

1	Details of the Primary Insider/Close Associate					
a)	Name	Havbruinvest 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)	<table border="1"> <tr> <th>Price(s)</th> <th>Volume(s)</th> </tr> <tr> <td>NOK 61</td> <td>NOK 1,220,000</td> </tr> </table>	Price(s)	Volume(s)	NOK 61	NOK 1,220,000
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				