GRAYSCALE FILECOIN TRUST (FIL)

2022 Grantor Trust Tax Information EIN: 85-6627668

The following information is being provided to assist Shareholders of the Grayscale Filecoin Trust (FIL) (the "Trust") with reporting of their taxable income and expenses for the period January 1, 2022 through December 31, 2022

TAXATION OF THE TRUST

The Trust is a grantor trust for U.S. federal income tax purposes. As a result, the Trust itself is not subject to U.S. federal income tax. Instead, the Trust's income and expenses "flow through" to the Shareholders.

TAXATION OF US INDIVIDUAL SHAREHOLDERS

Shareholders generally will be treated, for U.S. federal income tax purposes, as if they directly owned a pro rata share of the underlying assets held in the Trust. Shareholders also will be treated as if they directly received their respective pro rata shares of the Trust's income and proceeds, and directly incurred their pro rata share of the Trust's expenses. Most state and local tax authorities follow U.S. income tax rules in this regard. However, Shareholders should contact their own tax advisors as to the state and local tax consequences of ownership of the Trust.

The Trust holds only Filecoin ("FIL") tokens and, accordingly, received no income during the year.

The Trust paid expenses periodically, as shown in the attached 2022 Gross Proceeds File. These expenses are allocated into monthly periods as shown in the 2022 Expense File. An example illustrating the computation of a Shareholder's share of expenses is provided.

Because the Trust paid out only a de minimis amount of FIL tokens for payment of Trust expenses during the year and made no distributions of sale proceeds to its Shareholders, under Treas. Reg. Sec. 1.671-5(c)(2)(iv)(B) neither the Trust nor brokers are required to report the gross proceeds of Trust sales to Shareholders on Form 1099B. In lieu of Form 1099B, this information is contained in the attached 2022 Gross Proceeds File together with an example illustrating how a Shareholder should calculate gain or loss.

GLOSSARY OF TERMS

Grayscale Filecoin Trust (FIL) - (the "Trust")

Expense File - Summary of allocated monthly Trust expenses per share in USD (page 2)

<u>Gross Proceeds File</u> – Summary of daily value per share (in FIL), amount of FIL paid to cover trust expenses (in FIL), and per share proceeds from FIL paid to cover trust expenses (in USD) - (pages 3 -14)

<u>Pro-Rated Shares</u> – All income and expenses are distributed pro rata based on the actual number of days in the calendar month (see example on page 2)

GRAYSCALE FILECOIN TRUST (FIL) 2022 EXPENSE FILE

Summary of Expenses by Month (Details on pages 3-14)				
Date	Expenses Per Share (USD)	Amount of FIL Per Share		
January	0.04153895	0.00196216		
February	0.03977169	0.00187425		
March	0.05076098	0.00206429		
April	0.03493423	0.00199624		
May	0.01649796	0.00206224		
June	0.01051541	0.00199156		
July	0.02080344	0.00205365		
August	0.01186539	0.00204929		
September	0.01122119	0.00197905		
October	0.01104043	0.00204075		
November	0.00863208	0.00197079		
December	0.00617800	0.00203224		
Total for year	0.26375975	0.02407651		

How to Calculate the Shareholder's Investment Expenses

(Please consult your tax advisor as to reporting)

Identify in the table above the months (full and partial) in which the Shareholder held shares in the Trust. The amount in the column labeled "Expenses Per Share," represents the amount of investment expense paid per share for a full month. For any month in which the shares were not held on each day in such month, the expenses should be pro-rated based on the number of days held (see attached details for each month pages 3-14).

Example illustrating calculation of a Shareholder's 2022 Grayscale Filecoin Trust (FIL) Expenses

Assume that a Shareholder purchased 20,000 shares on February 15, 2022 and sold them on September 15, 2022. For the month of February, Shareholder's expenses are 0.03977169 (See Summary Table above – February Factor) x (13/28) = 0.01846543 per share. For the months of March through August, the expenses per share are as shown in the summary table above. For the month of September, Shareholder's expenses are 0.01122119 (See Summary Table above – September Factor) x 0.011221

Total Expenses per Share	\$ 0	.16945343
Number of Shares Held		20,000
Total Expense	\$	3,389.07

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
1/1/2022	0.98019800		
1/2/2022	0.98013087		
1/3/2022	0.98006373		
1/4/2022	0.97999661		
1/5/2022	0.97992948		
1/6/2022	0.97986236		
1/7/2022	0.97979525		
1/8/2022	0.97972814		
1/9/2022	0.97966104		
1/10/2022	0.97959394		
1/11/2022	0.97952684		
1/12/2022	0.97945975		
1/13/2022	0.97939266		
1/14/2022	0.97932558		
1/15/2022	0.97925850		
1/16/2022	0.97919143		
1/17/2022	0.97912436		
1/18/2022	0.97905730		
1/19/2022	0.97899024		
1/20/2022	0.97892319		
1/21/2022	0.97885614		
1/22/2022	0.97878909		
1/23/2022	0.97872205		
1/24/2022	0.97866316		
1/25/2022	0.97859613		
1/26/2022	0.97852910		
1/27/2022	0.97846208		
1/28/2022	0.97839506		
1/29/2022	0.97832805		
1/30/2022	0.97826104		
1/31/2022	0.97819403	0.00196216	0.04153895

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
2/1/2022	0.97812703		
2/2/2022	0.97806004		
2/3/2022	0.97799305		
2/4/2022	0.97792606		
2/5/2022	0.97785908		
2/6/2022	0.97779210		
2/7/2022	0.97772513		
2/8/2022	0.97765816		
2/9/2022	0.97759120		
2/10/2022	0.97752424		
2/11/2022	0.97745729		
2/12/2022	0.97739034		
2/13/2022	0.97732340		
2/14/2022	0.97725646		
2/15/2022	0.97718952		
2/16/2022	0.97712259		
2/17/2022	0.97705566		
2/18/2022	0.97698874		
2/19/2022	0.97692182		
2/20/2022	0.97685491		
2/21/2022	0.97678800		
2/22/2022	0.97672110		
2/23/2022	0.97665420		
2/24/2022	0.97658731		
2/25/2022	0.97652042		
2/26/2022	0.97645353		
2/27/2022	0.97638665		
2/28/2022	0.97631978	0.00187425	0.03977169

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
3/1/2022	0.97625291		
3/2/2022	0.97618604		
3/3/2022	0.97611918		
3/4/2022	0.97605232		
3/5/2022	0.97598547		
3/6/2022	0.97591862		
3/7/2022	0.97585178		
3/8/2022	0.97578494		
3/9/2022	0.97571810		
3/10/2022	0.97565127		
3/11/2022	0.97558445		
3/12/2022	0.97551762		
3/13/2022	0.97545081		
3/14/2022	0.97538400		
3/15/2022	0.97531719		
3/16/2022	0.97525039		
3/17/2022	0.97518359		
3/18/2022	0.97511680		
3/19/2022	0.97505001		
3/20/2022	0.97498322		
3/21/2022	0.97491644		
3/22/2022	0.97484967		
3/23/2022	0.97478290		
3/24/2022	0.97471613		
3/25/2022	0.97464937		
3/26/2022	0.97458261		
3/27/2022	0.97451586		
3/28/2022	0.97444911		
3/29/2022	0.97438237		
3/30/2022	0.97431563		
3/31/2022	0.97424890	0.00206429	0.05076098

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
4/1/2022	0.97418217		
4/2/2022	0.97411544		
4/3/2022	0.97404872		
4/4/2022	0.97398201		
4/5/2022	0.97391530		
4/6/2022	0.97384859		
4/7/2022	0.97378189		
4/8/2022	0.97371519		
4/9/2022	0.97364850		
4/10/2022	0.97358181		
4/11/2022	0.97351513		
4/12/2022	0.97344845		
4/13/2022	0.97338177		
4/14/2022	0.97331510		
4/15/2022	0.97324844		
4/16/2022	0.97318178		
4/17/2022	0.97311512		
4/18/2022	0.97304847		
4/19/2022	0.97298182		
4/20/2022	0.97291518		
4/21/2022	0.97284854		
4/22/2022	0.97278191		
4/23/2022	0.97271528		
4/24/2022	0.97264865		
4/25/2022	0.97258203		
4/26/2022	0.97251542		
4/27/2022	0.97244881		
4/28/2022	0.97238220		
4/29/2022	0.97231560		
4/30/2022	0.97224900	0.00199624	0.03493423

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
5/1/2022	0.97218241		
5/2/2022	0.97211582		
5/3/2022	0.97204924		
5/4/2022	0.97198266		
5/5/2022	0.97191609		
5/6/2022	0.97184952		
5/7/2022	0.97178295		
5/8/2022	0.97171639		
5/9/2022	0.97164984		
5/10/2022	0.97158328		
5/11/2022	0.97151674		
5/12/2022	0.97145020		
5/13/2022	0.97138366		
5/14/2022	0.97131712		
5/15/2022	0.97125060		
5/16/2022	0.97118407		
5/17/2022	0.97111755		
5/18/2022	0.97105104		
5/19/2022	0.97098453		
5/20/2022	0.97091802		
5/21/2022	0.97085152		
5/22/2022	0.97078502		
5/23/2022	0.97071853		
5/24/2022	0.97065204		
5/25/2022	0.97058556		
5/26/2022	0.97051908		
5/27/2022	0.97045261		
5/28/2022	0.97038614		
5/29/2022	0.97031967		
5/30/2022	0.97025321		
5/31/2022	0.97018676	0.00206224	0.01649796

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
6/1/2022	0.97012031		
6/2/2022	0.97005386		
6/3/2022	0.96998742		
6/4/2022	0.96992098		
6/5/2022	0.96985455		
6/6/2022	0.96978812		
6/7/2022	0.96972170		
6/8/2022	0.96965528		
6/9/2022	0.96958886		
6/10/2022	0.96952245		
6/11/2022	0.96945605		
6/12/2022	0.96938965		
6/13/2022	0.96932325		
6/14/2022	0.96925686		
6/15/2022	0.96919047		
6/16/2022	0.96912409		
6/17/2022	0.96905771		
6/18/2022	0.96899133		
6/19/2022	0.96892496		
6/20/2022	0.96885860		
6/21/2022	0.96879224		
6/22/2022	0.96872588		
6/23/2022	0.96865953		
6/24/2022	0.96859319		
6/25/2022	0.96852684		
6/26/2022	0.96846051		
6/27/2022	0.96839417		
6/28/2022	0.96832785		
6/29/2022	0.96826152		
6/30/2022	0.96819520	0.00199156	0.01051541

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
7/1/2022	0.96812889		
7/2/2022	0.96806258		
7/3/2022	0.96799627		
7/4/2022	0.96792997		
7/5/2022	0.96786367		
7/6/2022	0.96779738		
7/7/2022	0.96773110		
7/8/2022	0.96766481		
7/9/2022	0.96759853		
7/10/2022	0.96753226		
7/11/2022	0.96746599		
7/12/2022	0.96739973		
7/13/2022	0.96733347		
7/14/2022	0.96726721		
7/15/2022	0.96720096		
7/16/2022	0.96713471		
7/17/2022	0.96706847		
7/18/2022	0.96700223		
7/19/2022	0.96693600		
7/20/2022	0.96686977		
7/21/2022	0.96680355		
7/22/2022	0.96673733		
7/23/2022	0.96667111		
7/24/2022	0.96660490		
7/25/2022	0.96653870		
7/26/2022	0.96647250		
7/27/2022	0.96640630		
7/28/2022	0.96634011		
7/29/2022	0.96627392		
7/30/2022	0.96620774		
7/31/2022	0.96614156	0.00205365	0.02080344

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
8/1/2022	0.96607538		
8/2/2022	0.96600921		
8/3/2022	0.96594305		
8/4/2022	0.96587689		
8/5/2022	0.96581073		
8/6/2022	0.96574458		
8/7/2022	0.96567843		
8/8/2022	0.96561229		
8/9/2022	0.96554615		
8/10/2022	0.96548002		
8/11/2022	0.96541389		
8/12/2022	0.96534777		
8/13/2022	0.96528165		
8/14/2022	0.96521553		
8/15/2022	0.96514942		
8/16/2022	0.96508332		
8/17/2022	0.96501721		
8/18/2022	0.96495112		
8/19/2022	0.96488502		
8/20/2022	0.96481894		
8/21/2022	0.96475285		
8/22/2022	0.96468677		
8/23/2022	0.96462070		
8/24/2022	0.96455463		
8/25/2022	0.96448856		
8/26/2022	0.96442250		
8/27/2022	0.96435645		
8/28/2022	0.96429039		
8/29/2022	0.96422435		
8/30/2022	0.96415830		
8/31/2022	0.96409227	0.00204929	0.01186539

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
9/1/2022	0.96402623		
9/2/2022	0.96396020		
9/3/2022	0.96389418		
9/4/2022	0.96382816		
9/5/2022	0.96376214		
9/6/2022	0.96369613		
9/7/2022	0.96363013		
9/8/2022	0.96356412		
9/9/2022	0.96349813		
9/10/2022	0.96343213		
9/11/2022	0.96336614		
9/12/2022	0.96330016		
9/13/2022	0.96323418		
9/14/2022	0.96316821		
9/15/2022	0.96310224		
9/16/2022	0.96303627		
9/17/2022	0.96297031		
9/18/2022	0.96290435		
9/19/2022	0.96283840		
9/20/2022	0.96277245		
9/21/2022	0.96270651		
9/22/2022	0.96264057		
9/23/2022	0.96257463		
9/24/2022	0.96250870		
9/25/2022	0.96244278		
9/26/2022	0.96237686		
9/27/2022	0.96231094		
9/28/2022	0.96224503		
9/29/2022	0.96217912		
9/30/2022	0.96211322	0.00197905	0.01122119

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
10/1/2022	0.96204732		
10/2/2022	0.96198143		
10/3/2022	0.96191554		
10/4/2022	0.96184966		
10/5/2022	0.96178378		
10/6/2022	0.96171790		
10/7/2022	0.96165203		
10/8/2022	0.96158616		
10/9/2022	0.96152030		
10/10/2022	0.96145444		
10/11/2022	0.96138859		
10/12/2022	0.96132274		
10/13/2022	0.96125690		
10/14/2022	0.96119106		
10/15/2022	0.96112522		
10/16/2022	0.96105939		
10/17/2022	0.96099357		
10/18/2022	0.96092774		
10/19/2022	0.96086193		
10/20/2022	0.96079612		
10/21/2022	0.96073031		
10/22/2022	0.96066450		
10/23/2022	0.96059870		
10/24/2022	0.96053291		
10/25/2022	0.96046712		
10/26/2022	0.96040133		
10/27/2022	0.96033555		
10/28/2022	0.96026978		
10/29/2022	0.96020401		
10/30/2022	0.96013824		
10/31/2022	0.96007248	0.00204075	0.01104043

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
11/1/2022	0.96000672		
11/2/2022	0.95994096		
11/3/2022	0.95987521		
11/4/2022	0.95980947		
11/5/2022	0.95974373		
11/6/2022	0.95967799		
11/7/2022	0.95961226		
11/8/2022	0.95954653		
11/9/2022	0.95948081		
11/10/2022	0.95941509		
11/11/2022	0.95934938		
11/12/2022	0.95928367		
11/13/2022	0.95921797		
11/14/2022	0.95915227		
11/15/2022	0.95908657		
11/16/2022	0.95902088		
11/17/2022	0.95895520		
11/18/2022	0.95888951		
11/19/2022	0.95882384		
11/20/2022	0.95875816		
11/21/2022	0.95869249		
11/22/2022	0.95862683		
11/23/2022	0.95856117		
11/24/2022	0.95849552		
11/25/2022	0.95842987		
11/26/2022	0.95836422		
11/27/2022	0.95829858		
11/28/2022	0.95823294		
11/29/2022	0.95816731		
11/30/2022	0.95810168	0.00197079	0.00863208

Date	FIL Per Share	Number of FIL Used to Cover Trust Expenses Per Share (in FIL)	Proceeds from Payout of FIL to Cover Trust Expenses Per Share (in USD)
12/1/2022	0.95803606		
12/2/2022	0.95797044		
12/3/2022	0.95790483		
12/4/2022	0.95783922		
12/5/2022	0.95777361		
12/6/2022	0.95770801		
12/7/2022	0.95764241		
12/8/2022	0.95757682		
12/9/2022	0.95751123		
12/10/2022	0.95744565		
12/11/2022	0.95738007		
12/12/2022	0.95731450		
12/13/2022	0.95724893		
12/14/2022	0.95718336		
12/15/2022	0.95711780		
12/16/2022	0.95705225		
12/17/2022	0.95698669		
12/18/2022	0.95692115		
12/19/2022	0.95685561		
12/20/2022	0.95679007		
12/21/2022	0.95672453		
12/22/2022	0.95665900		
12/23/2022	0.95659348		
12/24/2022	0.95652796		
12/25/2022	0.95646244		
12/26/2022	0.95639693		
12/27/2022	0.95633143		
12/28/2022	0.95626592		
12/29/2022	0.95620043		
12/30/2022	0.95613493		
12/31/2022	0.95606944	0.00203224	0.00617800
TOTAL		0.02407651	0.26375975

Grayscale Filecoin Trust (FIL) Gross Proceeds and Expense Files show FIL tokens per share owned in the Trust, as well as FIL tokens paid out, proceeds, and expenses per share in the Trust. You can use this information to calculate your share of Trust expenses, and your gain or loss on sale of FIL tokens to pay such expenses.

The Trust holds no assets other than FIL tokens. Accordingly, when expenses are incurred, Trust assets (i.e., FIL tokens) are sold to cover the expenses. The following example illustrates the tax consequences to the Shareholder. In Step 1, we discuss how a Shareholder would determine his or her stake in the Trust (i.e., how many FIL tokens they own). In Step 2, we discuss how much of his or her stake is sold throughout the year to cover expenses (and how many FIL tokens they still own). In Step 3, we determine the Shareholder's basis in the FIL tokens sold by the Trust. Gain or loss from this sale is determined in relation to the basis of the assets sold. In Step 4, we determine the gain or loss from the sale of the assets and where the gain or loss is reported on the Shareholder's tax return. In Step 5, we calculate the Shareholder's portion of the Trust's expenses. In Step 6, we determine the Shareholder's new balance of FIL tokens at the end of the year and his or her new cost basis in the FIL tokens.

The following example is for illustrative purposes only and is not intended to be construed as tax advice. Shareholders should consult a tax professional in the use of their information on their respective tax returns.

Example: Shareholder XYZ purchases 20,000 Trust shares on 2/10/2022 at a price of \$23.45 per share for a total purchase price of \$469,000. Shareholder XYZ had no other purchases or sales of Trust shares during 2022 and held the shares for the remainder of 2022.

Step 1: Identify the shareholder's pro rata ownership of Filecoin.

Locate the Filecoin Per Share amount on Shareholder XYZ's purchase date of 2/10/2022 in the gross proceeds file. In this example the number is 0.97752424. This represents the number of FIL tokens per share on that date.

For Shareholder XYZ, the total amount of FIL tokens owned for its 2/10/2022 purchase is 19,550.48480000 (0.97752424 per share multiplied by 20,000 shares purchased on 2/10/2022). Note: This step should be completed for each date on which Trust shares were purchased.

Step 2: Calculate the Filecoin paid out from Shareholder XYZ's account during 2022 to pay expenses

The FIL tokens paid out per share during 2022 includes the cumulative amounts of all FIL token payouts for the period which includes the day after the purchase date of 2/10/2022 through the day before payout date.

During 2022, the total amount of FIL tokens paid out after the 2/10/2022 purchase date is 0.02144498 per share. This is determined by taking the total amount of FIL tokens per share paid out in 2022 (0.02407651) and subtracting the amount of FIL tokens paid out prior to the purchase (0.00196216 from January plus 0.00066938 (10/28 multiplied by 0.00187425 from February)). Then multiply this number (0.02144498) by the number of shares owned (20,000) for a total of 428.89950000 FIL tokens paid to cover trust expenses.

Step 3: Calculate Shareholder's cost basis in Filecoin paid out from Shareholder's account

Total FIL token payout (*Step 2*) 428.89950000 ----- x **\$ 469.000**

FIL tokens acquired (*Step 1*) 19,550.48480000

Cost basis of FIL token payout \$10,288.95

Step 4: Calculate Shareholder's gain or loss on Filecoin payout for each lot purchased

Identify all proceeds per share received by the Trust after Shareholder XYZ's 2/10/2022 purchase date. During 2022, periodic payouts for the period 2/11/2022 through 12/31/2022 generated proceeds per share of \$0.20801663 (total proceeds of payout of FIL tokens for the year, \$0.26375975, less \$0.05574313, which is the proceeds of payouts made prior to purchase [\$0.04153895 from January] plus \$0.01420418 from the first ten days in February). Therefore, Shareholder XYZ's gain or loss is determined as follows:

Total Proceeds: \$0.20801663 per share X 20,000 shares	\$ 4,160.33
Less: Total cost basis of FIL token payout (Step 3)	10,288.95
Total Reportable Gain/(Loss)	\$ (6,128.62)
(To be reported on Shareholder's Form 1040 Schedule D)	

Step 5: Calculate Shareholder's investment expenses

Identify all expenses per share paid by the Trust after Shareholder XYZ's 2/10/2022 purchase date. During 2022, the expenses were paid periodically and for the period of 2/11/2022 through 12/31/2022 amounted to \$0.20801663 per share. Therefore, Shareholder XYZ's expenses are as follows:

Total Expenses Per Share (Step 4)		0.20801663
Total Shares		20,000
Total Expense	\$	4,160.33
Calculate Shareholder's Adjusted Filosoin Hold and Cost Pasis		

Step 6: Calculate Shareholder's Adjusted Filecoin Held and Cost Basis

FIL tokens Purchased on 2/10/2022 (Step 1)	19	9,550.48480000
Less: FIL token payout during 2022 (Step 2)		428.89950000
Adjusted Shareholder's FIL tokens at 12/31/2022	19,121.58530000	
Original Purchase Cost on 2/10/2022	\$	469,000.00
Less: Cost of FIL token payout during 2022 (Step 3)		10,288.95
Adjusted Shareholder's basis at 12/31/2022	\$	458,711.05

Shareholder's adjusted FIL tokens and adjusted cost calculated in Step 6 are his/her adjusted FIL tokens and adjusted basis for the 2/10/2022 purchase at the end of 12/31/2022.

Shareholders with several purchases should calculate gain, loss and adjusted basis separately for each purchased lot and then sum up the results of each lot to arrive at the net reportable gain or loss and the total investment expenses. Shareholders, who purchased their shares prior to 2022, and made no other purchases, should calculate their adjusted cost basis using the gross proceeds information for the relevant years by following the same steps as in the example above. The adjusted cost basis at 12/31/2021 should be used as the beginning cost for 2022 instead of the original purchase cost. Shareholders with an additional purchase in 2022 will have two cost lots to account for in 2022. The calculation of gains and losses will be affected by the cost basis method used to account for the sales.