

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

DIVISION OF CORPORATION FINANCE

December 20, 2024

David Quek Yong Qi Chief Executive Officer Cuprina Holdings (Cayman) Limited Blk 1090 Lower Delta Road #06-08 Singapore 169201

Re: Cuprina Holdings (Cayman) Limited Registration Statement on Form F-1 Filed December 6, 2024 File No. 333-283643

Dear David Quek Yong Qi:

We have reviewed your registration statement and have the following comments.

Please respond to this letter by amending your registration statement and providing the requested information. 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 any amendment to your registration statement and the information you provide in response to this letter, we may have additional comments.

Registration Statement on Form F-1

Capitalization, page 52

1. Please revise to include the company's indebtedness as part of your Capitalization table consistent with Item 3B of Form 20-F.

Exhibits

2. The consent of your independent registered public accounting firm included as Exhibit 23.1 refers to Amendment No. 10. Please update accordingly.

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.

Refer to Rules 460 and 461 regarding requests for acceleration. Please allow adequate

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time for us to review any amendment prior to the requested effective date of the registration statement.

Please contact Christine Torney at 202-551-3652 or Angela Connell at 202-551-3426 if you have questions regarding comments on the financial statements and related matters. Please contact Doris Stacey Gama at 202-551-3188 or Alan Campbell at 202-551-4224 with any other questions.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: Lawrence Venick, Esq.