



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

May 6, 2025

Wai Yiu Yau  
Chairman of the Board and Chief Executive Officer  
Globavend Holdings Limited  
Office 1401, Level 14, 197 St Georges Tce  
Perth, WA 6000  
Australia

**Re: Globavend Holdings Limited**  
**Draft Registration Statement on Form F-1**  
**Submitted April 15, 2025**  
**CIK 0001978527**

Dear Wai Yiu Yau:

We have reviewed your draft registration statement and have the following comment(s).

Please respond to this letter by providing the requested information and either submitting an amended draft registration statement or publicly filing your registration statement on EDGAR. If you do not believe a comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing the information you provide in response to this letter and your amended draft registration statement or filed registration statement, we may have additional comments.

Draft Registration Statement on Form F-1 submitted April 15, 2025

Risk Factors

We have received a deficiency letter from Nasdaq relating to our non-compliance with Nasdaq's continued listing requirements, page 15

1. Please revise your risk factor disclosure here and elsewhere as appropriate to disclose that this offering could cause the price of your Ordinary Shares to fall below the minimum bid price, which could result in your Ordinary Shares being delisted from Nasdaq.

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Please contact Irene Barberena-Meissner at 202-551-6548 or Daniel Morris at 202-551-3314 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Energy & Transportation

cc: Aaron M. Schleicher, Esq.