



Hudson Global Resources (Aust) Pty Ltd

Modern Slavery Statement

Financial Year 2022

21 June 2023

Hudson

Great people. Great performance.

Hudson's Structure & Operations

Hudson is a market leading recruitment and labour hire agency operating in Australia, Singapore and New Zealand.

The core services that Hudson delivers relate to the supply of:

- (a) Permanent recruitment services directed at the placement of candidates as permanent employees directly employed by our customers; and
- (b) Labour-hire services directed at the placement of casual employees at the workplaces of our customers but employed by Hudson.
- (c) Coaching and Outplacement services

Hudson provides services to a range of employer sectors in these markets, but specialises in delivering services to professional services businesses, banking and finance businesses and the public sector.

As of 31 December 2022, Hudson employed approximately 400 permanent employees and 2,300 casual employees / independent contractors across Australia, New Zealand & Singapore

Hudson's Supply Chains

As primarily a "people business", Hudson is heavily dependent on the services provided by our direct and on-hire employees to deliver the services to Customers. Hudson engages a limited number of suppliers to support the delivery of our services to Customers. Hudson's annual total spend on all Suppliers represents just 5% of Hudson's annual revenue.

Those Supplier categories are:

- System Software
- IT Hardware
- IT Services
- Lessors
- Financial & Insurance Services
- Professional Advisers

Risks of Modern Slavery Practices in Hudson's operations and Supply Chains

Modern Slavery refers to any situations of exploitation where a person cannot refuse or leave work because of threats, violence, coercion, abuse of power or deception. The Australian regime defines modern slavery to incorporate conduct that would constitute an offence under existing human trafficking, slavery and slavery-like offences in the Commonwealth Criminal Code. Modern Slavery includes:

- slavery
- servitude
- the worst forms of child labour
- forced labour
- human trafficking
- debt bondage
- slavery like practices
- forced marriage
- deceptive recruiting for labour or services

Hudson has performed a risk assessment of our Modern Slavery risks both within Hudson and in our supply chains. That assessment focused on risks that may cause or contribute to Modern Slavery Practices. The assessment included the delivery of a Modern Slavery Due Diligence Questionnaire in 2021 that:

- made enquiries about Supplier policy and procedure framework in relation to Modern Slavery Practices
- requested Suppliers to identify Modern Slavery Risks
- made enquiries of Suppliers regarding any incidents of Modern Slavery Practices within those organisations

None of the Questionnaire responses that Hudson received identified any areas of concern in relation to Modern Slavery Practices.

Additional to the Questionnaire process, Hudson has identified a limited number of risks of Modern Slavery Practices within our operations and supply chains.

Whilst most risks assessed by Hudson were identified as **LOW**, one risk as assessed as **MEDIUM** having regard to the severity of the potential impact and likelihood of the risk.

Those risks are summarised and assessed in the table below:

Modern Slavery Risk	Risk Assessment 2022	Why?
Forced Labour in our Supply Chain	LOW	<p>Most of Hudson's key suppliers are Software providers that have their own Modern Slavery Statement reporting obligations under Modern Slavery legislation.</p> <p>When entering into agreements with suppliers, Hudson ensures that the agreements contain robust provisions and contractual obligations that align with global modern slavery legislation. These contractual arrangements explicitly outline the supplier's responsibilities and commitments to combat modern slavery, including the implementation of effective policies and practices within their own operations and supply chains.</p> <p>Hudson maintains an ongoing engagement with its suppliers to ensure continuous monitoring and evaluation of their modern slavery practices through its use of its Modern Slavery Due Diligence Questionnaire. This collaborative approach allows for a proactive exchange of information and encourages suppliers to uphold the highest ethical standards in relation to modern slavery.</p>
Deceptive Recruitment Practices	LOW	<p>Hudson ensures that all frontline recruitment employees receive comprehensive training on our fundamental legal obligations, encompassing crucial areas such as misleading and deceptive practices governed by the Australian Consumer Law. This training equips our employees with the necessary knowledge and skills to uphold ethical standards and ensure compliance in day-to-day activities.</p> <p>Hudson maintains a strong partnership with its key software providers, who play a vital role in facilitating the placement of advertising for our services. These providers, including reputable platforms such as www.seek.com have proactively implemented robust controls to combat fraudulent job advertisements, deceptive recruitment practices, and fraudulent hirer accounts.</p>

Modern Slavery Risk	Risk Assessment 2022	Why?
Underpayment of Wages	LOW	<p>Hudson has implemented robust controls to ensure that every worker engaged by Hudson receives at least their minimum entitlements under relevant workplace laws in Australia, New Zealand, Singapore, Pakistan and the Philippines.</p> <p>Those controls include a dedicated Contractor Support team that assesses each new role against a proprietary software tool to ensure the worker is accurately classified to the relevant industrial instrument.</p> <p>The systems and processes that Hudson has implemented have been reviewed by the Fair Work Ombudsman. Periodic internal payroll audits that test the accuracy and reliability of these systems and processes have also been conducted.</p>
Engaging Remote Workers in Remote Locations	MEDIUM	<p>Hudson engages a limited number of remote workers in Pakistan and the Philippines to support certain administrative functions within Hudson and the administrative needs of some of our customers.</p> <p>The remote workers:</p> <ul style="list-style-type: none"> • are primarily engaged in technical administrative support roles • use their own devices (i.e. laptops) • work from home <p>Hudson has identified the following specific modern slavery risks in relation to its engagement of remote workers:</p> <ul style="list-style-type: none"> • Engaging base-skilled workers – performing jobs with low barriers to entry • Underpaying workers • Workers subcontracting their work to one or more subcontractors

Actions taken to address Modern Slavery Practice Risks

Having regard to the risk assessment rating for each of the identified Modern Slavery Practices risks, Hudson implements the following actions to address those risks:

<p>Policy Framework</p>	<p>Code of Conduct: Hudson’s code of conduct outlines the company’s commitment to integrity and maintaining high ethical standards. The Code of Conduct includes standards that Hudson expects of its employees including compliance, governance, violations, fair dealings, anti-harassment, and equal opportunity.</p> <p>Misconduct policy: Hudson’s misconduct policy establishes a framework and escalation process in managing misconduct which is aligned to the Hudson Code of Conduct, and relevant HR policies in relation to employee behaviour.</p> <p>Whistle-blower Protection policy: Hudson’s whistle-blower policy promotes a culture of conducting our business with honesty and integrity and forms part of Hudson’s broader corporate governance network.</p> <p>While the above list of policies is non-exhaustive, these policies serve as foundational documents that guide employee behaviour, outline expected ethical standards, and provide channels for reporting potential areas of risk and non-compliance.</p> <p>By regularly reviewing and revising these policies, Hudson ensures that they remain relevant and aligned with evolving best practices and legal requirements in combating modern slavery.</p> <p>This proactive approach allows Hudson to address any gaps or weaknesses in its policies and strengthen them to effectively tackle modern slavery risks.</p>
<p>Supplier Due Diligence</p>	<p>Hudson has implemented due diligence measures as part of supplier on-boarding and procurement to improve Hudson’s ability to identify Modern Slavery risks associated with new and renewing suppliers. The Modern Slavery Due Diligence Questionnaire is a form which requests information from each supplier in respect of modern slavery in the supply chain. Supplier responses to the questionnaire will assist Hudson to identify and assess risk of modern slavery in the supply chain.</p> <p>This form is non-exhaustive and acknowledges that it is merely an initial request for information. Hudson may subsequently ask for further information and directs suppliers to update responses as more</p>

	<p>information becomes available or if subsequent events make any earlier responses inaccurate.</p> <p>Hudson requests suppliers to provide information on its policies, procedures, and compliance, in addition to any relevant information in respect of procurement, goods and services, whereby there may have been any concerns raised regarding modern slavery in the business or supply chains.</p>
Risk Management Framework	<p>Hudson's Audit, Risk & Compliance Subcommittee (ARCS) is a standing committee of key executives that identifies, assesses all key risks within Hudson together with identifying appropriate controls. To the extent that the ARCS assesses that the risk of any Modern Slavery Practices increases from LOW to HIGH, those risks will form part of the regular Risk Management Framework.</p>
RCSA and APSCo Memberships	<p>Hudson actively leverages its membership in the Recruitment, Consulting & Staffing Association (RCSA) and the Association of Professional Staffing Companies (APSCo) to combat modern slavery risks. These affiliations provide Hudson with valuable resources and materials that address industry-specific risk and compliance concerns, including Modern Slavery.</p> <p>Through its engagement with the RCSA and APSCo, Hudson receives and reviews up-to-date updates, insights, and guidelines, allowing the organisation to strengthen its compliance measures and effectively address modern slavery risks.</p> <p>Participating in industry forums offered by these associations creates a platform for Hudson employees to exchange ideas and information. These forums foster meaningful discussions and facilitate knowledge-sharing among labour-hire industry providers. By actively participating in these forums, Hudson enhances its understanding of prevailing challenges and emerging best practices in combating modern slavery.</p>
Remote Worker Controls	<p>These specific risks are mitigated by the following:</p> <ol style="list-style-type: none"> 1. Hudson remote workers are invariably university educated persons with knowledge and experience in working with modern information systems including software, hardware and industry specific systems (e.g. Microsoft Excel for accounting). Accordingly, they are not engaging in work that has low barriers to entry.

	<ol style="list-style-type: none"> 2. Hudson remote workers are paid well in excess of the minimum wage rates in the relevant country. 3. All payments are facilitated through Multiplier, a globally recognised service provider. Multiplier provides an end-to-end platform that facilitates efficient onboarding, payroll management, tax compliance, social contributions, and local insurance policies for remote workers. 4. Hudson requires all remote workers to provide copies of photo identification documentation (e.g. passport) to verify their identity before engagement. 5. Hudson requires remote workers to use reputable third-party software systems to deliver: <ul style="list-style-type: none"> • a secure remote worker desktop environment attached to the verified identity of the remote worker to prevent data breaches and subcontracting • password cloaking, so core client systems cannot be accessed outside the Hudson supplied environment.
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Assessing the effectiveness of Actions

Hudson's current actions in relation to assessing the effectiveness of actions include:

Regularly reviewing policy and procedure framework

Hudson adopts a proactive stance towards continuous improvement, consistently reassessing and refining our suite of policies and procedures.

This enables us to identify potential gaps or areas where our framework can be further strengthened to address modern slavery risks effectively. By conducting regular reviews, we remain agile and responsive to emerging challenges, ensuring that our policies align with evolving best practices and legal requirements.

Continuous improvement

Hudson culture of open communication encourages employees to actively engage and provide feedback regarding our modern slavery approach. This assists in identifying and addressing any gaps that may exist in our efforts to tackle modern slavery within our operations and supply chains as a labour hire organisation.

Licensing Authorities

Hudson's compliance with modern slavery obligations extends beyond its own operations and encompasses the requirements imposed by labour-hire authorities in the ACT, Victoria, and Queensland. These authorities mandate annual reporting from licence holders, including Hudson, to ensure ongoing demonstration of responsible practices and the suitability of named executives and responsible managers as "fit and proper" individuals.

The successful renewal of our licences demonstrates Hudson's commitment to meeting key legal obligations, including those related to modern slavery. It highlights the effectiveness of our systems and controls in preventing and addressing modern slavery risks within our operations and supply chains. By adhering to these licensing requirements, Hudson demonstrates our dedication to maintaining robust compliance measures.

Hudson's Modern Slavery Statements

Hudson's 2020 Modern Slavery Statement underscored our commitment to implementing specific initiatives aimed at combating modern slavery. One key aspect of these initiatives was the incorporation of Modern Slavery Clauses into contracts.

Consultation

Hudson Global Resources (Aust) Pty Ltd is the reporting entity for this statement (wholly-owned by Apache Group Holdings Pty Ltd). The respective Boards of the entities within the wider Hudson group meet on a regular basis and discuss and address material issues that are common to the Hudson group including legal obligations such as those imposed by the Modern Slavery Act 2018 (Cth) and related legislation.

Approval

This Modern Slavery Statement was approved by the Board of Directors of Apache Group Holdings Pty Ltd on 21 June 2023.



Glenn Boswell
General Counsel and Company Secretary
Hudson Global Resources (Aust) Pty Ltd & Apache Group Holdings Pty Ltd