

TAKE-TWO INTERACTIVE

U.K. MODERN SLAVERY STATEMENT 2022

The U.K. Modern Slavery Act 2015 (the "Act") requires certain businesses to prepare and publish an annual Modern Slavery Statement setting out the efforts undertaken during the fiscal year, and those that are ongoing, to ensure that slavery and human trafficking are not present in their own businesses or in any of their supply chains. We believe the Act serves as a valuable tool to combat these illegal practices, and are committed to maintaining and improving procedures that help to ensure compliance with it.

Take-Two Interactive Software, Inc. ("Take-Two") is a leading developer, publisher and marketer of interactive entertainment for consumers around the globe. The Company develops and publishes products principally through Rockstar Games, 2K, Private Division, and Zynga. Our products are currently designed for console systems, PC, and mobile, including smartphones and tablets, and are delivered through physical retail, digital download, online platforms and cloud streaming services. Take-Two's common stock is publicly traded on NASDAQ under the symbol TTWO.

This Modern Slavery statement is made on behalf of Take-Two Interactive Software UK Limited and Take-Two GB Limited, subsidiaries of Take-Two that operate in the UK. It sets out the steps taken and advanced by Take-Two and its affiliated organisations ("Affiliates") in the prior fiscal year to guard against the presence of modern slavery in our organization and in our supply chain.

A. WHAT IS MODERN SLAVERY?

Modern slavery is a violation of fundamental human rights, and is a crime. It takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking. It exists in both developed and developing economies across many business sectors.

B. OUR COMMITMENT

Take-Two is committed to conducting business ethically, with honesty and integrity, and treating everyone with dignity and respect. We have no tolerance for modern slavery in our organization or in our supply chain.

We are committed to complying with all applicable laws and regulations, and promoting a work environment that values honesty, openness, integrity, and respect for others. Moreover, we promote respect for the fundamental freedoms articulated in the United Nations' Universal Declaration of Human Rights, and seek to combat the abuses of modern slavery such as forced and compulsory labour and human trafficking that exist in both developed and developing economies across a multitude of business sectors.

We expect all of our suppliers and business partners to maintain these same high standards of conduct, for themselves and their business partners.

C. OUR POLICIES AND PRACTICES

We constantly evaluate the effectiveness of our business practices, and fortify our policies and procedures. We aim to mitigate, to the greatest extent possible, our Company's key compliance risks. Specifically with respect to modern slavery, we have multiple policies and procedures in place to defend against its entry in our business or supply chains, some of which are outlined below.

Our Hiring and Employment Practices

Our employee recruitment processes, in the United Kingdom and globally, are robust and in line with all applicable employment laws and regulations. We conduct “right to work” document checks and ensure all employees are 16 years of age or older.

Compensation and other rewards are in compliance with all applicable laws and regulations including minimum wage and holiday entitlement laws, are competitive with the relevant market, and are reviewed annually. All employment is freely chosen, and employees are free to resign at any time.

We offer a generous benefits package, with supplementary financial, health and welfare benefits, and family-friendly leave options to support our employees’ (and their families’) lifestyle choices.

Take-Two Interactive Software, Inc. and its Affiliates are committed to providing a work environment that is based upon dignity and respect, and is free from harassment. Employment at any of our locations around the world is dependent upon substantive ability, talent and work ethic, not on an individual’s race, colour, religion, creed, sex or gender, age, national origin or ancestry, physical or mental disability, pregnancy, sexual orientation, gender identity, marital status, veteran status, genetic information, or other characteristics protected by any applicable law. Our commitment to equal employment opportunity applies to all aspects of the employment relationship, from recruitment and hiring through compensation, benefits, discipline and termination.

Our Global Code of Business Conduct and Ethics

Our Global Code of Business Conduct and Ethics (the “Global Code”) reflects Take-Two’s core values and demonstrates our commitment to conducting business fairly and ethically, and to promoting a work environment that values honesty, openness and integrity. The Global Code applies to Take-Two Interactive Software UK Limited and Take-Two GB Limited (as well as all Take-Two Affiliates globally), and all directors, officers, employees, consultants, contractors and agents who do business on behalf of Take-Two and/or its Affiliates (the “Employees and other Covered Individuals”).

As our Global Code highlights, we are committed to ensuring that none of the products we develop, have manufactured or sell, including promotional materials, are made using child labour, prison labour, or are in violation of any law prohibiting modern slavery or human trafficking. The current version of our Global Code is published under the Policies & Conduct tab of our corporate website at www.take2games.com.

The Global Code Reflects Our Culture

The Global Code sets out our commitment to ethical business practices, and provides a guide to ethical decision-making. It strictly prohibits any form of illegal discrimination or harassment in the Company, and encourages and promotes equal opportunities for all Employees and other Covered Individuals.

We constantly review our Global Code to ensure it is up to date and adequately addresses relevant legal, cultural, and social developments. We recently added a section to our Global Code encouraging Employees and other Covered Persons to be active in public service and in the civic life of their communities, including with respect to charitable and educational activities. We also bolstered our Code’s stated commitment to providing an inclusive workplace in which everyone feels respected, heard and safe, and to welcome candidates and colleagues from a variety of social, cultural, racial, ethnic, religious and economic backgrounds.

The Global Code Mandates Reporting Any Knowledge or Suspicion of Human Rights Abuses, Slavery, or any other Violation of Law or of Our Global Code.

The Global Code requires Employees and other Covered Individuals to report any actual or suspected violations of applicable laws, regulations, or the Global Code. It sets out a clear process, and several different options, for reporting any such violations, including a telephone number of an independent third-party with whom Employees and other Covered Individuals—or anyone who suspects a violation—can make a confidential report.

The Global Code also makes clear that anyone who, in good faith, reports any actual or suspected violation of applicable law, regulation or the Global Code will not be subject to any disciplinary, retaliatory or adverse employment action of any kind.

The Code is available in ten languages. All Employees and Other Covered Individuals must certify their agreement to abide by the Code upon joining the Company.

Our Global Policy Regarding Human Rights and Modern Slavery

Our Global Human Rights and Modern Slavery Policy emphasises our commitment to tackling issues of slavery and conducting our business in a fair and ethical manner. It underscores our respect for the fundamental freedoms outlined in the United Nations' Universal Declaration of Human Rights and outlines the steps we take both within our own business and within our supply chains to combat issues of modern slavery such as forced and compulsory labour and human trafficking. The policy is publicly available at www.take2games.com under the Policies & Conduct tab.

Our Employees and other Covered Individuals are encouraged to familiarise themselves with the Global Policy Regarding Human Rights and Modern Slavery, and to use our internal reporting systems for any potential questions or concerns regarding our business, suppliers or supply chain.

Our Global Gifts and Entertainment Policy

Take-Two is in the process of adopting a Global Gifts and Entertainment Policy that reflects the Company's commitment to operating fairly, ethically, and legally wherever in the world we do business. The Global G&E Policy makes clear that no gift or entertainment may be given or received in exchange for an improper benefit, or to improperly influence a business decision or performance.

Our Diversity Statement

Take-Two's Diversity Statement, published at www.take2games.com under the Policies & Conduct tab, makes clear our belief that a multiplicity of experiences, affiliations and perspectives contributes to a stronger, more dynamic and more cohesive organization, and reflects our commitment to enhancing diversity at Take-Two and throughout our industry. It describes our efforts to provide an inclusive workplace in which everyone feels respected, heard and safe, as well as our culture of compassion and respect that fosters a warm, welcoming environment for all qualified candidates and colleagues.

Our Diversity Statement also outlines our efforts to expand the diversity of our industry's candidate pool through scholarships to minority game design students, contributions to organizations providing STEM opportunities to children in underserved communities, and by delivering interview training and career counselling to young adults in those communities.

Finally, our Diversity Statement highlights our Company's commitment to support inclusion in our communities and among our customers through financial contributions to social justice

organizations, service and volunteer projects, and in working to support the rights of marginalized and underserved communities.

Our Global Policy for Reporting Misconduct

Our Global Policy for Reporting Misconduct, published under the Policies & Conduct tab at www.take2games.com, provides that all persons acting on behalf of Take-Two must promptly report any actual or suspected violation of applicable law, regulation, or Company policy, including of any of the policies discussed in this Modern Slavery Statement. It details the various ways any person may submit a report of misconduct, confidentially if desired, or anonymously where permitted by law, including:

- In person or by phone to a Take-Two supervisor, member of Take-Two's legal department, or any Human Resources representative
- In person or by phone to the Company's General Counsel or Head of Internal Audit
- In person or by phone to any member of the Company's Board of Directors
- Through our externally managed Ethics Point service, through its website take2.ethicspoint.com, or by calling Ethics Point toll-free by phone from 20 countries, 24 hours a day and seven days a week

The Policy for Reporting Misconduct outlines the action the Company will take upon receiving a report of misconduct, and notes that all complaints will be investigated promptly and with discretion. It also provides assurance that no disciplinary, retaliatory, or adverse action of any kind will be taken against any person who in good faith reports an actual or suspected violation of applicable law, regulation, or the Global Code of Business Conduct and Ethics, regardless of whether such violation is ultimately determined to have occurred.

Our Inaugural Environmental, Social and Governance (ESG) Assessment and Report

Take-Two aims to operate in a manner that is not only inclusive and welcoming of our employees and communities, but that is also fiscally prudent and environmentally responsible. This past year, as part of that effort, Take-Two completed its first ESG materiality assessment, and recently published our inaugural annual ESG Report. That report is accessible at www.take2games.com under the Investors tab.

Take-Two's materiality assessment is helping us to identify, map, and measure the impact our environmental, social and governance activities have on our Company, our communities, and our global environment. It takes into consideration ESG standards and practices within and outside of our industry; inputs from various stakeholders including key members of our Company's business groups, shareholders, and business partners; the wishes and needs of our consumers; and other relevant factors. In particular, it is helping us assess our greenhouse gas footprint to develop an actionable and measurable plan to improve our environmental impact. Through this process, Take-Two will formalize ESG goals, targets and key performance indicators (KPIs), and establish a roadmap for our future ESG efforts.

D. OUR IN-DEPTH TRAINING PROGRAM TO PROMOTE COMPLIANCE WITH OUR POLICIES AND PRACTICES

Upon joining Take-Two or any of its Affiliates, and approximately every two years thereafter, our Employees and other Covered Persons receive intensive online compliance training regarding the

requirements of our Global Code, Anti-Bribery and Corruption, Anti-Trust/Competition Law, Anti-Harassment and Discrimination, and Data Privacy, and our Policy for Reporting Wrongdoing.

Online training courses are available in eleven languages, and are periodically updated and refreshed.

In addition to online training sessions, employees in a wide range of business groups, including those in senior and higher-risk positions, are engaged approximately every two years in live compliance training workshops. These workshops provide an opportunity to review and discuss the compliance topics listed above, as well as to provide targeted training to particular business groups regarding our third-party diligence process, our Supplier Code of Conduct, our global Policy Regarding Human Rights and Modern Slavery, and other compliance policies and procedures. These sessions facilitate outreach to a broad range of Employees and other Covered Persons globally, and also serve as informal, ongoing compliance risk assessments for each location or group.

E. SEEKING BEST PRACTICES IN OUR SUPPLY CHAINS

To carry out our business activities, we work with and rely on a variety of third parties.

Our supply chain is primarily comprised of disc replicators located in the United States, Mexico, Brazil, Ireland, Germany, Austria, China and Japan. We also contract with other businesses that provide printing, distribution, shipping, logistics, marketing, manufacturing, and other services on our behalf (“Suppliers”).

The Modern Slavery Statements of our key Suppliers, including replicators, reflect their own prohibitions on any form of forced, involuntary, or child labour, or human rights abuses of any kind, in their operations or those of their suppliers. They also commit to conducting periodic internal and/or independent third-party audits and re-audits of their supply chains to ensure compliance with high labour, employment, health, and safety standards, and to determine areas for improvement.

Our Third-Party Diligence Process and Our Supplier Code of Conduct

Suppliers acting on behalf of Take-Two and its Affiliates are required to abide by our Supplier Code of Conduct (“Supplier Code”), published under the Policies & Conduct tab at www.take2games.com.

Our Supplier Code echoes the commitment Take-Two has made, throughout its other policies and core business practices, to conduct business fairly and ethically, comply with all applicable laws and regulations, and to promote a work environment that values honesty, openness, integrity, and respect for fundamental human rights, wherever in the world we operate.

We incorporate the terms of our Supplier Code into our Supplier agreements. We also provide a copy of our Supplier Code—available in thirteen languages—to Suppliers upon engagement.

We conduct risk assessments and undertake pre-engagement risk-based due diligence to confirm Suppliers have historically operated in a manner that is fair, ethical, and respectful of the law and human rights. We also require our Suppliers to adhere both to the letter and the spirit of our Supplier Code in all business dealings with or on behalf of Take-Two.

Moreover, we require Suppliers to promptly notify us if, in the course of their work for Take-Two, they become aware that any applicable laws and/or provisions of the Supplier Code have been violated. We also require immediate notification of any criminal or civil legal actions, investigations, fines or other sanctions that relate to their work for Take-Two.

Our Supplier Code reiterates portions of our Policy for Reporting Misconduct, advising Suppliers of the various methods to report a legal or ethical violation, or provide notice of a legal action,

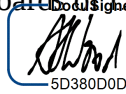
including through our externally managed Ethics Point hotline that is available online or toll-free by phone from 20 countries, 24 hours a day, seven days a week.

We regularly train our Employees and Other Covered Persons about our Supplier Code of Conduct, to ensure that our entire organization is engaging only ethical and law-abiding Suppliers, and holding our existing Suppliers to the same standards of integrity to which Take-Two has committed.

We also provide training regarding our Supplier Code to certain of our consultants and third-party agents and suppliers, to promote their understanding of and compliance with its obligations.

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This Modern Slavery Statement covers the financial year ending March 2022 and has been approved by the Boards of Directors of Take-Two Interactive Software UK Limited and Take-Two GB Limited.


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12 September 2022

Signature of Director

Date

Andrew Wood

Director of Take-Two Interactive Software UK Limited
and Take-Two GB Limited