

1	Details of the Primary Insider/Close Associate		
a)	Name	Havbrukinvest AS, business registration number 989 291 548	
2 Reason for the notification			
a)	Position/status	A company closely associated with primary insider in Frøy, CEO of Frøy ASA, Helge Gåsø	
b)	Initial notification/Amendment	Initial notification	
3 Details of the company, emission allowance market participant, auction platform, auctioneer or auction monitor			
a)	Name	Frøy ASA	
b)	LEI	549300U4W5TODHJ1RL14	
4 Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted			
a)	Description of the financial instrument, type of instrument Identification code	Ordinary shares in Frøy ASA ISIN: NO0010936792	
b)	Nature of the transaction	Subscription	
c)	Price(s) and volume(s)	Price(s)	Volume(s)
		NOK 61	NOK 1,220,000
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-25	
f)	Place of the transaction	Outside a trading venue, bookbuilding in ongoing IPO	