September 6, 2022 Youssef Salem Chief Financial Officer Swvl Holdings Corp The Offices 4, One Central Dubai World Trade Center Dubai, United Arab Emirates Re: Swvl Holdings Corp Registration Statement on Form F-1 Filed on August 29, 2022 File No. 333-267144 Dear Mr. Salem: 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 Janice Adeloye at 202-551-3034 or Taylor Beech at 202-551-4515 with any questions.

Division of Corporation Finance

Sincerely,

Office of Trade & Services