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VIA ELECTRONIC MAIL

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Dear Sirs/Mesdames:

Re: THC BioMed Intl Ltd. (the “Company”)

On September 25, 2018 the Company, in connection with an investment agreement with Alumina Partners (Ontario) Ltd. (“**Alumina**”), closed a private placement for total gross proceeds of \$999,999.98 (the “**Private Placement**”). Alumina purchased 1,344,086 units of the Company (the “**Units**”) at a price of \$0.744 per Unit. Each Unit consists of one common share (a “**Common Share**”) and one common share purchase warrant (a “**Warrant**”) in the capital of the Company. Each whole Warrant shall entitle the holder thereof to acquire one Common Share (a “**Warrant Share**”) at a price of \$1.1625 for a period of thirty-six (36) months from closing of the Private Placement.

It is our opinion as legal counsel to the Company that the Units issued in connection with the Private Placement have been duly issued and are outstanding as fully paid and non-assessable securities.

Yours truly,

OWEN BIRD LAW CORPORATION

/s/ “*Owen Bird Law Corporation*”