



Hudson Global Resources (Aust) Pty Ltd

Modern Slavery Statement

Financial Year 2024

June 2025

Hudson
Great people. Great performance.

Hudson's Structure & Operations

Hudson is a market leading recruitment and labour hire agency operating in Australia, New Zealand, India, Pakistan, and the Philippines.

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;
- (b) Labour-hire services directed at the placement of casual employees at the workplaces of our customers but employed or engaged by Hudson;
- (c) Labour-hire services directed at the use of remote temporary and permanent employees for our customers but employed or engaged by Hudson; and
- (d) 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 2024, Hudson employed approximately 200 permanent employees and 1,800 casual employees / independent contractors across Australia, New Zealand, Philippines, India, and Pakistan.

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 2-3% of Hudson's annual revenue.

Those Supplier categories are:

- System Software
- IT Hardware
- IT Services
- Lessors
- Financial & Insurance Services
- Professional Advisers
- Remote payroll and employer of record (**EOR**)

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 recognises that it operates in certain sectors and industries that may have modern slavery risks because of their characteristics and processes, such as the use of short-term contracts and outsourcing, the use of foreign workers or potential recruitment strategies by suppliers, their agents or other labour hire agencies.

Hudson also recognises that it operates in countries that also may have higher risks of modern slavery due to factors including:

- Poverty & illiteracy
- Lack of effective labour inspections
- Gender Inequality
- Internal Displacement
- Ineffective government

Specifically, Hudson engages remote workers in:

- the Philippines through a wholly owned subsidiary; and
- Pakistan and India through third-party EOR providers.

As of the completion of this report, Hudson currently engages the following number of workers in each region respectively:

- Philippines: 89 workers
- Pakistan: 20 workers
- India: 6 workers

To ensure wage compliance and the fair and equal treatment of offshore and remote workers, we have implemented specific operational processes:

Formal Contracts: All workers, including those in Pakistan, India, and the Philippines, are provided with formal employment contracts or independent contractor agreements that clearly outline their roles, responsibilities, and remuneration packages. These contracts are crafted to

exceed in-country labour law requirements and often aligning to Australian labour law requirements, ensuring transparency and fairness.

Formal Pay Conditions: Hudson has established formal pay conditions in all locations. These conditions are regularly reviewed and updated to reflect any changes in local and Australian labour laws, ensuring ongoing compliance.

Comprehensive Policies: Hudson's comprehensive policies cover various aspects of employment, including anti-discrimination, health and safety, and grievance procedures. These policies are communicated to all employees and enforced consistently to maintain a fair and equitable working environment.

Regular Contact with Workers: Hudson maintains regular communication with our workers to ensure alignment with our operational standards and to share best practices. This interaction helps Hudson monitor compliance and address any potential issues promptly.

Support Services: Hudson provides support services to all workers, including access to HR support and counselling. These services are designed to assist employees in understanding their rights and accessing resources when needed.

Transparent Wage Disclosure: Wages and benefits are clearly communicated to all employees during the hiring process and through regular updates. This transparency ensures that workers are fully aware of their earnings and any deductions.

Wage Comparisons: Hudson regularly conduct wage comparisons to ensure our pay rates are competitive and fair. This involves benchmarking against industry standards and local wage data to confirm that our compensation packages are equitable and in line with or above local requirements.

Reputable Remote Payroll Providers: For employees who are not directly engaged by Hudson, Hudson utilises reputable remote payroll and EOR providers. These providers ensure that all employment and payroll processes adhere to local and international labour laws and standards.

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 2024	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>
Deceptive Recruitment Practices	LOW	<p>Hudson ensures that all frontline recruitment employees receive comprehensive training on our fundamental legal obligations including misleading and deceptive practices governed by the Australian Consumer Law.</p> <p>Hudson maintains strong partnerships 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>
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.</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>

Modern Slavery Risk	Risk Assessment 2024	Why?
Engaging Remote Workers in Remote Locations	MEDIUM	<p>Hudson engages a limited number of remote workers in Pakistan, India, 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 <p>To mitigate the identified risk of subcontracting, Hudson's Australian-based staff maintain regular contact with remote workers and engage with them in priority setting, success metrics tracking, and quality and time management expectations.</p> <p>In addition, Hudson utilises third-party service providers in some locations – such as Vietnam – that provide managerial supervision of remote workers in a secure and safe office environment.</p>

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:

Policy Framework	<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</p>
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		<p>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>
Supplier Diligence	Due	<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.</p>
Risk Management Framework		<p>Hudson operates a Risk Management Framework that involves a standing committee of key executives that identifies key risks, allocates responsible owners, allocates a Risk Score and identifies and agrees appropriate controls. To the extent that the committee 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 Membership		<p>Hudson actively leverages its membership in the Recruitment, Consulting & Staffing Association (RCSA) to mitigate employment risks. membership provides 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, 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>
Remote Worker Controls		<p>These specific risks are mitigated by the following:</p> <p>Hudson remote workers are predominantly 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.</p> <p>Foreign worker remuneration is calculated according to labour laws and statutory entitlements of the country in which the worker is based. To remain competitive and attract the best talent in the market, remuneration</p>

	<p>packages on offer are often well above statutory minimums. To calculate remuneration packages, we rely on a combination of internally developed rate calculators and reputable third-party providers.</p> <p>Terms and conditions of foreign workers engaged by Hudson are in accordance with the minimum statutory requirements of the country in which the worker resides. In the event there are discrepancies between Australian and foreign labour laws, we offer pay, entitlements, and conditions more than the minimums required by law to attract top talent in those respective markets.</p> <p>Hudson requires all remote workers to provide copies of photo identification documentation (e.g. passport) to verify their identity before engagement.</p> <p>Hudson requires remote workers to use reputable third-party software systems to deliver:</p> <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 (General)

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.

Assessing the effectiveness of Actions (Remote Workers)

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

Worker Verification

Hudson will continue to use technology and local partnerships to verify the identity of workers and their working conditions, ensuring they have legal working status and are not subject to coercion or debt bondage.

Contracts and Fair Payment Practices

Hudson ensures all workers receive clear and understandable contracts outlining their rights, duties, and remuneration, in compliance with local labour laws and international human rights standards. Hudson payment systems guarantee timely and fair compensation directly to the workers, minimising the risk of financial exploitation by intermediaries.

Monitoring and Audits

Hudson conducts regular check-ins with workers to discuss their working conditions and any concerns they may have, facilitated through digital communication tools. Quarterly check-ins are conducted with all our suppliers, discussing compliance with modern slavery laws, updates on any changes in the supplier's operations that might affect risk levels, and reviews of any incidents or concerns reported in the previous quarter.

Training and Awareness Programs:

Hudson will provide training for workers on their rights and how to report concerns about modern slavery through online modules. Training will also be extended to all employees involved in hiring and managing workers are trained to recognise signs of modern slavery and understand the appropriate steps to take if they suspect exploitation. Hudson will establish confidential and anonymous reporting mechanisms for workers to raise concerns about modern slavery, including hotlines and email.

Consultation

Hudson Global Resources (Aust) Pty Ltd is the reporting entity for this statement (wholly owned by Apache Group Holdings Pty Ltd).

Key executives were consulted and engaged in the preparation of this Statement.

Approval

This Modern Slavery Statement was approved by the Board of Directors of Apache Group Holdings Pty Ltd on 26 June 2025. This statement is signed by Kendall Ryan in his role as the Chief Financial Officer of Hudson Global Resources (Aust) Pty Ltd and Apache Group Holdings Pty Ltd



Kendall Ryan
Chief Financial Officer

Hudson Global Resources (Aust) Pty Ltd & Apache Group Holdings Pty Ltd
~~24/10/2024~~ 24/10/2025