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| ENVIRONMENTAL POLICY | | |

Seaspan Ship Management Ltd. (SSML) is committed to pollution prevention, regulatory compliance and continual improvement in environmental performance. The company has implemented the Seaspan Management System (SMS) which incorporates the following environmental aims and objectives:

- 1) Continuous reduction of environmental risks.
- 2) Continuous improvement of processes to minimize environmental impact including reduction of waste at source.

SSML will achieve these aims and objectives through the following measures:

- 1) Establish a fleet wide culture of environmental compliance that extends to all shore and shipboard staff.
- 2) Develop an environmental compliance system that ensures compliance with applicable international environmental statutes, regulations, enforceable agreements, and requirements; minimizing risks to the environment from accidental waste oil stream releases and garbage, sewage, ballast water pollution and air pollution; and provides for continual improvement in environmental performance.
- 3) Implement procedures, install and maintain equipment to ensure environmental protection and minimize risks to the environment from unplanned release of pollutants.
- 4) Provide suitable and sufficient resource, training, instruction and information to all shipboard and shore-side personnel to secure personal contribution and commitment towards environmental compliance.
- 5) Implement mechanisms for detecting, reporting, correcting and preventing non-compliance.
- 6) Conduct shipboard and shore-side audits and inspections to determine the effectiveness and implementation of the Environmental Management System.
- 7) At Seaspan we shall never compromise on environmental compliance for commercial gain. Pollution control equipment, waste disposal protocols and records are maintained in strict compliance with marine environmental protection requirements. There is zero tolerance for violators

It is company policy that employees are not punished or otherwise suffer negative consequences solely for reporting violations of environmental laws, regulations, or policies.

The SSML Environmental Policy will be implemented throughout the organization and made available through the Company Website.



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