



AXIS Capital Holdings Limited

Fair Disclosure Policy

AXIS CAPITAL HOLDINGS LIMITED FAIR DISCLOSURE POLICY

This Fair Disclosure Policy (this “Policy”) sets forth our commitment to fair disclosure of information about AXIS Capital Holdings Limited and its subsidiaries (collectively, “AXIS”) without advantage to any particular analyst or investor, consistent with Regulation FD-Fair Disclosure (“Regulation FD”) promulgated by the U.S. Securities and Exchange Commission (the “SEC”). We will continue to provide current and potential shareholders access to all material information concerning AXIS in accordance with all applicable securities laws. We will also provide investors access to management when practicable and consistent with Regulation FD. We believe it is in AXIS' best interest to maintain an active and open dialogue with current and potential shareholders regarding our historical performance and future prospects while complying fully with all applicable securities laws.

I. Compliance

We will comply with all reporting and disclosure requirements contained in all applicable securities laws, including Regulation FD and the rules and regulations of the New York Stock Exchange. It has been, and will continue to be, our practice to disclose material information about AXIS publicly and not selectively. AXIS expects the strictest compliance with this Policy by all directors, officers and employees.

II. Compliance Guidelines

AXIS has established the following guidelines to ensure compliance with Regulation FD and to avoid selective disclosure of material non-public information:

A. Disclosure

We will post this Policy on our website, as well as any changes to this Policy as they occur.

B. Authorized Officers of AXIS

1. Persons authorized to communicate on behalf of AXIS to analysts and securities market professionals and associates thereof, shareholders, and investment companies and affiliates thereof (the “Designated Persons”), are limited to the President and Chief Executive Officer, the Chairman of the Board of Directors, the Chief Financial Officer, the Group Controller, and the Corporate Development Officer (the “Authorized Officers”).

2. Other officers and employees of AXIS may communicate with Designated Persons only after an Authorized Officer has (i) authorized such officer or employee to

communicate with specified Designated Person(s), and (ii) reviewed and authorized the scope and content of such communication for disclosure to such Designated Person(s).

3. No officer or employee is authorized to communicate to any person information about AXIS that is material non-public information, except through disclosure made in a manner authorized by the General Counsel.

4. Officers and employees must refer all questions concerning communications with Designated Persons to the Corporate Development Officer.

C. Quarterly Earnings Release Conference Calls

1. We will issue quarterly earnings releases and furnish such documents to the SEC on a current report on Form 8-K. In connection with quarterly earnings releases, we will make financial supplements available on our website.

2. Shortly after the issuance of each quarterly earnings release we will hold a conference call open to the public and the media (in listen-only mode). Advance public notice about the call will be made through a media release, by electronic distribution, and posting on our website.

3. A playback of the conference call will be provided on our website for approximately one month after the conference call.

4. We realize how important it is for you to receive prompt replies from us. We will do our best to respond to inquiries as soon as we can. If questions are of interest to a wider audience, we may also post our answers on our website and/or furnish them to the SEC in a current report on Form 8-K. We do not intend to post on our website or furnish to the SEC all of the questions posed to us.

5. Any guidance relative to AXIS' financial goals, and changes to or affirmations of guidance, will be provided through public disclosure, such as media releases or conference calls open to the public.

6. We will continue to use the safe harbor guidelines for forward-looking information contained in the U.S. federal securities laws in conducting any communications with Designated Persons as part of individual, group and conference communications formats.

D. Analyst Reports and Models

We will not review or comment on analyst reports or models.

E. Quiet Period

Following the end of each quarter until the announcement of our financial results, we observe a “quiet period” during which we do not comment on AXIS' operations, financial

performance or financial outlook. We will notify the public of the timing of the quiet period by posting this information on our website.

F. Presentations

1. We will participate in certain securities firm-sponsored and other conferences.

2. Authorized Officers will meet with individual Designated Persons and groups of Designated Persons. Similarly, we will participate in other public meetings at which Designated Persons could be present, including industry seminars, trade shows and employee meetings.

3. We do not intend to disclose any material, non-public information during these conferences, meetings and presentations. However, if material, non-public information is disclosed, we will comply with Regulation FD.

III. Modifications and Amendments

AXIS reserves the right to modify and/or amend this Policy at any time.

May 2017