

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
HUDSON GLOBAL, INC.		59-3547281	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
MATTHEW DIAMOND	+1 203 489 9505	MATT.DIAMOND@HUDSONRPO.COM	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact	
53 FOREST AVE, 1ST FL		OLD GREENWICH, CT 06870	
8 Date of action		9 Classification and description	
JUNE 10, 2019		1:10 REVERSE STOCK SPLIT OF COMMON	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
443787205		HSON	

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ On June 10, 2019, the company effected a 1-for-10 reverse stock split of the company's common stock.
Cash will not be issued for fractional shares. Rather, where fractional shares exist on the conversion, the fractional share will be rounded up to the nearest whole share.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ The company's stockholders are required to allocate the aggregated cost basis in their shares of common stock held immediately prior to the reverse split among the shares of common stock held immediately after the reverse split. A stockholder's tax basis in one (1) share of common stock held immediately after the reverse split is equal to the stockholder's tax basis in ten (10) shares of common stock held immediately before the reverse split. The total tax basis of each stockholder in common shares received in the reverse split should equal the total tax basis of the stockholder in common shares before the reverse split.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ There is no change in the total tax basis of the shares of a stockholder as a result of the reverse split. Stockholders who acquired their shares on different dates and at different prices are encouraged to consult their own tax advisers regarding the allocation of the tax basis of such shares.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ The reverse stock split is a non-taxable recapitalization pursuant to Section 368(a)(1)(E) of the Internal Revenue Code. Section 354(a)(1) provides that no gain or loss shall be recognized if the stock in a corporation is exchanged solely for stock in such corporation. Section 358(a) provides that the tax basis of the stock in a corporation received is an exchange will be the same as the tax basis in the stock exchanged.

18 Can any resulting loss be recognized? ▶ No loss will be recognized as a result of the reverse stock split.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The reportable tax year for the reverse stock split of the common stock is the 2019 calendar year.

The information set forth in this Form 8937 does not constitute tax advice, does not take into account any stockholder's specific facts and circumstances, and does not purport to be a complete summary of the tax consequences of the reverse split to a stockholder. Each stockholder should consult such stockholder's own tax adviser with respect to the tax consequences of the reverse split to such stockholder.

Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ▶ 

Date ▶ June 21 2019

Print your name ▶ Patrick Lyons

Title ▶ Chief Financial Officer

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Firm's name ▶			Firm's EIN ▶	
Firm's address ▶			Phone no.	