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

Office of Technology

Finance