



AIRASIA X (“AIRASIA X”) CODE OF BUSINESS CONDUCT

1. Objectives

The objective of AAX is to engage efficiently, responsibly and profitably in the commercial aviation business. AAX seek a high standard of performance and aim to maintain a long-term position in its respective competitive environments.

2. Responsibilities

AAX recognizes five areas of responsibility:

To shareholders

To protect shareholders' investment, and provide an acceptable return.

To guests

To win and maintain guests by developing and providing services which offer value in terms of price, quality and safety, which are supported by the operations and commercial expertise.

To employees

To respect the human rights of the employees, to provide the employees with good and safe conditions of work, and good and competitive terms and conditions of service, to promote the development and best use of human talent and equal opportunity employment, and to encourage the involvement of employees in the planning and direction of their work, and in the application of these principles within AAX. It is recognized that commercial success depends on the full commitment of all employees.

To those with whom it does business

To seek mutually beneficial relationships with vendors, suppliers and in joint ventures and to promote the application of these principles in so doing. The ability to promote these principles effectively will be an important factor in the decision to enter into or remain in such relationships.

To society

To conduct business as responsible corporate members of society, to observe the laws of the countries in which AAX operates, to express support for fundamental human rights in line with the legitimate role of business.

These five areas of responsibility are seen as inseparable. Therefore it is the duty of management continuously to assess the priorities and discharge its responsibilities as best it can on the basis of that assessment.

3. Economic Principles

Profitability is essential to discharging these responsibilities and staying in business. It is a measure both of efficiency and of the value that guests place on AAX services. It is essential for AAX to maintain low operational unit cost without compromising Flight Safety Standards to be able to consistently provide low cost fares to guests.. Without profits and a strong financial foundation it would not be possible to fulfill the responsibilities outlined above.

4. Business Integrity

AAX insists on honesty, integrity and fairness in all aspects of its business and expect the same in its relationships with all those with whom it does business. The direct or indirect offer, payment, soliciting and acceptance of bribes in any form are unacceptable practices. Employees must avoid conflicts of interest between their private financial activities and their part in the conduct of company business. All business transactions on behalf of AAX must be reflected accurately and fairly in the accounts of the company in accordance with established procedures and be subject to audit.

5. Political Activities

AAX act in a socially responsible manner within the laws of the countries in which it operates in pursuit of its legitimate commercial objectives. AAX do not make payments to political parties, organizations or its representatives or take any part in party politics. However, when dealing with governments, AAX have the right and the responsibility to make its position known on any matter which affects themselves, its employees, its guests, or its shareholders. AAX also have the right to make its position known on matters affecting the community, where it have a contribution to make.

6. Health, Safety and the Environment

Consistent with AAX's commitment to maintain low operational cost, AAX will ensure that in doing so, it will not compromise Flight Safety Standards.

To this end AAX manage these matters as any other critical business activity, set targets for improvement, and measure, appraise and report performance.

7. The Community

The most important contribution that companies can make to the social and material progress of the countries in which they operate is in performing their basic activities as effectively as possible. In addition, AAX takes a constructive interest in societal matters which may not be directly related to the business. Opportunities for involvement - for example through community, educational or donations programmes - will vary depending upon the size of the company concerned, the nature of the local society, and the scope for useful private initiatives.

8. Competition

AAX support free enterprise. It seeks to compete fairly and ethically and within the framework of applicable competition laws; AAX will not prevent others from competing freely with it.

9. Communication

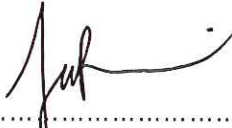
AAX recognize that in view of the importance of the activities in which they are engaged and the impact on national economies and individuals, open communication is essential. To this end, AAX has comprehensive corporate information programmes and provides full relevant information about its activities to legitimately interested parties, subject to any overriding considerations of business confidentiality and cost.

10. Personal Data Protection

AAX recognizes the importance of personal data protection. AAX undertakes that the personal information provided by its guests through AirAsia's website will only be used to purposes for which the personal information was originally requested and for directly related purposes unless AAX is required or authorized under law to disclose such personal information or written consent allowing disclosure of such personal information is given by our guests.

AAX also undertakes to not sell the name and/ or personal data of our guests to third parties.

Chief Executive Officer,



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AZRAN OSMAN-RANI