

AXIS Capital Holdings Limited Human Rights Policy

AXIS Capital Holdings Limited and its global subsidiaries (hereinafter, “AXIS” or the “Company”) are committed to respecting the rights of all individuals in our value chain, including women and minorities. This Human Rights Policy (this “Policy”) establishes standards for global business conduct related to human rights and labor for AXIS, its employees and AXIS suppliers.

In developing this Policy, AXIS has considered, among other things, the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights, the Ten Principles of the United Nations Global Compact and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

Human Rights Principles

We believe that treating everyone with dignity and fairness is essential to our role as a responsible, modern company. As part of our commitment to human rights, we adhere to the following principles and expect Company employees and suppliers to do so as well.

- **Fair Treatment.** We strive to comply with all relevant labor and employment laws and expect our employees and suppliers to do so as well. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Physical discipline or abuse, threat of physical discipline or abuse, or any form of harassment or verbal abuse, or other forms of intimidation, are prohibited.
- **Equal Opportunity and Diversity.** The Company is firmly committed to providing equal opportunity in all aspects of employment, and all employment practices are based on ability and performance. The Company prohibits discrimination against any employee, officer or director or any prospective employee, officer or director on the basis of sex, race, color, age, religion, sexual preference, marital status, national origin, disability, ancestry, political opinion or any basis prohibited by the laws that govern its operations.
- **Safe and Healthy Workplace.** We provide a safe and healthy workplace that complies with applicable safety and health laws, regulations and internal requirements, and expect our suppliers to do the same.
- **Forced Labor and Human Trafficking.** We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking. Company employees and suppliers must ensure that all work is voluntary, conducted only through freely agreed upon and documented employment

terms, and paid in accordance with all applicable laws and regulations. Company employees and suppliers may not engage in any form of trafficking in persons, procure commercial sex acts or use forced labor in the performance of contracts. Employees of AXIS must have the right to freely terminate employment in accordance with applicable laws and regulations without fear of physical, psychological, sexual or verbal abuse.

- **Child Labor.** AXIS prohibits the use of child labor in our business and supply chain. We require that all employees of AXIS and its suppliers be of the appropriate age as defined by applicable local and national laws.
- **Freedom of Association.** AXIS respects freedom of association and collective bargaining. Where employees wish to be represented by trade unions, AXIS will cooperate in good faith with the bodies that its employees collectively choose to represent them within the appropriate national legal frameworks.
- **Free, Prior and Informed Consent.** We expect insureds to respect and observe the right to Free, Prior and Informed Consent (“FPIC”) in accordance with the United Nations Declaration on the Rights of Indigenous Peoples, and it is our policy to not provide insurance coverage on projects undertaken on indigenous territories without FPIC.

Governance

This Policy has been reviewed by senior management and will be shared publicly on the Company’s website. The Human Capital and Compensation Committee of the Company’s Board of Directors will review the Policy annually in accordance with its oversight of the Company’s human capital management efforts.

Training and Certification

Each employee is required to annually self-certify to compliance with this Policy as part of our annual Business Ethics Certification Program. Employees periodically will receive training on this Policy.

Contact Information; Stakeholder Engagement

It is incumbent upon all of our employees to ensure that AXIS work environments are at all times respectful of human rights in accordance with this Policy. The Company has established procedures that govern the process through which employees and others may openly, confidentially or anonymously report an actual or potential violation of this Policy, our Code of Conduct, or any applicable law, rule or regulation. Any employee who is or becomes aware of any actual or potential violation of this Policy must promptly disclose to the General Counsel or through any other means set forth for reporting such matters in AXIS’ Whistleblower Policy, the facts and circumstances of such actual or potential violation. All information so disclosed will be

treated confidentially except to the extent necessary to investigate and/or sanction a violation of this Policy or any related law, rule or regulation. Because these reports are essential to the effective operation of the Company, retaliation against reporting individuals is prohibited.

AXIS will take into account stakeholder feedback in connection with the implementation of this Policy and the evaluation of the effectiveness of measures taken pursuant to this Policy.