



Hudson Global Resources (Aust) Pty Ltd

Modern Slavery Statement

FY2021

30 June 2022

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

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 in respect of the following roles:

- Accounting & Finance
- Administration & Office Support
- IT & Technology
- Graduate and Project Recruitment
- Executive Recruitment
- Human Resources
- Marketing & Communications
- Career and Outplacement
- Risk & Compliance.

As of 31 December 2021, Hudson employed the following numbers of employees in the following jurisdictions:

Jurisdictions	2021 Employees (casual and permanent)
Australia	2,791
New Zealand	286
Singapore	33

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. For example, 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 Practice 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. Each of those risks is assessed as LOW 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 2021	Why?
Forced Labour in our Supply Chain	LOW	Most of Hudson's key suppliers are Software providers that have their own Modern Slavery Statement reporting obligations.
Deceptive Recruitment Practices	LOW	Hudson trains all frontline recruitment employees about our key legal obligations, including misleading and deceptive practices under the Australian Consumer Law. Additionally, our key Software providers for the placement of advertising for our services (including www.seek.com) have implemented controls designed to prevent and detect fraudulent job ads, including deceptive recruitment and fraudulent hirer accounts.
Underpayment of Wages	LOW	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 and Singapore. 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>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>
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Actions taken to address Modern Slavery Practices risks

Having regard to the **LOW** 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>Supplier & Client Due Diligence</p>	<p>In 2021 Hudson adopted and implemented a revised Delegations framework to accommodate a significant business restructure implemented in April 2021. The revised Delegations include limitations on employees entering and reviewing contracts, including contracts with Suppliers. Only senior employees (with knowledge and understanding of Modern Slavery risks) are delegated to enter material contracts with Suppliers.</p> <p>In 2021, Hudson implemented a process for Clients that Hudson casual employees at their premises (Host Clients). All Host Clients are required to complete and submit an “on-site safety questionnaire”. The Hudson Safety Team assesses those responses and either grants or rejects approval. This process ensures that our employees are not subject to unsafe work practices, including slavery-like practices.</p>
<p>Risk Management Framework</p>	<p>Hudson’s Audit, Risk & Compliance Committee (ARCC) is a standing committee of key executives that identifies, assesses all key risks within</p>

	<p>Hudson together with identifying appropriate controls. To the extent that the ARCC 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> <p>No such assessments were made in 2021.</p>
<p>RCSA Membership</p>	<p>As an RCSA member, Hudson receives and reviews up-to-date materials from the RCSA about industry specific risk and compliance issues and insights, including Modern Slavery. RCSA forums attended by Hudson employees allow the exchange of ideas and information with other providers in the labour-hire industry.</p>

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 continuous improvement approach regarding regularly reviewing the suite of policy and procedure frameworks.

Continuous improvement: Internally, employees can engage and provide feedback where they see fit. This collaborative approach allows for ineffectiveness and gaps in our modern slavery approach to be addressed.

Licensing Authorities: Labour-hire authorities in the ACT, Victoria and Queensland impose annual reporting obligations on licence holders (including Hudson). Hudson is required to continually demonstrate that it adopts responsible practices and that named executives and responsible managers are "fit and proper" persons. Hudson's successful renewal of these licences demonstrates that Hudson conforms with key legal obligations and that its systems and controls are effective

2020 Modern Slavery Statement: The 2020 Modern Slavery Statement referred to implementing Modern Slavery initiatives, including measuring the number of contracts that include Modern Slavery Clauses. In 2021, a key Hudson initiative was entering an Enforceable Undertaking with the Fair Work Ombudsman (EU) in relation to historic breaches of the Fair Work Act and complying with that EU. In the Modern Slavery context, the measures we have implemented during the EU process has meant that Hudson's risk of underpaying employees in the future has been further reduced. The focus on the EU meant that Hudson could not implement those Modern Slavery initiatives, although significant progress was made in relation to Risk and Compliance matters generally with the implementation of new Delegations (see above).

In 2022, Hudson' remains focused on complying with the EU obligations. By 31 December 2022, Hudson plans to have developed a framework to objectively measure Modern Slavery risks including training measurement and measuring engagement with Suppliers on Modern Slavery issues.

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 with 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 29 June 2022.



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