

## **TAKE-TWO INTERACTIVE**

### **U.K. MODERN SLAVERY STATEMENT 2024**

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 gaming 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, NaturalMotion Games Limited, and Gram Games 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. Compensation levels are reviewed annually, and benefits and leaves packages are reviewed periodically. 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 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](http://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 have 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 across social, cultural, racial, ethnic, religious and economic backgrounds.

**The Global Code Mandates Reporting Any Knowledge or Suspicion of Human Rights Abuses, Slavery, Unlawful Discrimination, Harassment, 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 website and 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](http://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 has adopted 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.

**Diversity & Inclusion**

It is our belief that a multiplicity of experiences, affiliations and perspectives, contribute to a stronger, more dynamic and more cohesive global organization. Additionally, we believe strongly in corporate citizenship and support these efforts by way of service projects, volunteerism, and philanthropy. We have supported the mission and work of numerous organizations across the UK while promoting visibility into our industry in hopes of providing greater access and opportunity to underserved communities. Our goal in these efforts is to uplift and leverage our shared values as an organization that values diversity and inclusion.

**Our Global Policy for Reporting Misconduct**

Our Global Policy for Reporting Misconduct, published under the Policies & Conduct tab at [www.take2games.com](http://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, any member of Take-Two's legal department, or any Human Resources representative
- In person or by phone to the Company's Chief Legal Officer 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](https://take2.ethicspoint.com), or by calling Ethics Point toll-free by phone from 25 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 Impact 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. As part of that effort, Take-Two published in September its 2024 Impact Report. That report is accessible at [www.take2games.com](https://www.take2games.com) under the Investors tab.

These efforts are managed by our Sustainability Committee comprised of senior-level management from across the organization. This committee is overseen by the Board of Directors via the Corporate Governance Committee. The mandate of our Sustainability Committee is to ensure that, where appropriate, sustainability considerations are incorporated into our corporate strategy, disclosure, and long-term goals to maintain and advance sustainable shareholder value.

### **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, including our policies concerning 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 comprised of companies and individuals around the world that provide various kinds of goods, services and resources. These include disc replicators located in the United States, Mexico, Brazil, Poland, Germany, Austria, and Japan; technology companies located in the United States, China, India and elsewhere; and marketing companies, artists, engineers, game developers, and game testers located around the world. We also contract with other businesses that provide printing, distribution, shipping, logistics, manufacturing, and other services on our behalf (“Suppliers”). Our Suppliers generally do not make use of unskilled labour and therefore are at low risk of Modern Slavery.

The Modern Slavery Statements of our key Suppliers, including replicators and technology companies, 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](http://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 25 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 2024 and has been approved by the Boards of Directors of Take-Two Interactive Software UK Limited, NaturalMotion Games Limited, and Gram Games Limited.


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October 24, 2024

Signature of Director of Take-Two

Interactive Software UK Limited


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