



Initial Disclosure Notice

Disclosure of Directors and Senior Managers Relevant Interests

Sections 297(1) and 298(1), Financial Markets Conduct Act 2013

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| To NZX Limited; and | |
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 30/08/2019 |
| Date on which issuer listed or appointment made: | 1/09/2019 |

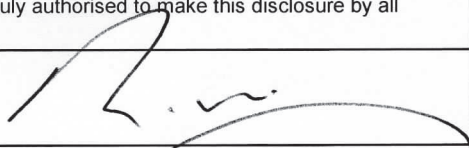
Director or senior manager giving disclosure

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|---|---------------------------------|
| Full name: | Robert Malcolm Major |
| Name of listed issuer: | Comvita Limited |
| Name of related body corporate (if applicable): | n/a |
| Position held in listed issuer: | Director (appointed 01/09/2019) |

Summary of relevant interest (excluding specified derivatives)

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|------------------------------------|--|
| Class of quoted financial product: | Ordinary shares |
| Number held in class: | 3,550 |
| Nature of relevant interest: | Power to exercise right to vote and power to dispose of securities (joint ownership) |
| Current registered holder: | Ms S A Parkinson & Mr R M Major |

Certification

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| 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: | 30-8-2019 |

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| 30/08/2019 |