

Date of signature:

Ongoing Disclosure Notice

Disclosure of Directors and Senior Managers Relevant Interests

Sections 297(2) and 298(2), Financial Markets Conduct Act 2013

| Sections 297(2) and 296(2), Financial Markets Conduct Act 2013 | |
|---|---|
| To NZX Limited; and | |
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 8-Dec-17 |
| Date of last disclosure: | 17-Nov-17 |
| 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 derivativ | 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 - 104,378 Start Scheme A/C - 96,560 SKPR Holdings Limited - 175,510 |
| Number held in class after acquisition or disposal: | Scott Philip Coulter - 114,008 Start Scheme A/C - 96,560 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: | 2 |
| Details of transactions requiring disclosure- | |
| Date of transaction: | Scott Philip Coulter - acquisition 05/12/2017, |
| Nature of transaction: | disposal 07/12/2017 Scott Philip Coulter - Purchase of 18,750 shares through Executive Share Scheme and 9,120 shares sold on market. |
| 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: | Scott Philip Coulter - acquisition \$68,812.50 Scott Philip Coulter - disposal \$68,812.50 |
| 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 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: | |

8-Dec-17



Disclosure of Directors and Senior Managers Relevant Interests

| To NZX Limited; and | |
|---|---|
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 8-Dec-17 |
| Date of last disclosure: | 15-Nov-17 |
| Director or senior manager giving disclosure | |
| Full name(s): | Brett Donald Hewlett |
| Name of listed issuer: | Comvita Limited |
| Name of related body corporate (if applicable): | n/a |
| Position held in listed issuer: | Director |
| Summary of acquisition or disposal of relevant interest (excluding specified derivative | s) |
| Class of affected quoted financial products: | Ordinary Shares |
| Nature of the affected relevant interest(s): | Brett Donald Hewlett - registered holder Start Scheme A/C - joint registered holder Hewlett Investment Fund Trust - beneficial holder |
| For that relevant interest- | |
| Number held in class before acquisition or disposal: | Brett Donald Hewlett - 97,490 quoted ordinary shares Start Scheme A/C - 13,420 Hewlett Investment Fund Trust - 267,143 quoted ordinary shares and 97,500 not quoted ordinary shares partly paid |
| Number held in class after acquisition or disposal: | Brett Donald Hewlett - 97,490 quoted ordinary shares Start Scheme A/C - 13,420 Hewlett Investment Fund Trust - 300,268 quoted ordinary shares and 64,375 not quoted ordinary shares partly paid |
| Current registered holder(s): | Start Scheme A/C - Brett Donald Hewlett and Rhonda Hewlett Hewlett Investment Fund Trust - Brett Donald Hewlett, Rhonda Hewlett and YRW Trustees 2005 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: | 1 |
| Details of transactions requiring disclosure- | |
| Date of transaction: Nature of transaction: | Brett Donald Hewlett - 05/12/2017 Brett Donald Hewlett - Purchase of 33,125 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: | \$121,568.75 |
| 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 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 | |
| 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: | Stritt. |
| Date of signature: | 8-Dec-17 |



Disclosure of Directors and Senior Managers Relevant Interests

| To NZX Limited; and | |
|--|---|
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 8-Dec-17 |
| Date this disclosure: | 15-Nov-17 |
| Date of last disclosure. | 13-1104-17 |
| 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 |) |
| 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: | 47,490 |
| Number held in class after acquisition or disposal: | 54,990 |
| 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- | |
| Date of transaction: | 5-Dec-17 |
| Nature of transaction: | Purchase of 7,500 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: | \$27,525 |
| 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 |
| include the following details— Whether relevant interests were acquired or disposed of during a closed period: | No |
| include the following details— | No n/a |
| 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 | |
| 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): 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 | n/a |
| 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): Certification I certify that, to the best of my knowledge and belief, the information contained in this | n/a |



Disclosure of Directors and Senior Managers Relevant Interests

| To NZX Limited; and | |
|---|--|
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 8-Dec-17 |
| Date of last disclosure: | 15-Nov-17 |
| Director or senior manager giving disclosure | |
| Full name(s): | Julianne Marie Keast |
| Name of listed issuer: | Comvita Limited |
| Name of related body corporate (if applicable): | n/a |
| Position held in listed issuer: | Acting Chief Financial Officer |
| Summary of acquisition or disposal of relevant interest (excluding specified derivative | |
| 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: | Julianne Marie Keast - 25,501 Custodial Services Limited - 8,611 |
| Number held in class after acquisition or disposal: | Julianne Marie Keast - 30,501 |
| | Custodial Services Limited - 8,611 |
| Current registered holder(s): | Julianne Marie Keast |
| 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: | 5-Dec-17 |
| Nature of transaction: | Julianne Marie Keast - Purchase of 5,000 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: | \$18,350 |
| 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 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: | Julianne feast |
| Date of signature: | 8-Dec-17 |



Disclosure of Directors and Senior Managers Relevant Interests

| To NZX Limited; and | |
|--|--|
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 8-Dec-17 |
| Date of last disclosure: | 15-Nov-17 |
| 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: | 71,505 |
| Number held in class after acquisition or disposal: | 79,005 |
| 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- | [- n |
| Date of transaction: Nature of transaction: | 5-Dec-17 Purchase of 7,500 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: | \$27,525.00 |
| 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 | n/a |
| proceed during the closed period: | liva |
| 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: | 8-Dec-17 |



Disclosure of Directors and Senior Managers Relevant Interests

| To NZX Limited; and | |
|---|---|
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 8-Dec-17 |
| Date of last disclosure: | 15-Nov-17 |
| 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 Commercial 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): | Mark Francis Sadd - registered holder Start Scheme A/C - registered holder |
| For that relevant interest- | otart ocheme 700 Tegistered Holder |
| Number held in class before acquisition or disposal: | Mark Francis Sadd - 9,671 |
| Number held in class after acquisition or disposal: | Start Scheme A/C - 7,371 Mark Francis Sadd - 19,671 |
| Number field in class after acquisition of disposar. | Start Scheme A/C - 7,371 |
| 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: | 5-Dec-17 |
| Nature of transaction: | Purchase of 10,000 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: | \$36,700 |
| 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 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: | |
| Date of signature: | 8-Dec-17 |