



Procedure for Complaints Regarding Accounting Matters

The Audit Committee has adopted the following procedures for (i) the receipt, retention, and treatment of complaints received by Seaspan Corporation (the "Corporation") regarding accounting, internal accounting controls, auditing matters; and (ii) the confidential, anonymous submissions by employees of concerns regarding questionable accounting or auditing matters.

1. The Corporation will create and post on its website designated mail and e mail addresses for receiving complaints regarding accounting, internal accounting controls or auditing matters.
2. Copies of each complaint submitted shall be sent to a designated recipient, which may be a member of the Audit Committee, counsel to the Corporation, or other designated person, and who will be identified by the Corporation from time to time (the "Designated Recipient").

Compliance hotline: (604) 638-2624

Website compliance reporting address: ethics_hotline@seaspancorp.com

Postal compliance reporting address: George H. Juetten
Director
Seaspan Corporation
2600-200 Granville Street
Vancouver, BC V6C 1S4

3. Each complaint will be tracked and handled by the Designated Recipient at the direction of the Chairman of the Audit Committee, as appropriate.
4. The Audit Committee shall receive periodic updates on the status of each complaint.
5. The Audit Committee has the right to request alternative treatment for any complaint addressed to it. Such alternative treatment may include the retention of outside counsel or other advisors to participate in any part of the process of resolving the complaint.
6. No retaliation or other adverse action against an employee submitting a complaint in good faith under these procedures shall be allowed by the Corporation. The Audit Committee shall review these guidelines annually to evaluate whether any amendments are necessary to comply with applicable internal policies or any legal or regulatory requirements.

October 9, 2009