



THE SUPPLIER CODE OF CONDUCT

Supply Chain Management
2025

Effective Date: 16 April 2025

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Purpose

Seaspan ULC (*referred to as “Seaspan” in this Supplier Code of Conduct, and includes all entities under Seaspan ULC*) is a leader in shipbuilding, repair, refit and marine transportation. Seaspan Shipyards and Seaspan Marine Group play a crucial role in revitalizing Canada's marine industry while nurturing talent and expertise for future generations of shipbuilders, designers, engineers, and mariners.

This Supplier Code of Conduct (the “Code”) applies to Suppliers. In this Code, “*Supplier*” refers to any provider of goods and/or services directly to Seaspan and its sub-Suppliers. Suppliers must comply with the requirements in the Code and with any local or international laws in the countries they operate in. When local or international law addresses similar issues, the higher standard will be applied. Suppliers must maintain documentation to demonstrate their compliance with this Code, applicable laws and the terms of their contracts with Seaspan. Suppliers must provide evidence of compliance when requested. Seaspan may verify compliance through site visits and inspections conducted by Seaspan personnel or designated representatives.

Seaspan expects Suppliers to share this Code with its sub-Suppliers.

Health and Safety

At Seaspan, safety is at the heart of everything we do, we are dedicated to a healthy and injury-free workplace. Suppliers must align with this commitment by ensuring a risk-free, clean, and compliant work environment, adhering to all health and safety regulations, and proactively managing risks. This involves implementing safety procedures, performing maintenance, providing training, and maintaining robust safety management systems.

Suppliers based in British Columbia, Canada, working on Seaspan sites or vessels must have active WorkSafe coverage that is in good standing. For Suppliers based outside of British Columbia, WorkSafe coverage is required if work on Seaspan sites exceed fourteen days in a calendar year.

Quality Management

A key aspect of Seaspan’s commitment to its customers is quality. We are dedicated to upholding the highest standards in the industry and expect our Suppliers to reflect this commitment. Suppliers must ensure that all products and services meet Seaspan’s quality standards, contributing to the excellence and reliability of our goods and services. Suppliers must be ready to provide details about their Quality Management System at the request of Seaspan’s Supply Chain Management or Quality Management team.

Environmental

Seaspan is steadfast in its commitment to responsible environmental practices, sustainable operations, and the continuous enhancement of our environmental performance and impact. Our Suppliers play a vital role in achieving these objectives by adhering to applicable environmental laws and regulations. Suppliers must actively minimize their environmental footprint while being responsible stewards of our shared habitat.

Modern Slavery

Modern slavery refers to forms of contemporary slavery such as forced or compulsory labour, child labour, human trafficking or any other internationally recognized exploitative labour practices.

Suppliers must ensure that all labour is freely chosen and must not use any form of forced labour. Workers should feel safe and respected, with the freedom to move without restrictions, ensuring they can leave their employment by their own choice.

Suppliers must not employ underage individuals in their respective country, either directly or through subcontractors.

Suppliers must not participate in any human trafficking or any form of slavery, including bonded or indentured labor. This means ensuring that all recruitment and employment practices are fair and voluntary without any form of coercion or deceit. Employment terms should be communicated clearly and in a language that workers understand, ensuring they are fully aware of their rights and conditions.

Employment Conditions and Compensation

Suppliers must adhere to all wage laws that relate to minimum wages, overtime hours, rest periods and legally mandated benefits. Wages must be paid promptly to employees. Suppliers must provide all workers with a written employment documentation that clearly outlines the terms, conditions, rights, and responsibilities in a language understood by the employee. Workers should not incur recruitment fees or be penalized for refusing overtime.

Freedom of Association and Collective Bargaining

We require our Suppliers to respect and uphold the rights of workers to freely form and join labour unions, seek representation, join workers' councils, and to bargain collectively in accordance with local laws.

Respect, Equity and Inclusion

Seaspan values diversity and is dedicated to creating a respectful and inclusive culture that reflects Canada's diversity. We are committed to employment equity and the removal of barriers for women, Indigenous peoples, visible minorities, and individuals with disabilities.

Suppliers must ensure that their hiring and employment practices, including promotions, rewards, and training, are free from discrimination based on race, place of origin, colour, ethnic origin, creed/religion, sexual orientation, gender identity, age, disability, or any protected factor.

Suppliers and their sub-suppliers are expected to cultivate a positive work environment built on dignity and respect and free from any forms of physical, sexual, verbal harassment, violence, bullying, teasing or other aggressive behaviour.

Support for Indigenous Peoples

Seaspan recognizes the deep-rooted history and enduring connection of Indigenous Peoples with the land and water where we operate in Canada. We are committed to fostering and strengthening relationships with the Indigenous communities.

Suppliers are encouraged to engage and establish respectful and constructive consultations with local Indigenous communities about mutually beneficial projects and economic activities.

Ethical Business Dealings

Suppliers must avoid offering or accepting any payments, gifts, or other valuables that could influence business decisions or provide an unfair advantage. Bribery, corruption, kickbacks, and extortion are strictly banned. Additionally, Suppliers are prohibited from making payments to expedite routine actions.

Suppliers should not be involved, directly or indirectly, in accepting, hiding, converting, or transferring funds acquired through criminal activities. Money laundering, embezzlement, terrorist financing, assisting with tax evasion, fraud, and falsification are all strictly prohibited. When dealing with public officials, Suppliers should be especially cautious to avoid anything that could be seen as a bribe or create a perception of unethical behavior.

Conflict of Interest

A conflict of interest occurs when personal interests (financial, relationships, etc...) conflict or can be reasonably perceived to conflict with the interests of Seaspan. Suppliers must avoid conflicts of interest in the performance of their contracts with Seaspan. Suppliers that are aware of any matter that causes or may cause any conflict must immediately disclose it to Seaspan's contracting authority in writing. Examples of conflict of interests include, but are not limited to, a Supplier that is owned by a Seaspan employee, a Supplier that has a personal relationship with an employee at Seaspan, or any direct or indirect financial interests in the Supplier.

Confidentiality

Suppliers must keep all Seaspan's confidential information private as per its contractual obligations to Seaspan. This includes a broad range of sensitive data, such as research, development, trade secrets, business plans, customer and vendor information, and any third-party proprietary information disclosed during their business relationship.

Grievance Mechanisms

Seaspan is committed to ensuring all individuals affected by our operations, including employees and contractors, have access to a clear and accessible grievance mechanism. Suppliers should establish a process where employees can raise concerns or report violations to issues related to the Code, labour practices, human rights, or workplace safety. Additionally, Suppliers should ensure confidentiality for whistleblowers and prohibit retaliation.

Monitoring and Reporting of Violation

Seaspan reserves the right to monitor a Supplier's compliance to the Code and audit its control processes. Seaspan may also request information from the Supplier to confirm its adherence to the Code. If a Supplier is unable, unwilling, or non-compliant with the Code, Seaspan reserves the right to pursue appropriate actions including but not limited to seeking more information, to requiring a corrective action plan from the Supplier, to terminating the Supplier's contract with Seaspan.