



DIVISION OF  
CORPORATION FINANCE

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

September 10, 2024

Raymond Wai Man Cheung  
Chief Executive Officer  
Basel Medical Group Ltd  
6 Napier Road  
Unit #02-10/11 Gleneagles Medical Centre  
Singapore 258499

**Re: Basel Medical Group Ltd  
Amendment No. 4 to  
Draft Registration Statement on Form F-1  
Submitted August 29, 2024  
CIK No. 0002004489**

Dear Raymond Wai Man Cheung:

We have reviewed your amended draft registration statement and have the following comment.

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. Unless we note otherwise, any references to prior comments are to comments in our July 15, 2024 letter.

Amendment No. 4 to Draft Registration Statement on Form F-1 submitted August 29, 2024  
Related Party Transactions, page 84

1. As it relates to the August 23, 2024 deed of undertaking, please disclose (i) the date on which Rainforest Capital VCC made its payment to Basel Medical in satisfaction of amounts owed by Singmed Investment Pte Ltd and Dr. Yip to Basel Medical and (ii) the actual payment amount. In addition, for the periods presented through the date of payment by Rainforest Capital VCC, please disclose a rollforward of the amounts due to and from Singmed Investment Pte Ltd, Dr. Yip and Basel Medical.

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Please contact Nudrat Salik at 202-551-3692 or Michael Fay at 202-551-3812 if you have questions regarding comments on the financial statements and related matters. Please contact Robert Augustin at 202-551-8483 or Jane Park at 202-551-7439 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Industrial Applications and  
Services

cc: Benjamin Tan, Esq.