

May 5, 2021

Direct Dial: 416.862.6701
Our Matter Number: 1220441

Toronto

Montréal

Calgary

Ottawa

Vancouver

New York

Canadian Securities Exchange
100 King Street West, Suite 7210
Toronto, Ontario, M5X 1E1

Dear Sirs/Mesdames:

Issuance of common shares of Belgravia Hartford Capital Inc. (the “Company”) to members of the Company’s management

We have acted as legal counsel to the Company in connection with the issuance of 8,910,000 common shares of the Company (the “**Shares**”) to certain members of the Company’s management (the “**Recipients**”) on May 5, 2021 for past services provided to the Company by the Recipients, as set out in Exhibit A. The Shares have been issued in lieu of cash payment in recognition of the significant contributions by the Recipients to the Company.

We are providing this opinion at the request of the Company in accordance with Section 2.8 of the Canadian Securities Exchange (the “**CSE**”) Policy 6 – Distributions.

A. Scope of Examinations

In connection with the opinion expressed herein, we have considered such questions of law and examined such statutes and regulations, public and corporate records, certificates, and other documents and conducted such other examinations as we have considered necessary. In addition, as to any facts relevant to our opinion, we have relied on a certificate of an officer of the Company.

B. Assumptions and Reliances

We have assumed the legal capacity of all individuals, the genuineness of all signatures, the authenticity of all documents submitted to us as originals and the conformity to authentic original documents of all documents submitted to us as certified, conformed, electronic, photostatic or facsimile copies.

C. Jurisdiction

We are solicitors qualified to practice law in the Province of Ontario and we express no opinion as to any laws or any matters governed by any laws other than the laws of the Province of Ontario and the federal laws of Canada applicable therein.



D. Opinions

On the basis of the foregoing, we are of the opinion that the Shares have been validly issued and are fully paid and non-assessable.

E. Conclusion

This opinion is solely for your benefit and is not to be relied upon by any other person or for any other purpose other than in connection with the listing of the Shares on the CSE.

Yours truly,

A handwritten signature in dark ink that reads "Osler Hoskins & Harcourt LLP".

CM/AA



EXHIBIT A

Recipient	Shares
Mehdi Azodi, President and CEO of the Company	6,180,000
PLK Accounting and Finance Inc., a corporation controlled by Paul Kania, CFO of the Company	1,800,00
Spark Corp., a corporation controlled by Deena Siblock, COO of the Company	930,000