

OTC Pink Basic Disclosure Guidelines

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

The name of the Issuer is SStartrade Tech, Inc. Until November, 2017, the name of the Issuer was Smart Holdings, Inc.

2) Address of the issuer's principal executive offices

Company Headquarters

c/o Perucchi

CP 6952, Lugano, Switzerland

Phone: 41-79-223-9610

Email: horn@sstartrade.ch

Website(s): www.sstartradetech.com

IR Contact:

None

3) Security Information

Trading Symbol: SSTT

Exact title and class of securities outstanding: common stock

CUSIP: 85235N107

Par or Stated Value: \$.0001

Total shares authorized: 1,975,000,000 as of: 9/30/2018

Total shares outstanding: 99,610,855 as of: 9/30/2018

Transfer Agent

Name: Issuer Direct

500 Perimeter Park Drive

Suite D

Morrisville, NC 27560

Phone: 919-481-4000

Is the Transfer Agent registered under the Exchange Act?* Yes

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

List any restrictions on the transfer of security:

None

Describe any trading suspension orders issued by the SEC in the past 12 months.

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:

1-for-10 reverse split, effective December, 2017.

4) Issuance History

In December, 2017, the Issuer completed a 1-for-10 reverse split of its common shares, resulting in 99,509,868 shares being issued and outstanding (including shares issued to round up to the nearest whole share). Any shares that were previously legended/restricted remained as such.

In February, 2018, the Issuer issued 100,000 shares to an unaffiliated Swiss investor, in exchange for his investment of \$32,609. The transaction was exempt from registration as a private transaction under Section 4(a)(2) of the Securities Act of 1933, and in accordance with Regulation S, as the investor is not a US person. The stock certificate bears appropriate restrictive legends.

5) Financial Statements

The Issuer's Financial Statements for the quarter ended September 30, 2018 were posted separately with OTC Markets separately on December 4, 2018, and are hereby incorporated by reference.

6) Describe the Issuer's Business, Products and Services

Describe the issuer's business so a potential investor can clearly understand the company. In answering this item, please include the following:

A. a description of the issuer's business operations:

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; and the other is 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 kilometres (the property in question, known as the Kadara property, is 237.17 square kilometres), 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 licences, all of which are in process. The licence renewal process has been ongoing for more than one year, but the Issuer has been unsuccessful in securing the renewal of the licence to mine the Kadara property..

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

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.

The ongoing delays in the renewal of the Issuer's licence 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.

For the purpose of strict observance of this Licence Agreement, and accomplishment of the extraction of ore gold in the Trans-Baikal Territory of the Russian Federation, (as uploaded on the website www.sstartradetech.com), the Board of Directors of SStarTrade SA decided, in May 2017, to perform first-priority financing of urgent costs, such as evaluation and geological exploration works and acquisition of mining and quarrying equipment. In order to accelerate the analysis and elaboration the outcome of the surveys conducted in the past years, SStarTrade SA secured a debt financing facility for \$8M in November, 2017. Although this loan was to be repaid early in 2018, the Issuer has secured an extension, and repayment terms are unclear as of the posting of this Quarterly Report. This financing allowed the analysis to permit the confirmation and announcement of 3 to 5 tons of gold to the State balance with the Federal Subsoil Resource Management Agency of the Russian Federation, in February 2018. However, as noted above, the status of any mining licences is unclear; and as of the date of this Report, the Issuer does not have any licences to mine any licenced areas.

The financing originates from the activity of the LLC Gaysky steel plant in Orenburg region (Russian Federation), which is at the moment controlled by SStarTrade SA, which in turn is owned 74% by the Issuer. The Gaysky plant is subject to negotiations for the sale to an industrial group in Russia, and the Issuer believes that the transaction should be closed by the first quarter of 2019.

This will allow the Issuer to concentrate on the primary business of obtaining mining licenses in the Trans-Baikal Territory of the Russian Federation.

B. Date and State (or Jurisdiction) of Incorporation:

The Issuer was incorporated in the State of Nevada on December 6, 2005.

C. The Issuer's SIC Code is 8742.

D. The issuer's fiscal year end date is December 31.

E. Principal products or services, and their markets: The Gaysky steel plant produces cast parts and rolled parts for mechanical industries. 100% of the parts are sold to Russian and former CIS countries markets. The surface where the office building and the production plant are located is owned by Gaysky Steel; the outer deposits and shunting yard are leased by Gaysky Steel to the local authority pursuant to a 49-year agreement, with privileged purchase rights. As noted above, the Issuer is attempting to sell the Gaysky steel plant.

7) Describe the 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 three individual concessions, each of which is subject to receipt of the updated licenses, totalling 237 square kilometres, as described above.

8) Officers, Directors, and Control Persons

A. Names of Officers, Directors, and Control Persons.

The Issuer's sole officer and director is Bruno Horn, a Swiss citizen. His wife, Carla Horn, is a more than 5% shareholder-see below.

B. Legal/Disciplinary History. Neither Bruno Horn nor Carla Horn has, in the last five 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);
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;
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
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.

C. Beneficial Shareholders. The persons beneficially owning more than ten percent (10%) of the Issuer's equity securities are as follows:

Bruno Horn: owns 86,859,618 shares, which is 87.3% of the Issuer's issued and outstanding shares,
Carla Horn, Mr. Horn's wife, owns 9,662,180 shares, which is 9.7%.

9) Third Party Providers

Legal Counsel:

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

Accountant or Auditor:

Name: None

Investor Relations Consultant

None.

Other Advisor: Any other advisor(s) that assisted, advised, prepared or provided information with respect to this disclosure statement: None.

10) Issuer Certification

I, Bruno Horn, CEO and CFO of SStartrade Tech, Inc., hereby certify that:

1. I have reviewed this Quarterly Report 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.

December 11th, 2018



Bruno Horn, CEO and CFO