

GRAYSCALE BITCOIN TRUST ETF

2024 Grantor Trust Tax Information

EIN: 46-7019388

CUSIP: 389637109

Ticker: GBTC

The following information is being provided to assist Shareholders of the Grayscale Bitcoin Trust ETF (the "Trust") with reporting of their taxable income and expenses for the period January 1, 2024 through December 31, 2024.

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 Bitcoin ("BTC") tokens and, accordingly, received no income during the year.

The Trust paid expenses periodically, as shown in the attached 2024 Gross Proceeds File. These expenses are allocated into monthly periods as shown in the 2024 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 BTC 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 2024 Gross Proceeds File together with an example illustrating how a Shareholder should calculate gain or loss.

GLOSSARY OF TERMS

Grayscale Bitcoin Trust ETF - (the "Trust")

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

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

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

Initial Distribution - On July 31, 2024, the Trust distributed 10% of its Bitcoin to Grayscale Bitcoin Mini Trust ETF as consideration for newly created shares of Grayscale Bitcoin Mini Trust in a 1:1 distribution.

GRAYSCALE BITCOIN TRUST ETF 2024 EXPENSE FILE

Summary of Expenses by Month (Details on pages 3-14)

Date	Expenses Per Share (USD)	Amount of BTC Per Share
January	0.05619561	0.00000132
February	0.06153367	0.00000108
March	0.08399718	0.00000120
April	0.06876000	0.00000112
May	0.07613126	0.00000114
June	0.07037706	0.00000110
July	0.07261587	0.00000113
August	0.05960584	0.00000103
September	0.06063390	0.00000098
October	0.06933287	0.00000101
November	0.09117773	0.00000099
December	0.09989697	0.00000102
Total for year	0.87025796	0.00001312

How to Calculate the Shareholder's Investment Expenses

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 2024 Grayscale Bitcoin Trust ETF Expenses

Assume that a Shareholder purchased 20,000 shares on February 15, 2024 and sold them on September 15, 2024. For the month of February, Shareholder's expenses are \$0.06153367 (See Summary Table above – February Factor) x (14/29) = \$0.02970591 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 \$0.0606339 (See Summary Table above – September Factor) x (15/30) = \$0.03031695. The total expenses for the Shareholder are therefore \$0.49151007 per share (sum of all factors from February 15th through September 15th) multiplied by the number of shares held (20,000), or \$9,830.20.

Total Expenses per Share	\$ 0.49151007
Number of Shares Held	20,000
Total Expense	\$ 9,830.20

(Please consult your tax advisor as to reporting)

GRAYSCALE BITCOIN TRUST ETF 2024 GROSS PROCEEDS FILE

Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
1/1/2024	0.00089474		
1/2/2024	0.00089469		
1/3/2024	0.00089464		
1/4/2024	0.00089459		
1/5/2024	0.00089455		
1/6/2024	0.00089450		
1/7/2024	0.00089445		
1/8/2024	0.00089440		
1/9/2024	0.00089435		
1/10/2024	0.00089430		
1/11/2024	0.00089426		
1/12/2024	0.00089423		
1/13/2024	0.00089419		
1/14/2024	0.00089415		
1/15/2024	0.00089412		
1/16/2024	0.00089408		
1/17/2024	0.00089404	0.00000067	0.02872996
1/18/2024	0.00089401		
1/19/2024	0.00089397		
1/20/2024	0.00089393		
1/21/2024	0.00089390		
1/22/2024	0.00089386		
1/23/2024	0.00089382		
1/24/2024	0.00089378		
1/25/2024	0.00089375		
1/26/2024	0.00089371		
1/27/2024	0.00089367		
1/28/2024	0.00089364		
1/29/2024	0.00089360		
1/30/2024	0.00089356		
1/31/2024	0.00089353	0.00000065	0.02746565

GRAYSCALE BITCOIN TRUST ETF 2024 GROSS PROCEEDS FILE

Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
2/1/2024	0.00089349		
2/2/2024	0.00089345		
2/3/2024	0.00089342		
2/4/2024	0.00089338		
2/5/2024	0.00089334		
2/6/2024	0.00089331		
2/7/2024	0.00089327		
2/8/2024	0.00089323		
2/9/2024	0.00089320		
2/10/2024	0.00089316		
2/11/2024	0.00089312		
2/12/2024	0.00089309		
2/13/2024	0.00089305		
2/14/2024	0.00089301		
2/15/2024	0.00089298	0.00000056	0.02906234
2/16/2024	0.00089294		
2/17/2024	0.00089290		
2/18/2024	0.00089287		
2/19/2024	0.00089283		
2/20/2024	0.00089279		
2/21/2024	0.00089276		
2/22/2024	0.00089272		
2/23/2024	0.00089268		
2/24/2024	0.00089265		
2/25/2024	0.00089261		
2/26/2024	0.00089257		
2/27/2024	0.00089254		
2/28/2024	0.00089250		
2/29/2024	0.00089246	0.00000052	0.03247133

GRAYSCALE BITCOIN TRUST ETF 2024 GROSS PROCEEDS FILE

Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
3/1/2024	0.00089243		
3/2/2024	0.00089239		
3/3/2024	0.00089235		
3/4/2024	0.00089232		
3/5/2024	0.00089228		
3/6/2024	0.00089224		
3/7/2024	0.00089221		
3/8/2024	0.00089217		
3/9/2024	0.00089213		
3/10/2024	0.00089210		
3/11/2024	0.00089206		
3/12/2024	0.00089202		
3/13/2024	0.00089199		
3/14/2024	0.00089195		
3/15/2024	0.00089191	0.00000058	0.04028544
3/16/2024	0.00089188		
3/17/2024	0.00089184		
3/18/2024	0.00089180		
3/19/2024	0.00089177		
3/20/2024	0.00089173		
3/21/2024	0.00089169		
3/22/2024	0.00089166		
3/23/2024	0.00089162		
3/24/2024	0.00089158		
3/25/2024	0.00089155		
3/26/2024	0.00089151		
3/27/2024	0.00089147		
3/28/2024	0.00089144		
3/29/2024	0.00089140		
3/30/2024	0.00089136		
3/31/2024	0.00089133	0.00000062	0.04371174

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Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
4/1/2024	0.00089129		
4/2/2024	0.00089125		
4/3/2024	0.00089122		
4/4/2024	0.00089118		
4/5/2024	0.00089114		
4/6/2024	0.00089111		
4/7/2024	0.00089107		
4/8/2024	0.00089103		
4/9/2024	0.00089100		
4/10/2024	0.00089096		
4/11/2024	0.00089093		
4/12/2024	0.00089089		
4/13/2024	0.00089085		
4/14/2024	0.00089082		
4/15/2024	0.00089078	0.00000056	0.03576660
4/16/2024	0.00089074		
4/17/2024	0.00089071		
4/18/2024	0.00089067		
4/19/2024	0.00089063		
4/20/2024	0.00089060		
4/21/2024	0.00089056		
4/22/2024	0.00089052		
4/23/2024	0.00089049		
4/24/2024	0.00089045		
4/25/2024	0.00089041		
4/26/2024	0.00089038		
4/27/2024	0.00089034		
4/28/2024	0.00089030		
4/29/2024	0.00089027		
4/30/2024	0.00089023	0.00000056	0.03299340

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Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
5/1/2024	0.00089019		
5/2/2024	0.00089016		
5/3/2024	0.00089012		
5/4/2024	0.00089008		
5/5/2024	0.00089005		
5/6/2024	0.00089001		
5/7/2024	0.00088998		
5/8/2024	0.00088994		
5/9/2024	0.00088990		
5/10/2024	0.00088987		
5/11/2024	0.00088983		
5/12/2024	0.00088979		
5/13/2024	0.00088976		
5/14/2024	0.00088972		
5/15/2024	0.00088968	0.00000055	0.03648573
5/16/2024	0.00088965		
5/17/2024	0.00088961		
5/18/2024	0.00088957		
5/19/2024	0.00088954		
5/20/2024	0.00088950		
5/21/2024	0.00088946		
5/22/2024	0.00088943		
5/23/2024	0.00088939		
5/24/2024	0.00088936		
5/25/2024	0.00088932		
5/26/2024	0.00088928		
5/27/2024	0.00088925		
5/28/2024	0.00088921		
5/29/2024	0.00088917		
5/30/2024	0.00088914		
5/31/2024	0.00088910	0.00000059	0.03964553

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Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
6/1/2024	0.00088906		
6/2/2024	0.00088903		
6/3/2024	0.00088899		
6/4/2024	0.00088895		
6/5/2024	0.00088892		
6/6/2024	0.00088888		
6/7/2024	0.00088884		
6/8/2024	0.00088881		
6/9/2024	0.00088877		
6/10/2024	0.00088874		
6/11/2024	0.00088870		
6/12/2024	0.00088866		
6/13/2024	0.00088863		
6/14/2024	0.00088859		
6/15/2024	0.00088855	0.00000055	0.03652679
6/16/2024	0.00088852		
6/17/2024	0.00088848		
6/18/2024	0.00088844		
6/19/2024	0.00088841		
6/20/2024	0.00088837		
6/21/2024	0.00088833		
6/22/2024	0.00088830		
6/23/2024	0.00088826		
6/24/2024	0.00088822		
6/25/2024	0.00088819		
6/26/2024	0.00088815		
6/27/2024	0.00088812	0.00000040	0.02481185
6/28/2024	0.00088808		
6/29/2024	0.00088804		
6/30/2024	0.00088801	0.00000015	0.00903842

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Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
7/1/2024	0.00088797		
7/2/2024	0.00088793		
7/3/2024	0.00088790		
7/4/2024	0.00088786		
7/5/2024	0.00088782		
7/6/2024	0.00088779		
7/7/2024	0.00088775		
7/8/2024	0.00088772		
7/9/2024	0.00088768		
7/10/2024	0.00088764		
7/11/2024	0.00088761		
7/12/2024	0.00088757		
7/13/2024	0.00088753		
7/14/2024	0.00088750		
7/15/2024	0.00088746	0.00000055	0.03471400
7/16/2024	0.00088742		
7/17/2024	0.00088739		
7/18/2024	0.00088735		
7/19/2024	0.00088732		
7/20/2024	0.00088728		
7/21/2024	0.00088724		
7/22/2024	0.00088721		
7/23/2024	0.00088717		
7/24/2024	0.00088713		
7/25/2024	0.00088710		
7/26/2024	0.00088706		
7/27/2024	0.00088702		
7/28/2024	0.00088699		
7/29/2024	0.00088695		
7/30/2024	0.00079822		
7/31/2024	0.00079819	0.00000058	0.03790187

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Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
8/1/2024	0.00079816		
8/2/2024	0.00079813		
8/3/2024	0.00079809		
8/4/2024	0.00079806		
8/5/2024	0.00079803		
8/6/2024	0.00079799		
8/7/2024	0.00079796		
8/8/2024	0.00079793		
8/9/2024	0.00079790		
8/10/2024	0.00079786		
8/11/2024	0.00079783		
8/12/2024	0.00079780		
8/13/2024	0.00079777		
8/14/2024	0.00079773		
8/15/2024	0.00079770	0.00000050	0.02861280
8/16/2024	0.00079767		
8/17/2024	0.00079763		
8/18/2024	0.00079760		
8/19/2024	0.00079757		
8/20/2024	0.00079754		
8/21/2024	0.00079750		
8/22/2024	0.00079747		
8/23/2024	0.00079744		
8/24/2024	0.00079741		
8/25/2024	0.00079737		
8/26/2024	0.00079734		
8/27/2024	0.00079731		
8/28/2024	0.00079727		
8/29/2024	0.00079724		
8/30/2024	0.00079721		
8/31/2024	0.00079718	0.00000053	0.03099304

GRAYSCALE BITCOIN TRUST ETF 2024 GROSS PROCEEDS FILE

Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
9/1/2024	0.00079714		
9/2/2024	0.00079711		
9/3/2024	0.00079708		
9/4/2024	0.00079705		
9/5/2024	0.00079701		
9/6/2024	0.00079698		
9/7/2024	0.00079695		
9/8/2024	0.00079691		
9/9/2024	0.00079688		
9/10/2024	0.00079685		
9/11/2024	0.00079682		
9/12/2024	0.00079678		
9/13/2024	0.00079675		
9/14/2024	0.00079672		
9/15/2024	0.00079669	0.00000049	0.02954495
9/16/2024	0.00079665		
9/17/2024	0.00079662		
9/18/2024	0.00079659		
9/19/2024	0.00079656		
9/20/2024	0.00079652		
9/21/2024	0.00079649		
9/22/2024	0.00079646		
9/23/2024	0.00079642		
9/24/2024	0.00079639		
9/25/2024	0.00079636		
9/26/2024	0.00079633		
9/27/2024	0.00079629		
9/28/2024	0.00079626		
9/29/2024	0.00079623		
9/30/2024	0.00079620	0.00000049	0.03108895

GRAYSCALE BITCOIN TRUST ETF 2024 GROSS PROCEEDS FILE

Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
10/1/2024	0.00079616		
10/2/2024	0.00079613		
10/3/2024	0.00079610		
10/4/2024	0.00079607		
10/5/2024	0.00079603		
10/6/2024	0.00079600		
10/7/2024	0.00079597		
10/8/2024	0.00079594		
10/9/2024	0.00079590		
10/10/2024	0.00079587		
10/11/2024	0.00079584		
10/12/2024	0.00079580		
10/13/2024	0.00079577		
10/14/2024	0.00079574		
10/15/2024	0.00079571	0.00000049	0.03280445
10/16/2024	0.00079567		
10/17/2024	0.00079564		
10/18/2024	0.00079561		
10/19/2024	0.00079558		
10/20/2024	0.00079554		
10/21/2024	0.00079551		
10/22/2024	0.00079548		
10/23/2024	0.00079545		
10/24/2024	0.00079541		
10/25/2024	0.00079538		
10/26/2024	0.00079535		
10/27/2024	0.00079532		
10/28/2024	0.00079528		
10/29/2024	0.00079525		
10/30/2024	0.00079522		
10/31/2024	0.00079519	0.00000052	0.03652842

GRAYSCALE BITCOIN TRUST ETF 2024 GROSS PROCEEDS FILE

Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
11/1/2024	0.00079515		
11/2/2024	0.00079512		
11/3/2024	0.00079509		
11/4/2024	0.00079505		
11/5/2024	0.00079502		
11/6/2024	0.00079499		
11/7/2024	0.00079496		
11/8/2024	0.00079492		
11/9/2024	0.00079489		
11/10/2024	0.00079486		
11/11/2024	0.00079483		
11/12/2024	0.00079479		
11/13/2024	0.00079476		
11/14/2024	0.00079473		
11/15/2024	0.00079470		
11/16/2024	0.00079466		
11/17/2024	0.00079463	0.00000056	0.04979328
11/18/2024	0.00079460		
11/19/2024	0.00079457		
11/20/2024	0.00079453		
11/21/2024	0.00079450		
11/22/2024	0.00079447		
11/23/2024	0.00079444		
11/24/2024	0.00079440		
11/25/2024	0.00079437		
11/26/2024	0.00079434		
11/27/2024	0.00079431		
11/28/2024	0.00079427		
11/29/2024	0.00079424		
11/30/2024	0.00079421	0.00000043	0.04138445

GRAYSCALE BITCOIN TRUST ETF 2024 GROSS PROCEEDS FILE

Date	BTC Per Share	Number of BTC Used to Cover Trust Expenses Per Share (in BTC)	Proceeds from Payout of BTC to Cover Trust Expenses Per Share (in USD)
12/1/2024	0.00079418		
12/2/2024	0.00079414		
12/3/2024	0.00079411		
12/4/2024	0.00079408		
12/5/2024	0.00079404		
12/6/2024	0.00079401		
12/7/2024	0.00079398		
12/8/2024	0.00079395		
12/9/2024	0.00079391		
12/10/2024	0.00079388		
12/11/2024	0.00079385		
12/12/2024	0.00079382		
12/13/2024	0.00079378		
12/14/2024	0.00079375		
12/15/2024	0.00079372	0.00000049	0.05075404
12/16/2024	0.00079369		
12/17/2024	0.00079365		
12/18/2024	0.00079362		
12/19/2024	0.00079359		
12/20/2024	0.00079356		
12/21/2024	0.00079352		
12/22/2024	0.00079349		
12/23/2024	0.00079346		
12/24/2024	0.00079343		
12/25/2024	0.00079339		
12/26/2024	0.00079336		
12/27/2024	0.00079333		
12/28/2024	0.00079330		
12/29/2024	0.00079326		
12/30/2024	0.00079323		
12/31/2024	0.00079320	0.00000053	0.04914293
TOTAL		0.00001312	0.87025796

Grayscale Bitcoin Trust ETF Gross Proceeds and Expense Files show BTC tokens per share owned in the Trust, as well as BTC 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 BTC tokens to pay such expenses.

The Trust holds no assets other than BTC tokens. Accordingly, when expenses are incurred, Trust assets (i.e., BTC 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 BTC 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 BTC tokens they still own). In Step 3, we determine the Shareholder's basis in the BTC 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 BTC tokens at the end of the year and his or her new cost basis in the BTC 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 2/10/2024 at a price of \$42.78 per share for a total purchase price of \$855,600. Shareholder XYZ had no other purchases or sales of Trust shares during 2024 and held the shares for the remainder of 2024.

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

Locate the Bitcoin Per Share amount on Shareholder XYZ's purchase date of 2/10/2024 in the gross proceeds file. In this example the number is 0.00089316. This represents the number of BTC tokens per share on that date.

For Shareholder XYZ, the total amount of BTC tokens owned for its 2/10/2024 purchase is 17.86320000 (0.00089316 per share multiplied by 20,000 shares purchased on 2/10/2024). Note: This step should be completed for each date on which Trust shares were purchased.

Step 2: Calculate the Bitcoin paid out from Shareholder XYZ's account during 2024 to pay expenses

The BTC tokens paid out per share during 2024 includes the cumulative amounts of all BTC token payouts for the period which includes the day after the purchase date of 2/10/2024 through the day before payout date.

During 2024, the total amount of BTC tokens paid out after the 2/10/2024 purchase date is 0.00001143 per share. This is determined by taking the total amount of BTC tokens per share paid out in 2024 (0.00001312) and subtracting the amount of BTC tokens paid out prior to the purchase (0.00000132 from January plus 0.00000037 (10/29 multiplied by 0.00000108 from February)). Then multiply this number (0.00001143) by the number of shares owned (20,000) for a total of 0.22855172 BTC tokens paid to cover trust expenses.

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

Total BTC token payout (<i>Step 2</i>)	0.22855172		
	-----	x	\$855,600
BTC tokens acquired (<i>Step 1</i>)	17.86320000		
Cost basis of BTC token payout	\$10,947.02		

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

Identify all proceeds per share received by the Trust after Shareholder XYZ's 2/10/2024 purchase date. During 2024, periodic payouts for the period 2/11/2024 through 12/31/2024 generated proceeds per share of \$0.79284384 (total proceeds of payout of BTC tokens for the year, \$0.87025796, less \$0.07741412, which is the proceeds of payouts made prior to purchase [\$0.05619561 from January] plus \$0.02121851 from the first ten days in February). Therefore, Shareholder XYZ's gain or loss is determined as follows:

Total Proceeds: \$0.79284384 per share X 20,000 shares	\$ 15,856.88
Less: Total cost basis of BTC token payout (<i>Step 3</i>)	10,947.02
Total Reportable Gain/(Loss)	<u>\$ 4,909.86</u>
(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 2/10/2024 purchase date. During 2024, the expenses were paid periodically and for the period of 2/11/2024 through 12/31/2024 amounted to \$0.79284384 per share. Therefore, Shareholder XYZ's expenses are as follows:

Total Expenses Per Share (<i>Step 4</i>)	\$ 0.79284384
Total Shares	20,000
Total Expense	<u>\$ 15,856.88</u>

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

BTC tokens Purchased on 2/10/2024 (<i>Step 1</i>)	17.86320000
Less: BTC token payout during 2024 (<i>Step 2</i>)	0.22855172
Adjusted Shareholder's BTC tokens at 12/31/2024	<u>17.63464828</u>
Original Purchase Cost on 2/10/2024	\$ 855,600.00
Less: Cost of BTC token payout during 2024 (<i>Step 3</i>)	10,947.02
Adjusted Shareholder's basis at 12/31/2024	<u>\$ 844,652.98</u>

Shareholder's adjusted BTC tokens and adjusted cost calculated in Step 6 are his/her adjusted BTC tokens and adjusted basis for the 2/10/2024 purchase at the end of 12/31/2024.

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 2024, 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 12/31/2023 should be used as the beginning cost for 2024 instead of the original purchase cost. Shareholders with an additional purchase in 2024 will have two cost lots to account for in 2024. The calculation of gains and losses will be affected by the cost basis method used to account for the sales.

Items of Consideration

Shareholders should note that on July 31, 2024, the Grayscale Bitcoin Trust ETF effected an Initial Distribution, contributing 10% of its Bitcoin to the Grayscale Bitcoin Mini Trust ETF as consideration for newly created shares of the Grayscale Bitcoin Mini Trust ETF on the inception date. Shareholders who received shares of the Grayscale Bitcoin Mini Trust ETF as a part of the Initial Distribution should refer to the attached rider with regard to the calculation of the cost basis of those shares.

Grayscale Bitcoin Trust ETF Initial Distribution
of Grayscale Bitcoin Mini Trust ETF Shares to Shareholders of Record of Grayscale Bitcoin
Trust ETF as of July 30, 2024

GLOSSARY OF TERMS

Distribution Date – July 31, 2024, the date on which shares of BTC are distributed to Shareholders of Record.

BTC Portion – 10% of the Bitcoin held by GBTC, determined as of immediately after the close of business on the day prior to the Record Date and taking into account creation and/or redemption orders that settle prior to the close of the Record Date.

GBTC Portion – 90% of the Bitcoin held by GBTC, determined as of immediately after the close of business on the day prior to the Record Date and taking into account creation and/or redemption orders that settle prior to the close of the Record Date.

GBTC – Grayscale Bitcoin Trust ETF

BTC – Grayscale Bitcoin Mini Trust ETF

Initial Distribution - GBTC's pro rata distribution, to Shareholders of Record, of shares of BTC issued to GBTC in exchange for the contribution by GBTC of the BTC Portion.

Shareholders of Record - Shareholders of GBTC as of the close of business (i.e., 4:00 pm New York Time) on the Record Date.

Record Date - July 30, 2024

Grayscale Bitcoin Trust ETF Initial Distribution

Shareholders should note that on the Distribution Date, to effectuate the Initial Distribution, Grayscale Bitcoin Trust ETF ("GBTC") contributed 10% of its Bitcoin, determined as of immediately after the close of business on the day prior to the Record Date and taking into account creation and/or redemption orders that settled prior to the close of the Record Date (the "BTC Portion"), to Grayscale Bitcoin Mini Trust ETF ("BTC") as consideration for newly created shares of the BTC Trust. The newly created shares of BTC were then distributed to shareholders of GBTC as of the close of business on the Record Date ("Shareholders of Record"), pro rata based on a 1:1 ratio, such that for each one (1) share of GBTC held by each GBTC Shareholder of Record, such GBTC Shareholder of Record was entitled to receive one (1) share of BTC on the Distribution Date.

GBTC shares had a Bitcoin-per-share ratio of 0.00088695 per share immediately after the close of business on the day prior to the Record Date.

GBTC shares trading on the Record Date initially had a Bitcoin-per-share ratio that was 90% of the Bitcoin-per-share ratio at the close of business on the day prior to the Record Date. From and after the Record Date, GBTC shares had a Bitcoin-per-share ratio that was reduced by the amount of Bitcoin per-share accrued as Sponsor's Fee with respect to 90% of the Bitcoin held by GBTC, determined as of immediately after the close of business on the day prior to the Record Date and taking into account creation and/or redemption orders that settled prior to the close of the Record Date (the "GBTC Portion"), from and after the Record Date.

BTC shares had an initial Bitcoin-per-share ratio on the Distribution Date that was 10% of GBTC's Bitcoin-per-share ratio at the close of business on the day prior to the Record Date.

There were no additional expenses or further payments incurred in connection with the Initial Distribution.

Importance of obtaining professional tax advice

This communication is not intended as, and does not constitute, tax advice. The U.S. federal income tax consequences of the Initial Distribution are complex, subject to uncertainty in certain respects and may be affected by circumstances specific to a beneficial owner of GBTC shares. Any beneficial owner of GBTC shares who receives BTC shares in the Initial Distribution, and any intermediary holding shares of GBTC or BTC, should consult their own tax adviser regarding the U.S. federal income tax consequences of the Initial Distribution, including the proper allocation of existing cost basis between shares of GBTC and shares of BTC.

Expected basis consequences of the Initial Distribution

It is expected that neither GBTC nor any beneficial owner of GBTC shares will recognize any gain or loss for U.S. federal income tax purposes as a result of the Initial Distribution. Accordingly, it is expected that neither GBTC's contribution of Bitcoin to the BTC Trust nor GBTC's distribution of shares in the BTC Trust to Shareholders of Record will be reported to any beneficial owner of GBTC shares (or to any intermediary holding GBTC shares) as giving rise to income, gain, loss, deduction, credit or proceeds.

It is expected that each beneficial owner of GBTC shares who receives (or is treated for U.S. federal income tax purposes as having received) shares of the BTC Trust in the Initial Distribution will be required to allocate its cost basis in its pro rata share of the Bitcoin held by GBTC between (x) its pro rata share of the GBTC Portion and (y) its pro rata share of the BTC Portion. Any transaction the trade date for which occurs on or after the Record Date in shares of GBTC or the Trust that are affected by such basis allocation should take such basis allocation into account.

Under this framework, 90% of a beneficial owner's cost basis in the GBTC shares as of the Record Date would be retained in the GBTC shares (subject to adjustment for Sponsor's Fee accrued with respect to the GBTC portion) and 10% of that beneficial owner's cost basis in the GBTC shares as of the Record Date would be reallocated to the BTC Trust shares.

(See below for more information on allocating the GBTC cost basis to the BTC cost basis).

How to allocate cost basis between existing GBTC shares and newly created BTC shares

As stated above, the BTC shares were distributed in kind to Shareholders of Record of GBTC on the Distribution Date. To determine the cost basis allocation of their GBTC and BTC shares, a shareholder of record must multiply their existing (pre-distribution) cost basis of GBTC by 10% to allocate to their BTC shares and multiply their existing (pre-distribution) cost basis of GBTC by 90% to allocate to their GBTC shares.

Example:

Assume on the Record Date, Shareholder XYZ holds 20,000 GBTC shares immediately after the close of business on the day prior to the Record Date (i.e., after taking into account any adjustments arising prior to the Record Date, including any adjustments arising from the accrual and payment of the Sponsor Fee's prior to the Record Date). Shareholder XYZ's cost basis in its GBTC shares is equal to \$10.00 per share for a total cost basis of \$200,000.

Step 1: Identify the shareholder's adjusted cost basis in its share of the BTC Portion as of the Record Date and the Distribution Date

The Bitcoin contributed by GBTC to BTC in connection with the Initial Distribution was 10% of the Bitcoin held by GBTC immediately after the close of business on the day prior to the Record Date (and taking into account creation and/or redemption orders that settled prior to the close of the Record Date). Provided that Shareholder XYZ had a total cost basis of \$200,000 in its pro rata share of Bitcoin held by GBTC, Shareholder XYZ's cost basis in 10% of its pro rata share of that Bitcoin was \$20,000. Further, because the Initial Distribution was made on a 1-for-1 basis, Shareholder XYZ received 20,000 shares of BTC in the Initial Distribution. Accordingly, Shareholder XYZ's initial cost basis per share of BTC received in the Initial Distribution is approximately \$1.00 (\$20,000 divided by 20,000 shares).

GBTC cost basis as of close of Record Date	\$ 200,000.00
Initial Distribution Rate	10%
Allocated cost basis in the pro forma BTC shares	\$ 20,000.00
Allocated cost basis in BTC	\$ 20,000.00
Total Shares	20,000
Shareholder's allocated cost basis per pro forma share in BTC	\$ 1.00

Step 2: Identify the shareholder's adjusted cost basis in the GBTC Portion as of the Record Date

The Bitcoin remaining in GBTC after the Initial Distribution constituted 90% of the Bitcoin held by GBTC immediately after the close of business on the day prior to the Record Date (and taking into account creation and/or redemption orders that settled prior to the close of the Record Date), decreased by the amount of any Sponsor's Fee accrued or paid for the period between the Record Date and the Distribution Date. Provided that Shareholder XYZ had a total cost basis (determined immediately after the close of business on the day prior to the Record Date) of \$200,000 in its pro rata share of Bitcoin held by GBTC, Shareholder XYZ's cost basis in 90% of its pro rata share of that Bitcoin was \$180,000. Given Shareholder XYZ retains 20,000 shares of GBTC after the Initial Distribution, Shareholder XYZ's cost basis per share of GBTC, excluding basis attributable to the BTC Portion, as of the opening of the Record Date is approximately \$9.00 (\$180,000 divided by 20,000 shares).

GBTC cost basis as of close of Record Date	\$ 200,000.00
1 - Initial Distribution Rate	90%
Allocated cost basis in the pro forma BTC shares	\$ 180,000.00
Allocated cost basis in GBTC on Record Date	\$ 180,000.00
Total Shares	20,000
Shareholder's allocated cost basis per pro forma share in GBTC	\$ 9.00

If Shareholder XYZ acquired shares on different dates or for different prices, Shareholder XYZ would repeat the calculations above separately for each purchased lot.

For additional details, please reference the Organizational Actions Affecting Basis details available at the link below on the Grayscale website.

[BTC Organizational Actions Affecting Basis](#)