



DIVISION OF  
CORPORATION FINANCE

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

December 18, 2024

Jing (Phil) Zhou  
Chief Financial Officer  
ECARX Holdings Inc.  
5/F Building 1, Zhongteng Building  
2121 Longteng Avenue  
Zuhui District, Shanghai 200232  
People's Republic of China

**Re: ECARX Holdings Inc.**  
**Form 20-F for the Year Ended December 31, 2023**  
**Response dated November 14, 2024**

Dear Jing (Phil) Zhou:

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 Technology