

AMENDED

Form **8937**

(December 2011)
Department of the Treasury
Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-2224

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name SEASPAN CORPORATION		2 Issuer's employer identification number (EIN) 98-0464510	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact Unit 2 – 2nd Floor, Bupa Centre, 141 Connaught Road West		7 City, town, or post office, state, and Zip code of contact Hong Kong	
8 Date of action April 30, 2019		9 Classification and description Series I Preferred Shares	
10 CUSIP number Y75638141	11 Serial number(s)	12 Ticker symbol SSW PRI	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ During the year to date ended April 30, 2019, Seaspn Corporation declared the following cash distributions per share to the Series I preferred shareholders of record as of the dates specified below:

\$0.500000 per share held as of January 29, 2019

\$0.500000 per share held as of April 29, 2019

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ Dividends paid in excess of the current and accumulated earnings and profits of a corporation reduce the basis of the shares of the corporation pursuant to Internal Revenue Code 301(c)(2) and 316(a).

The cash distributions declared and paid to date are less than the current and accumulated earnings and profits of Seaspn Corporation. The full amount of the distributions per share were paid out of current and accumulated earnings and profits and are allocated in order of the cash distributions. The basis of each share held as of the date of record will not be affected.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ Based on Seaspn Corporation's current and accumulated earnings and profits, the full amount of the distributions per share were paid out of current and accumulated earnings and profits and are allocated in order of the cash distributions. The basis of each share held as of the date of record will not be affected.

