

| 1 | Details of the Primary Insider/Close Associate | | | | | | | |
|-------------|--|--|----------|-----------|-------------|------|--|--|
| a) | Name | Skipsinvest AS | | | | | | |
| 2 | Reason for the notification | | | | | | | |
| a) | Position/status | Close associate to Harry Bøe, member of the board in Frøy | | | | | | |
| 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 | Shares in Frøy ASA, ISIN NO0010936792 | | | | | | |
| b) | Nature of the transaction | Purchase of shares | | | | | | |
| c) | Price(s) and volume(s) | <table border="1"> <tr> <th>Price(s)</th> <th>Volume(s)</th> </tr> <tr> <td>NOK 47,4249</td> <td>5000</td> </tr> <tr> <td> </td> <td> </td> </tr> </table> | Price(s) | Volume(s) | NOK 47,4249 | 5000 | | |
| Price(s) | Volume(s) | | | | | | | |
| NOK 47,4249 | 5000 | | | | | | | |
| | | | | | | | | |
| d) | Aggregated information — Aggregated volume — Price | 5000 shares Price: 47,4249 | | | | | | |
| e) | Date of the transaction | 19.11.2021 | | | | | | |
| f) | Place of the transaction | XOSL – Oslo Børs | | | | | | |