

AXIS Capital Holdings Limited

Whistleblower Policy

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WHISTLEBLOWER POLICY

AXIS Capital Holdings Limited (the "Company") requires all employees, officers and directors to comply with applicable laws, rules, regulations, and Company policies. To provide procedures for reporting potential and actual violations relating to any law, rule, regulation, or Company policy, the Company's Audit Committee has established this Whistleblower Policy. This Whistleblower Policy:

- Governs the process through which employees, officers, directors and others may report potential violations or concerns relating to any law, rule, regulation, or Company policy, including any violations or concerns relating to accounting, internal accounting controls, or auditing matters.

- Establishes a mechanism for responding to any reports from employees, officers, directors, and others regarding such potential violations or concerns.

- Prohibits retaliation against employees raising such potential violations or concerns.

- Establishes procedures for the retention of records of reports.

The Audit Committee shall have overall responsibility for the implementation of this Whistleblower Policy.

How Do I Report a Violation, Concern or Retaliation?

If you know or believe that an unintentional or deliberate violation of applicable laws, rules, regulations or Company policy has occurred, the Company encourages you to immediately submit a report to the Chair of the Audit Committee or the General Counsel. The report should describe one or more of the following, as applicable:

- A violation or a failure to comply with law, rule, regulation, or Company policy, including any violations or failures relating to accounting, internal accounting controls or auditing matters.

- A concern that questionable accounting, internal accounting controls or auditing practices have taken place or are taking place.

- An allegation or concern that an employee, officer, or director who, in accordance with this Whistleblower Policy, reported an alleged violation or concern was retaliated against.

You may choose to submit a confidential report openly or anonymously. When reporting a violation or concern, please provide the time, location, and nature of the matter, the names of people involved and other details so it can be investigated. You have the option to submit a report to the Chair of the Audit Committee or the General Counsel, openly or anonymously, by any of the following means:

1. Writing to the Chair of the Audit Committee or the General Counsel at AXIS Capital Holdings Limited, P.O. Box HM 1254, Hamilton HMFX Bermuda.

2. Contacting the Chair of the Audit Committee or the General Counsel by (i) telephone via the Company's toll-free hotlines at (844) 948-0411 (within the U.S.) or (ii) by phone via the Click Connect feature available on axiscapital.ethicspoint.com, which connects directly with a NAVEX representative.

3. Contacting the General Counsel by (i) telephone at +1 212 835 3067 or (ii) e-mailing the General Counsel at christina.gray@axiscapital.com.

4. Using the Company's web-based reporting module at axiscapital.ethicspoint.com.

All addresses, phone numbers, e-mail addresses and other information necessary to submit a report by any of these means will be listed on the Company's website.

This Whistleblower Policy is intended to encourage and enable employees to raise good faith concerns about questionable or illicit conduct to the Chair of the Audit Committee or the General Counsel. However, nothing in this Whistleblower Policy (or any Company policy, confidentiality, non-disclosure agreement, or other employment-related arrangement) is intended to prevent an employee from reporting information to the appropriate governmental agency when the employee has reasonable cause to believe that a violation of law has occurred.

How Will A Report Be Handled?

Upon receiving a report, the Chair of the Audit Committee or the General Counsel will review the report to determine if it involves accounting, internal accounting controls, or auditing matters. Reports relating to such matters will be handled by the Chair of the Audit Committee and will be treated in accordance with the procedure set forth below. Reports that involve legal or regulatory matters, allegations of retaliation, or other matters will be handled by the General Counsel.

The Company will acknowledge receipt of any report if the identity of the reporter is known and will investigate all complaints and reports as thoroughly, promptly, and confidentially as is reasonably possible. The Company will undertake all

investigations with due regard to the privacy of all parties involved consistent with a thorough and appropriate investigation. Confidentiality will be maintained throughout the investigative process to the extent consistent with adequate investigation techniques, and the taking of appropriate, prompt, and effective remedial action. In order to show proper regard for the privacy rights of all involved, such incidents should not be discussed with anyone who is not in a position to investigate or take action with respect to the issues involved.

The Company expects each director, officer, and employee to make every reasonable effort to assist persons involved in reviewing and investigating any report, including making himself or herself available for interviewing, responding to requests for documentation, or other information, etc.

Reports Regarding Accounting Matters. The Chair of the Audit Committee will notify the Audit Committee in writing of all reports received involving accounting, internal accounting controls, or auditing matters. The Chair of the Audit Committee will also send to the Audit Committee an unedited, exact copy of each such report (or a transcript if submitted on the ethics hotline/Click Connect feature on the EthicsPoint reporting site). The Chair of the Audit Committee will undertake a preliminary investigation of the allegation.

As soon as practicable after receipt of such a report, the Chair of the Audit Committee will prepare and deliver to the Audit Committee a written report: (i) summarizing the allegations raised and the preliminary investigation of these allegations; and (ii) providing a recommendation as to what additional action, if any, should be taken. As soon as practicable after receiving the Chair of the Audit Committee's written report, the Audit Committee will convene a meeting to review and consider the report. Upon review and consideration of the report, the Audit Committee will consider what further action, if any, will be taken. The Audit Committee shall have the authority to engage outside auditors, counsel, or other experts to assist in the investigation and analysis of any report.

It is the responsibility of the Audit Committee to report to Company management and the General Counsel any noncompliance with laws, rules, regulations or Company policy, and to coordinate with the General Counsel to assure that Company management takes necessary corrective action including, where appropriate, reporting any violation to the relevant federal, state, or other law enforcement, governmental or regulatory authorities. It is also the responsibility of the Audit Committee to report the status of all outstanding reports to the full board of directors on a quarterly basis.

Reports Regarding Legal Matters, Retaliation or Other Matters. If the report involves potential violations of applicable laws, rules, regulation, or Company policy, retaliation against a reporting individual or other matters, the General Counsel will

determine what further action, if any, will be taken. The General Counsel shall have the authority to engage outside auditors, counsel, or other experts to assist in the investigation and analysis of any report.

Regular Presentation to the Audit Committee. At each regularly scheduled quarterly meeting of the Audit Committee, the Chair of the Audit Committee and the General Counsel will present a summary to the Audit Committee stating the nature of each report submitted during the quarter immediately preceding the Audit Committee meeting, what further actions, if any, were taken with respect to each report, and the status of any further action taken.

Conflicts of Interest. If at any time, the General Counsel has reason to believe that a report he or she receives or an investigation he or she has undertaken as a result of a report raises a potential or real conflict of interest, the General Counsel will immediately notify the Chair of the Audit Committee and cease his or her investigation. The Audit Committee will determine what further action, if any, will be taken as to the report, such as the hiring of outside counsel to conduct the review or investigation of the report. Any Audit Committee member having a conflict of interest as to a report must recuse himself or herself from consideration of the report. In the event that no members of the Audit Committee are available to consider the issue as a result of a conflict of interest, the Company's board of directors will consider the report or designate a committee to consider the report.

Retention of Reports and Documents. The General Counsel and the Audit Committee will retain for a minimum period of seven years all records relating to any report and to the investigation of any report.

Can I Be Retaliated Against for Reporting?

Retaliation against any individual who submits a report, provides information or otherwise participates in an investigation is strictly prohibited by Company policy and will not be tolerated.

Neither the Company, the General Counsel, the Audit Committee, nor any of the Company's employees, officers, directors, or agents will retaliate or tolerate any retaliation against any individual who, in good faith and in accordance with this Whistleblower Policy, makes a report or provides assistance to the General Counsel, the Audit Committee, or any other person or group, including any governmental, regulatory, or law enforcement body, investigating a report.

Furthermore, the General Counsel and the Audit Committee shall not, unless compelled by judicial or other legal process, reveal the identity of any employee, officer, or director who submits a report and who requests that his or her identity as the person who submitted the report remain confidential.

Effective: September 2026