

AXIS Capital Holdings Limited
Group Statement on Modern Slavery and Human Trafficking

This statement is made pursuant to Section 54, Part 6, of the UK Modern Slavery Act 2015 and has been approved by the Board of AXIS Capital Holdings Limited.

AXIS Capital Holdings Limited and its global subsidiaries as listed on Schedule 1 (hereinafter "AXIS Capital") are committed to respecting, protecting and advancing human rights. We have a zero-tolerance approach for any form of slavery, forced labour, or human trafficking (collectively referred to as "modern slavery") in our business and supply chains. This statement sets out the steps we have taken to mitigate modern slavery risks.

This statement applies to fiscal year 2026.

Our Organisation

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

AXIS Capital, through its operating subsidiaries, is a global specialty underwriter and provider of insurance and reinsurance solutions.

Our People

AXIS Capital is committed to maintaining a working environment in which the rights, freedom, and dignity of all our employees is respected. As well as appropriately remunerating and rewarding our employees, we strive to promote a collaborative and harmonious working culture. Our commitment to maintaining a positive work environment is supported by our sustainability initiatives which consider the impact of our business decisions on our employees, as well as on our external stakeholders, including third party vendors.

Our Supply Chains

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

Our Policies

AXIS Capital is committed to promoting an open and transparent culture; where employees never feel afraid of 'speaking up' and doing the right thing. This is supported by our Code of Business Conduct which sets forth the guiding principles for conducting our business with integrity and in compliance with all applicable laws and regulations to uphold the Company's commitment to best business practices. Our Whistleblower Policy sets out the procedures that enable employees to openly or confidentially express concerns about actual or potential violations relating to laws, regulations, and Company policies.

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

All business we conduct with third parties is subject to AXIS Capital's Procurement Policy and Outsourcing Policy. Additionally, AXIS Capital's vendors and service providers are required to comply with our Vendor Code of Conduct.

Training

Periodic training and/or annual certification of our Code of Business Conduct, Whistleblower Policy, other business ethics policies and our statement on modern slavery and human trafficking is required to be completed by all employees globally.

This statement is reviewed annually.

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

AXIS CAPITAL HOLDINGS LIMITED

By: 

W. Marston Becker, Director

Effective: January 1, 2026

Schedule 1
AXIS Capital Holdings Limited Subsidiaries

<u>Subsidiary</u>	<u>Jurisdiction of Incorporation</u>
AXIS Specialty Holdings Bermuda Limited	Bermuda
AXIS Specialty Limited	Bermuda
Axis Specialty Insurance Limited	Bermuda
AXIS Specialty Investments Limited	Bermuda
AXIS Specialty Investments II Limited	Bermuda
AXIS ILS Ltd.	Bermuda
AXIS Reinsurance Managers Limited	Bermuda
AXIS Re SE	Ireland
AXIS Specialty Europe SE	Ireland
AXIS Specialty Global Holdings Limited	Ireland
AXIS Specialty Holdings Ireland Limited	Ireland
AXIS Group Benefits LLC	Arizona
AXIS Specialty Insurance Company	Connecticut
AXIS Group Services, Inc.	Delaware
AXIS Specialty Finance LLC	Delaware
AXIS Specialty U.S. Holdings, Inc.	Delaware
AXIS Specialty U.S. Services, Inc.	Delaware
AXIS ILS, Inc.	Delaware
AXIS Insurance Company	Illinois
AXIS Surplus Insurance Company	Illinois
AXIS Reinsurance Company	New York

AXIS Managing Agency Ltd.	United Kingdom
AXIS Specialty Finance PLC	United Kingdom
AXIS Specialty UK Holdings Limited	United Kingdom
AXIS Corporate Capital UK Limited	United Kingdom
AXIS Corporate Capital UK II Limited	United Kingdom
Novae Group Limited	United Kingdom
AXIS UK Services Limited	United Kingdom
AXIS Underwriting Limited	United Kingdom
AXIS Re SE Escritório de Representação No Brasil Ltda.	Brazil
AXIS Specialty Canada Services, ULC	British Columbia