

October 17, 2023

Andy Yeung
Chief Financial Officer
Yum China Holdings, Inc.
101 East Park Boulevard, Suite 805
Plano, Texas 75074

Inc.

Fiscal Year Ended December 31, 2022

Re: Yum China Holdings,
Form 10-K for the
File No. 001-37762

Dear Andy Yeung:

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

Disclosure Review Program

cc:

Lindsey Smith