



POLICY & PROCEDURE MANUAL

TITLE: WHISTLE BLOWER POLICY		PREPARED BY: Nancy McKenzie
NO.	Page1 of 2	AUTHORIZED BY: Jonathan Whitworth
EFFECTIVE DATE: October 2005	REVISION DATE: February 1, 2011	

PURPOSE

This policy has been introduced to support employees raising matters of significance or concern in the way we conduct our business and/or to report any violations of company policies by individual employees or other representatives of Seaspan. Examples of the types of issues that could be reported under this policy may include:

- safety concerns;
- environmental issues;
- concerns about the management of Seaspan's people;
- the mishandling of equipment or other assets;
- financial matters or suspected fraud;
- violation of laws or regulations; or
- employee conduct in contravention to Seaspan's policies.

EMPLOYEE RIGHTS AND RESPONSIBILITIES

It is your right and responsibility to obtain guidance about a business practice and/or compliance issue when you are uncertain about what action you should take and to report instances of questionable behavior and/or possible violations of Seaspan's standards.

NO RETALIATION

No director, officer or employee who in good faith reports a violation of these standards or who participates in an investigation of a violation shall be subject to harassment, retaliation or adverse employment consequences. Any employee who retaliates against an individual who has reported a violation in good faith will be subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees to raise serious concerns within the Company rather than seeking resolution outside the Company.

ACTING IN GOOD FAITH

Anyone reporting a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed in their report. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

CONFIDENTIALITY

Violations or suspected violations may be submitted confidentially or anonymously. Information contained in the report will be kept confidential to the extent possible and subject to Seaspan's need to conduct an adequate investigation.



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REPORTING

How to report

Seaspan supports open communication and encourages employees to raise your questions, concerns, suggestions or complaints to your supervisor. However, if your are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with someone in the Human Resources department, or anyone in management that you are comfortable approaching, up to and including the CEO. Supervisors and Managers are obligated to investigate any suspected violations of Seaspan’s standards of conduct reported under this policy.

In the event that you are uncomfortable speaking with anyone in management and wish to make an anonymous report, Seaspan has engaged an independent company, Ethicspoint, to receive confidential reports by telephone or via the internet. You may make a report to the call centre, which is open 24 hours a day, 7 days a week, at 1-888-271-4587. Alternatively, you can make an on-line report at:
https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=22254

What to report

To assist in the response to or investigation of the alleged violation, your report should contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the alleged violation. Without limiting the foregoing, the report should, to the extent possible, contain the following information:

- The alleged event, matter or issue that is the subject of the alleged violation;
- The name of each person involved;
- If the alleged violation involves a specific event or events, the approximate date and location of each event; and
- Any additional information, documentation or other evidence available relating to the alleged violation.

POLICY CHANGE LOG AND AMENDMENT HISTORY

Date (YYYY/MM/DD)	No.	Person Responsible	Description/Notes
2005/10/05	1	N McKenzie	Initial Release
2008/09/30	2	N McKenzie	EthicsPoint service introduction
2011/01/19	3	K Francis	Logo, name, authorization & revision date