

AXIS CAPITAL HOLDINGS LTD  
Form IRANNOTICE  
October 27, 2016  
AXIS Capital

92 Pitts Bay Road  
Pembroke, HM 08  
P.O. Box HM 1254  
Hamilton HM FX, Bermuda

October 27, 2016

U.S. Securities and Exchange Commission  
100 F. Street, N.E.  
Washington, D.C. 20549

Re: Notice of disclosure filed in Quarterly Report under Section 219 of the Iran Threat Reduction and Syria Human Rights Act of 2012 and Section 13(r) of the Securities Exchange Act of 1934, as amended

Ladies and Gentlemen:

Pursuant to Section 219 of the Iran Threat Reduction and Syria Human Rights Act of 2012 and Section 13(r) of the Securities Exchange Act of 1934, as amended, notice is hereby provided that AXIS Capital Holdings Limited has made disclosure pursuant to such provisions in its Quarterly Report on Form 10-Q for the quarter ended September 30, 2016, which was filed with the Securities and Exchange Commission on October 27, 2016.

Respectfully submitted,  
AXIS Capital Holdings Limited

By: /s/ Richard T. Gieryn, Jr.  
Richard T. Gieryn, Jr.  
General Counsel