

1	Details of the Primary Insider/Close Associate		
a)	Name	Monica Hansen	
2	Reason for the notification		
a)	Position/status	Primary insider in capacity of her position as Group controller in Frøy ASA	
b)	Initial notification/Amendment	Amendment of 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	964 shares
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-26	
f)	Place of the transaction	Outside a trading venue, allocation in IPO	

1	Details of the Primary Insider/Close Associate		
a)	Name	Eirin Ervik Pedersen	
2	Reason for the notification		
a)	Position/status	Primary insider in capacity of her position as Head of service in Frøy ASA	
b)	Initial notification/Amendment	Amendment of 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	9643 shares
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-26	
f)	Place of the transaction	Outside a trading venue, allocation in IPO	

1	Details of the Primary Insider/Close Associate		
a)	Name	Oddleif Wigdahl	
2	Reason for the notification		
a)	Position/status	Primary insider in capacity of his position as Head of wellboats in Frøy ASA	
b)	Initial notification/Amendment	Amendment of 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	482 shares
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-26	
f)	Place of the transaction	Outside a trading venue, allocation in IPO	

1	Details of the Primary Insider/Close Associate		
a)	Name	Tove Anita Torstad	
2	Reason for the notification		
a)	Position/status	Primary insider in capacity of her position as HR and administration in Frøy ASA	
b)	Initial notification/Amendment	Amendment of 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	1928 shares
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-26	
f)	Place of the transaction	Outside a trading venue, allocation in IPO	

<b>1</b>	<b>Details of the Primary Insider/Close Associate</b>		
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a)	Name	Sørli AS	
2	Reason for the notification		
a)	Position/status	A company closely associated with primary insider in Frøy, CFO of Frøy ASA, Arne Rødsjø	
b)	Initial notification/Amendment	Amendment of 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	16393 shares
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-26	
f)	Place of the transaction	Outside a trading venue, allocation in IPO	

1	Details of the Primary Insider/Close Associate		
a)	Name	BJJ Holding AS	
2	Reason for the notification		
a)	Position/status	A company closely associated with primary insider in Frøy, Head of sea transport of Frøy ASA, Bjarne Johannessen	
b)	Initial notification/Amendment	Amendment of 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	100,000 shares
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-26	
f)	Place of the transaction	Outside a trading venue, allocation in IPO	

1	Details of the Primary Insider/Close Associate		
a)	Name	Havbruksinvest AS	
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	Amendment of 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	20,000 shares
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-26	
f)	Place of the transaction	Outside a trading venue, allocation in IPO	

1	Details of the Primary Insider/Close Associate		
a)	Name	Gåsø Næringsutvikling AS	
2	Reason for the notification		
a)	Position/status	A company closely associated with primary insiders in Frøy i) CEO of Frøy ASA, Helge Gåsø and ii) CMO/COO of Frøy, Anders Gåsø	
b)	Initial notification/Amendment	Amendment of 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	819.672 shares
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-26	
f)	Place of the transaction	Outside a trading venue, allocation in IPO	

<b>1</b>	<b>Details of the Primary Insider/Close Associate</b>		
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a)	Name	Ocean Capital Advisers AS	
2	Reason for the notification		
a)	Position/status	A company closely associated with primary insider in Frøy, Head of investor relations of Frøy ASA, Sondre Vevstad	
b)	Initial notification/Amendment	Amendment of 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	8196 shares
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-26	
f)	Place of the transaction	Outside a trading venue, allocation in IPO	

1	Details of the Primary Insider/Close Associate		
a)	Name	Skipsinvest AS	
2	Reason for the notification		
a)	Position/status	A company closely associated with primary insider in Frøy, board member in Frøy ASA, Harry Bøe	
b)	Initial notification/Amendment	Amendment of 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	549.180 shares
d)	Aggregated information — Aggregated volume — Price	N/A	
e)	Date of the transaction	2021-03-26	
f)	Place of the transaction	Outside a trading venue, allocation in IPO	