

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

September 12, 2023

Xavier Zee Chief Financial Officer AMTD Digital Inc. 27-29 rue de Bassano 75008 Paris

Re: AMTD Digital Inc.

Form 20-F for the Fiscal Year Ended April 30, 2023

File No. 001-40463

Dear Xavier Zee:

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 Disclosure Review Program

cc: Shu Du