TILT HOLDINGS

March 3, 2023

VIA ELECTRONIC SUBMISSION

British Columbia Securities Commission Alberta Securities Commission Financial and Consumer Affairs Authority of Saskatchewan Manitoba Securities Commission Ontario Securities Commission Autorité des marchés financiers Financial and Consumer Services Commission, New Brunswick Superintendent of Securities, Department of Justice and Public Safety, Prince Edward Island Nova Scotia Securities Commission Office of the Superintendent of Securities, Service NL Northwest Territories Office of the Superintendent of Securities Office of the Yukon Superintendent of Securities Nunavut Securities Office

C/O The Secretary Ontario Securities Commission 20 Queen Street West 19th Floor, Box 55 Toronto, Ontario M5H 3S8 comments@osc.gov.on.ca

Re: Joint CSA and IIROC Staff Notice 23-329 - Short Selling in Canada

We commend the Canadian Securities Administrators efforts to address the short sale issues in the Canadian marketplace and welcome the opportunity to further discuss our views.

As a U.S.-based company listed in Canada, we recognize the differences in the two systems and would applaud efforts to address the regulatory framework around short-selling and consider something similar to the Securities and Exchange Commission's circuit breaker rule, implementing pre-borrow or locate requirements, and offering more transparency through reporting disclosures and in connection with prospectus offerings and private placements.

We believe that implementing these changes should help address predatory short selling activities and provide a stronger, more transparent market for all.

Please do not hesitate to contact us if you have any additional questions or comments.

Sincerely,

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Gary Santo CEO TILT Holdings (NEO: TILT)