

Disclosure of Directors and Senior Managers Relevant Interests

| To NZX Limited; and | |
|---|---|
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 13-Dec-16 |
| Date of last disclosure: | 11-Nov-16 |
| | |
| Director or senior manager giving disclosure | |
| Full name(s): | Scott Philip Coulter |
| Name of listed issuer: | Comvita Limited |
| Name of related body corporate (if applicable): | n/a |
| Position held in listed issuer: | Chief Executive Officer |
| Summary of acquisition or disposal of relevant interest (excluding specified derivative | es) |
| Class of affected quoted financial products: | Ordinary Shares |
| Nature of the affected relevant interest(s): | Scott Philip Coulter - registered holder Start Scheme A/C - registered holder SKPR Holdings Limited - power to exercise, right to vote and power to acquire or dispose of the product |
| For that relevant interest- | |
| Number held in class before acquisition or disposal: | Scott Philip Coulter - 74,989 Start Scheme A/C - 96,334 SKPR Holdings Limited - 175,510 Scott Philip Coulter - 112,489 |
| Number held in class after acquisition or disposal: | Start Scheme A/C - 96,334 SKPR Holdings Limited - 175,510 |
| Current registered holder(s): | Scott Philip Coulter Start Scheme A/C SKPR Holdings Limited |
| Registered holder(s) once transfers are registered: | Same as current registered holders |
| Details of transactions giving rise to acquisition or disposal | |
| Total number of transactions to which notice relates: Details of transactions requiring disclosure- | 1 |
| Date of transaction: | 06-Dec-16 |
| Nature of transaction: | Purchase of 37,500 Shares through Executive |
| Nature of transaction. | Share Scheme |
| Name of any other party or parties to the transaction (if known): | n/a |
| The consideration, expressed in New Zealand dollars, paid or received for the acquisition or disposal. If the consideration was not in cash and cannot be readily by converted into a cash value, describe the consideration: | \$137,625.00 |
| Number of financial products to which the transaction related: | 1 |
| If the issuer has a financial products trading policy that prohibits directors or senior managers from trading during any period without written clearance (a closed period) include the following details— | No. |
| Whether relevant interests were acquired or disposed of during a closed period: | No |
| Whether prior written clearance was provided to allow the acquisition or disposal to proceed during the closed period: | n/a |
| Date of the prior written clearance (if any): | n/a |
| Certification I certify that, to the best of my knowledge and belief, the information contained in this disclosure is correct and that I am duly authorised to make this disclosure by all persons | |
| for whom it is made. | |
| Signature of director or officer: | Sh |
| Date of signature: | 13-Dec-16 |



Disclosure of Directors and Senior Managers Relevant Interests

| To NZX Limited; and | |
|---|---|
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 13-Dec-16 |
| Date of last disclosure: | 07-Nov-16 |
| Director or senior manager giving disclosure | |
| Full name(s): | Mark Francis Sadd |
| Name of listed issuer: | Comvita Limited |
| Name of related body corporate (if applicable): | n/a |
| Position held in listed issuer: | Chief Financial Officer |
| Summary of acquisition or disposal of relevant interest (excluding specified derivatives | s) |
| Class of affected quoted financial products: | Ordinary Shares |
| Nature of the affected relevant interest(s): | Registered holder |
| For that relevant interest- | |
| Number held in class before acquisition or disposal: | 7,245 |
| Number held in class after acquisition or disposal: | 27,245 |
| Current registered holder(s): | Mark Francis Sadd |
| Registered holder(s) once transfers are registered: | Mark Francis Sadd |
| Details of transactions giving rise to acquisition or disposal | |
| Total number of transactions to which notice relates: | 1 |
| Details of transactions requiring disclosure- | |
| Date of transaction: | 06-Dec-16 |
| Nature of transaction: | Purchase of 20,000 Shares through Executive Share Scheme |
| Name of any other party or parties to the transaction (if known): | n/a |
| The consideration, expressed in New Zealand dollars, paid or received for the acquisition or disposal. If the consideration was not in cash and cannot be readily by converted into a cash value, describe the consideration: | \$73,400.00 |
| Number of financial products to which the transaction related: | 1 |
| If the issuer has a financial products trading policy that prohibits directors or senior managers from trading during any period without written clearance (a closed period) include the following details— Whether relevant interests were acquired or disposed of during a closed period: Whether prior written clearance was provided to allow the acquisition or disposal to proceed during the closed period: Date of the prior written clearance (if any): | No n/a n/a |
| Certification I certify that, to the best of my knowledge and belief, the information contained in this disclosure is correct and that I am duly authorised to make this disclosure by all persons for whom it is made. Signature of director or officer: | |
| Date of signature: | 13-Dec-16 |



Disclosure of Directors and Senior Managers Relevant Interests

| To NZX Limited; and | |
|--|---|
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 13-Dec-16 |
| Date of last disclosure: | 11-Nov-16 |
| Date of last disclosure. | 1110010 |
| Director or senior manager giving disclosure | |
| Full name(s): | Colin Trevor Baskin |
| Name of listed issuer: | Comvita Limited |
| Name of related body corporate (if applicable): | n/a |
| Position held in listed issuer: | Chief Supply Chain Officer |
| Summary of acquisition or disposal of relevant interest (excluding specified derivatives | s) |
| Class of affected quoted financial products: | Ordinary Shares |
| Nature of the affected relevant interest(s): | Registered holder |
| For that relevant interest- | |
| Number held in class before acquisition or disposal: | 35,237 |
| Number held in class after acquisition or disposal: | 50,237 |
| Current registered holder(s): | Colin Trevor Baskin |
| Registered holder(s) once transfers are registered: | Colin Trevor Baskin |
| Details of transactions giving rise to acquisition or disposal | |
| Total number of transactions to which notice relates: | 1 |
| Details of transactions requiring disclosure- | 00.010 |
| Date of transaction: Nature of transaction: | 06-Dec-16 Purchase of 15,000 Shares through Executive |
| Tradition of transaction. | Share Scheme |
| Name of any other party or parties to the transaction (if known): | n/a |
| The consideration, expressed in New Zealand dollars, paid or received for the acquisition or disposal. If the consideration was not in cash and cannot be readily by converted into a cash value, describe the consideration: | \$55,050 |
| Number of financial products to which the transaction related: | 1 |
| If the issuer has a financial products trading policy that prohibits directors or senior managers from trading during any period without written clearance (a closed period) include the following details— Whether relevant interests were acquired or disposed of during a closed period: Whether prior written clearance was provided to allow the acquisition or disposal to proceed | No n/a |
| during the closed period: | |
| Date of the prior written clearance (if any): | n/a |
| Certification I certify that, to the best of my knowledge and belief, the information contained in this disclosure is correct and that I am duly authorised to make this disclosure by all persons for whom it is made. | |
| Signature of director or officer: | |
| | 60h. J. Baokn. |
| Date of signature: | 13-Dec-16 |



Disclosure of Directors and Senior Managers Relevant Interests

| To NZX Limited; and | |
|--|---|
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 13-Dec-16 |
| Date of last disclosure: | 07-Nov-16 |
| Date of last disclosure. | 07 1407 10 |
| Director or senior manager giving disclosure | |
| Full name(s): | Simon James Pothecary |
| Name of listed issuer: | Comvita Limited |
| Name of related body corporate (if applicable): | n/a |
| Position held in listed issuer: | Chief Sales Officer |
| Summary of acquisition or disposal of relevant interest (excluding specified derivatives | s) |
| Class of affected quoted financial products: | Ordinary Shares |
| Nature of the affected relevant interest(s): | Registered holder |
| For that relevant interest- | |
| Number held in class before acquisition or disposal: | 59,252 |
| Number held in class after acquisition or disposal: | 74,252 |
| Current registered holder(s): | Simon James Pothecary |
| Registered holder(s) once transfers are registered: | Simon James Pothecary |
| Details of transactions giving rise to acquisition or disposal | |
| Total number of transactions to which notice relates: | 1 |
| Details of transactions requiring disclosure- | 00 B 40 |
| Date of transaction: Nature of transaction: | 06-Dec-16 Purchase of 15,000 Shares through Executive |
| Tradition of transaction. | Share Scheme |
| Name of any other party or parties to the transaction (if known): | n/a |
| The consideration, expressed in New Zealand dollars, paid or received for the acquisition or disposal. If the consideration was not in cash and cannot be readily by converted into a cash value, describe the consideration: | \$55,050.00 |
| Number of financial products to which the transaction related: | 1 |
| If the issuer has a financial products trading policy that prohibits directors or senior managers from trading during any period without written clearance (a closed period) include the following details— Whether relevant interests were acquired or disposed of during a closed period: Whether prior written clearance was provided to allow the acquisition or disposal to proceed | No n/a |
| during the closed period: | |
| Date of the prior written clearance (if any): | n/a |
| Certification I certify that, to the best of my knowledge and belief, the information contained in this disclosure is correct and that I am duly authorised to make this disclosure by all persons for whom it is made. | |
| Signature of director or officer: | Siff |
| Date of signature: | 13-Dec-16 |



Disclosure of Directors and Senior Managers Relevant Interests

| To NZX Limited; and | |
|--|---|
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 13-Dec-16 |
| Date of last disclosure: | 11-Nov-16 |
| Director or senior manager giving disclosure | |
| Full name(s): | Karl Patrick Brus |
| Name of listed issuer: | Comvita Limited |
| Name of related body corporate (if applicable): | n/a |
| Position held in listed issuer: | Former Chief Corporate Services Officer - left Comvita 11 November 2016 |
| Summary of acquisition or disposal of relevant interest (excluding specified derivatives | s) |
| Class of affected quoted financial products: | Ordinary Shares |
| Nature of the affected relevant interest(s): | Start Scheme A/C - registered holder |
| For that relevant interest- | |
| Number held in class before acquisition or disposal: | Start Scheme A/C - 1,738 |
| Number field in class before acquisition of disposal. | Karl Patrick Brus - 0 |
| Number held in class after acquisition or disposal: | Start Scheme A/C - 1,738 |
| Current registered holder(s): | Karl Patrick Brus - 20,000 Start Scheme A/C - registered holder |
| ouron regional a notaer(o). | Karl Patrick Brus - registered holder |
| Registered holder(s) once transfers are registered: | Start Scheme A/C - registered holder |
| Details of transactions giving rise to acquisition or disposal Total number of transactions to which notice relates: Details of transactions requiring disclosure- | 1 |
| Date of transaction: | 06-Dec-16 |
| Nature of transaction: | Purchase of 20,000 Shares through Executive Share Scheme |
| Name of any other party or parties to the transaction (if known): | n/a |
| The consideration, expressed in New Zealand dollars, paid or received for the acquisition or disposal. If the consideration was not in cash and cannot be readily by converted into a cash value, describe the consideration: | \$73,400.00 |
| Number of financial products to which the transaction related: | 1 |
| If the issuer has a financial products trading policy that prohibits directors or senior managers from trading during any period without written clearance (a closed period) include the following details— Whether relevant interests were acquired or disposed of during a closed period: | No |
| Whether prior written clearance was provided to allow the acquisition or disposal to proceed | n/a |
| during the closed period: | |
| Date of the prior written clearance (if any): | n/a |
| Certification I certify that, to the best of my knowledge and belief, the information contained in this disclosure is correct and that I am duly authorised to make this disclosure by all persons for | |
| whom it is made. Signature of director or officer: | Palml Brus |
| Date of signature: | 13-Dec-16 |