

**USERNAME**

sustainability@atlascorporation.com

1. Company particulars and overall approach**1.1 - PRIMARY COMPANY NAME**

Seaspan Corporation

1.3 - HEAD OFFICE LOCATION

Unit 2 - 16th Floor, W668 Building, Nos. 668 Castle Peak Road, Cheung Sha Wan, Kowloon. Hong Kong

1.4 - WEBSITE

[https://https://www.seaspancorp.com/](https://www.seaspancorp.com/)

1.5 - COMPANY LOGO

- [Seaspan-Logo-1280px.png](#)

1.6 - NUMBER OF SHIPS OPERATED

117

1.6.1 - NUMBER OF SHIPS OWNED

134

1.6.2 - TOTAL DWT OF SHIPS OWNED

13402333

1.6.3 - NUMBER OF SHIPS CHARTERED

134

1.6.4 - TOTAL DWT OF SHIPS CHARTERED

13402333

1.7 - SHIP TYPES COVERED, PLEASE SELECT ALL THAT APPLY:

- Container

1.8 - PLEASE PROVIDE A BRIEF INTRODUCTION TO YOUR COMPANY

Seaspan is the largest independent owner and operator of containerships in the world, with an industry-leading, fully integrated operating platform that delivers unique and differentiated value to its customers through a full life-cycle asset management approach. Seaspan is well-positioned for sustainable long-term growth due to its resilient business model, attractive fleet, high quality customer base and financial strength. We are a trusted partner to our customers, providing them with high-quality modern vessels, best-in-class operations, innovative ship design, and efficient performance. We are truly a global company, employing 4800+ people around the world.

As of March 31, 2022, Seaspan's operating fleet consisted of 132 vessels with a total capacity of 1,147,980 TEU, and an additional 67 vessels under construction, increasing total fleet capacity to 1,959,380 TEU, on a fully delivered basis. Seaspan's operating fleet has an average age of 8.2 years and an average remaining charter period of 4.6 years.

1.9 - WHAT IS YOUR OVERALL APPROACH / POSITIONING ON SHIP RECYCLING?

Seaspan has developed its Ship Recycling Policy, which prioritizes a responsible approach to the decommissioning

and recycling of our vessels. All Seaspan vessels maintain certification required by the Hong Kong Convention. Furthermore, the company's purchase process ensures that hazardous materials, noted in the governing legislation, are properly identified, declared and an accurate inventory of hazardous materials is maintained. Seaspan is committed to safe, sustainable, socially responsible recycling of ships and strives to ensure that recycling of any of its ships performed at shipyards does not present any unnecessary risk to human health and safety, and the environment.

2. Ship recycling policy and standards

2.1 - DOES THE COMPANY HAVE A WRITTEN POLICY ON SHIP RECYCLING FOR ITS OWNED VESSELS?

Yes

2.1.1 - IS IT PUBLICLY AVAILABLE?

Yes

2.1.2 - PLEASE PROVIDE A URL

<https://atlascorporation.com/wp-content/uploads/2020/12/Ship-Recycling-Policy-09.24.20.pdf>

2.1.3 - SINCE WHEN HAS THIS POLICY BEEN APPLIED?

2020

2.2 - DOES THE COMPANY KEEP RECORDS OF SHIPS WHICH HAVE BEEN SENT FOR RECYCLING?

Yes

2.2.1 - ARE THE RECORDS PUBLIC?

No

2.3 - WHAT INTERNATIONAL CONVENTIONS AND PRINCIPLES DOES THE POLICY ADHERE TO?

- [Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal \(1992\)](#)
- [EU Ship Recycling Regulation \(2013\)](#)
- [Hong Kong International Convention for the safe and environmentally sound recycling of ships \(2009\)](#)
- [UN Global Compact](#)
- [UN Guiding Principles on Business and Human Rights \(2011\)](#)

2.4 - DOES THE EU SHIP RECYCLING REGULATION APPLY TO THE COMPANY'S OWNED SHIPS?

Yes

2.4.1 - HOW MANY SHIPS DOES THE REGULATION APPLY TO?

25-50%

2.5 - WHICH TOPICS DOES THE POLICY ADDRESS?

- Environment
- Health and safety
- Labour and human rights
- Anti-corruption
- Sub-contractors
- Downstream facilities for managing waste and hazardous materials

2.6 - DOES THE POLICY CONTAIN RESTRICTIONS BASED ON GEOGRAPHY AND/OR RECYCLING METHODS?

No

2.7 - DOES THE COMPANY HAVE A WRITTEN POLICY FOR SELECTING A YARD OR BUYER FOR RECYCLING?

Yes

2.7.1 - PLEASE PROVIDE FURTHER DETAILS INCLUDING A URL IF THE POLICY IS PUBLIC

<https://atlascorporation.com/wp-content/uploads/2020/12/Ship-Recycling-Policy-09.24.20.pdf>

2.8 - DOES THE COMPANY MAKE SHIP RECYCLING PART OF THE COMPANY'S SUSTAINABILITY GOALS?

No

2.9 - DOES THE COMPANY INCLUDE SHIP RECYCLING INFORMATION IN ITS SUSTAINABILITY REPORTING?

Yes

2.9.1 - IS THIS INFORMATION VERIFIED BY A THIRD PARTY?

No

2.9.2 - PLEASE PROVIDE FURTHER DETAILS INCLUDING A URL TO THE LATEST SUSTAINABILITY REPORT

<https://atlascorporation.com/wp-content/uploads/2021/08/2020-Atlas-Corp-Sustainability-Report.pdf>

2.10 - DOES THE COMPANY HAVE A SHIP RECYCLING STANDARD* (OR SIMILARLY NAMED) IN FORCE?

No

3. Policy for selling owned vessels for further trading

3.1 - DOES THE COMPANY HAVE A POLICY TO PROMOTE RESPONSIBLE RECYCLING OF OWNED VESSELS SOLD FOR FURTHER TRADING?

Yes

3.1.1 - PLEASE PROVIDE FURTHER DETAILS

- i. Not recycle the vessel within 24 months of purchase
- ii. Comply with requirements of the Basel Convention, Hong Kong Convention, as well as all EU and other applicable regulations, whether international, national and/or local, if the Buyer recycles the vessel at any time in the future.

3.2 - DOES THE COMPANY IMPOSE LEGALLY BINDING COVENANTS OR OFFER COMMERCIAL INCENTIVES TO THE BUYER TO ENCOURAGE RESPONSIBLE SHIP RECYCLING?

Yes

3.2.1 - PLEASE PROVIDE FURTHER DETAILS

See answer 3.1.1

3.3 - DOES THE COMPANY TAKE STEPS TO PROMOTE RESPONSIBLE RECYCLING OF VESSELS CHARTERED FOR 5 YEARS AND OVER, RELEASED FOR REDEPLOYMENT OR RECYCLING?

Never

3.4 - DOES THE COMPANY TAKE STEPS TO PROMOTE RESPONSIBLE RECYCLING OF VESSELS CHARTERED FOR 2 YEARS AND OVER RELEASED FOR REDEPLOYMENT OR RECYCLING?

Never

3.5 - DOES THE COMPANY TAKE STEPS TO PROMOTE RESPONSIBLE RECYCLING OF VESSELS OWNED THROUGH JVS?

Never

4. Ship recycling contract

4.1 - DOES THE COMPANY FOLLOW A STANDARD CONTRACT FOR THE SALE OF VESSELS FOR GREEN RECYCLING (E.G. RECYCLECON FROM BIMCO)?

Always

4.1.1 - IF AN INDUSTRY STANDARD CONTRACT TEMPLATE USED, PLEASE SPECIFY

The company will use standard form (RECYCLECON from BIMCO) with logical amendments in synch with the company's Recycling Policy.

4.2 - DOES THE CONTRACT INCLUDE AN EXPLICIT REQUIREMENT TO RECYCLE THE VESSEL AT A SPECIFIC SHIP RECYCLING FACILITY?

Always

4.2.1 - PLEASE PROVIDE FURTHER DETAILS

No recent precedent. The contract will include requirements per our Recycling Policy

4.3 - DOES THE COMPANY REQUIRE ACCESS TO THE SHIP RECYCLING FACILITY DURING THE RECYCLING PROCESS FOR ANY OF THE FOLLOWING? PLEASE SELECT ANY/ALL THAT MAY APPLY

- Monitoring
- Control
- Stop-work
- Performance follow-up

4.4 - DOES THE CONTRACT REQUIRE COMPLIANCE WITH THE COMPANY'S WRITTEN POLICY ON SHIP RECYCLING?

Yes

4.5 - WHAT PROTECTION IS IN PLACE FOR THE SELLER TO ENSURE THAT MILESTONES CAN BE SET, THAT ACCESS TO THE SHIP AND MONITORING CAN BE MAINTAINED THROUGHOUT THE SHIP RECYCLING PROCESS?

The Ship Recycling contract will include the requirements for access to the ship and monitoring , throughout the ship recycling process

5. Inventory of Hazardous Materials (IHM) and Ship Recycling Documentation

5.1 - DOES THE COMPANY HAVE A SHIP RECYCLING PLAN FOR EACH VESSEL?

Yes

5.2 - DOES THE COMPANY PROVIDE THE BUYER OR SHIP RECYCLER WITH A CLASS APPROVED IHM, AT THE TIME OF FINALISING THE SHIP RECYCLING CONTRACT?

Always

5.3 - DOES THE COMPANY PROVIDE ALL RELEVANT SHIP CERTIFICATES, PLANS, PROCEDURES AND DOCUMENTS, TO ENABLE THE YARDS TO FOLLOW APPLICABLE SHIP RECYCLING GUIDELINES (AND THE RELEVANT STANDARDS FROM QUESTION 2.2. THAT THE COMPANY IS ALIGNED TO)?

Always

5.4 - DOES THE COMPANY HAVE SPECIFIC REQUIREMENTS FOR HANDLING HAZARDOUS MATERIALS AS LISTED IN THE STOCKHOLM CONVENTION?

No

5.5 - IF OWNING OR OPERATING TANKERS, DOES THE COMPANY HAVE SPECIFIC REQUIREMENTS TO ENSURE THAT TANKERS ARRIVE AT THE SHIP RECYCLING FACILITY IN A CONDITION READY FOR CERTIFICATION AS SAFE-FOR-ENTRY OR SAFE-FOR-HOT-WORK?

No

6. Implementation of the ship recycling policy and standard

6.1 - DOES THE COMPANY REQUIRE THE SHIP RECYCLING FACILITY TO HAVE A HONG KONG CONVENTION STATEMENT OF COMPLIANCE ISSUED BY A CLASSIFICATION SOCIETY?

Always

6.1.1 - PLEASE PROVIDE FURTHER DETAILS

Company policy requires the nomination of recycling yards which are HK Convention compliant.

6.2 - DOES THE COMPANY CARRY OUT ADDITIONAL AUDITS TO VERIFY COMPLIANCE PRIOR TO RECYCLING?

Always

6.2.1 - PLEASE PROVIDE FURTHER DETAILS

Seaspan undertakes to inspect selected recycling yards, either independently or with an industry body.

6.3 - DOES THE COMPANY MONITOR YARD COMPLIANCE DURING THE RECYCLING PROCESS?

Always

**6.3.1 - PLEASE DESCRIBE HOW THE MONITORING TAKES PLACE (PLEASE SELECT ANY/ALL THAT MAY APPLY).
THROUGH:**

- Spot checks
- Company representative on-site

6.3.2 - PLEASE DESCRIBE WHAT TOPICS THE MONITORING ADDRESSES (PLEASE SELECT ANY/ALL THAT MAY APPLY)

- Environment
- Health and Safety
- Labour and Human Rights
- Anti-corruption
- Sub-contractors
- Downstream facilities for managing waste and hazardous materials

6.4 - DOES THE COMPANY HAVE THE CONTRACTUAL RIGHT TO STOP WORK AT THE FACILITY, IN CASE OF UNSAFE OPERATIONS OR OTHER NON-COMPLIANCES?

Always

6.5 - DOES THE COMPANY REQUIRE FACILITIES TO PROVIDE A PROCESS WHEREBY YARD WORKERS CAN VOICE AND RESOLVE CONCERNS AND GRIEVANCES REGARDING ALL WORKPLACE ISSUES WITHOUT FEAR OF RETRIBUTION?

Always

6.5.1 - PLEASE PROVIDE FURTHER DETAILS

Seaspan conducts operations in line with its “Code of Business Conduct and Ethics” and as such selects SRF which demonstrate acceptable environmental and labour practices confirming the Modern Slavery Act.

6.6 - DOES THE COMPANY REQUIRE FACILITIES TO ENABLE YARD WORKERS TO ASSOCIATE AND BARGAIN COLLECTIVELY?

Never