

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

February 21, 2023

Alexey Mashchenkov Chief Financial Officer QIWI PLC Kennedy 12, Kennedy Business Centre P.C. 1087 Nicosia, Cyprus

Re: QIWI PLC

Form 20-F for Fiscal Year Ended December 31, 2021 Response Dated December 29, 2022

File No. 001-35893

Dear Alexey Mashchenkov:

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 Office of Trade & Services

cc: Pranav Trivedi