

February 2, 2021

Richard Byworth
Chief Executive Officer
Diginex Ltd
35/F Two International Finance Centre
8 Finance Street, Central
Hong Kong

Re: Diginex Ltd
Registration

Statement on Form F-1
2021

Filed January 29,

File No. 333-252530

Dear Mr. Byworth:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Taylor

Beech at 202-551-4515 with any questions.

Sincerely,

Division of Corporation Finance

Office of Trade & Services

cc:

David A. Sakowitz, Esq.