



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

DIVISION OF
CORPORATION FINANCE

July 13, 2023

David Humphreys
Chief Financial Officer
Babylon Holdings Ltd
2500 Bee Cave Road
Building 1 - Suite 400
Austin, TX 78746

Re: Babylon Holdings Ltd
Form 8-K filed June 23, 2023
Response dated July 6, 2023
File No. 001-40952

Dear David Humphreys:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance
Office of Industrial Applications and
Services

cc: Ryan Maierson, Esq.