



Policy on Fair Disclosure to Investors

Policy Statement

Seaspan Corporation (the "Corporation") is committed to fair disclosure of information about the Corporation without advantage to any particular analyst or investor, consistent with the Securities and Exchange Commission's ("SEC") Fair Disclosure Regulation ("Regulation FD"). The Corporation will continue to provide current and potential shareholders access to key information reasonably required to make an informed decision on whether to invest in the Corporation's shares.

Our Regulation FD policy (i) prohibits the selective disclosure of material, non-public information about the Corporation, (ii) sets forth procedures that will prevent such disclosure, and (iii) provides for the broad, public distribution of material information regarding the Corporation.

Philosophy

The Corporation and its management believe it is in the Corporation's best interest to maintain an active and open dialogue with shareholders and potential investors regarding the Corporation's historical performance and future prospects. The Corporation can best create shareholder value by publicly articulating its strategies, business strengths, and growth opportunities through an active dialogue.

Compliance

The Corporation complies with all applicable periodic reporting and disclosure requirements outlined by the SEC, including Regulation FD. It has been, and will continue to be, our practice to disclose material information about the company publicly, not selectively.

Compliance Guidelines

The Corporation has established the following guidelines to ensure compliance with Regulation FD and avoid selective disclosure of nonpublic material information.

- I. Disclosure Policy The Corporation will communicate its anticipated approach to compliance with Regulation FD by posting its policy on its Web site. Any changes will be posted promptly.
- II. Authorized Representatives of Company
 - a. Only the CEO or CFO may communicate on behalf of the Corporation to analysts, securities market professionals, institutional investors, and major shareholders of the company (what we call "Regulation FD Persons").
 - b. Other officers [(including officers or directors of the Corporation's manager, Seaspan Management Services Limited and its wholly owned subsidiaries)] or members (the Corporation's term for employees) of the company may communicate with Regulation FD Persons as part of the Corporation's investor relations program. In such instances, either the CEO or the CFO must also be present. No employee is authorized to communicate business or financial information about the company to Regulation FD Persons that is nonpublic, material information.
 - c. Members should refer all questions about the Corporation's financial results or future financial performance to the CFO, or in his or her absence, to the CEO.
 - d. Senior managers may make appropriate announcements and conduct interviews about their business, technology and significant developments with the media. Media interviews are exempt from Regulation FD except in disclosing financial projections.

- e. The Corporate Secretary will maintain documentation of information provided to Regulation FD Persons.

III. Quarterly Earnings Release Conference Calls and Updates

- a. We will hold quarterly investor conference calls [and webcasts] open to the public and media (in listen-only mode) and provide public notice about the call through a media release by electronic distribution through CCN Matthews and posting on the Corporation's Web site. For quarterly conference calls, notice will be posted on our Web site approximately one week before the conference call.
- b. A playback of the conference call will be provided for approximately one week after the conference call. In addition, a playback of the webcast will be available for approximately one month at the Corporation's Web site www.seaspancorp.com.
- c. Any company guidance to Regulation FD Persons relative to the Corporation's financial goals will be provided through public disclosure, such as annual reports, media releases or conference calls open to the public.

IV. Questions to Investor Relations

Investor Relations, currently managed by the CFO, will take phone calls from Regulation FD persons with questions. In order to comply with Regulation FD, however, we have adopted rules about when and how we answer them.

- a. We may immediately respond to questions that relate to information which is solely historical and already public.
- b. During the two-week period following the Corporation's quarterly earnings release, we may also answer questions that relate to forward-looking information contained in our quarterly earnings release or disclosed by us during the earnings conference call.
- c. All other questions from Regulation FD Persons must be submitted in writing to Seaspan Investor Relations via e-mail [investorrelations@seaspancorp.com] or by letter. We will then determine whether to respond (i) directly to the person making the inquiry, (ii) through a public disclosure, or (iii) not at all.

This procedure may slow our response time. We realize, however, 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 the Investor Information section of our Web site. We do not intend to post on our Web site all of the questions posed to us.

V. Analyst Models and Reports

- a. We will provide public earnings guidance, as we recognize that such information is critically needed by the marketplace. The SEC, however, has prohibited giving non-public earnings guidance to Regulation FD Persons. We will not, therefore, provide Regulation FD Persons with non-public earnings guidance under any circumstances.
- b. While we may elect to review materials prepared by Regulation FD Persons, we will not comment (orally or in writing) upon any such material, except that we may correct inaccuracies relating to:
 - 1. Public, historical information, and
 - 2. In limited circumstances, forward-looking information relating to statements made by us in our quarterly earnings release or publicly disclosed by us during the quarterly earnings conference call.

VI. Quiet Period

The Corporation will observe a "quiet period," during which the Corporation will not comment on financial outlook for the Corporation. These periods will normally be for the last two weeks of each fiscal quarter and continue until earnings results are publicly released for that quarter.

VII. Presentations

- a. We will use the safe harbor guidelines for forward-looking information as part of individual, group, and conference investor communications formats.
- b. Visit the Investor Information section of our Web site (www.seaspancorp.com) to stay abreast of information about the Corporation. Items of interest to investors will be posted here. Information on conference call dates and times as well as instructions on how to access the call will also be listed. All interested persons may listen to the conference call through telephone or webcasting. Regulation FD Persons may also be permitted to participate in the conference via telephone.
- c. The Corporation will participate in securities firm-sponsored and other investor conferences. It will be our practice to post those presentations on our Web site, [www. .com.] If any inadvertent disclosures at these conferences of material, nonpublic information occurs, appropriate public disclosure will be made promptly.
- d. The CEO or CFO will meet with individual investors, and groups of investors. Similarly, we will participate in other public forums at which analysts or investors could be present, including industry seminars, trade shows, employee, retiree and annual shareholder meetings, and meetings with commercial partners that are shareholders. We do not intend to disclose any material, non-public information during these meetings. If the authorized representative determines that material, non-public information has been disclosed, appropriate public disclosure will be made promptly.

Further Information About Regulation FD

All inquiries regarding the provisions or procedures of this policy should be addressed to Seaspan Investor Relations via e-mail [ir@seaspancorp.com] or by letter.

January 22, 2010