



DIVISION OF  
CORPORATION FINANCE

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

July 29, 2025

Darren Hoo  
Principal Executive Officer  
Megan Holdings Limited  
B-01-07, Gateway Corporate Suites  
Gateway Kiaramas  
No.1, Jalan Desa Kiara  
50480 Mont Kiara  
Kuala Lumpur, Malaysia

**Re: Megan Holdings Limited  
Amendment No. 10 to Registration Statement on Form F-1  
Filed July 17, 2025  
File No. 333-281357**

Dear Darren Hoo:

We have reviewed your amended 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.

Amendment No. 10 to Registration Statement on Form F-1

Management's Discussion and Analysis of Financial Condition and Results of Operations  
Segment reporting, page 46

1. Please update your disclosure here that refers to only one operating segment, as Note 16 of the audited financial statements sets forth that you have two operating segments.

Consolidated Financial Statements  
Note 16 - Segment reporting, page F-31

2. Please provide the following segment disclosures as required by ASC 280 upon the adoption of ASU No. 2023-07:

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- Significant segment expenses that are regularly provided to the CODM and included within a reported measure of segment profit or loss as required by ASC 280-10-50-26A;
- An amount for "other segment items" by reportable segment (calculated as the difference between (a) "segment revenue" less each "significant segment expense" category above and (b) each reported measure of segment profit or loss), including a description of the composition of "other segment items" as required by ASC 280-10-50-26B; and
- The title and position of the CODM, required by ASC 280-10-50-21(c), and an explanation of how the CODM uses the reported measure(s) of segment profit or loss in assessing performance and allocating resources, required by ASC 280-10-50-29(f).

Please contact Kristin Lochhead at 202-551-3664 or Michael Fay at 202-551-3812 if you have questions regarding comments on the financial statements and related matters. Please contact Juan Grana at 202-551-6034 or Katherine Bagley at 202-551-2545 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Industrial Applications and  
Services

cc: Yarona L. Yieh, Esq.