

Disclosure Statement Pursuant to the Pink Basic Disclosure Guidelines

SSTARTRADE TECH, INC.

a Nevada corporation

c/o Perucchi
CP 6952, Lugano, Switzerland

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Website(s): www.sstartradetech.com
SIC Code: 1040

Annual Report
For the Period Ending: December 31, 2018
(the "Reporting Period")

As of
December 31, 2018, the number of shares outstanding of our Common Stock was: 99,610,855.

As of December 31, 2017, the number of shares outstanding of our Common Stock was: 99,510,855.

Indicate by check mark whether the company is a shell company (as defined in Rule 405 of the Securities Act of 1933 and Rule 12b-2 of the Exchange Act of 1934):

Yes: ☐ No: ☒ (Double-click and select "Default Value" to check)

Indicate by check mark whether the company's shell status has changed since the previous reporting period:

Yes: ☐ No: ☒

Indicate by check mark whether a Change in Control¹ of the company has occurred over this reporting period:

Yes: ☐ No: ☒

1) Name of the issuer and its predecessors (if any)

The issuer was incorporated in the State of Nevada on December 6, 2005, as Smart Holdings, Inc. Until November, 2017, the name of the Issuer was Smart Holdings, Inc. The Issuer is active and in good standing in the State of Nevada.

¹ "Change in Control" shall mean any events resulting in:

(i) Any "person" (as such term is used in Sections 13(d) and 14(d) of the Exchange Act) becoming the "beneficial owner" (as defined in Rule 13d-3 of the Exchange Act), directly or indirectly, of securities of the Company representing fifty percent (50%) or more of the total voting power represented by the Company's then outstanding voting securities;

(ii) The consummation of the sale or disposition by the Company of all or substantially all of the Company's assets;

(iii) A change in the composition of the Board occurring within a two (2)-year period, as a result of which fewer than a majority of the directors are directors immediately prior to such change; or

(iv) The consummation of a merger or consolidation of the Company with any other corporation, other than a merger or consolidation which would result in the voting securities of the Company outstanding immediately prior thereto continuing to represent (either by remaining outstanding or by being converted into voting securities of the surviving entity or its parent) at least fifty percent (50%) of the total voting power represented by the voting securities of the Company or such surviving entity or its parent outstanding immediately after such merger or consolidation.

Has the issuer or any of its predecessors ever been in bankruptcy, receivership, or any similar proceeding in the past five years?

Yes: ☐ No: ☒

2) Security Information

Trading symbol:	SSTT
Exact title and class of securities outstanding:	Common Stock, \$.0001 p.v.
CUSIP:	<u>85235N107</u>
Par or stated value:	\$.0001
Total shares authorized:	1,975,000,000 as of date: 12/31/2018
Total shares outstanding:	<u>99,610,855</u> as of date: 12/31/2018
Number of shares in the Public Float ² :	<u>2'0771'503</u> as of date: <u>12/31/2018</u>
Total number of shareholders of record:	<u>About 40 shareholders of record, plus shares in street name</u>

Additional class of securities (if any):

Trading symbol:	_____
Exact title and class of securities outstanding:	_____
CUSIP:	_____
Par or stated value:	_____
Total shares authorized:	_____ as of date: _____
Total shares outstanding:	_____ as of date: _____

Transfer Agent

Name: Issuer Direct
500 Perimeter Park Drive
Suite D
Morrisville, NC 27560
Phone: 919-481-4000
Email: eddie.tobler@issuerdirect.com

Is the Transfer Agent registered under the Exchange Act?³ Yes: ☒ No: ☐

Describe any trading suspension orders issued by the SEC concerning the issuer or its predecessors:

None

List any stock split, stock dividend, recapitalization, merger, acquisition, spin-off, or reorganization either currently anticipated or that occurred within the past 12 months:

None

3) Issuance History

The goal of this section is to provide disclosure with respect to each event that resulted in any direct changes to the total shares outstanding of any class of the issuer's securities **in the past two completed fiscal years and any subsequent interim period.**

² "Public Float" shall mean the total number of unrestricted shares not held directly or indirectly by an officer, director, any person who is the beneficial owner of more than 10 percent of the total shares outstanding (a "control person"), or any affiliates thereof, or any immediate family members of officers, directors and control persons.

³ To be included in the Pink Current Information tier, the transfer agent must be registered under the Exchange Act.

Disclosure under this item shall include, in chronological order, all offerings and issuances of securities, including debt convertible into equity securities, whether private or public, and all shares or any other securities or options to acquire such securities issued for services. Using the tabular format below, please describe these events.

A. Changes to the Number of Outstanding Shares

Check this box to indicate there were no changes to the number of outstanding shares within the past two completed fiscal years and any subsequent periods: ☐

[illegible]

_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
Shares Outstanding on 12/31/2018	<u>Ending Balance:</u> Common: <u>99,610,855</u> Preferred: _____								

Example: A company with a fiscal year end of December 31st, in addressing this item for its quarter ended September 30, 2018, would include any events that resulted in changes to any class of its outstanding shares from the period beginning on January 1, 2016 through September 30, 2018 pursuant to the tabular format above.

Use the space below to provide any additional details, including footnotes to the table above:

C. Debt Securities, Including Promissory and Convertible Notes

Use the chart and additional space below to list and describe any issuance of promissory notes, convertible notes or convertible debentures **in the past two completed fiscal years and any subsequent interim period.**

Check this box if there are no outstanding promissory, convertible notes or debt arrangements: X

Date of Note Issuance	Outstanding Balance (\$)	Principal Amount at Issuance (\$)	Interest Accrued (\$)	Maturity Date	Conversion Terms (e.g. pricing mechanism for determining conversion of instrument to shares)	Name of Noteholder	Reason for Issuance (e.g. Loan, Services, etc.)
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____

Use the space below to provide any additional details, including footnotes to the table above:

4) Financial Statements

A. The following financial statements were prepared in accordance with:

- ☒ U.S. GAAP
☐ IFRS

B. The financial statements for this reporting period were prepared by (name of individual)⁴:

Name: Vasily Grishaev
Title: Accountant
Relationship to Issuer: Provider of service

Provide the financial statements described below for the most recent fiscal year or quarter. For the initial disclosure statement (qualifying for Pink Current Information for the first time) please provide reports for the two previous fiscal years and any subsequent interim periods.

- C. Balance sheet;
- D. Statement of income;
- E. Statement of cash flows;
- F. Financial notes; and
- G. Audit letter, if audited

You may either (i) attach/append the financial statements to this disclosure statement or (ii) file the financial statements through OTCIQ as a separate report using the appropriate report name for the applicable period end. ("Annual Report," "Quarterly Report" or "Interim Report").

If you choose to publish the financial statements in a separate report as described above, you must state in the accompanying disclosure statement that such financial statements are incorporated by reference. You may reference the document(s) containing the required financial statements by indicating the document name, period end date, and the date that it was posted to OTCIQ in the field below.

26th June, 2019

Financial statement information is considered current until the due date for the subsequent report (as set forth in the qualifications section above). To remain qualified for Current Information, a company must post its Annual Report within 90 days from its fiscal year-end date and Quarterly Reports within 45 days of each fiscal quarter-end date.

5) Issuer's Business, Products and Services

The Issuer has acquired 74% of SStartrade SA, a Swiss corporation. This Swiss company controls 100% of the shares of two companies in Russia: one is LLC Gaysky, a steel plant in the Orenburg region; the other being a gold mining company, LLC Favorit Centre. Because of changes in licensing procedures, limiting the size of each property for which a license may be granted to 100 square kilometers (the property in question, known as the Kadara property, is 237.17 square kilometers), LLC Favorit Centre's license to conduct geological surveys and to conduct extraction work on a property located in the Trans-Baikal region of eastern Russia, is now required to be divided into three licenses, all of which are in process. The license renewal process has been ongoing for more than one year, but the Issuer has been unsuccessful in securing the renewal of the license to mine the Kadara property.

⁴ The financial statements requested pursuant to this item must be prepared in accordance with US GAAP or IFRS by persons with sufficient financial skills.

In August, 2018, the State Authority in Russia for subsoil usage advised the Issuer that the new licenses may take still some time, with no indication on how much time, **will be needed, and no positive assurance that the license will be renewed.**

In the fourth quarter of 2018, Russian companies, whose ultimate beneficiary is the Issuer, continued their activities in a more active manner, aimed both at resolving emerging issues with state regulation of subsoil use at the Kadara gold mine deposit, and at minimizing the costs of steel production.

The steel enterprise LLC Gaysky renewed a number of existing contracts and concluded new contracts for a total amount of \$ 68.7 million. Also, despite the beginning of the phased technical re-equipment of two workshops, LLC Gaysky ends this fiscal year with a profit exceeding 4 million US dollars. However, LLC Gaysky still owes \$8M to the bank, which is currently still due, and retooling will be required (due to the replacement of a number of machine tools and workshop equipment). As a result, a decision was made by the Board of Directors of SStarTrade SA to prepare for the sale of LLC Gaysky in order to concentrate solely on the gold mining business, in which most members of the Board of Directors see serious appeal.

As for the situation with the forced reissuance of the licence for the Kadara gold mine deposit in the Trans-Baikal Territory, held by Favorit-Center LLC, **the current situation** is as follows: Fulfilling the existing licence obligations, at the request of Rosnedra, as a licencing government agency, Favorit-Center LLC carried out activities in 2018 to define the boundaries of the licenced area during the geological season. This is because at present the newly adopted Russian regulatory acts do not allow the definition and use of activity areas of the subsoil that are directly adjacent to plots that include explored and (or) developed field and minerals. The boundaries of the plots must be separated at least 5 km from other mineral deposit being explored and (or) developed (i.e., the borders of the explored and (or) developed mineral deposits).

Personnel of Favorit-Center LLC, together with the concerned state geological exploration organization, conducted in 2018 to thicken the explorative network, using deep horizons drilling, flanks and other types of drilling.

The Issuer is currently negotiating with the office of Rosnedra, the relevant Russian governmental authority in Krasnoyarsk, Russia, to understand the extent of the licence in question, as the surface is defined in the licence as 147 square kilometres, while in the new planned surface the extension was to be 237 square kilometres. As of the date of this report, the Issuer cannot give any assurance that the previous licence will be renewed, or if so, when and upon what conditions.

The ongoing delays in the renewal of the Issuer's license have required the Issuer to pursue other opportunities, while the negotiations regarding the Kadara property continue. **As of the date of this Report, the Issuer has not secured any license to mine any other property in the region.**

SSTT (the Issuer) owns 74% of:

SStartrade SA, which owns 100% of:

LLC Gaysky and LLC Favorit Centre (for details of companies see above)

Bruno Horn, CEO of the Issuer, is the contact person for each of the above companies.

6) Issuer's Facilities

In addition to the Gaysky Steel facility, described above, the Issuer's mining concessions—for which renewal of the license is **unclear**, as described above—are located in the TransBaikal region and consist of a undefined number of individual concessions, the number is to be defined by the authority, each of which is subject to receipt of the updated licenses, totalling 237 square kilometres, as described above.

7) Officers, Directors, and Control Persons

Name of Officer/Director and Control Person	Affiliation with Company (e.g. Officer/Director/Owner of more than 5%)	Residential Address (City / State Only)	Number of shares owned	Share type/class	Ownership Percentage of Class Outstanding	Note
Bruno Horn	CEO, CFO, Director, principal shareholder	Lugano, Switzerland	86,859,618	Common stock, \$.0001 pv	87.3	_____
Carla Horn	5% owner	Lugano, Switzerland	9,662,180	Common stoc, \$.0001 pv	9.7	_____
_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____

8) Legal/Disciplinary History

A. Please identify whether any of the persons listed above have, in the past 10 years, been the subject of:

1. A conviction in a criminal proceeding or named as a defendant in a pending criminal proceeding (excluding traffic violations and other minor offenses);

None.

2. The entry of an order, judgment, or decree, not subsequently reversed, suspended or vacated, by a court of competent jurisdiction that permanently or temporarily enjoined, barred, suspended or otherwise limited such person's involvement in any type of business, securities, commodities, or banking activities;

None.

3. A finding or judgment by a court of competent jurisdiction (in a civil action), the Securities and Exchange Commission, the Commodity Futures Trading Commission, or a state securities regulator of a violation of federal or state securities or commodities law, which finding or judgment has not been reversed, suspended, or vacated; or

None.

4. The entry of an order by a self-regulatory organization that permanently or temporarily barred, suspended, or otherwise limited such person's involvement in any type of business or securities activities.

None.

B. Describe briefly any material pending legal proceedings, other than ordinary routine litigation incidental to the business, to which the issuer or any of its subsidiaries is a party or of which any of their property is the subject. Include the name of the court or agency in which the proceedings are pending, the date instituted, the principal parties thereto, a description of the factual basis alleged to underlie the proceeding and the relief sought. Include similar information as to any such proceedings known to be contemplated by governmental authorities.

None

9) Third Party Providers

Please provide the name, address, telephone number and email address of each of the following outside providers:

Securities Counsel

Name: John Lowy
Firm: John B. Lowy, P.C.
Address 1: 645 Fifth Avenue, Suite 400
Address 2: New York, NY 10022
Phone: 212-371-7799
Email: johnl@johnlowylaw.com

Accountant or Auditor

Name: _____
Firm: _____
Address 1: _____
Address 2: _____
Phone: _____
Email: _____

Investor Relations Consultant

Name: None
Firm: _____
Address 1: _____
Address 2: _____
Phone: _____
Email: _____

Other Service Providers

Provide the name of any other service provider(s), including, counsel, advisor(s) or consultant(s) **that assisted, advised, prepared or provided information with respect to this disclosure statement**, or provided assistance or services to the issuer during the reporting period.

Name: None
Firm: _____
Nature of Services: _____
Address 1: _____
Address 2: _____
Phone: _____
Email: _____

10) Issuer Certification

Principal Executive Officer:

The issuer shall include certifications by the chief executive officer and chief financial officer of the issuer (or any other persons with different titles but having the same responsibilities).

The certifications shall follow the format:

I, Bruno Horn, hereby certify that:

1. I have reviewed this Annual Disclosure Statement of SStartrade Tech, Inc.
2. Based on my knowledge, this disclosure statement does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this disclosure statement; and
3. Based on my knowledge, the financial statements, and other financial information included or incorporated by reference in this disclosure statement, fairly present in all material respects the financial condition, results of operations and cash flows of the issuer as of, and for, the periods presented in this disclosure statement.

July 12th, 2019



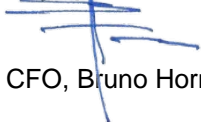
CEO Bruno Horn

Principal Financial Officer:

I, Bruno Horn, certify that:

1. I have reviewed this Annual Disclosure Statement of SStartrade Tech, Inc.;
2. Based on my knowledge, this disclosure statement does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this disclosure statement; and
3. Based on my knowledge, the financial statements, and other financial information included or incorporated by reference in this disclosure statement, fairly present in all material respects the financial condition, results of operations and cash flows of the issuer as of, and for, the periods presented in this disclosure statement.

July 12th, 2019



CFO, Bruno Horn