

**Report of Organizational Actions
 Affecting Basis of Securities**

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Hudson Global, Inc.		2 Issuer's employer identification number (EIN) 59-3547281	
3 Name of contact for additional information David Kirby	4 Telephone No. of contact 212-351-7216	5 Email address of contact David.Kirby@hudson.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 1325 Avenue of the Americas, 12th Floor		7 City, town, or post office, state, and Zip code of contact New York, NY 10019	
8 Date of action 6/24/2016		9 Classification and description Common Stock	
10 CUSIP number 443787106	11 Serial number(s)	12 Ticker symbol HSO	13 Account number(s)

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 24, 2016, Hudson Global, Inc. (Hudson) made cash distributions of \$0.05 per share to its shareholders of record on June 14, 2016.

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 ▶ Hudson has determined that 100% of the distributions paid on June 24, 2016 will be treated as a nontaxable return of capital to the extent of the shareholder's tax basis. Any amount in excess of the shareholder's tax basis will be treated as a capital gain for U.S. tax purposes.

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 ▶ Hudson completed an earnings and profits (E&P) calculation as of December 31, 2016, with an estimate of the current E&P for the year ending December 31, 2016. According to this calculation, Hudson does not have any current or accumulated E&P. Therefore, 100% of the distributions is a return of capital.


Part II Organizational Action (continued)

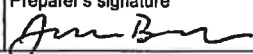
17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
Section 301(c) and Section 316

18 Can any resulting loss be recognized? ▶ N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
Reportable tax year: 2016

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.

Sign Here
Signature ▶  Date ▶ 1/9/2017
Print your name ▶ PATRICK LYONS Title ▶ CFO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	PRICEWATERHOUSECOOPERS, LLP		12/21/16		P01440910
	Firm's name ▶ PRICEWATERHOUSECOOPERS, LLP	Firm's EIN ▶ 13-4008324	Phone no. 646-471-3000		
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