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February 23, 2021

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

Dear Sirs/Mesdames:

**Re: Belgravia Hartford Capital Inc. (the “Company”)
Proposed Share Consolidation**

In accordance with Section 3.3(f) of CSE Policy 9 – Name Change, Stock Splits and Share Consolidations, we are providing this opinion to you regarding the proposed consolidation of the common shares (the “Shares”) of the Company on the basis of one (1) post-consolidation Share for every ten (10) pre-consolidation Shares (the “Share Consolidation”) which was effective on February 23, 2021 (the “Effective Date”).

In connection with rendering this opinion, we have, among other things, considered such questions of law and examined such statutes, regulations, rulings, order, corporate records, certificates and other documents and have made such other examinations, searches and investigations as we have considered necessary or desirable for the purpose of rendering this opinion. As counsel to the Company, we have examined executed copies of:

- (a) A certified copy of the articles of the Company (the “Articles”) whereby in accordance with Article 9.1(c) of the Company’s Articles, the Board may approve such Share Consolidation by consent resolution (the “Articles”); and
- (b) A certified copy of the resolutions of the board of directors of the Company approving the Consolidation (the “Board Resolutions”).

For the purposes of this opinion, we have assumed, with respect to all documents examined by us, the genuineness of all signatures, the legal capacity at all relevant times of any natural person signing any such documents, the authenticity and completeness of all such documents submitted to us as originals, the conformity to authentic originals of all such documents submitted to us as certified or true copies or as reproductions (including documents provided via fax, PDF or other electronic means) and the truthfulness and accuracy of the corporate records of the Company and of all certificates of public officials and corporate officers.

We have also assumed that: (a) The Articles of the Company, in the form examined by us, will not be amended or altered between the date of this opinion and the Effective Date; (b) there will be no change of the law between the date of this opinion and the Effective Date; and (c) the Board Resolutions will not be amended, revoked, cancelled or otherwise terminated or altered between the date of this opinion and the Effective Date.



Based upon and relying on the foregoing, and subject to the qualifications set out herein, we are of the opinion that all necessary steps under the Business Corporations Act (British Columbia) have been taken by the Company to effect the Consolidation of the Shares, to be effect on or about the Effective Date.

This opinion is rendered solely to the Canadian Securities Exchange in connection with the Consolidation and may not be used or relied upon by you for any other purpose or used or relied upon by any other person, nor quoted from or referred to in any documents without prior written consent.

Sincerely,
DLA Piper (Canada) LLP
Per:

A handwritten signature in black ink, appearing to read 'Sanjay Joshi', with a long horizontal stroke extending to the right.

Sanjay Joshi

SJ