

Ongoing Disclosure Notice

Disclosure of Directors and Senior Managers Relevant Interests Sections 297(2) and 298(2), Financial Markets Conduct Act 2013

| To A1737 I foods do not | |
|---|--|
| To NZX Limited; and | One with the last |
| Name of listed issuer: | Comvita Limited |
| Date this disclosure made: | 20-Dec-19 |
| Date of last disclosure: | 20-Nov-19 |
| Director or senior manager giving disclosure | |
| Full name(s): | Neil John Craig |
| Name of listed issuer: | Comvita Limited |
| Name of related body corporate (if applicable): | n/a |
| Position held in listed issuer: | Company Chair |
| 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): | Beneficial owner of the shares |
| For that relevant interest- | |
| Number held in class before acquisition or disposal: | 17.850 Neil John Craig - Start Scheme A/C |
| Number held in class after acquisition or disposal: | 500,000 Neil John Craig - Custodial Services Ltd; |
| | 19,128 Neil John Craig - Start Scheme A/C; |
| | 75,000 Sheryl Denise Tebbutt (Partner) - Custodial Services Ltd; |
| | 25,000 Anna Beth Craig (Daughter) - Custodial Services Ltd; |
| | 440,000 Neil John Craig, Sheryl Denise Tebbutt, Sharp Tudhope |
| | Trustee Services No 27 Ltd for Eaglesham Trust - Custodial Services |
| | Ltd |
| | Elu |
| Current registered holder(s): | Neil John Craig - Start Scheme A/C |
| Registered holder(s) once transfers are registered: | Neil John Craig - Start Scheme A/C |
| Details of transactions giving rise to acquisition or disposal | |
| Total number of transactions to which notice relates: | 1 |
| Details of transactions requiring disclosure- | j |
| Date of transaction: | 19-Dec-19 |
| Nature of transaction: | 1,278 ordinary shares acquired pursuant to a non-discretionary fixed |
| | trading plan, to which shares will be acquired on a monthly basis |
| | without interruption over the next 12 months. This is the eighth |
| | acquisition of shares pursuant to the fixed trading plan. |
| | |
| 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 | \$3,934 |
| or disposal. If the consideration was not in cash and cannot be readily by converted into a | |
| cash value, describe the consideration: | |
| Number of financial products to which the transaction related: | 1 |
| | L |
| If the insure has a financial products trading policy that prohibits disaster | |
| If the issuer has a financial products trading policy that prohibits directors or senior | |
| nanagers 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: | 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: | | |

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Ongoing Disclosure Notice

Disclosure of Directors and Senior Managers Relevant Interests

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

| To NZX Limited; and | |
|----------------------------|--|
| Name of listed issuer: | |
| Date this disclosure made: | |
| Date of last disclosure: | |

| Comvita Limited | |
|-----------------|--|
| 20-Dec-19 | |
| 20-Nov-19 | |

Director or senior manager giving disclosure

| Full name(s): | 1 | Christine Mary Fleury |
|---|---|-----------------------|
| Name of listed issuer: | | Comvita Limited |
| Name of related body corporate (if applicable): | | n/a |
| Position held in listed issuer: | | Board Secretary |

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): | Craigs Start Scheme A/C - registered holder |
| For that relevant interest- | |
| Number held in class before acquisition or disposal: | Craigs Start Scheme A/C - 8,848 Tutamai Trust - 110,000 |
| Number held in class after acquisition or disposal: | Craigs Start Scheme A/C - 9,482 |
| Current registered holder(s): | Christine Mary Fleury |
| Registered holder(s) once transfers are registered: | Christine Mary Fleury |

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: | 1 |
| Nature of transaction: | 6: di w in th th |
| Name of any other party or parties to the transaction (if known): | n, |
| 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: | \$ |
| Number of financial products to which the transaction related: | 1 |

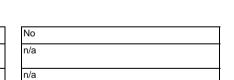
If the issuer has a financial products trading policy that prohibits directors or senior managers from trading during any period without written clearance (a closed period) include the following details-

| 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): | | |

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:



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|-----------|--|
| 20-Dec-19 | |

Dec-19

ordinary shares acquired pursuant to a non cretionary fixed trading plan, to which shares be acquired on a monthly basis without rruption over the next 12 months. This is seventh acquisition of shares pursuant to fixed trading plan.

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