit Committee

The Audit Committee is a sub-committee of the Board and its purpose is to assist the Board of Directors in its oversight of:

- the integrity of the Company's financial statements,
- the Company's compliance with legal and regulatory requirements,
- the independent auditors' qualifications, independence and effectiveness; and
- the effectiveness, adequacy and performance of the Company's internal audit, internal controls and IT systems.

The Audit Committee also reviews external reports and disclosures pursuant to the rules promulgated by the CBI and otherwise. In fulfilling its purpose, the committee maintains free and open communication with the Company's independent auditors, internal auditors and management.

The Audit Committee comprises non-executive directors, the majority being independent, and neither the Chairperson of the Board nor the Chief Executive Officer are members.

The Committee consists of no fewer than three directors, as determined by the Board of Directors. Committee members shall be appointed annually by a majority vote of the Board of Directors. The Committee chairperson is an independent non-executive director appointed by a majority vote of the Board of Directors.

Board Risk Committee

The purpose of the Risk Committee is to assist the Board of Directors in overseeing the integrity and effectiveness of the Company's enterprise risk management framework, and ensuring that the Company's risk assumption and risk mitigation activities are consistent with that framework.

In furtherance of its purpose, the Risk Management Committee has the following duties and responsibilities:

- review and approve the Company's Enterprise Risk Management Framework, and monitor management's effective implementation of this framework,
- review and approve annually, the Company's Risk Management Policy, Reinsurance Management Strategy, Internal Control Policy, and other key risk policies overseeing their integrity and effectiveness,
- review the output of the Stress Test and Scenario Testing Framework, and provide input on scenario design and selection,
- review and approve any changes to the Company's Strategic Solvency Target and Risk Limits,
- review and approve the Company's annual Own Risk and Solvency Assessment ("ORSA") policy and ORSA report,
- before a decision to proceed is taken by the Board, review the inherent risks associated with any proposed strategic transactions, focusing in particular on risk aspects and implications on the Company's Own Solvency Needs and Risk Limits,
- to review and recommend for approval to the Board, the Company's three-year business plan, focusing in particular on risk aspects and implications for the Company's Strategic Solvency Target and Risk Limits; and
- meet on a regular basis with the Chief Risk Officer in a separate executive session.

The Risk Committee shall consist of no fewer than three directors, as determined by the Board of Directors. The Committee shall include a chairperson who shall be a non-executive director.

Executive Committee ("ExCo")

The ExCo chaired by the Chief Executive Officer, is delegated the day-to-day running of the Company by the Board. The ExCo includes the Company executive's holding Pre-approval controlled function ("PCF") positions and other senior management:



The ExCo has established a number of functional internal Committees to support the management and governance of the Company's activities. It is also supported by various AXIS Group committees including the Risk Management Committee, the Reinsurance Purchasing Group, the Reinsurance Security Committee and the Legal Entity Capital Committee.

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B.1 General governance arrangements (continued)
Executive Committee ("ExCo") (continued)

The main responsibilities of the ExCo are:

- managing and overseeing the business activities of the Company, including the branches,
- annually preparing ARE's three-year business plan, and presenting same to the Board for approval, Managing the actual performance compared to plan.
- Ensuring that both ARE's business strategy and capital plan are sustainable and that the key goals in the business strategy are within agreed risk appetite.
- Reviewing ARE's risk framework and appetite and recommending to the Board for approval.
- Managing and overseeing the calculation, governance and documentation of ARE's Solvency Capital Requirement.
- Managing and overseeing key control functions including risk, internal audit, actuarial, and compliance.
- Delegating approval to the Reserve Committee ARE's quarterly provision for loss and loss expense reserves and Solvency II Technical Provisions.
- Reviewing certain policies of ARE and recommending same to the Board for approval.
- Reviewing and approving those policies of ARE which do not require Board approval.
- Managing and overseeing the establishment and development of IT Systems and Technologies and approving ARE's IT Strategy on an annual basis.
- Reviewing updates from Human Resources regarding its diversity and inclusion policy and HR initiatives on promoting diversity within the workforce and to make recommendations to the Board as to how to promote diversity at Board level and in the workforce.

Underwriting Committee

The Underwriting Committee ensures underwriting alignment with business objectives, the annual business plan, and any relevant regulatory and compliance requirements. The Underwriting Committee is responsible for:

- underwriting strategy and management, including overseeing the management of underwriting risk within agreed risk appetites, and reporting breaches to the ExCo, or other committee, as appropriate;
- reviewing and providing input into the business plan for recommendation to the ExCo;
- reviewing progress against the annual business plan and monitoring performance against defined targets;
- maintaining and monitoring the underwriting control framework, ensuring that appropriate documented underwriting policies and procedures are in place;
- monitoring the qualitative and quantitative review of the underwriting process, evaluating the results and reviewing any underwriting breaches or control failures (including review of any internal audit reports in so far as they relate to the underwriting control environment);
- approving Class of Business Underwriting Guidelines and monitoring breaches of business written outside agreed criteria, or causing breach of appetite; and
- reviewing letters of authority to underwriters.

The Underwriting Committee is chaired by the Deputy Chief Underwriter and receives updates from various underwriting teams as well as the Pricing, Risk Funding, Claims, Delegated Underwriting, Conduct Risk, Risk, Compliance, Operations, and Reserving functions.

Reserving Committee

The purpose of the Committee is to assist the Board in its oversight of the governance of the setting of reserves and its compliance with the Reserving Policy as set by the Board.

Core responsibilities of the Reserving Committee include:

- Reviewing and approving the quarterly actuarial reserve proposals of the actuarial central estimate (ACE) and management best estimate (MBE) for inclusion in local management accounts.
- Review the Solvency II technical provisions and recommend approval to the Solvency II Disclosure Committee as part of the quarterly Solvency II regulatory submissions.
- Reviewing the year-end GAAP reserves and recommending to the Company's Audit Committee the level of reserves to be included in the year-end Financial Statements.
- Reviewing the annual technical provisions on a Solvency II basis and recommending to the Solvency II Disclosure Committee and Audit Committee for approval to include in the annual year-end regulatory submission.
- Review the actuarial best estimate projections of ultimate claims, gross and net of reinsurance, and by line of business.
- Review month two plus forecast reserves for month three.
- Overseeing the governance of the setting of technical provisions and its compliance with the Reserving Policy.
- Considering areas of judgment and materiality within the reserves.

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B.1 General governance arrangements (continued)

Reserving Committee (continued)

- Reconciliation/Walk from GAAP Reserves to Solvency II technical provisions.
- Where relevant, ensuring that any changes to the business processes or claims handling practices or target market profile that may impact on technical provisions are documented and discussed with the actuarial function.
- Where relevant, documenting its views on whether any such changes will impact on the quantum of technical provisions required, for example that there are actual savings arising from any such changes rather than just changes in the timing of claims paid.

The Reserving Committee includes the Head of Actuarial Function, Chief Executive Officer, Head of Finance, Chief Risk Officer, Head of Underwriting and Head of Claims.

Risk Management Committee

The Risk Management Committee is a functional Committee whose main purpose is to support the Board Risk Committee in overseeing the integrity and effectiveness of the company's Enterprise Risk Management Framework, and make appropriate recommendations to the Board Risk Committee.

The Risk Management Committee comprises the Chief Risk Officer, Chief Executive Officer, Head of Underwriting, Head of Finance, Head of Compliance and Head of Actuarial Function.

Solvency II Disclosure Committee

The purpose of the Solvency II Disclosure Committee is to provide a forum that ensures that Solvency II Reporting and Disclosures are accurate, complete and present fairly in all material respects the financial condition and results of operations of the Company and are made in a timely manner in accordance with applicable laws, rules and regulations. The Committee reviews annual Solvency II reporting and recommends board approval. On a quarterly basis, the Board of Directors has delegated authority to the Solvency II Disclosure Committee to approve the quarterly reporting.

The Solvency II Disclosure Committee comprises the Head of Finance, Chief Executive Officer, Head of Investments, Chief Risk Officer, Head of Compliance and Head of Actuarial Function.

Zurich Branch Management Committee

The Zurich Branch is a functional committee whose responsibilities include:

- effective, prudent and ethical oversight of the Zurich Branch, including managing the business activities and back office function of the Zurich Branch,
- implementing and monitoring the annual business plan of the Zurich Branch as approved by the Board of Directors, and
- managing the interaction and relationship with other management and AXIS Capital committees.

The Zurich Branch Management Committee includes Zurich branch executives holding senior positions. The management committee may co-opt other positions onto the committee.

The Terms of Reference of each management level Committee specify the delegation of responsibilities by the Board and/or ExCo to the Committee. The second and third line are appropriately represented at all management level Committees. There are clear policies and procedures in place to ensure that any input from Compliance, Risk or Internal Audit required for a decision are included in the relevant reports or documentation.

Key Functions

Under Solvency II, the following are considered key functions:

- Risk management function,
- Compliance function,
- Internal Audit function; and
- Actuarial function.

The Company ensures that key functions have the necessary authority, resources and operational independence to carry out their tasks and fulfil their obligations. All key functions present regular updates to the Board of Directors on a quarterly basis. The roles and responsibilities of each function are further described later in this section.

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B.1 General governance arrangements (continued)

Conflicts of interest

Conflicts of interests, and the appearance of conflicts, are prohibited under the Company's Conflict of Interest Policy and the AXIS Code of Business Conduct. Each employee, officer and director of the Company is required to conduct business with integrity and to comply with all applicable laws.

B.1.2 Remuneration

An AXIS Europe Remuneration Policy has been established to cover the Company and its sister company, AXIS Specialty Europe SE.

The remuneration policy and practices shall incorporate the following principles and shall:

- be in line with the Company's business and risk management strategy plan, its risk profile, objectives, risk management practices, its long-term interests and performance as a whole,
- ensure that conflicts of interest are avoided,
- promote sound and effective risk management and shall not encourage risk taking that exceeds the Company's risk appetite and risk tolerance limits,
- incorporate non-financial performance metrics as part of the annual performance management process,
- reward employees who demonstrate a significant contribution to the success of the business,
- remain competitive to attract, retain and motivate high performing staff with appropriate experience, qualifications and talent; and
- be non-discriminatory.

AXIS Europe's remuneration structure includes both fixed and variable components.

Fixed:

The fixed component of the remuneration structure shall be of a sufficiently high proportion of total remuneration to the effect that employees are not dependent on the variable remuneration component.

Variable:

- variable remuneration payments shall be flexible and discretionary,
- the variable component of remuneration shall be determined by a combination of individual performance and the performance of the AXIS Capital,
- employee's performance shall be evaluated based on achievement of both financial goals related to business targets and non-financial goals,
- metrics used to measure AXIS Capital performance in determining the variable component of the remuneration shall allow for a downwards adjustment for exposure to current and future risks; and
- a portion of the variable remuneration applicable to employees at senior leader level and above shall be deferred over a period of not less than three years.

The variable component of remuneration of employees engaged in risk, compliance, internal audit and actuarial functions is not directly linked to the performance of the individual operational units they monitor and/or test.

Other Remuneration

Termination or severance payments shall be related to performance achieved over the employees entire period of activity and shall be designed not to reward failure.

Employees subject to this policy are prohibited from hedging the economic risk of owning AXIS Capital stock or pledging AXIS Capital stock for loans or other obligations in accordance with the AXIS Insider Trading Policy.

B.1.3 Material transactions with shareholders and the Board of Directors

There have been no material transactions during the reporting period with the company's sole shareholder ASHIL outside the normal course of business. There were no contracts or arrangements of any significance in relation to the business of the Company in which the Directors had a material interest, as defined by the Companies Act 2014, at any time during the reporting period.

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B.1 General governance arrangements (continued)

B.1.3 Material transactions with shareholders and the Board of Directors(continued)

Director emoluments include all payments made to the Board of Directors. The Directors of the Company are employed by a related group company. It is not practicable to allocate remuneration received between their services as executives of group companies and their services as Directors of the Company. Fees paid by the Company to non-executive Directors are included in 'Aggregate emoluments in respect of qualifying services'.

	2024	2023
	USD'000	USD'000
Aggregate emoluments paid to or receivable by directors in respect of qualifying services	2,412	1,769
Aggregate amount of money or value of other assets, including shares but excluding share options, paid to or receivable by the directors under long term incentive schemes in respect of qualifying services	711	595
Aggregate Contributions paid, treated as paid or payable during the financial year to a retirement benefit scheme in respect of qualifying services of directors	106	250
Compensation paid or payable for loss of office or other termination benefits	596	—
	<u>3,825</u>	<u>2,614</u>

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B.2 Fit and proper requirements

The Company is subject to the Central Bank's Fitness and Probity ("F&P") Regime, which is set out under Part 3 of the Central Bank Act, 2010 and subsequent Statutory Instruments. This Regime sets the minimum standards aimed to ensure all persons who run the business, or hold key positions, are at all times competent and capable, act honestly, ethically and with integrity and are financially sound. The Regime requires the Company to have in place certain control functions ("CF") and pre-approval control functions ("PCFs"). The potential candidates for controlled functions that are subject to pre-approval by the Central Bank before appointment include Board Directors and the heads of key functions. Before taking up a PCF position a potential candidate is required to submit an Individual Questionnaire to the Central Bank for review and approval. If approval is not given the potential candidate is not appointed.

The Company's policy, 'AXIS European Accountability and Fitness & Probity Regimes' policy sets out the approach to assessing the fitness & probity of existing staff and new hires.

In order to meet the F&P requirements, the Company applies the below criteria for CFs and PCFs and must satisfy itself on reasonable grounds that the person complies with the F&P Standards:

- an assessment of whether an individual's Conduct is deemed Competent and Capable,
- an assessment of whether an individual's Conduct is deemed Honest, Ethical and Acting with Integrity; and
- an assessment of an individual's Financial Soundness.

The Company does not allow a person to perform a controlled function unless it is satisfied that the person complies with the F&P requirements. The person has to agree to comply with the requirements on an ongoing basis. This includes a commitment to continuing their professional development and retention of certain qualifications, where applicable. CFs and PCFs attest, on an annual basis, to continuing compliance with F&P Standards.

The Central Bank's (Individual Accountability Framework) Act 2023 (the IAF Act) was signed into law on 9 March 2023 with final guidance published in December 2024. The framework consists of four pillars:

1. The Senior Executive Accountability Regime (SEAR),
2. Common Conduct Standards for CFs and Additional Conduct Standards for PCFs and CF-1s, New Business Standards,
3. Reforms to the F&P Regime and
4. Amendments to the CBI's Enforcement Capabilities under the Administrative Sanctions Procedure (ASP).

The Company, as a reinsurance company, is not in scope of SEAR but does fall in scope of the other three pillars.

Since 29 December 2023, the Company is in scope of the new Conduct standards, meaning all CFs and PCFs must abide by these standards and the Company must provide training and have in effect policies on how these standards are integrated. The conduct standards also introduces the Duty of Responsibility that requires PCFs to take 'reasonable steps' to ensure that the aspects of the firm's affairs for which they are responsible for, are conducted so that the firm does not contravene its obligations under financial services legislation. Standards for Business that are applicable to all firms have also been introduced.

Additionally the Company has also been in scope of the reforms to the F&P Regime since December 2023. These reforms introduce obligations on the Company allowing a person to perform a CF or PCF role unless they are in compliance with F&P standards and must maintain a 'certificate' regarding the confirmation of the ongoing F&P of each PCF and CF. The Company has implemented a number of controls in order to meet the new requirements.

As a result of the recent changes due to IAF, the Company has reviewed the Fitness & Probity policy to ensure that it complies with the Fitness & Probity Regime and IAF. This policy has been renamed and approved by the Board as the 'European Accountability Regimes and Fitness & Probity Policy'.

B.3 Risk management system including the Own Risk and Solvency Assessment ("ORSA")

B.3.1 Overview of the Risk Management Framework

AXIS has an established Group-Wide Enterprise Risk Management ("ERM") framework which provides a structured and consistent approach to ensuring that risks are appropriately identified, assessed, managed, monitored and reported with clear ownership and appropriate levels of oversight. This framework is implemented consistently and proportionately across the AXIS Group and its legal entities, including the Company.

The mission of ERM at AXIS is to promptly identify, assess, manage, monitor and report risks that affect the achievement of the Company's strategic, operational and financial objectives. The key objectives of the risk management framework are to:

- protect the Company's capital base and earnings by monitoring its risks against the stated risk appetite and limits;
- promote a sound risk management culture through disciplined and informed risk taking;

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B.3 Risk management system including the Own Risk and Solvency Assessment ("ORSA") (continued)

B.3.1 Overview of the Risk Management Framework(continued)

- enhance value creation and contribute to an optimal risk-return profile by providing the basis for efficient capital deployment;
- support the Group-wide decision-making process by providing reliable and timely risk information;
- achieve global legal and regulatory risk obligations, and
- safeguard AXIS Capital' reputation.

The ERM framework is an evolving framework which develops in response to changes in the Company's internal and external environment in order to remain relevant to the business and enhance value creation. The implementation and oversight of the framework is the responsibility of the Risk Function, which is led by the CRO.

The key elements of the ERM Framework are described in further detail below and include Risk Governance, Risk Strategy/Appetite Statement, the Risk Management Cycle and key Controls.

Risk Governance

The Risk Function articulates roles and responsibilities for risk management throughout the Company, from the Board and the Chief Executive Officer to the business and functional areas, thus embedding risk management throughout the business.

Risk governance is executed through a three lines of defence model, with the business units ("first line") responsible for the identification, assessment, management, mitigation and monitoring of risks on a day-to-day basis; the Risk Management Function ("second line") providing oversight and guidance on risk management across the business by supporting and challenging Risk Owners in their identification, assessment, management and mitigation of risk; and Internal Audit ("third line") providing independent assurance on the effectiveness of governance, risk management and internal controls.



The Board Risk Committee assists the Board of Directors in overseeing the integrity and effectiveness of the ERM framework, The Board Risk Committee reviews, approves and monitors risk strategy, risk appetite and key risk limits and receives regular reports from the Risk Function to ensure any significant risk issues are being addressed by management. The Board Risk Committee further reviews the Company's policies and procedures and satisfies itself that those effective systems of risk management and controls are established and maintained. Among its other responsibilities, the Board Risk Committee also reviews and approves the Company's annual Own Risk and Solvency Assessment ("ORSA") report.

The ExCo is responsible for the implementation of the Company's ERM framework, with all identified material risks on the Company's risk register assigned ownership to an ExCo member. This ensures that ownership of risks is at the highest level of the Company and that Risk Owners have the appropriate authority and resources to take management action where appropriate. The ExCo is supported by the Risk Management Committee ("RMC"), as well as various committees and working groups at Group and Company level (for example the Emerging Risk and Environmental Working Groups).

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B.3 Risk management system including the Own Risk and Solvency Assessment ("ORSA") (continued)

B.3.1 Overview of the Risk Management Framework (continued)

Risk Appetite and Limit Framework

The Company articulates its appetite and tolerance for risk through its Risk Appetite and Limit Framework. The Company's risk appetite, as approved by the Board of Directors, represents the amount of risk that the Company is willing to accept in pursuit of its strategic objectives within the constraints imposed by its capital resources, as well as the expectations of its stakeholders as to the type of risk the Company holds within the business. The Risk Appetite Statement and Limit framework includes limits by individual risk type which are defined based on the capital available and management's preference for risk in line with the Company's business strategy. The Risk Appetite Statement and Limit frameworks reviewed and approved by the Board Risk Committee on an annual basis.

The Risk Function regularly monitors the Company's position against risk appetite through, for example, risk dashboards and limit consumption reports. These are intended to allow the Risk Function to detect potential deviations from the Company's internal risk limits at an early stage.

Risk Management Cycle

The Risk Function implements the ERM framework through a cyclical process of identifying, assessing, managing, monitoring and reporting of all material risks to which the Company is or could be exposed.

Ongoing risk identification activities are in place to identify new and/or changing risks to the achievement of the Company's strategy and business objectives. A process is also in place for scanning the external environment to identify risks that present an emerging threat to the business environment, industry or Company. These are classified as emerging risks and are captured on the Company's emerging risk radar. The Emerging Risks Working Group oversees the process for identifying, assessing, managing, monitoring and reporting current and potential emerging risks. They are regularly discussed and reviewed by the Company's Board Risk Committee.

Risk assessment and measurement activities are carried out on a regular basis in order to understand the Company's exposure to each risk on the Risk Register, through quantitative and/or qualitative measures and inform the Company's own view of risk and assessment against risk appetite. Risk mitigation strategies and control activities are in place for each risk based on impact and materiality and are typically aimed at reducing or avoiding exposure, in line with the Company's risk appetite.

Changes in the internal and external environment are monitored on an on-going basis, ensuring that changes that may substantially affect the Company's exposure to risks are identified, assessed and appropriately managed. The Risk Function engages in extensive risk reporting and communication in order to enable the Board in their risk oversight responsibility and support the Company's decision-making process by providing reliable and timely risk information.

Key controls

Each Risk Owner is responsible for designing and implementing an adequate and efficient internal control environment to manage their respective risks. The control environment consists of processes, policies, guidelines, standards of practice/procedures, collectively referred to as 'key controls' deployed by the Risk Owner to manage risk. The effectiveness of key controls is evaluated on a quarterly basis by first line control owners, and reviewed by the Risk Function. Internal Audit provide overall assurance over the effectiveness of key controls. All key controls are documented and signed-off quarterly within AXIS' Riskonnect platform which facilitates control self-assessment and enforces individual ownership and accountability for key controls. The Risk function facilitates training for control owners, including an online e-learning module, on their role and responsibilities as a control owner.

B.3.2 Own Risk and Solvency Assessment ("ORSA")

The ORSA is the overarching framework of processes employed by Management to establish a comprehensive assessment of the Company's solvency position based on its current, prospective and stressed risk profile and associated capital requirements.

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B.3 Risk management system including the Own Risk and Solvency Assessment ("ORSA")(continued)

B.3.2 Own Risk and Solvency Assessment ("ORSA")(continued)

The main objectives of the ORSA process are to:

- inform short and longer-term decision making and strategic management; and
- ensure the Company has sufficient capital at all times commensurate with a comprehensive assessment of its risk profile, and in line with internal and external solvency standards.

In order to fulfil the objectives set out above, the ORSA is a dynamic process which is incorporated into the Company's ERM framework and Risk Management Cycle which provides a continuous assessment of all material risks the Company is exposed to, with quarterly reporting to the Board on material changes to the risk profile and associated capital requirements. In addition, ORSA results are formally documented in the annual ORSA report which includes a summary of the ORSA activity during the previous year and the outcome of the forward-looking assessment.

ORSA triggers are defined and monitored to identify events with the potential to materially impact the most recent ORSA results, for example changes to the risk profile or capital.

A core component of the ORSA is the forward-looking assessment performed in conjunction with the business planning process, whereby the impact of short and medium term business plans on the risk profile and capital needs of the Company are assessed. As part of this, the outputs from the Company's Solvency II Standard Formula are reviewed to analyse changes in risk composition, prospective risk exposures relative to the Risk Appetite and Limit Framework and overall risk capital requirements. The ORSA also includes various forms of stress tests and scenario analysis whereby the resilience of the Company's capital position to adverse stress scenarios over the planning horizon is assessed.

The Board of Directors is responsible for overseeing the Company's ORSA, with the Risk Committee serving as the focal point for that oversight. The Risk Committee has a material input into the ORSA through reviewing and challenging the quarterly and annual (forward-looking) results and approving the annual ORSA report, as well as reviewing the selection and calibration of stress and scenario tests. The outcome of the ORSA informs the Company's Risk Appetite and Limit Framework, including the ongoing appropriateness of its Own Solvency Needs and capital contingency plans, and influences the Company's business strategy by being closely linked to the business planning process.

B.4 Internal control system

The Board is ultimately responsible for ensuring that adequate and effective internal controls are embedded within the Company. Internal control is defined as the processes, policies, guidelines, and standards of practice in place to mitigate and manage risk to acceptable levels. The Company is committed to having an internal control system that satisfies its organisational needs and all applicable regulatory requirements. The Company seeks to avoid policies, procedures and practices that may provide incentives for inappropriate activities.

The AXIS internal control framework is based on the framework developed by the Committee of Sponsoring Organizations of the Treadway Commission ("COSO") in 1992, and updated in 2013.

The AXIS internal controls are documented and maintained in Riskconnect, the AXIS risk and control repository, and individual control owners certify each quarter to the adequate design and continued operating effectiveness of their respective controls.

The internal control framework includes the following five interrelated components:

- **Control Environment:** The primary responsibility of the Board is to provide effective governance over the Company's affairs for the benefit of its shareholders, and to help broaden the perspective of executive management. The Board has established the Audit Committee to facilitate and assist in the execution of its responsibilities. In terms of internal control oversight, it is the responsibility of the Audit Committee to review and periodically discuss with the Board the adequacy and effectiveness of the Company's internal control structure. There are several oversight committees such as the RMC which help set the management tone in terms of the control environment. In addition, AXIS operates with a "three lines of defence" model.
- **Risk Assessment:** The Internal Controls policy lists the risks ('Risk universe') to which the Company is exposed which the Risk Committee of the Board and RMC annually evaluate. For each risk in the universe, there is a separate risk policy which affirms AXIS's group-wide approach, appetite and risk mitigation/control philosophy for managing each risk.

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B.4 Internal control system (continued)

- **Control Activities:** Each risk policy identifies an individual Risk Owner, normally a member of the AXIS Group Executive Committee, having appropriate experience and knowledge of the risk. The Risk Owner is responsible for designing and implementing an adequate and efficient control environment to manage their respective risks. Activities include, but are not limited to, reconciliation, documented roles and responsibilities, clear authority limits, peer reviews, appropriate segregation of duties and metrics reporting.
- **Information and Communication:** In terms of communication, the Company has clear reporting and communication lines in place. Role profiles make clear each individual's role, their reporting lines and functional terms of reference set out responsibilities by function. Clear organisational and structure charts are also maintained. There is an escalation policy in place to ensure matters are reported upwards as required by employees. The Report Concerns Policy also provides various confidential lines of communication for reporting violations and concerns.
- **Monitoring:** The effectiveness of the internal control framework is independently validated via regular internal audit reviews which are conducted on a rotational basis with findings reported to the Audit Committee. There are also Management Initiated Audits ("MIAs") done on claims and underwriting transactions which are reported to the Management Audit Committee. There are various monitoring activities performed by the second line of defence in line with their annual monitoring plans.

The internal control framework is regularly reviewed and updated and annually assessed by the external auditors. The Internal Audit function also validate that the COSO 2013 framework is present and functioning as part of its annual internal audit plan.

Compliance Function

The Company has a Compliance Function which is part of the Group Legal Department, predominantly staffed by lawyers and compliance experts. The Compliance Function is an assurance function responsible for the compliance and governance arrangements of the Company. The mandate of the Compliance Function is to support the business to be compliant with applicable regulations within the "three lines of defence" model, which defines the governance structure at AXIS and the related roles and responsibilities.

The Board has appointed a Head of Compliance (a PCF) of the Company who is primarily responsible for ensuring the activities of the Company are conducted in compliance with the Regulations, and reporting to the Board and to the Central Bank and other Regulatory Authorities as applicable. In line with Article 270 of the Delegated Regulation, the Board reviews the Compliance Policies at least annually and ensures that recommendations for improvements are adequately incorporated and approve proposals for Policy amendment.

The Head of Compliance oversees the Compliance Function and ensures it is appropriately resourced and meets all material service level requirements. The Compliance Function has access to specialist external expertise to assist on particular matters or jurisdictions.

Principal responsibilities of the Head of Compliance include:

- obtaining the approval of the CEO and the Board for a Policy statement on compliance with the insurance acts and regulations, with guidelines issued by the CBI and with other applicable legislation,
- advising the Board and management on compliance with laws and regulations supporting delivery of strategic objectives,
- establishing an annual Compliance Plan to manage regulatory risks,
- designing a common monitoring framework and delivering risk-based monitoring activities,
- leading the horizon scanning and regular updates to the business,
- designing, implementing and reviewing compliance policies, procedures and related processes, and
- designing and executing compliance training and awareness on compliance matters such as countering the financing of terrorism and financial sanctions, consumer protection and anti-bribery and corruption.

In addition, the duties of the Compliance Function include assessing the adequacy of the measures adopted by the Company to prevent non-compliance.

In line with Article 270 of the Delegated Regulation and Article 46 of the Solvency II Directive, the Compliance Function maintains a set of Compliance policies to track applicable legal, regulatory and corporate requirements.

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B.5 Internal Audit Function

Internal Audit is an independent and objective assurance and consulting activity that is guided by a philosophy of adding value to improve the operations, protect the assets and reputation of the Company. It assists the Company in accomplishing its objectives by bringing a systematic and disciplined approach to evaluate and improve the effectiveness of the Company's governance, risk management and internal control.

The internal audit activity is established by the Audit Committee of the Board. The internal audit activity's responsibilities are defined by the Audit Committee as part of their oversight role.

The internal audit activity will govern itself by adherence to The Institute of Internal Auditors' mandatory guidance including the Definition of Internal Auditing, the Code of Ethics, and the International Standards for the Professional Practice of Internal Auditing (Standards). This mandatory guidance constitutes principles of the fundamental requirements for the professional practice of internal auditing and for evaluating the effectiveness of the internal audit activity's performance.

The Institute of Internal Auditors' Practice Advisories, Practice Guides, and Position Papers will also be adhered to as applicable to guide operations. In addition, the internal audit activity will adhere to AXIS' relevant policies and procedures and the internal audit activity's methodology.

The internal audit activity, with strict accountability for confidentiality and safeguarding records and information, is authorized full, free, and unrestricted access to any and all of AXIS records, physical properties, and personnel pertinent to carrying out any engagement. All employees are requested to assist the internal audit activity in fulfilling its roles and responsibilities. The internal audit activity will also have free and unrestricted access to the Audit Committee and full Board.

The internal audit activity will remain free from interference by any element in the organization, including matters of audit selection, scope, procedures, frequency, timing, or report content to permit maintenance of a necessary independent and objective mental attitude.

Internal auditors will have no direct operational responsibility or authority over any of the activities audited. Accordingly, they will not implement internal controls, develop procedures, install systems, prepare records, or engage in any other activity that may impair internal auditor's judgment.

Internal audits are performed across the Company's audit universe, which encompasses all areas of the business and the Company, within a three to five year cycle. Areas of higher risk will be audited more frequently. Audits selected for a forthcoming annual plan will be submitted for approval to the Audit Committee. Over the course of each year, auditors meet with key personnel to monitor performance, changes in the business, and emerging risks within the Company. Resulting midterm changes to the audit plan will be recommended and submitted to the Audit Committee for approval. The internal audit methodology is set out in the 'AXIS Internal Audit Methodology' document. The methodology is reviewed to ensure that it is up-to date after any changes to the business or updates to the IIA Standards.

The scope of each audit is determined using a risk based approach. At the conclusion of each audit, an audit report containing any issues requiring corrective action by management is published. Management is responsible for implementing these agreed upon action plans. Internal Audit is responsible for monitoring implementation of these action plans and verifying satisfactory performance. The Audit Committee is briefed quarterly on the status of internal audits in progress, completed audits, open corrective action plans, and any other important matters concerning the Company. Evidence supporting Internal Audit's conclusions is maintained in the Riskconnect system.

B.6 Actuarial Function

The main purpose of the Actuarial function is to effectively support the Company reserving framework and governance, including principles, policies, standards of practice, processes and controls and reporting.

The Actuarial function has the following duties and responsibilities:

- calculation and recommendation of the technical provisions,
- ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions made in the calculation of the technical provisions,
- peer reviewing and signing off on work product and recommendations that relate to governance and control function responsibilities. This includes the peer reviewing of pricing and planning loss ratios as necessary,
- ensuring the sufficiency and quality of the data used in the calculation of technical provisions,
- informing the Board of Directors of the reliability and adequacy of the calculation of technical provisions,
- ensuring the sufficiency of processes and controls supporting the AXIS reserving framework and maintaining comprehensive documentation for all aspects of this framework,
- expressing an opinion on the overall underwriting policy and the adequacy of reinsurance arrangements,
- contributing to the effective implementation of the risk management system, in particular with respect to the risk modelling underlying the calculation of the capital requirements,
- establishing and maintaining a reserving platform, infrastructure and reporting capabilities to support GAAP, local statutory and management needs; and

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B.6 Actuarial Function (continued)

- ensuring that the reserving framework is applied effectively in the Company.

The Head of Actuarial function provides a written report to the Board presenting the tasks undertaken by the Actuarial function and their results, as well as any deficiencies identified and recommendations on how such deficiencies should be remedied. A full Actuarial report is provided at least annually, with updates addressing specific aspects of the work of the Actuarial function provided on a more regular basis.

B.7 Outsourcing

Outsourcing is an arrangement of any kind between the Company and a service provider by which that service provider performs a process, a service or an activity that would otherwise be undertaken by the Company itself. Where appropriate, the Company uses service providers when it is more efficient and more cost effective than utilising its own resources.

The Company is subject to the AXIS European Outsourcing Policy which is derived from Directive 2009/138/EC (the “Solvency II Directive”), Commission Delegated Regulation (EU) 2015/35 (the “Delegated Regulation”), the EIOPA Guidelines on System of Governance and the Central Banks Cross Industry Guidance on Outsourcing. The purpose of the AXIS European Outsourcing Policy is to ensure that the Company is identifying and managing the risks associated with its outsourcing activities through appropriate due diligence, approval and on-going monitoring activities and thereby continue to meet both its financial and service obligations, including operational resilience. The policy requirements are based on the principle that as a regulated firm, the Company remains fully responsible for discharging all its obligations when outsourcing certain functions or activities. The Company’s service providers may be an entity from the AXIS Group (intra-group outsourcing or insourcing) or a third party (external outsourcing) and it may be located inside or outside of the EU.

The Board is ultimately responsible for ensuring that there is adequate oversight and governance in relation to outsourcing. The outsourcing of a 'critical or important' activity must be approved by the Board or a PCF holder (“Business Leader”) prior to the commencement of an outsourcing arrangement. Business Leaders are responsible for carrying out appropriate due diligence on service providers in accordance with the AXIS European Outsourcing Policy to ensure the service provider has the necessary ability to carry out the outsourcing activity, taking into account the impact of the proposed arrangement on the operations of the Company.

The Company determines whether an outsourced function or activity is critical or important. A materiality assessment has been designed by the Company for use in determining whether an arrangement is deemed a Critical or Important Functional Activity (“CIFA”). This materiality assessment is documented within the AXIS European Outsourcing Policy, which is subject to Board review and approval on an annual basis.

Business Leaders ensure that risk assessments are conducted of any proposed outsourcing arrangements, aligned with the Company's risk appetite, and where necessary, appropriate controls developed and implemented. The relevant function or team will conduct and document these risk assessments as appropriate. Outsourced arrangements, whether internal or external, must not harm the Company, specifically:

- a. Materially impairing the quality of the Company’s governance of its business
- b. Unduly increasing the Company’s operational risk
- c. Obstructing relevant supervisory authorities from monitoring the Company's compliance with outsourcing regulations and any regulations applying to the activities themselves, and
- d. Harming the service that the Company provides to its policyholders and clients.

The Company maintains an Outsourcing Register which documents all internal and external outsourced arrangements, which is regularly reviewed and updated in compliance with the Central Banks Cross Industry Guidance on Outsourcing.

The AXIS Group Vendor Management Office (“VMO”) has established an enterprise-wide standard methodology to assess performance and risk of outsourced services (excluding claims which is monitored by the relevant business leader). Outsourcing arrangements are managed effectively through Service Level Agreements (“SLAs”) which are reported to and monitored by the VMO reporting relevant issues to the business leader. The VMO ensures that all relevant aspects of a service providers risk management, financial resources and internal control systems are adequate and robust, in addition to ensuring that the outsourcing activities do not impact AXIS governance or operational risk.

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B.7 Outsourcing (continued)

The Company benefits from the shared support services provided by the wider AXIS group entities, providing the Company with access to necessary skills and resources enabling the Company to operate more effectively to meet regulatory and business requirements.

The table below outlines an overview of the outsourced CIFAs and the jurisdiction of where the service provider is located:

Function	Description of Service Provided	Jurisdiction
Internal		
Investment Management	Delivery of investment management services within the investment limits as set by the Board and the production and delivery of investment performance reporting to the Board and other relevant oversight Committees.	US
Internal Audit	Delivery of audits on the approved Internal Audit Plan, including reporting to relevant management, in compliance with the Internal Audit Charter and the International Professional Practices Framework of the Institute of Internal Auditors.	US
External		
Finance	Finance Outsourcing include provision of accounting and reconciliation services	Multi-jurisdictional
Actuarial	Actuarial outsourcing includes actuarial close and control services	Multi-jurisdictional
Investments	Investment services outsourcing includes investment management of assets, accounting and risk solutions.	Multi-jurisdictional
Business and Technology	IT services outsourcing includes provision of data storage and IT application development and maintenance	Multi-jurisdictional
Claims	Claims outsourcing include claims business process, compliance and modelling support, claims handling and advice.	Multi-jurisdictional

B.8 Assessment of governance

The Board is responsible for ensuring sound governance, that the operational effectiveness of the risk management and control environment is maintained and that effective risk management policies are adhered to within the risk management framework. Risk assessment and evaluation takes place as an integral part of the annual planning and forecasting process, the results of which are reviewed by senior management and the Board. There is also an ongoing program of operational reviews and audits and annual self-assessment of financial controls. The results of these reviews are reported to the Audit Committee, whose purpose is to assist the Board and the ExCo, in the oversight of the effectiveness, adequacy and performance of the Company's internal controls.

The Company has assessed the effectiveness of risk management and the control environment and has concluded that it provides for the sound and prudent management of its business, and that it is proportionate to the nature, scale and complexity of the risks inherent in the Company's business.

B.9 Any other information

The Board is responsible for ensuring that the Company keeps adequate accounting records which correctly explain and record the transactions of the Company, and enable at any time the assets, liabilities, financial position and profit or loss of the Company to be determined with reasonable accuracy. They are also responsible for safeguarding the assets of the Company and maintaining sufficient information to enable any person charged with the winding up of the Company to take control of those assets. The accounting records are kept at 6th Floor, 20 Kildare Street, Dublin 2.

All material information regarding system of governance is disclosed in sections B.1 - B.8.

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C. RISK PROFILE

The Company's risk profile comprises insurance, credit, market, operational, liquidity, strategic and other risks that arise as a result of doing business. Ongoing risk identification activities are in place to identify new, emerging and changing risks to the achievement of the Company's strategy and business objectives. Risk assessment activities are carried out on a regular basis in order to understand the Company's exposure to each risk, through quantitative and/or qualitative measures and inform the Company's own view of risk. The following sections provide definitions of the above risk categories as well as the Company's related risk management practices.

C.1 Insurance Risk

The insurance risk category encompasses underwriting risks in all lines of business including the motor, property, catastrophe, credit and surety, professional lines, liability, agriculture and accident and health classes of treaty and facultative reinsurance business. Insurance risk is the inherent uncertainty as to the occurrence, amount and timing of insurance liabilities transferred to the Company through the underwriting process. The two main components are underwriting risk and reserving risk. Underwriting risk represents the risk that premiums will not be sufficient to cover future incurred losses. Reserving risk represents the risk that loss reserves we have established to cover losses already incurred are insufficient.

C.1.1 Underwriting risk

Risk Definition

Underwriting risk represents the risk that premiums will not be sufficient to cover future incurred losses.

Risk Mitigation

Underwriting risk is managed through the Company's underwriting risk governance framework. A key component of this is the peer review process which allows for a collaborative review of risk and pricing by management, and ensures underwriting is within established protocols and guidelines. Underwriting guidelines are in place to provide a framework for consistent pricing and risk analysis and to ensure alignment to the Company's risk appetite. Limits are set on underwriting capacity, and cascade authority to individuals based on their specific roles and expertise.

Another key component of the Company's mitigation of underwriting risk is the purchase of reinsurance / retrocession protection. AXIS Capital has a centralized Ceded Reinsurance department which coordinates external treaty reinsurance purchasing across the group and is overseen by the Reinsurance Purchasing Group, in conjunction with the Reinsurance Security Committee. The Company also benefits from internal quota share and stop loss agreements with AXIS Specialty Limited ("ASL").

Premium (Pricing) Risk

Risk Definition

Premiums for (re)insurance contracts are intended to cover expected claim costs, acquisition costs, operating costs, and an adequate level of profit margin commensurate to the risk being assumed. Premium amount is typically agreed upfront, whereas the claim cost materialises over an extended period, especially for liability lines. Social, economic, and legal environment may evolve differently over that period compared to the original expectation. Additionally, inherent variability in claim counts and amounts could result in higher overall claim costs than expected in a given year. These factors could lead to a shortfall in premiums charged at the time of underwriting the policy. Premium risk can increase in times of heightened uncertainty in claim cost trends and at times when demand-supply imbalance results in competitive pricing.

Risk Mitigation

The Company mitigates premium risk in its portfolio through four main levers. Firstly, it takes a vigilant and cautious approach on claims cost trends, and the Company reviews these assumptions regularly and frequently. Secondly, in some of its contracts the Company include loss and / or exposure adjustment features that flex premium and / or acquisition costs in response to higher than expected exposures and / or claim costs. Thirdly, the Company employ underwriting action and reinsurance protection to minimise volatility in its claims experience by managing aggregation of limits and by maintaining balance between portfolio margin and limits deployed. Most importantly, the Company exercise active cycle management whereby it grows the portfolio at times when pricing is in surplus and it shrinks the portfolio at times when pricing is in deficit.

Natural Peril Catastrophe risk

Natural catastrophes such as earthquakes, hurricanes, storms and floods represent a challenge for risk management due to their accumulation potential and volatility. In managing natural catastrophe risk, the internal risk tolerance framework for the Company aims to limit the impact to the Company's Regulatory SCR coverage ratio from an aggregation of natural peril catastrophe events. The Company make use of vendor models and its own experience and expertise in managing natural peril catastrophe risk.

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Man-made Catastrophe Risk

Consistent with the Company's management of natural peril catastrophe exposures, the Company it takes a similarly focused and analytical approach to the management of man-made catastrophes. For these risks the Company couple the vendor models (where available) with its bespoke modeling and underwriting judgment and expertise. This allows the Company to take advantage of business opportunities related to man-made catastrophe exposures particularly where the Company can measure and limit the risk sufficiently as well as obtain risk-adequate pricing.

Risk Mitigation

Through the effective monitoring and reporting of accumulation risk, the Company is able to effectively intervene and mitigate risk on a timely basis. The Company also uses reputable catastrophe models to support this monitoring.

Stress and scenario testing is also performed to enhance understanding of the Company's exposure to accumulation risk and measure the potential impact of stress scenarios to the Company's solvency ratios. Stress testing performed covers natural catastrophe and man-made catastrophe exposure. Results are reported to the Risk Management Committee and Board Risk Committee.

Special Purpose Vehicles

In June 2022, AXIS sponsored a catastrophe bond, Northshore Re II Limited, Series 2022-1 which provides the Group with multi-year annual aggregate cover capacity of USD 140 million for U.S. named storms (including Puerto Rico & U.S. Virgin Islands) and U.S. and Canada earthquake events. The risk period is from 1 July 2022 to 30 June 2025.

The catastrophe bond operates on an index trigger and losses are calculated through usage of pay-out factors. The vehicle is fully funded at the inception of the risk period, ensuring full collateralization of the cover throughout the risk period.

In December 2023, AXIS sponsored a new cyber bond, Long Walk Reinsurance Limited, Series 2024-1 which provides the Group with multi-year occurrence capacity of USD 75 million for systemic cyber events. The risk period is from 1 January 2024 to 31 December 2025. The cyber bond operates on an indemnity trigger with losses based on AXIS' original ultimate net loss. The vehicle is fully funded at the inception of the risk period, ensuring full collateralization of the cover throughout the risk period.

C.1.2 Reserving Risk

Risk Definition

The estimation of loss reserves is subject to uncertainty due to the fact that the settlement of claims that arise before the balance sheet date is dependent on future events and developments. There are many factors that would cause loss reserves to increase or decrease, which include, but are not limited to emerging claims and coverage issues, changes in the legislative, regulatory, social and economic environment and unexpected changes in loss inflation.

Risk Mitigation

The AXIS Capital reserve framework is designed to ensure that the process of establishing reserves is supported by appropriate governance structure and reserving risk management practices including processes and controls over the reserving cycle and internal and external independent assessment of the adequacy of loss reserves. The Company calculates reserves for losses and loss expenses ("loss reserves") in accordance with actuarial best practice based on substantiated methodologies and assumptions. In addition, the Company has a well established processes in place for determining loss reserves, which the Company ensures are consistently applied. The Company's loss reserving process demands data quality and reliability and requires a quantitative and qualitative review of overall reserves and individual large claims.

SCR Coverage Scenario Testing - Insurance Risk

SII SCR coverage scenario testing is performed on an annual basis to assess the sensitivity of the SCR and the SCR coverage ratio to various scenarios including insurance risk. A summary of the testing performed for insurance risk as at 31 December 2024 is provided in section C.8.

C.2 Credit Risk

Risk Definition

Credit risk represents the risk of incurring financial loss due to the diminished creditworthiness (reduced financial strength and, ultimately, possible default) of the Company's third party counterparties. The key areas of exposure to credit risk for the Company are in relation to its investment portfolio, reinsurance program, amounts due from policyholders and intermediaries, and credit risk assumed through reinsurance contracts such as Credit and Surety business

Risk Mitigation

As part of the Company's Credit Risk Framework, credit risk limits are assigned which are based on and adjusted according to a variety of factors including the prevailing economic environment and the nature of underlying credit exposures.

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C.2 Credit Risk (continued)

Investment portfolio

The Company is exposed to potential losses arising from the diminished creditworthiness of issuers of bonds as well as third party counterparties such as custodians. Exposure to such credit risk is limited through diversification, issuer exposure limitation and, with respect to custodians, through contractual and other legal remedies.

The fixed term maturity portfolio represents approximately USD 770.0 million or 15.8 % of the Company's total assets (2023: USD 1,065.4 million or 22.6% of its total assets). The credit ratings of fixed term maturities are shown below at 31 December 2024 and 31 December 2023.

	2024	2023
	USD '000	USD '000
Rating		
AAA	17,209	17,156
AA	394,656	547,715
A	144,432	233,117
BBB	77,366	164,634
Below BBB	136,365	102,780
	770,028	1,065,402

The methodology for assigning credit ratings to fixed term maturities is in line with the methodology used for the Barclays U.S Aggregate Bond Index. This methodology uses the middle of Standard & Poor's (S&P), Moody's and Fitch ratings. When ratings from only two of these agencies are available, the lower rating is used.

The Company also has credit risk relating to cash and cash equivalents. Cash and cash equivalents consists of cash at bank and investment in money market funds. In order to mitigate concentration and operational risks related to cash and cash equivalents, the maximum amount of cash that can be deposited with a single counterparty is limited and the Company invests in acceptable counterparties based on current rating, outlook and other relevant factors.

The table below provides a breakdown of the Company's cash and cash equivalents by credit rating at 31 December 2024 and 31 December 2023:

		2024	2023
		USD '000	USD '000
Rating	Rating Agency		
AAA	S&P	25,848	43,640
P-1	Moody's	605,433	33,389
		631,281	77,029

The increase in cash and cash equivalents is offset by a reduction in financial investments as investments were liquidated in advance of year end to fund a material retrospective reinsurance agreement that is due to close during the first half of 2025.

Reinsurance recoverable assets

As a result of its reinsurance / retro purchasing activities the Company is exposed to the credit risk of a reinsurer failing to meet its obligations under the reinsurance contracts. To help mitigate this, all reinsurance purchasing is subject to financial security requirements specified by the Reinsurance Security Committee ("RSC"). The RSC maintains a list of approved reinsurers, reviews credit risk assessments for potential new reinsurers, regularly monitors approved reinsurers with consideration for events which may have a material impact on their creditworthiness, recommends counterparty limits for different types of ceded business and monitors concentrations of credit risk. This assessment considers a wide range of individual attributes, including a review of the counterparty's financial strength, industry position and other qualitative factors. Generally, the RSC requires reinsurers who do not meet specified requirements to provide collateral.

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C.2 Credit Risk (continued)

Investment portfolio (continued)

The table below provides a breakdown of the Company's reinsurance recoverable balances (including provision for ceded unearned premium) by credit rating. As at 31 December 2024 and 31 December 2023:

	2024	2023
	USD '000	USD '000
Rating		
A++	1,036	983
A+	53,846	56,116
A	2,152,326	2,248,741
A-	71,098	87,586
B++	3,345	3,691
Not rated	45,550	27,867
	<u>2,327,201</u>	<u>2,424,984</u>

The A balance includes USD 2,116.9 million (2023: USD 2,204.3 million) recoverable from ASL, a related party.

Premium receivables

The largest credit risk exposure to receivables is from brokers and other intermediaries; the risk arises where they collect premiums from customers on behalf of the Company. There are policies and standards in place to manage and monitor credit risk from intermediaries with a focus on day-to-day monitoring of the largest positions and overdue debt collection.

Underwriting portfolio

The Company provides reinsurance of credit and bond insurers exposed to the risks of financial loss arising from non-payment of trade receivables covered by a policy (credit insurance) or non-performance (bonding). The Company's credit reinsurance exposures are concentrated primarily within developed economies, while the surety bond exposures are concentrated primarily within Latin American and developed economies. The underlying risk associated with the Company's credit related business is governed through the underwriting risk management framework described in note C1.1.

SCR Coverage Scenario Testing - Credit Risk

SII SCR Coverage scenario testing is performed on an annual basis to assess the sensitivity of the SCR and the SCR coverage ratio to various scenarios including credit risk. A summary of the testing performed as at 31 December 2024 is provided in section C.8.

C.3 Market Risk

Risk Definition

Market risk is the risk that the Company's financial instruments may be negatively impacted by movements in financial market prices or rates such as securities' prices, interest rates, credit spreads and foreign currency exchange rates. Fluctuations in market prices or rates primarily affect the Company's investment portfolio.

Through asset and liability management, the Company aims to ensure that market risks influence both the economic value of investments and loss reserves, and other liabilities in the same way, thus mitigating the effect of market fluctuations. For example, important features of liabilities are reflected, such as maturity patterns and currency structures, on the assets side of the balance sheet by acquiring investments with similar characteristics.

Asset-liability management is supplemented with various internal policies and limits. As part of the annual Strategic Asset Allocation process, whereby target allocations for the various asset classes are set for the forthcoming period, different strategic asset classes are simulated and stressed to evaluate the 'optimal' portfolio (given return objectives and risk constraints). The management of asset classes is centralized to control aggregation of risk and provide a consistent approach to constructing portfolios as well as the selection process of external asset managers. Limits are set on the concentration of investments by single issuers and certain asset classes, and the Company limit the level of illiquid investments.

Investment portfolios are stress tested using historical and hypothetical scenarios to analyze the impact of unusual market conditions and to ensure potential investment losses remain within risk appetite.

The company mitigates foreign currency risk by seeking to match estimated liabilities payable in foreign currencies with assets, including cash and investments that are denominated in the same currencies.

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C.3 Market Risk (continued)

Risk Definition(continued)

The Balance Sheet includes a substantial amount of assets whose fair values are subject to market risks. The following sections provide information on the primary market risk exposures at 31 December 2024. The Company does not currently anticipate significant changes in primary market risk exposures or in how those exposures are managed in future reporting periods based upon what is known or expected to be in effect in future reporting periods.

Equity price risk

The portfolio of equity securities has exposure to equity price risk. This risk is defined as the potential loss in fair value resulting from adverse changes in Securities prices. The global equity portfolio is managed to a benchmark composite index, which consists of a blend of the S&P500 and MSCI World Indices. Changes in the underlying indices have a corresponding impact on the overall portfolio.

Interest rate and credit spread risk

Interest rate risk includes fluctuations in interest rates and credit spreads that have a direct impact on the fair value of fixed term maturities. As interest rates rise and credit spreads widen, the fair value of fixed term maturities falls, and the converse is also true.

Sensitivity to interest rate changes and credit spread changes is monitored by revaluing fixed maturities using a variety of different interest rates (inclusive of credit spreads). Duration and convexity is used at the security level to estimate the change in fair value that would result from a change in each security's yield. Duration measures the price sensitivity of an asset to changes in yield rates. Convexity measures how the duration of the security changes with interest rates. The duration and convexity analysis takes into account changes in prepayment expectations for MBS and ABS securities. The analysis is performed at the security level and aggregated up to the asset category levels for reporting.

Foreign exchange risk

Foreign exchange or currency risk represents the risk that the fair value of future cash flows, assets and liabilities will fluctuate because of changes in foreign exchange rates. Foreign exchange risk is managed by seeking to match the estimated insurance liabilities payable in foreign currencies with assets, including cash and investments that are also denominated in such currencies. Foreign Currency derivatives are utilized to manage and reduce open currency exposures reported on the company's quarter end balance sheets and as a result reduce FX exposures and associated currency risk charges under Solvency II.

The table below provides a breakdown of the Company's exposure to foreign currencies at 31 December 2024 and 31 December 2023

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Foreign exchange risk(continued)

As at 31 December 2024	GBP	INR	EUR	BRL	ILS	AUD	Other	Total
	USD'000	USD'000	USD'000	USD'000	USD'000	USD'000	USD'000	USD'000
Invested assets	179,778	—	303,893	—	—	23,746	17,953	525,370
Other net assets/(liabilities)	(230,918)	(47,833)	(256,790)	(27,474)	(16,527)	(10,290)	(39,780)	(629,612)
Total Foreign Currency Exposure	(51,141)	(47,833)	47,104	(27,474)	(16,527)	13,456	(21,827)	(104,241)
Total Derivative Amount	32,890	—	(62,573)	—	—	—	9,482	(20,201)
Net Foreign Currency Exposure	(18,251)	(47,833)	(15,469)	(27,474)	(16,527)	13,456	(12,345)	(124,443)
Pre-tax impact of net foreign currency exposure on shareholders' equity given a hypothetical 10% rate movement	(1,825)	(4,783)	(1,547)	(2,747)	(1,653)	1,346	(1,235)	(12,444)

31 December 2023	GBP	INR	EUR	BRL	ILS	AUD	Other	Total
	USD'000	USD'000	USD'000	USD'000	USD'000	USD'000	USD'000	USD'000
Invested assets	146,832	—	339,681	—	—	497	10,423	497,433
Other net assets/liabilities	(222,380)	(34,229)	(291,803)	(19,972)	(15,056)	(12,680)	(40,562)	(636,683)
Total Foreign Currency Exposure	(75,548)	(34,229)	47,878	(19,972)	(15,056)	(12,182)	(30,139)	(139,250)
Total Derivative Amount	71,358	—	(33,009)	—	—	18,247	2,799	59,394
Net Foreign Currency Exposure	(4,190)	(34,229)	14,869	(19,972)	(15,056)	6,065	(27,340)	(79,855)
Pre-tax impact of net foreign currency exposure on shareholders' equity given a hypothetical 10% rate movement	(419)	(3,423)	1,487	(1,997)	(1,506)	606	(2,734)	(7,985)

SCR Coverage Scenario Testing - Market Risk

SII SCR Coverage scenario testing is performed on an annual basis to assess the sensitivity of the SCR and the SCR coverage ratio to various scenarios including market risk. A summary of the testing performed as at 31 December 2024 is provided in section C.8.

C.4 Prudent person principle and investments

The Company is required to invest in assets in accordance with the 'prudent person principle'. As part of its prudent person approach, when the Company invests its assets it considers the following:

- (a) the type of business carried on by the Company, in particular the nature, the amount and the duration of the expected claims payments, in such a way as to secure sufficiency, liquidity, security, quality, profitability and matching of the Company's investments,
- (b) diversification and adequate spread of assets so as to enable appropriate response to changing economic circumstances, in particular developments in the financial markets and real estate markets or large impact catastrophic events,
- (c) keeps to a prudent level of investments in assets that are not traded on a regulated financial market,
- (d) proper diversification of the assets so as to avoid excessive reliance on any particular asset, issuer or group of undertakings and accumulations of risk in the portfolio as a whole,
- (e) not invest in assets issued by the same issuer, or by issuers belonging to the same group, in such a way as to expose the undertaking to excessive risk concentration; and
- (f) assess the impact of irregular market circumstances on its assets and diversify those assets to ensure that the impact is reduced.

The Company may invest in derivative instruments to the extent that they help to reduce investment risks or facilitate efficient portfolio management. However, the Company shall value those investments on a prudent basis, taking into account the underlying assets and must include a valuation of the relevant institution's assets. The Company will also avoid excessive risk exposure to a single counterparty and to other derivative operations.

The requirements specified in paragraph (d) and (e) above do not apply to investment in government bonds.

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C.5 Liquidity Risk

Risk Definition

Liquidity risk represents the risk that the Company may not have sufficient financial resources to meet obligations when they fall due or would have to incur excessive costs to do so. As an insurer, the core business generates liquidity primarily through premium, investment income and the maturity/sale of investments. Exposure to liquidity risk stems mainly from the need to cover potential extreme loss events.

Risk mitigation

The Company aims to ensure it maintains adequate liquidity to meet its liquidity needs under both normal and stressed conditions.

To manage liquidity risk, a range of liquidity policies and measures are in place including maintaining cash and cash equivalents and high quality, liquid investment portfolios to meet expected outflows, as well as those that could result from a range of potential stress events. Forecasts are also prepared regularly to predict required liquidity levels over both the short-and medium-term.

In addition, there are internal limits on the minimum percentage of the investment portfolio to mature within a defined timeframe. The Company further undertakes stress testing to ensure that it would be able to withstand extreme loss events and still remain liquid.

Expected profit in future premium

The expected profit included in future premiums is calculated as the difference between the technical provisions with a risk margin and a calculation of the technical provisions without a risk margin under the assumption that the premiums relating to existing insurance and reinsurance contracts that are expected to be received in the future are not received for any reason other than the insured event having occurred, regardless of the legal or contractual rights of the policyholder to discontinue the policy. At 31 December 2024, the expected profit in future premiums net of reinsurance is USD 29.7 million (2023: USD 25.1 million).

C.6 Operational Risk

Risk Definition

Operational risk represents the risk of both financial and non-financial loss as a result of inadequate or failed processes, system failures, human error or external events. This includes, but is not limited to, direct or indirect financial loss, reputational damage, customer dissatisfaction, and/or legal and regulatory penalties. .

Risk mitigation

The Risk Function is responsible for coordinating and overseeing a group-wide framework for operational risk management. As part of this oversight, the Risk Function facilitates the identification, assessment and management of key operational risks through several processes, risk assessments, operational risk events and various stress testing exercises.

The Risk Function manages transaction type operational risks through the application of process controls through out its business.

The Risk Register is used as a detailed repository of each of the key drivers of risk the Company is exposed to, along with the key controls and KRIs that are in place to maintain the level of risk within the defined risk appetite. There is a quarterly certification process to manage this, whereby control owners confirm the performance of the controls and identify any issues to be followed up. Risk assessments are undertaken annual to test and verify the accuracy and completeness of the mitigation measures in place.

The Risk Function also maintains an operational risk event database (containing both actual events as well as near misses) help monitor and analyze potential operational risk issues, identify any trends, and, where necessary, put in place improvement actions to avoid occurrence or recurrence of operational events.

The Risk Function further supplements this with thematic deep dive reviews to identify the key drivers of risk and review and challenge the appropriateness of current mitigation strategies and make recommendations for improvement.

The Risk Function has specific processes and systems in place to focus on high priority operational matters, such as managing business resilience, information security, and third-party vendor risk, which are described below:

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C.6 Operational Risk (Continued)

Risk Mitigation (Continued)

- Major failures and disasters that could cause a severe disruption to working environments, facilities, and personnel, represent a significant operational risk to our business. Our Business Continuity Management framework strives to protect critical business services and the functions that support these business services from these effects to enable us to carry out our core tasks in time and at the quality required.
- We have developed a number of Information Technology ("IT") platforms, applications and security controls to support our business activities worldwide. Dedicated security standards are in place for our IT systems to ensure the proper use, availability and protection of our information assets.
- We have enhanced our governance processes for governance and prioritization of projects, to ensure greater transparency of decision-making process, alignment of teams working on the same projects, consistency of approach and alignment to strategy.
- Our use of third-party vendors exposes us to a number of increased operational risks, including the risk of security breaches, fraud, non-compliance with laws and regulations or internal guidelines and inadequate service. We manage material third-party vendor risk, by, among other things, performing a thorough risk assessment on potential large vendors, reviewing a vendor's financial stability, ability to provide ongoing service and business resilience planning.

C.7 Other material risks

Inflation

The Company's balance sheet is exposed to changes in economic and social inflation. Unexpected inflation movements can have an impact on the valuation of the Company's insurance liabilities and on the adequacy of pricing, as well as on investment valuations and the ability to match durations between assets and liabilities. In addition, to the extent that unanticipated higher inflation in different geographies leads to currency fluctuations, the Company may also experience increased volatility on foreign exchange gains and losses.

The Company has undertaken extensive activity to ensure that all elements of the Company's risk profile which are impacted by inflation are being properly managed and that valuations on the Company's balance sheet take into account the most up-to-date assumptions on current and future inflation rates.

Climate change

The Company is potentially exposed to different aspects of climate risk, specifically, physical, liability and transition risks, across our underwriting and investment portfolio as well as its operations as a result of climate change.

Physical risks describe weather-related events and longer-term shifts in climate, and emanate primarily from underwriting of property insurance and reinsurance. Climate change may expose the Company to an increased frequency and/or severity of these weather-related losses, and there is a risk that the Company's pricing of these perils or its management of the associated aggregations does not or will not appropriately allow for changes in climate. Over the longer term, climate change may have an impact on the economic viability of certain lines of business, if suitable adjustments in price and coverage cannot be achieved.

Additionally, catastrophic events and the effects of climate change could result in increased credit exposure to reinsurers and other counterparties with whom the Company transacts business, declines in the value of investments the Company holds and disruptions to the Company's physical infrastructure, systems, networks and operations.

Changes in security asset prices such as real estate, stocks and long-term bonds may impact the value of our investments, resulting in realized or unrealized losses on our invested assets. Climate-related risks to security asset prices can include, but are not limited to: (i) changes in supply/demand characteristics for fossil fuels (e.g., coal, oil, natural gas); (ii) advances in low-carbon technology and renewable energy development; (iii) effects of extreme weather events on the physical and operational exposure of issuers; and the (iv) transition that these companies make towards addressing climate risk in their own businesses.

The Company may also be exposed to liability risks. Liability risks relate to losses or damages suffered by the Company's insured from physical or transition risks, such as losses stemming from climate-related litigation in liability lines. These risks could arise from management and boards not fully considering or responding to the impacts of climate change, or not appropriately disclosing current and future risks.

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C.7 Other material risks (Continued)

There is additionally a risk that certain elements of the Company's business cease to be viable as a result of climate change "transition" risks, which relate to losses driven by changes in technology, measures adopted by governments and regulators to encourage and support this transition, and society as a whole adapting to a lower-policy, legal, technological, and market changes to address climate risks and include changes in consumer behavior, shareholder preferences, and any additional regulatory and legislative requirements. During 2024 the Company, in collaboration with AXIS Group, increased its focus on resourcing and planning for reporting under the Corporate Sustainability Reporting Directive (CSRD) and EU Taxonomy. In February 2025, as part of its Omnibus proposal, the European Commission announced changes to the scope and reporting timelines for specific firms under this regulation. Given the proximity of this announcement to the report date, AXIS are still assessing the impacts of the Omnibus proposal and whether the Company is in scope of CSRD under the new rules, and will adjust its pre-existing CSRD project plan in due course.

AXIS Capital, has in place a "Environmental Working Group" which includes representation from the Company, to ensure that the potential risks and opportunities from climate change are identified and then managed in line with the standard risk management framework. In line with CBI guidance, a Climate change materiality assessment is undertaken annually to assess the potential impacts of climate change on its operations and develop appropriate monitoring methodologies.

Given the Company benefits from a number of group level climate change initiatives, as well as a more a specific local climate change strategy within Europe, the Company believe that the current business model and strategy is appropriate, given the outcome of the Company's most recent materiality assessment. The Company fully recognises this is an iterative process and the Company will continue to evolve its work and revisit this conclusion as more data becomes available. The Company have introduced enhanced climate risk reporting mechanisms to facilitate monitoring of the Company climate change risk and compliance with AXIS Capital commitments.

Effective 2020, AXIS Capital ceased underwriting risks for (and investing in the securities of) companies whose primary activity relates to thermal coal mining or power generation, or tar sands extraction, and in 2021, AXIS Capital announced a commitment to not underwrite new insurance or facultative reinsurance contracts, or provide investment support, for projects covering the exploration, production or transportation of oil and gas in the Arctic National Wildlife Refuge.

AXIS Capital has committed to fully phasing out thermal coal from its insurance and facultative reinsurance portfolios no later than 2030 in OECD countries and 2040 globally. Additionally, by the end of 2025, AXIS Capital has committed to phasing out any existing investments in companies in the thermal coal or oil sands industries that exceed its policy thresholds in its fossil fuel policy.

If Axis is unable to achieve its objectives relating to climate change or the current response to climate change is perceived to be ineffective or insufficient, or the way Axis responds is perceived negatively, its business and reputation may suffer. In addition, there remains a risk that Axis financial condition or operating performance may be impacted by changes in its business model arising from climate change transition and by the performance of strategies Axis puts in place to manage this transition.

Further details on Group wide energy and carbon reduction initiative is documented in the Corporate Citizenship section of the AXIS Capital Holdings Annual Report.

Current Wars/Conflicts

The Company has some limited exposure to losses resulting from acts of terrorism, political unrest and geopolitical instability, including, but not limited to, events related to Russia's invasion of Ukraine and conflict in the Middle East and in many regions of the world. Russia's invasion of Ukraine continues to have a profound impact on energy markets, particularly in Europe, which is impacting and may continue to impact economic conditions and investment returns. Some classes of business underwritten by the Company, notably Credit and Surety risks may also be impacted beyond loss reserves already established for these events.

Reinsurance Purchasing

The Company purchase both internal and external reinsurance for its insurance and reinsurance operations in order to mitigate the volatility of losses on its financial results. From time to time, market conditions have limited, and in some cases have prevented, insurers and reinsurers from obtaining the types and amounts of reinsurance that they consider adequate for their business needs. There is no guarantee that the Company's desired amounts of reinsurance or retrocessional reinsurance will be available in the marketplace in the future. In the current environment, the Company's ability to renew its current reinsurance or retrocessional reinsurance arrangements or obtain desired amounts of new or replacement coverage on favorable terms may be substantially reduced as a result of the impact of inflation, industry catastrophic losses to reinsurer capital and the appetite for certain lines of business.

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C.7 Other material risks (continued)

Reinsurance Purchasing (continued)

In addition to capacity risk, the remaining capacity may not be on terms the Company deems appropriate or acceptable or with companies with whom it wants to do business. If the Company is unable to renew its current reinsurance or retrocessional reinsurance or purchase new or replacement coverage on favorable terms or at all, the amount of business the Company is willing to write may be limited, the protection from losses due to large loss events may be materially reduced, or its regulatory capital requirements may significantly increase.

AXIS Capital business planning process and associated outwards planned reinsurance programme is undertaken cognisant of the reinsurance market environment and adjusted accordingly. Where the Company believe that outwards reinsurance may not be available in terms of overall limit or pricing in order to remain within its stated underwriting risk appetite on a prospective basis, the Company may consider gross portfolio reductions to ensure continued compliance with such limits.

Pandemics or other outbreaks of contagious diseases

The spread of COVID-19 and mitigating measures caused unprecedented disruptions to the global economy and normal business operations across sectors and countries, including the sectors and countries in which it operates. A resurgence of the COVID-19 outbreak, as a result of new variants, or future pandemics or other outbreaks of contagious diseases may result in similar or worse economic implications and business disruptions. The impact of pandemic events is something that continues to be monitored through the Company's exposure management and emerging risk frameworks.

Emerging claim and coverage issues

As industry practices and legal, judicial, social, political, technological and other environmental conditions change, unexpected issues related to claims and coverage may emerge. These issues may adversely affect the Company's business by either extending coverage beyond the underwriting intent or by increasing the frequency and/or severity of claims. The Company continues to be disciplined and vigilant in its management of this risk.

Cyber

Risks from cybersecurity threats are dynamic and fast evolving, and could be exacerbated by geopolitical tensions, including hostile actions taken by nation-states and terrorist organizations. There is a risk that increases in the frequency and severity of cybersecurity incidents affecting the Company, its clients, or its third-party service providers could materially adversely affect the Company's results of operations, financial condition or liquidity. The losses incurred from these risks are also dependent on its clients' and its third-party service providers' cybersecurity practices and defenses, as well as how policy terms and conditions interact with the evolving threat landscape. In addition, the Company's exposure to cybersecurity incidents potentially includes exposure through "non-affirmative" coverages, meaning risks and potential losses associated with policies where cybersecurity risk is not explicitly included or excluded in the policy terms and conditions. As this is a relatively new risk, even in cases where losses from cybersecurity incidents are explicitly excluded, there can be no assurance that a court or arbitration panel will interpret policy language in line with the intention of the exclusion. The Company continuously monitors the threat of attempted cyber and other security attacks in order to prevent, detect, address and mitigate the risk of threats to its data and systems.

AXIS Capital has made significant developments to its cyber exposure management framework in recent years. Stochastic models and deterministic scenarios have been developed in order to facilitate the understanding and monitoring of exposures to cyber underwriting events.

C.8 Any other information

Sensitivity testing

SII SCR Coverage sensitivity testing is performed on an annual basis to assess the sensitivity of the SCR and the SCR coverage ratio to various scenarios stressing the Company's material risks. A summary of the sensitivity testing results has been provided by risk category below. No future management actions are assumed in any of the scenarios. A number of sensitivity tests resulted in a breach of the Company's Own Solvency Needs however they all remained above the 100% SCR coverage ratio, the base line coverage ratio of 140% at year-end is expected to increase above 150% once the retrospective reinsurance agreement is closed in the first half of 2025.

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C.8 Any other information (continued)
Sensitivity testing (continued)

Sensitivity	Description	Risk Category	SCR Impact (USD'm)	SCR post shock (USD'm)	SCR Coverage
Baseline	Based on 2024 Annual SCR		481		140 %
<u>Higher growth than planned during 2025</u>	<u>Net Earned Premium increase by 10% across all lines</u>	<u>Insurance Risk</u>	<u>15</u>	<u>496</u>	<u>136 %</u>
Reserve deterioration in long tail lines	20% increase Net Claims Provisions for long-tail lines	Insurance Risk	28	509	127 %
Credit spreads widening	Widening by 100bps for Investment Grade & 400bps for High Yield	Market Risk	15	496	122 %
Premiums Receivable	Increase proportion of > 90 days aged debt by 50%.	Counterparty Default Risk	5	486	138 %
Reinsurance counterparties downgrade	Reinsurer downgrade (all RI counterparties one credit rating notch downgrade except ASL where credit quality step reduced by 1)	Counterparty Default Risk	73	554	118 %
Yield curve movement	Yield curve movement up by 1%	Multiple Risks	(9)	472	140 %
Yield curve movement	Yield curve movement down by 1%	Multiple Risks	15	496	136 %

In the event of a breach, the Company has a number of ways by which it can manage its solvency coverage and ensure that it returns within target. This includes changing gross exposures or external reinsurance arrangements, changing the internal reinsurance arrangements or other traditional forms of capital management (e.g. capital injections, cease dividend payments etc.).

All material information regarding the Company's risk profile is disclosed in sections C.1 - C.8.

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D. VALUATION FOR SOLVENCY PURPOSES

The Company's financial statements including the balance sheet have been prepared under the historical cost convention, as modified by the inclusion of certain investments at fair value and in accordance with FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" ("FRS 102") and FRS 103 "Insurance Contracts" ("FRS 103") issued by the Financial Reporting Council and promulgated by the Institute of Chartered Accountants in Ireland, and comply with the Companies Act 2014 and the European Union (Insurance Undertakings: Financial Statements) Regulations, 2015.

The Solvency II Balance Sheet recognises assets and liabilities in conformity with the international accounting standards adopted by the Commission in accordance with Regulation (EC) No 1606/2002 (IFRS as adopted by the EU) unless otherwise stated within Solvency II.

D.1 Assets

	Solvency II	GAAP	Difference	
	2024	2024	2024	
	USD'000	USD'000	USD'000	Adjustment Type
Deferred acquisition costs	—	16,728	(16,728)	Valuation
Deferred tax asset	413	—	413	Valuation
Property, plant & equipment held for own use	2,319	5,923	(3,604)	Valuation
Holdings in related undertakings, including participations	96	96	—	
Government Bonds	344,778	344,986	(208)	Reclassification
Corporate Bonds	924,742	379,179	545,563	Reclassification
Collateralised securities	46,204	45,863	341	Reclassification
Collective Investments Undertakings	389,007	134,573	254,434	Reclassification
Derivatives	480	—	480	Reclassification
Deposits other than cash equivalents	5,000	—	5,000	Reclassification
Other investments	20,394	354,862	(334,468)	Reclassification
Other loans and mortgages	76,791	—	76,791	Reclassification
Investments	1,807,491	1,259,558	547,933	
Deposits to cedants	71,786	71,786	—	
Insurance and intermediaries receivables	46,328	471,809	(425,481)	Valuation
Reinsurance receivables	6,057	6,057	—	
Cash and cash equivalents	13,037	586,922	(573,885)	Reclassification
Any other assets, not elsewhere shown	52,706	24,300	28,406	Reclassification
	2,000,138	2,443,083	(442,946)	

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D.1 Assets (continued)

	Solvency II	GAAP	Difference	
	2023	2023	2023	
	USD'000	USD'000	USD'000	Adjustment Type
Deferred acquisition costs	—	15,626	(15,626)	Valuation
Property, plant & equipment held for own use	3,390	7,201	(3,811)	Valuation
Holdings in related undertakings, including participations	96	96	—	
Government Bonds	436,089	438,657	(2,568)	Reclassification
Corporate Bonds	529,240	518,300	10,940	Reclassification
Collateralised securities	108,809	108,445	364	Reclassification
Collective Investments Undertakings	434,693	136,871	297,822	Reclassification
Derivatives	366	—	366	Reclassification
Deposits other than cash equivalents	5,000	—	5,000	Reclassification
Other investments	16,550	386,427	(369,877)	Reclassification
Other loans and mortgages	69,120	—	69,120	Reclassification
Investments	1,599,962	1,588,795	11,167	
Deposits to cedants	91,397	91,397	—	
Insurance and intermediaries receivables	41,060	436,778	(395,718)	Valuation
Reinsurance receivables	29,601	29,601	—	
Cash and cash equivalents	13,249	14,270	(1,021)	Reclassification
Any other assets, not elsewhere shown	9,057	18,710	(9,653)	Reclassification
	<u>1,787,714</u>	<u>2,202,378</u>	<u>(414,662)</u>	

Reclassification for solvency purposes are differences in classifications of balances between GAAP and Solvency II balance sheet line items. Valuation adjustments are valuation differences between GAAP and Solvency II measurement methodologies.

D.1.1 Deferred acquisition costs

Acquisition costs vary with and are directly related to the acquisition of insurance and reinsurance contracts and consist primarily of fees and commissions paid to brokers and premium taxes.

Under Solvency II, cash flow projections used in the calculation of Solvency II technical provisions include acquisition costs associated with reinsurance contracts. Deferred acquisition costs are valued at nil in order to avoid double counting as acquisition costs are considered in the Solvency II technical provision calculations.

Under GAAP, acquisition costs are deferred over the period during which the Company is exposed to the underlying risk which is generally one to two years with the exception of multi year contracts.

D.1.2 Deferred tax

Certain GAAP assets and liabilities are restated in accordance with SII valuation rules. The restated assets and liabilities are analysed for permanent differences arising between SII restated accounts and tax accounts. All material differences are considered and deferred tax is provided on any temporary differences arising. Current tax legislation and rates are applied to calculate the deferred tax. Deferred tax assets and liabilities are presented net on the face of the SII Balance Sheet.

Under GAAP, deferred taxation is calculated on the differences between the Company's taxable profits and the results as stated in the financial statements. These differences arise as a result of timing differences on unrealised gains and losses on investments and capital allowances. Deferred tax assets and liabilities are offset when taxes are levied by the same taxation authority and when there is a legally enforceable right to offset them.

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D.1.3 Property, plant and equipment

Property, plant and equipment includes lease "right of use" assets, software, computer equipment, fixtures & fittings and leasehold improvements.

Under Solvency II, operating leases are measured in accordance with IFRS 16 with a right of use asset and lease liability recognised in the Balance Sheet. Under GAAP, rent payable under operating leases is charged on a straight-line basis over the term of the lease. The "right of use" lease asset is included in Property, plant & equipment.

Under GAAP, property, plant and equipment is measured at cost less depreciation. The Company provides depreciation at cost less estimated residual value in equal instalments over the estimated useful lives of the assets.

Software, computer equipment, fixture & fittings and leasehold improvements are valued at nil on the SII economic balance sheet as an active secondary market does not exist to provide appropriate fair value estimations.

D.1.4 Investments

The Company's investments comprise debt, equity and other investments.

Under Solvency II, investments are measured in accordance with IAS 39 at fair value through profit & loss. Fair value measurement is consistent with GAAP except for the recognition of accrued interest. Under Solvency II, accrued interest is included in the valuation of debt and cash instruments. Under GAAP, accrued interest is recognised separately in 'Any other assets'.

Fair Value Measurement

Under GAAP, investments are measured in accordance with FRS 102 section 11 and section 12. The Company determines the classification of its investments at initial recognition. The Company classifies its investments on a portfolio by portfolio basis and has designated all investment portfolios as at fair value through profit and loss. These portfolios are managed and their performance evaluated on a fair value basis. Short-term investments comprise debt securities that, at purchase, have a maturity greater than three months but less than one year. Due to the short-term nature of these investments amortised cost is used to approximate fair value. All purchases and sales of investments are recorded on the trade date, which is the date that the Company commits to purchase or sell the assets. The fair values of listed investments are based on closing bid prices at year end. For investments not traded on an active market, the Company establishes fair value based on quoted market prices of similar instruments or on other valuation techniques.

Derivatives are initially recognised at fair value on the date on which a derivative contract is entered into and are subsequently re-measured at their fair value. Changes in the fair value are recognised immediately in the profit and loss account. Fair values are obtained from quoted market prices in active markets, including recent market transactions, and valuation techniques, including discounted cash flow models and options pricing models, as appropriate. All derivatives are carried as assets when the fair value is positive and as liabilities when the fair value is negative.

Under GAAP, commercial mortgage loans are reported at amortized cost which is calculated as the unpaid principal balance, adjusted for deferred fees or expenses. The same valuation approach is maintained under Solvency II. This is considered to approximate fair value and considered an alternative valuation methodology as set out in Solvency II.

Fair value is defined as the price to sell an asset or transfer a liability (i.e. the "exit price") in an orderly transaction between market participants. The fair value hierarchy used gives the highest priority to quoted prices in active markets and the lowest priority to unobservable data. The hierarchy is broken down into three levels as follows:

- Level 1 - The best evidence of fair value is a quoted price for an identical asset in an active market. Quoted in an active market in this context means quoted prices are readily and regularly available and those prices represent actual and regularly occurring market transactions on an arm's length basis. The quoted price is usually the current bid price.
- Level 2 - When quoted prices are unavailable, the price of a recent transaction for an identical asset provides evidence of fair value as long as there has not been a significant change in economic circumstances or a significant lapse of time since the transaction took place. If the entity can demonstrate that the last transaction price is not a good estimate of fair value (e.g. because it reflects the amount that an entity would receive or pay in a forced transaction, involuntary liquidation or distress sale), that price is adjusted.
- Level 3 - If the market for the asset is not active and recent transactions of an identical asset on their own are not a good estimate of fair value, an entity estimates the fair value by using a valuation technique. The objective of using a valuation technique is to estimate what the transaction price would have been on the measurement date in an arm's length exchange motivated by normal business considerations.

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D.1.4 Investments (continued)

Classification

Under GAAP, classification of investments is in accordance with FRS 102 and the European Union (Insurance Undertakings: Financial Statements) Regulations, 2015. Under Solvency II, certain investments have been reclassified where necessary in order to conform to Solvency II asset categories.

Holdings in related undertakings

According to Article 13(20) of the SII directive, the term "participation" means the ownership, direct or by way of control, of 20% or more of the voting rights or capital of an undertaking.

The Company holds 99.99% of the share of the Brazil Subsidiary with the remaining 0.01% held by ASHIL. Under GAAP, the Company recognizes the investment at cost valued at USD 95,849.

Article 13 of the Delegated Regulation (EU) 2015/35 sets out the valuation methods for related undertakings providing three options:

- the default valuation method (quoted market prices)
- the adjusted equity method; and
- the valuation method using market prices for a similar asset or liability.

Considering the materiality of the investment in the Brazil Subsidiary, the investment in subsidiary has not been revalued under Solvency II and is recognized at cost.

D.1.5 Deposits to Cedents

Amounts relate to funds withheld balances held by the cedent. For a number of reinsurance contracts, it is agreed within the contract wording that a percentage of the premium or a loss reserve deposit will be held on the cedent's balance sheet, on which the Company will generally earn interest at a rate slightly above risk-free rates. A revolving deposit is maintained until cessation of the contract and is normally reimbursed and recalculated on a quarterly basis based on the quarters premium and claims reserves. As the calculations are carried out and balances are normally settled quarterly, they are deemed to be at fair value at the reporting period end.

D.1.6 Insurance and intermediaries receivables

Under Solvency II, premium and commission receivable balances past due are recognised at fair value. Under Solvency II, technical provisions are calculated on a cash-flow basis. Premiums and commission receivable balances not yet due are included in technical provision best estimate calculations and eliminated from the GAAP Insurance and intermediaries receivable balance. A balance is deemed not yet due at the balance sheet date, if the receivable is not aged (overdue) and will become due for payment by the client some time after the balance sheet date.

Under GAAP, premium and commission receivable balances arising under insurance contracts are recognised when due and measured at cost. A provision for impairment is established when there is objective evidence that, as a result of one or more events that occurred after the initial recognition, the estimated future cash flows have been impacted.

D.1.7 Reinsurance receivables

Under Solvency II, similar to Insurance and intermediaries receivables, balances deemed not yet due are included in best estimate calculation in technical provisions and removed from the GAAP reinsurance receivable balance.

Under GAAP, ceded premium advances and losses paid recoverable are recognised at cost with a provision for impairment if identified.

D.1.8 Cash and Cash Equivalents

Cash and cash equivalents are carried at face value and include fixed income securities that, at purchase have a maturity 3 months or less.

Under Solvency II, certain cash deposits have been reclassified to investments where necessary in order to conform to Solvency II asset categories. As noted in 'Investments' under Solvency II, accrued interest is included in the valuation of cash and cash equivalents. Under GAAP, accrued interest is recognised separately in 'Any Other Assets'.

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D.1.9 Any other assets

Any other assets includes amounts such as amounts due from group companies, prepaid expenses, accrued interest and other taxes receivable in the GAAP balance sheet. The balances are measured at a value for which they could be exchanged between knowledgeable and willing parties in an arm's length transaction. As noted above, under Solvency II, accrued interest is included in the valuation of debt and cash instruments. Under GAAP, accrued interest is recognised in 'Any Other Assets'.

D.2 Technical provisions

The valuation methodology for technical provisions in accordance with Solvency II differs significantly from the valuation in the financial statements which are evaluated on a GAAP basis.

	Solvency II			GAAP
	2024	2024	2024	2024
	USD'000	USD'000	USD'000	USD'000
Net technical provisions	Best Estimate	Risk Margin	Total	Total
Direct business and accepted proportional reinsurance				
Medical expense	1,427	263	1,690	1,389
Income protection	1,232	811	2,043	4,349
Motor vehicle liability	28,480	6,630	35,110	40,632
Other motor	13,864	3,228	17,092	17,248
Marine, aviation and transport	265	64	329	2,634
Fire and other damage to property	39,279	12,001	51,280	78,141
General liability	42,993	9,377	52,370	60,625
Credit and suretyship	36,176	8,008	44,184	74,172
Assistance	429	70	499	489
Accepted non-proportional reinsurance				
Health	4,522	1,359	5,881	7,732
Casualty	256,338	48,327	304,665	344,764
Marine, aviation and transport reinsurance	2,518	438	2,956	1,824
Property	42,976	8,328	51,304	46,676
Total Non-Life obligation	470,499	98,904	569,403	680,675
Accepted Life reinsurance	4,642	864	5,506	—
Total	475,141	99,768	574,909	680,675

*Accepted Life reinsurance relates to reserves for claims which are settled using at least in part, structured annuity payments known as Periodical Payment Orders ("PPOs").

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D.2 Technical provisions (continued)

	Solvency II		GAAP	
	2023	2023	2023	2023
	USD'000	USD'000	USD'000	USD'000
	Best Estimate	Risk Margin	Total	Total
Net technical provisions				
Direct business and accepted proportional reinsurance				
Medical expense	1,416	257	1,673	1,418
Income protection	(625)	595	(30)	3,444
Motor vehicle liability	34,193	7,766	41,959	53,703
Other motor	17,756	4,032	21,788	22,797
Marine, aviation and transport	472	84	556	3,482
Fire and other damage to property	44,665	11,539	56,204	81,384
General liability	45,118	9,137	54,255	63,061
Credit and suretyship	34,920	6,542	41,462	63,281
Assistance	27	8	35	44
Accepted non-proportional reinsurance				
Health	4,570	1,241	5,811	7,703
Casualty	252,304	46,277	298,581	333,499
Marine, aviation and transport	3,824	676	4,500	469
Property	70,642	13,166	83,808	74,299
Total Non-Life obligation	509,282	101,320	610,602	708,584
Accepted Life reinsurance	4,791	857	5,648	—
Total	514,073	102,177	616,250	708,584

*Accepted Life reinsurance relates to reserves for claims which are settled using at least in part, structured annuity payments known as Periodical Payment Orders ("PPOs").

D.2.1 GAAP technical provisions

Claims reserves

Claims Reserves represent an estimate of the unpaid portion of the ultimate liability for losses and loss expenses for reinsured events that have occurred at or before the balance sheet date. The balance reflects both claims that have been reported ('case reserves') and claims that have been incurred but not yet reported ("IBNR"). These amounts are reduced for estimated amounts of salvage and subrogation recoveries.

Reserves for losses and loss expenses are reviewed on a quarterly basis. Case reserves are primarily established based on amounts reported from insureds, reinsureds and/or brokers. Management estimates IBNR after reviewing detailed actuarial analyses and applying informed judgements regarding qualitative factors that may not be fully captured in the actuarial estimates. A variety of standard actuarial methods are utilised in this process, including the Initial Expected Loss Ratio, Bornhuetter-Ferguson and Chain Ladder methods. The Company estimate is highly dependent on management's critical judgement as to which method(s) are most appropriate for a particular year and class of business.

Initial Expected Loss Ratio ("IELR") Method: This indication of ultimate claim cost is based on applying an expected loss ratio for the period to an exposure measure, normally the earned or written premium. The expected loss ratio is normally calibrated based on the historical loss ratios of the class of business, adjusted for changes in the underwriting environment such as premium rates, claim trends and terms and conditions as well as qualitative information such as shifts in the mix of business. Where the history is not considered fully credible, a benchmark may also be given some weight.

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D.2.1 GAAP technical provisions (continued)

Development Factor ("DF") Method (also termed Chain Ladder Method): The indication of ultimate claim cost is based on grossing up the cumulative reported (or paid) claims according to a factor representing the expected percentage of claims assumed to have been reported (or paid) given the delay period that has elapsed since the start of the accident or underwriting period ('percentage developed'). This 'development profile' is normally calibrated by considering the percentage of the ultimate claims cost that has emerged in older, more mature, periods at each delay period. Where the history is not considered fully credible, a benchmark may also be given some weight.

Bornhuetter-Ferguson ("BF") Method: The BF method is a weighted average of the IELR and DF methods. It gives more weight to the IELR method in the earlier stages of a year's development before progressively weighting more towards experience indications (i.e., DF method) as the year matures.

Any adjustments to previous reserves for losses and loss expenses are recognised in the period they are determined. While management believes that reserves for losses and loss expenses are adequate, this estimate requires significant judgement and new information, events or circumstances may result in ultimate losses that are materially greater or less than provided for in the balance sheet.

The current reserving process is based on historical statistics which may or may not be borne out in the future. There is uncertainty around claims inflation which may be higher or lower in the future than seen in the historical data. Some classes of business assume a certain number of claims to be reported in the future which may turn out to be different in reality. The stability of the claims process can also affect reserving estimates. Should the claims process speed up through automation or slow down due to processing delays, even taking these into account, there will be increased uncertainty in the reserving estimates.

Unearned premium reserves

Premiums written are recorded in accordance with the terms of the underlying policies. Premiums are earned over the period during which the Company is exposed to the underlying risk which is generally one to two years with the exception of multi-year contracts. Unearned premiums represent the portion of premiums written which are applicable to the unexpired risks under contracts in force.

D.2.2 Solvency II technical provisions

Technical provisions on a Solvency II basis combine the data and results from the GAAP based reserving process with additional information and calculations.

The calculation of the Solvency II technical provisions is split into three parts:

- i. **Provisions relating to earned business ('Claims Provision')** which are the best estimate amount of future cashflows of earned, unpaid claims (i.e., reported outstanding claims and earned IBNR from the standard reserving process) and associated runoff expenses. The best estimate of ultimate claims under the traditional GAAP basis generally only reflects actual historical losses and development patterns. The technical provisions for Solvency II require that allowance is also made for events or circumstances that are not reasonably foreseeable (i.e., have low probabilities) and are at levels not contained in the historical data (i.e., have potentially large severities). This additional reserve amount is referred to as 'Events not in Data' ("ENIDs").
- ii. **Provisions relating to unearned business ('Premium Provision')** which are the best estimate of future cashflows for unearned business comprising of unearned business already incepted, as well as business that is not yet incepted but has been already been bound before the valuation date. As with the earned provision, the claim amount is also loaded for ENIDs that could impact unearned business, includes associated run-off expenses and is offset by future premiums to be received.
- iii. **Risk Margin** reflects the premium that would be required by a third party assuming the business was transferred at the valuation date. A cost of capital approach is used to determine this premium.

Both the earned and unearned provisions take account of the expected reinsurance recoveries to be received in respect of this business, reduced for reinsurance bad debt.

All elements of the provisions take account of the assumed cash flow pattern on a best estimate basis (i.e., excluding margins for prudence) and are discounted at the EIOPA provided risk free discount rates. It is intended that the Best Estimate captures a probability-weighted average of all future outcomes, including the possibility of claim events that have not been seen in the Company's history.

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D.2.3 Differences between Solvency II and GAAP valuation bases

The main differences between the Solvency II technical provision methodology and the methodology used to derive the technical provisions on a GAAP basis are as follows, for the Solvency II technical provision:

- i. Standard Solvency II classes of business are used for reporting and also at the original currency level, with all minor currencies being grouped into an 'Other' category.
- ii. The reserves held for future reporting and development of claims are calculated on a best-estimate basis with an explicit risk margin added onto this best estimate. This is different from the GAAP basis where booked reserves may include some margin for uncertainty.
- iii. The technical provisions also contain an allowance for ENIDs representing low frequency/high severity events.
- iv. Future premium income and claims outgoing are all discounted for the time value of money using the relevant EIOPA risk free interest rates.
- v. Bound unaccepted business is included in the analysis, with the expected claims offset by the future premium income for this business.
- vi. Claims associated with unearned premium are estimated rather than the full unearned premium reserve being held.
- vii. The expected cost of future claims is offset by the future premium income.
- viii. All calculations are based on a cash flow basis.
- ix. Additional allowance for expenses is made on the basis that the provision includes the expected expense amount needed to service all existing policies throughout their lifetime.

D.2.4 Level of uncertainty

The level of the technical provisions on both a GAAP and on a Solvency II basis is heavily dependent on the reliability and accuracy of the underlying reserving process. In particular, future claims development is inherently uncertain and subject to future events that cannot be known accurately at the present time. The best estimate of ultimate claims, while considered to have been derived using a reasonable methodology and set of assumptions, may still differ, potentially significantly, from the eventual cost of ultimate claims.

D.2.5 Recoverables from reinsurance/retrocession contracts

The Company purchases reinsurance to reduce the risk of exposure to loss. Four types of reinsurance cover are purchased; facultative, excess of loss, quota share and stop loss. Facultative covers are typically individual risk purchases. Excess of loss covers provide a contractually set amount of cover after an excess point has been reached. This excess point can be based on the size of an industry loss or a fixed monetary amount. Generally these covers are purchased on a package policy basis, and they may provide cover for a number of lines of business within one contract. Quota share covers provide a proportional amount of coverage from the first dollar of loss and stop loss cover protects the Company's net ultimate loss ratio.

All of these reinsurance covers provide for recovery of a portion of losses paid and loss reserves from reinsurers. The Company predominantly cedes business with reinsurers rated A- or better by Standard & Poors and/or AM Best Company. The Company remains liable to the extent that reinsurers do not meet their obligations under these agreements either due to solvency issues, contractual disputes or some other reason. Included within reinsurance recoverable per GAAP as at 31 December 2024 were amounts of USD 1,866.7 million (2023: USD 1,977.1 million) recoverable from group companies. Included within the provision for unearned premiums ceded as at 31 December 2024 is an amount of USD 250.1 million (2023: USD 227.2 million) ceded to a group company.

D.2.6 Any other information

The Company has not applied the matching adjustment, volatility adjustment, transitional risk-free interest term structure of the transitional deduction in calculating Solvency II technical provisions.

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D.3 Other Liabilities

	Solvency II	GAAP	Difference	
	2024	2024	2024	
	USD'000	USD'000	USD'000	Adjustment Type
Derivatives	460	(20)	480	Reclassification
Insurance & intermediaries payables	55,749	61,336	(5,587)	Valuation
Reinsurance payables	236,233	564,474	(328,241)	Valuation
Deposits from Reinsurers	56,982	56,982	—	
Any other liabilities, not elsewhere shown	396,223	285,810	110,413	Valuation
	745,647	968,582	(222,935)	

	Solvency II	GAAP	Difference	
	2023	2023	2023	
	USD'000	USD'000	USD'000	Adjustment Type
Derivatives	184	(182)	366	Reclassification
Insurance & intermediaries payables	42,672	49,483	(6,811)	Valuation
Reinsurance payables	224,636	527,861	(303,225)	Valuation
Deposits from Reinsurers	74,947	74,947	—	
Any other liabilities, not elsewhere shown	68,233	47,666	20,567	Valuation
	410,672	699,775	(289,103)	

D.3.1 Insurance & intermediaries payable

Under Solvency II, similar to insurance and intermediaries receivable, balances not yet due for payment are recognised in technical provisions and removed from insurance and intermediaries payable. A balance is deemed not yet due at the balance sheet date, if payment will become due after the balance sheet date.

Under GAAP, amounts payable to policyholders, insurers and other business linked to reinsurance such as commissions due to intermediaries but not yet paid are recognised at cost.

D.3.2 Reinsurance payables

Similar to 'Insurance and intermediaries payable', under Solvency II, balances not yet due for payment are removed and recognised in technical provisions.

Under GAAP, premium payables are recognised at cost. A provision for impairment is established when there is objective evidence that, as a result of one or more events that occurred after the initial recognition, the estimated future cash flows have been impacted.

D.3.3 Deposits from Reinsurers

Deposits from reinsurers included amounts received from reinsurers or deducted by the reinsurer according to the reinsurance contract.

Balances are calculated each quarter in line with the terms and conditions of the agreements and are therefore deemed to be at fair value at each reporting period end.

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D.3.4 Any Other Liabilities

Under Solvency II, any other liabilities are recognised at fair value. Cost is considered to approximate fair value on the basis that duration is less than one year and no discounting is required.

Under Solvency II, operating leases are measured in accordance with IFRS 16 with a right of use asset and lease liability recognised in the Balance Sheet. The lease liability is included in "Any Other Liabilities". Under GAAP, rent payable under operating leases is charged on a straight-line basis over the term of the lease.

Under Solvency II, approved dividends not yet paid in the period up to submission of the return are included in "Any Other Liabilities". Under GAAP, dividends payable are recognised as a liability in the period during which the dividends are approved by the Board of the Company.

Under GAAP, 'Amounts payable to group companies', 'Net payable for investments purchased', 'Other taxes payable' and 'Accrued expenses' are recognised at cost and payable in less than one year.

D.4 Any other information

All material information regarding valuation is disclosed in sections D.1 - D.3.

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CAPITAL MANAGEMENT

E. CAPITAL MANAGEMENT

Capital management is a business process that links risk and return preferences with strategy setting and business planning. It requires cross functional collaboration, and involves a significant commitment from business segments, corporate functions, risk management and the Board of Directors.

The Company's Capital Management objective is to ensure that the Company maintains an appropriate level of capital, in terms of both quantity and quality, at all times, in line with its risk appetite and capital requirements, and that it fulfils its obligations to monitor, manage and report its capital position, both required and available, internally and externally as required, in accordance with relevant regulatory requirements. A business plan is prepared annually to support the capital management objective and includes a three year projection of expected performance.

Business strategy, capital and risk are closely integrated within decision making, and embedded through the ORSA process which assess that the prospective risk profile is in line with the Company's risk appetite framework. The SCR calculation is performed as part of the ORSA process to provide input into the Company's capital management strategy.

E.1 Own Funds

Eligible Own funds

For Solvency II, own funds are divided into levels of quality, known as tiers, depending on their loss absorbency. Tier 1 unrestricted, which is not subject to a limit, is of the highest quality, Tier 3 the lowest. At 31 December 2024, 99.9% (2023: 100%) of the Company's own funds are classified as Tier 1.

	2024	2024	2024	2024
	USD'000	USD'000	USD'000	USD'000
	Total	Tier 1	Tier 2	Tier 3
Ordinary share capital	1,011	1,011	—	—
Reconciliation reserve	670,934	670,934	—	—
Net deferred tax asset	413	—	—	413
Eligible own funds	672,358	671,945	—	413

	2023	2023	2023	2023
	USD'000	USD'000	USD'000	USD'000
	Total	Tier 1	Tier 2	Tier 3
Ordinary share capital	1,011	1,011	—	—
Reconciliation reserve	754,655	754,655	—	—
Net deferred tax asset	—	—	—	—
Eligible own funds	755,666	755,666	—	—

The reconciliation reserve includes the following:

- shareholders' equity on a GAAP basis as per the financial statements,
- revaluation reserve (adjustments from GAAP to Solvency II economic valuation basis); and
- deduction for restricted own fund items.

A reconciliation of shareholders' equity to eligible own funds is as follows:

	2024	2023
	USD'000	USD'000
GAAP shareholders' equity	793,827	794,019
Revaluation reserve	(116,219)	(33,352)
Less restricted own fund items		
Restricted asset	(5,250)	(5,000)
Eligible own funds	672,358	755,666

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E.1 Own Funds (continued)

The revaluation reserve, which is a component of the eligible own funds, is comprised of the differences between GAAP and the Solvency II valuation. Section D provides description of valuation differences between GAAP and Solvency II.

	2024	2023
	USD'000	USD'000
Adjustments for Solvency II technical provisions	113,882	108,830
Adjustments for Solvency II risk margin	(99,766)	(102,177)
Adjustment for deferred acquisition costs	(16,728)	(15,626)
Adjustments for property, plant and equipment (including operating leases)	(6,594)	(8,378)
Adjustment for approved dividend	(115,000)	(16,000)
Adjustments to any other liabilities	7,578	—
Deferred tax adjustment	410	—
Revaluation reserve	<u>(116,218)</u>	<u>(33,352)</u>

The Revaluation reserve is made up of:

- adjustment to recognise approved dividends in the period up to the submission of the return;
- adjustments for Solvency II technical provisions, excluding risk margin. These have decreased over the period, driven by a reduction in the benefit due to discounting and an increase in claims associated with unearned premium due to increased volumes;
- adjustment for the risk margin is a function of the main SCR risks and the run off of these risks. The decrease in adjustment results from an increase in the risk margin which is in line with the increase in the business and related risks;
- adjustment for deferred acquisition costs in line with Solvency II valuation rules;
- adjustment for property, plant and equipment recognises the revaluation of property, plant and equipment and capitalisation of operating leases on the Solvency II balance sheet;
- adjustment to any other liabilities relates to a deferred gains on retroactive treaty in line with Solvency II valuation rules; and
- adjustment for deferred tax asset in line with Solvency II valuation rules.

Restricted own fund items relate to USD 5.3 million restricted cash balances (2023: USD 5.0 million) held by the Company.

E.2 Solvency capital requirement and Minimum capital requirement

The 2024 and 2023 results presented are based on the 2024 annual and 2023 annual returns submitted to the CBI respectively.

The SCR has been calculated using the Standard Formula methodology.

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E.2 Solvency capital requirement and Minimum capital requirement(continued)

Solvency Capital Requirement	2024	2023
	USD'000	USD'000
Market risk	139,592	158,920
Counterparty default risk	107,544	107,294
Life underwriting risk	62,900	56,421
Health underwriting risk	8,300	7,769
Non-life underwriting risk	291,917	288,369
Diversification	(175,942)	(177,965)
Basic solvency capital requirement	434,311	440,808
Operational risk	57,585	63,084
Loss-absorbing capacity of deferred taxes	(10,778)	—
Solvency capital requirement	481,118	503,892
Eligible own funds	672,358	755,666
Ratio of eligible own funds to SCR	139.7 %	150.0 %

The decrease in SCR over prior year is predominantly driven by lower market risk and the recognition of a LACDT in 2024.

- Market risk has decreased due to a change in spread risk, interest rate risk and concentration risk arising from changes in assets allocations. These asset allocation changes were initiated in quarter four 2024 after the Company entered into a retrospective reinsurance agreement which is due to close in the first half of 2025.
- Counterparty default risk has remained relatively stable versus prior year.
- Life underwriting risk has increased due to the increase in mass lapse risk driven by new contracts.
- Health underwriting risk is not significant and has remained relatively stable versus prior year.
- Non-life underwriting risk has remained relative stable versus prior year.
- Operational risk has increased in line with the increase in gross technical provisions.
- A benefit arising from the loss-absorbing capacity of deferred taxes is recognised in the current year based on future taxable profits, in the prior year(s) there were insufficient sources of admissibility to recognise a LACDT.

Simplified calculation of the risk mitigating effect for reinsurance arrangements

In line with the simplification in Delegated Regulation Article 111, the risk mitigating effect on underwriting risk is determined as the difference between the actual net underwriting risk charge and the hypothetical underwriting risk charge assuming that none of the reinsurance arrangements existed (i.e gross underwriting risk charge). In doing so, the Company calculates this gross underwriting risk charge by applying a gross to net scaling factor to the net underwriting risk charge. This simplification is appropriate considering the material proportional reinsurance arrangements in place.

In line with the Delegated Regulation Article 107, this risk mitigating effect on underwriting risk is then apportioned out by reinsurance counterparty based on each reinsurance counterparty's share of the total best estimate reinsurance recoverable.

Lapse risk

The Company applies a simplification in the calculation of lapse risk charge whereby the risk charge is calculated on a basis of groups of policies, rather than on a policy level. This simplification approach is based on the Delegated Regulation Article 90a and 96a.

Share of Reinsurer's assets subject to collateral arrangements

The Company applies the simplification as per Article 112a of the Delegated Regulation which assumes more than 60% of the reinsurance counterparty's assets are subject to collateral arrangements in situations where this information is not available to the Company.

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CAPITAL MANAGEMENT

E.2 Solvency capital requirement and Minimum capital requirement (continued)

Collateral

The Company's counterparty default risk charge includes an allowance for collateral arrangements. The simplification based on Article 112 of the Delegated Regulation is applied for the calculation of the risk adjusted value of collateral to take into account the economic effect of the collateral.

Undertaking specific parameters

The Company does not use any undertaking specific parameters in the calculation of the SCR.

MCR

The MCR is calculated in accordance with Solvency II requirements using a factor-based formula calibrated using a Value-at-Risk measure with an 85% confidence level over a one-year period. The Company is required to maintain the higher of the minimum required capital (imposed by the regulations) of EUR 3.9 million or the MCR at all times during the year.

	2024	2024	2024
	Total	Tier 1	Tier 2
	USD'000	USD'000	USD'000
Eligible own funds to meet the MCR	671,945	671,945	—
MCR	<u><u>120,280</u></u>		
Ratio of eligible own funds to MCR	<u><u>558.7 %</u></u>		

	2023	2023	2023
	Total	Tier 1	Tier 2
	USD'000	USD'000	USD'000
Eligible own funds to meet the MCR	755,666	755,666	—
MCR	<u><u>125,973</u></u>		
Ratio of Eligible own funds to MCR	<u><u>599.9 %</u></u>		

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CAPITAL MANAGEMENT

The inputs used to calculate the MCR of the Company are as follows:

	Net (of reinsurance/ SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
	2024	2024
	USD'000	USD'000
Direct business and accepted proportional reinsurance		
Medical expense	1,427	—
Income protection	1,232	6,693
Motor vehicle liability	28,480	7,245
Other motor	13,864	3,527
Marine, aviation and transport	265	760
Fire and other damage to property	39,279	35,722
General liability	42,993	11,114
Credit and suretyship	36,176	39,734
Assistance	429	105
Accepted non-proportional reinsurance		
Health	4,522	5,058
Casualty	256,338	60,554
Marine, aviation, transport	2,518	972
Property	42,976	4,384
Total Non-Life obligation	470,499	175,868
Accepted Life reinsurance	4,642	—
Total	475,141	175,868

E.3 Use of duration based equity risk sub module in the calculation of SCR

Duration based equity risk sub module was not used in the calculation of the SCR.

E.4 Differences between standard formula and any internal model used

No internal or partial internal model was used for the calculation of the SCR.

E.5 Non Compliance with SCR and MCR

The Company has maintained capital sufficient to meet its SCR and MCR over the reporting period.

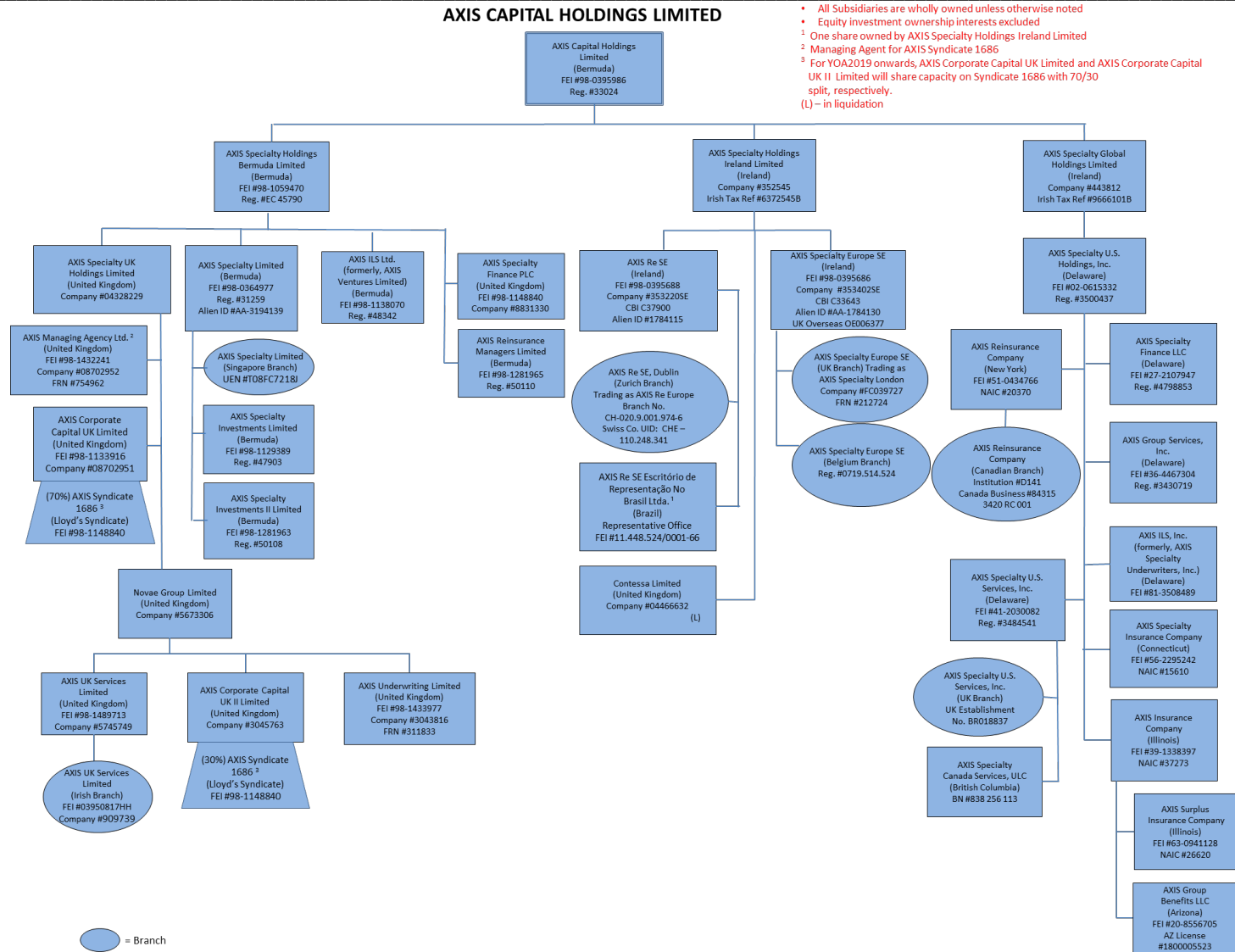
The final SCR and MCR amounts remain subject to supervisory assessment.

E.6 Any other information

All material information regarding capital management has been disclosed in Sections E.1 - E.5 above.

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APPENDIX I - GROUP STRUCTURE



- All Subsidiaries are wholly owned unless otherwise noted
- Equity investment ownership interests excluded
- ¹ One share owned by AXIS Specialty Holdings Ireland Limited
- ² Managing Agent for AXIS Syndicate 1686
- ³ For YOA2019 onwards, AXIS Corporate Capital UK Limited and AXIS Corporate Capital UK II Limited will share capacity on Syndicate 1686 with 70/30 split, respectively.
- (L) – in liquidation

S.02.01.02 Balance Sheet (USD'000s)

		Solvency II value
Assets		C0010
Goodwill	R0010	
Deferred acquisition costs	R0020	—
Intangible assets	R0030	—
Deferred tax assets	R0040	413
Pension benefit surplus	R0050	—
Property, plant & equipment held for own use	R0060	2,319
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	1,730,700
Property (other than for own use)	R0080	—
Holdings in related undertakings, including participations	R0090	96
Equities	R0100	—
Equities - listed	R0110	—
Equities - unlisted	R0120	—
Bonds	R0130	1,315,724
Government Bonds	R0140	344,778
Corporate Bonds	R0150	924,742
Structured notes	R0160	—
Collateralised securities	R0170	46,204
Collective Investments Undertakings	R0180	389,007
Derivatives	R0190	480
Deposits other than cash equivalents	R0200	5,000
Other investments	R0210	20,394
Assets held for index-linked and unit-linked contracts	R0220	—
Loans and mortgages	R0230	76,791
Loans on policies	R0240	—
Loans and mortgages to individuals	R0250	—
Other loans and mortgages	R0260	76,791
Reinsurance recoverables from:	R0270	1,497,153
Non-life and health similar to non-life	R0280	1,439,681
Non-life excluding health	R0290	1,417,821
Health similar to non-life	R0300	21,861
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	57,472
Health similar to life	R0320	—
Life excluding health and index-linked and unit-linked	R0330	57,472
Life index-linked and unit-linked	R0340	—
Deposits to cedants	R0350	71,786
Insurance and intermediaries receivables	R0360	46,328
Reinsurance receivables	R0370	6,057
Receivables (trade, not insurance)	R0380	—
Own shares (held directly)	R0390	—
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	—
Cash and cash equivalents	R0410	13,037
Any other assets, not elsewhere shown	R0420	52,706
Total assets	R0500	3,497,292

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APPENDIX II

S.02.01.02 Balance Sheet (USD'000s)

		Solvency II value
Liabilities		C0010
Technical provisions – non-life	R0510	2,009,082
Technical provisions – non-life (excluding health)	R0520	1,977,607
Technical Provisions calculated as a whole	R0530	—
Best Estimate	R0540	1,881,137
Risk margin	R0550	96,470
Technical provisions - health (similar to non-life)	R0560	31,474
Technical Provisions calculated as a whole	R0570	—
Best Estimate	R0580	29,042
Risk margin	R0590	2,432
Technical provisions - life (excluding index-linked and unit-linked)	R0600	62,978
Technical provisions - health (similar to life)	R0610	—
Technical Provisions calculated as a whole	R0620	—
Best Estimate	R0630	—
Risk margin	R0640	—
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	62,978
Technical Provisions calculated as a whole	R0660	—
Best Estimate	R0670	62,114
Risk margin	R0680	864
Technical provisions – index-linked and unit-linked	R0690	—
Technical Provisions calculated as a whole	R0700	—
Best Estimate	R0710	—
Risk margin	R0720	—
Other technical provisions	R0730	—
Contingent liabilities	R0740	—
Provisions other than technical provisions	R0750	—
Pension benefit obligations	R0760	—
Deposits from reinsurers	R0770	56,982
Deferred tax liabilities	R0780	3
Derivatives	R0790	460
Debts owed to credit institutions	R0800	1,974
Financial liabilities other than debts owed to credit institutions	R0810	—
Insurance & intermediaries payables	R0820	55,749
Reinsurance payables	R0830	236,233
Payables (trade, not insurance)	R0840	—
Subordinated Liabilities	R0850	—
Subordinated liabilities not in Basic Own Funds	R0860	—
Subordinated liabilities in Basic Own Funds	R0870	—
Any other liabilities, not elsewhere shown	R0880	396,223
Total liabilities	R0900	2,819,683
Excess of assets over liabilities	R1000	677,609

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S.05.01.02 - Premiums, claims and expenses by line of business (USD'000s)

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)									Line of business for: accepted non-proportional reinsurance				
		Medical expense	Income protection	Motor vehicle liability	Other motor	Marine, aviation and transport	Fire and other damage to	General liability	Credit and suretyship	Assistance	Health	Casualty	Marine, aviation and transport	Property	Total
		C0010	C0020	C0040	C0050	C0060	C0070	C0080	C0090	C0110	C0130	C0140	C0150	C0160	C0200
Premiums written															
Gross - Direct Business	R0110	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Gross - Proportional reinsurance accepted	R0120	1	28,910	32,325	15,735	3,179	167,134	50,597	198,426	391	—	—	—	—	496,699
Gross - Non-proportional reinsurance accepted	R0130	—	—	—	—	—	—	—	—	—	22,942	264,677	4,859	23,150	315,628
Reinsurers' share	R0140	1	22,217	25,080	12,208	2,419	131,412	39,483	158,692	286	17,884	204,123	3,887	18,766	636,458
Net	R0200	—	6,693	7,245	3,527	760	35,722	11,114	39,734	105	5,058	60,554	972	4,384	175,868
Premiums earned															
Gross - Direct Business	R0210	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Gross - Proportional reinsurance accepted	R0220	1	28,953	45,821	22,304	1,888	154,059	53,680	168,947	(99)	—	—	—	—	475,555
Gross - Non-proportional reinsurance accepted	R0230	—	—	—	—	—	—	—	—	—	22,879	238,730	4,168	21,008	286,784
Reinsurers' share	R0240	1	22,249	35,202	17,135	1,450	121,063	41,928	136,495	(81)	17,836	184,767	3,388	17,126	598,562
Net	R0300	—	6,704	10,619	5,169	438	32,996	11,752	32,452	(17)	5,042	53,963	779	3,881	163,778
Claims incurred															
Gross - Direct Business	R0310	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Gross - Proportional reinsurance accepted	R0320	(21)	26,310	33,338	16,228	1,026	97,903	39,822	59,334	163	—	—	—	—	274,101
Gross - Non-proportional reinsurance accepted	R0330	—	—	—	—	—	—	—	—	—	6,454	177,557	(9,368)	(1,026)	173,617
Reinsurers' share	R0340	(16)	19,747	25,022	12,166	770	75,620	30,579	47,033	(197)	5,100	132,938	(7,775)	(157)	340,830
Net	R0400	(5)	6,562	8,316	4,061	256	22,283	9,243	12,301	360	1,354	44,619	(1,593)	(868)	106,889
Expenses incurred	R0550	5	1,977	3,430	1,747	94	7,624	3,911	16,845	7	1,164	7,645	367	634	45,451
Other expenses	R1210	—	—	—	—	—	—	—	—	—	—	—	—	—	(2,578)
Total expenses	R1300	—	—	—	—	—	—	—	—	—	—	—	—	—	42,874

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S.04.05.21 - Premiums, claims and expenses by country (USD'000s)

			Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
		Home Country	UNITED KINGDOM	UNITED KINGDOM (GIBRALTAR)	INDIA	FRANCE	SPAIN	
		C0010	C0020	C0020	C0020	C0020	C0020	
Premiums written (gross)								
Gross Written Premium (direct)	R0020	—	—	—	—	—	—	—
Gross Written Premium (proportional reinsurance)	R0021	367	81,248	11	69,539	35,486	37,631	224,282
Gross Written Premium (non-proportional reinsurance)	R0022	7,854	101,686	107,252	3	25,819	3,157	245,771
Premiums earned (gross)								
Gross Earned Premium (direct)	R0030	—	—	—	—	—	—	—
Gross Earned Premium (proportional reinsurance)	R0031	414	66,736	1,675	64,873	38,945	37,296	209,939
Gross Earned Premium (non-proportional reinsurance)	R0032	7,430	94,007	88,813	3	27,655	3,023	220,931
Claims incurred (gross)								
Claims incurred (direct)	R0040	—	—	—	—	—	—	—
Claims incurred (proportional reinsurance)	R0041	(13,142)	41,462	3,652	36,074	22,497	23,840	114,384
Claims incurred (non-proportional reinsurance)	R0042	3,955	64,178	65,420	(2)	6,855	809	141,215
Expenses incurred (gross)								
Gross Expenses Incurred (direct)	R0050	—	—	—	—	—	—	—
Gross Expenses Incurred (proportional reinsurance)	R0051	195	15,691	460	7,576	14,414	19,247	57,583
Gross Expenses Incurred (non-proportional reinsurance)	R0052	1,177	15,452	14,618	2	4,357	546	36,152

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S.12.01.02 Life and Health SLT Technical Provisions (USD'000s)

		Insurance with profit participation	Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)	Health insurance (direct business)			Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
							Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	C0090	C0100	C0150	C0160	C0170	C0180	C0190	C0200	C0210
Technical provisions calculated as a whole	R0010	—	—	—	—	—			—	—	—
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0020	—	—	—	—	—			—	—	—
Technical provisions calculated as a sum of BE and RM											
Best Estimate											
Gross Best Estimate	R0030	—	—	62,114	62,114		—	—	—	—	—
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080	—		57,472	57,472						
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090	—		4,642	4,642						
Risk Margin	R0100	—		864	864						
Technical provisions - total	R0200										

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S.17.01.02 Non-life Technical Provisions (USD'000s)

		Direct business and accepted proportional reinsurance									Accepted non-proportional reinsurance				Total Non-Life obligation
		Medical expense insurance	Income Protection Insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport	Fire and other damage to property	General liability insurance	Credit and suretyship insurance	Assistance	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation	Non-proportional property reinsurance	
		C0020	C0030	C0050	C0060	C0070	C0080	C0090	C0100	C0120	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole	R0010			—	—					—	—	—	—	—	—
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050			—	—					—	—	—	—	—	—
Technical provisions calculated as a sum of BE and RM															
Best estimate															
Premium provisions															
Gross - Total	R0060	45	(12,634)	(31,228)	(15,202)	(396)	(114,675)	(35,765)	(80,255)	216	(11,506)	(15,867)	(495)	(9,771)	(327,535)
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	33	(9,510)	(24,077)	(11,721)	(317)	(89,460)	(28,367)	(73,396)	161	(8,727)	(12,498)	(657)	(7,995)	(266,532)
Net Best Estimate of Premium Provisions	R0150	12	(3,124)	(7,151)	(3,481)	(80)	(25,214)	(7,398)	(6,859)	55	(2,779)	(3,370)	162	(1,777)	(61,003)
Claims provisions															
Gross - Total	R0160	5,676	17,438	141,425	68,847	1,234	270,794	214,285	208,059	246	30,024	1,064,365	10,068	205,253	2,237,714
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	4,261	13,082	105,794	51,502	889	206,300	163,894	165,024	(128)	22,723	804,658	7,712	160,501	1,706,213
Net Best Estimate of Claims Provisions	R0250	1,415	4,356	35,631	17,346	345	64,493	50,390	43,035	374	7,301	259,707	2,356	44,752	531,501
Total Best estimate - gross	R0260	5,721	4,804	110,196	53,645	838	156,119	178,520	127,804	462	18,518	1,048,498	9,573	195,482	1,910,179
Total Best estimate - net	R0270	1,427	1,232	28,480	13,864	265	39,279	42,993	36,176	429	4,522	256,338	2,518	42,976	470,498
Risk margin	R0280	263	811	6,630	3,228	64	12,001	9,377	8,008	70	1,359	48,327	438	8,328	98,902
Technical provisions - total															
Technical provisions - total	R0320	5,984	5,614	116,827	56,873	902	168,120	187,897	135,812	532	19,876	1,096,825	10,012	203,810	2,009,082
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total															
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	4,294	3,572	81,716	39,781	573	116,840	135,527	91,628	33	13,995	792,160	7,055	152,506	1,439,681
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total															
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	R0340	1,690	2,042	35,110	17,092	329	51,280	52,369	44,184	498	5,881	304,664	2,956	51,303	569,400

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S.19.01.21 Non-life insurance claims (USD'000s)

Accident year/ Underwriting year	Z0010	Accident Year													
Gross Claims Paid (non-cumulative)															
(absolute amount)		Development Year													
	Year	0	1	2	3	4	5	6	7	8	9	10 & +		In Current year	Sum of years (cumulative)
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
Prior	R0100	—	—	—	—	—	—	—	—	—	—	20,360	R0100	20,360	20,360
N-9	R0160	125,160	144,827	157,771	63,760	40,073	34,878	36,993	8,897	6,401	12,230		R0160	12,230	630,990
N-8	R0170	143,782	159,700	101,516	56,990	40,921	38,658	20,816	17,494	19,844			R0170	19,844	599,721
N-7	R0180	176,593	242,908	159,765	86,765	46,514	48,552	343	23,856				R0180	23,856	785,297
N-6	R0190	187,847	192,046	109,746	55,437	65,500	79,746	42,611					R0190	42,611	732,934
N-5	R0200	174,899	198,847	122,165	60,333	57,520	44,398						R0200	44,398	658,161
N-4	R0210	126,379	147,435	78,723	44,622	73,906							R0210	73,906	471,065
N-3	R0220	83,969	191,765	115,722	68,725								R0220	68,725	460,180
N-2	R0230	77,090	99,513	87,229									R0230	87,229	263,832
N-1	R0240	67,131	84,699										R0240	84,699	151,830
N	R0250	51,539	—										R0250	51,539	51,539
		—	—	—	—	—	—	—	—	—	—	—	R0260	529,397	4,825,909

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Gross undiscounted Best Estimate Claims Provisions															
(absolute amount)	Z0010														
		Development Year													
		0	1	2	3	4	5	6	7	8	9	10 & +			Year end (discounted data)
		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300			C0310
Prior	R0100	—	—	—	—	—	—	—	—	—	—	288,988		R0100	250,563
N-9	R0160	—	436,731	312,079	233,424	166,478	138,341	109,574	87,937	73,887	59,449	—		R0100	50,901
N-8	R0170	663,454	413,813	300,242	216,379	198,596	156,724	126,867	128,368	106,788	—	—		R0160	91,946
N-7	R0180	676,679	458,605	379,897	312,342	263,342	190,560	174,912	139,653	—	—	—		R0170	118,679
N-6	R0190	676,951	515,325	432,710	336,558	267,991	237,643	183,178	—	—	—	—		R0190	157,647
N-5	R0200	735,872	557,340	393,198	308,430	248,863	206,141	—	—	—	—	—		R0200	178,266
N-4	R0210	670,133	529,846	436,752	382,348	291,276	—	—	—	—	—	—		R0210	259,276
N-3	R0220	604,720	446,535	348,321	267,159	—	—	—	—	—	—	—		R0220	233,555
N-2	R0230	470,846	407,408	303,655	—	—	—	—	—	—	—	—		R0230	261,405
N-1	R0240	413,210	311,268	—	—	—	—	—	—	—	—	—		R0240	265,675
N	R0250	433,588	—	—	—	—	—	—	—	—	—	—		R0250	369,801
		—	—	—	—	—	—	—	—	—	—	—	Total	R0260	2,237,714

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S.23.01.01 Own Funds (USD'000s)

		Total	Tier 1 - Unrestricted	Tier 1 - Restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	1,011	1,011		—	
Share premium account related to ordinary share capital	R0030	—	—		—	
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	—	—		—	
Subordinated mutual member accounts	R0050	—		—	—	—
Surplus funds	R0070	—				
Preference shares	R0090	—		—	—	—
Share premium account related to preference shares	R0110	—		—	—	—
Reconciliation reserve	R0130	670,934	670,934			
Subordinated liabilities	R0140	—	—	—	—	—
An amount equal to the value of net deferred tax assets	R0160	413				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	—	—	—	—	—
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	672,358	671,945	—	—	413
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300	—			—	
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310	—			—	
Unpaid and uncalled preference shares callable on demand	R0320	—			—	—
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330	—			—	—
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340	—			—	
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350	—			—	—
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360	—			—	
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370	—			—	—
Other ancillary own funds	R0390	—			—	—
Total ancillary own funds	R0400	—			—	—

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S.23.01.01 Own Funds (USD'000s)

		Total	Tier 1 - Unrestricted	Tier 1 - Restricted	Tier 2	Tier 3
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	672,358	671,945	—	—	413
Total available own funds to meet the MCR	R0510	671,945	671,945	—	—	
Total eligible own funds to meet the SCR	R0540	672,359	671,945	—	—	413
Total eligible own funds to meet the MCR	R0550	671,945	671,945	—	—	
SCR	R0580	481,119	—	—	—	—
MCR	R0600	120,280	—	—	—	—
Ratio of Eligible own funds to SCR	R0620	139.7 %	—	—	—	—
Ratio of Eligible own funds to MCR	R0640	558.7 %	—	—	—	—
S.23.01.01.02		Total				
		C0060				
Reconciliation reserve						
Excess of assets over liabilities	R0700	677,609	—	—	—	—
Own shares (held directly and indirectly)	R0710		—	—	—	—
Foreseeable dividends, distributions and charges	R0720	—	—	—	—	—
Other basic own fund items	R0730	1,424	—	—	—	—
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	5,250	—	—	—	—
Reconciliation reserve	R0760	670,934	—	—	—	—
Expected profits						
Expected profits included in future premiums (EPIFP) - Life business	R0770	—	—	—	—	—
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	195,682	—	—	—	—
Total Expected profits included in future premiums (EPIFP)	R0790	195,682	—	—	—	—

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S.25.01.21 Solvency Capital Requirement for undertakings on Standard Formula (USD'000s)

		Net solvency capital requirement	Gross solvency capital requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios
		C0110	C0040	C0050
Market risk	R0010	139,592	139,592	—
Counterparty default risk	R0020	107,544	107,544	—
Life underwriting risk	R0030	62,900	62,900	—
Health underwriting risk	R0040	8,300	8,300	—
Non-life underwriting risk	R0050	291,917	291,917	—
Diversification	R0060	(175,942)	(175,942)	—
Intangible asset risk	R0070	—	—	—
Basic solvency capital requirement	R0100	434,311	434,311	—

Calculation of Solvency Capital Requirement

Operational risk	R0130	57,585
Loss-absorbing capacity of technical provisions	R0140	—
Loss-absorbing capacity of deferred taxes	R0150	(10,778)
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	—
Solvency Capital Requirement excluding capital add-on	R0200	481,118
Capital add-on already set	R0210	—
of which, capital add-ons already set - Article 37 (1) Type a	R0211	—
of which, capital add-ons already set - Article 37 (1) Type b	R0212	—
of which, capital add-ons already set - Article 37 (1) Type c	R0213	—
of which, capital add-ons already set - Article 37 (1) Type d	R0214	—
Solvency capital requirement	R0220	481,118
Other information on SCR	AR0399	—
Capital requirement for duration-based equity risk sub-module	R0400	—
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	—
Total amount of Notional Solvency Capital Requirements for ring-fenced funds	R0420	—
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	—
Diversification effects due to RFF nSCR aggregation for article 304	R0440	—
Approach to tax rate		C0109
Approach based on average tax rate	R0590	Approach based on average tax rate

Calculation of loss absorbing capacity of deferred taxes		LAC DT
		C0130
LAC DT	R0640	—
LAC DT justified by reversion of deferred tax liabilities	R0650	—
LAC DT justified by reference to probable future taxable economic profit	R0660	—
LAC DT justified by carry back, current year	R0670	—
LAC DT justified by carry back, future years	R0680	—
Maximum LAC DT	R0690	—

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S.28.01.01 Minimum Capital Requirement - Only life or non-life insurance or reinsurance activity (USD'000s)

Linear formula component for non-life insurance and reinsurance obligations

		C0010	
	R0010	96,840	
MCR_{NL} Result			
		Net (of reinsurance/ SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	1,427	—
Income protection insurance and proportional reinsurance	R0030	1,232	6,693
Workers' compensation insurance and proportional reinsurance	R0040	—	—
Motor vehicle liability insurance and proportional reinsurance	R0050	28,480	7,245
Other motor insurance and proportional reinsurance	R0060	13,864	3,527
Marine, aviation and transport insurance and proportional reinsurance	R0070	265	760
Fire and other damage to property insurance and proportional reinsurance	R0080	39,279	35,722
General liability insurance and proportional reinsurance	R0090	42,993	11,114
Credit and suretyship insurance and proportional reinsurance	R0100	36,176	39,734
Legal expenses insurance and proportional reinsurance	R0110	—	—
Assistance and proportional reinsurance	R0120	429	105
Miscellaneous financial loss insurance and proportional reinsurance	R0130	—	—
Non-proportional health reinsurance	R0140	4,522	5,058
Non-proportional casualty reinsurance	R0150	256,338	60,554
Non-proportional marine, aviation and transport reinsurance	R0160	2,518	972
Non-proportional property reinsurance	R0170	42,976	4,384

AXIS Re SE
YEAR ENDED 31 DECEMBER 2024
APPENDIX II

Linear formula for life insurance and reinsurance obligations

		C0040	
MCR_L Result	R0200	97,485	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210	—	
Obligations with profit participation - future discretionary benefits	R0220	—	
Index-linked and unit-linked insurance obligations	R0230	—	
Other life (re)insurance and health (re)insurance obligations	R0240	4,642	
Total capital at risk for all life (re)insurance obligations	R0250		—
Overall MCR calculation			
		C0070	
Linear MCR	R0300	96,938	—
SCR	R0310	481,119	—
MCR cap	R0320	216,504	—
MCR floor	R0330	120,280	—
Combined MCR	R0340	120,280	—
Absolute floor of the MCR	R0350	4,036	—
		C0070	
Minimum Capital Requirement	R0400	120,280	—