

GLOBAL POLICY REGARDING HUMAN RIGHTS AND MODERN SLAVERY

Take-Two Interactive Software, Inc. 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, 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.

1. Our Commitment

In our business operations throughout the world, Take-Two is committed to conducting business fairly and ethically, 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 have no tolerance for human rights abuses, nor for any form of modern slavery, either in our organization, or in our supply chains.

2. Our Policies and Practices

To ensure that human rights are respected, and that modern slavery has no role in our business or supply chains, we take the following actions:

Our Hiring and Employment Practices

- Our employee recruitment processes 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. They are competitive with the relevant market, and are reviewed annually. All employment is freely chosen, and employees are free to resign their positions at any time.
- We offer a generous benefits package, with additional health and welfare options to support our employees' (and their families') lifestyle choices.

- Employment at any of our locations around the world is dependent upon substantive ability, talent and work ethic, not an individual's race, color, 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 their 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 "Code") reflects Take-Two's core values and demonstrates our commitment to conducting business fairly and ethically and promoting a work environment that values honesty, openness, integrity, and respect for fundamental human rights. The Code applies to all directors, officers, employees, consultants, contractors and agents who do business on behalf of the Company, wherever located.

As our 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 labor, prison labor, or are in violation of any law prohibiting modern slavery or human trafficking.

We also have a supplier-facing Code of Business Conduct and Ethics (the "Supplier Code") based on these same principles. Suppliers, vendors, business partners, and other third parties we engage are held to the same standards as are Take-Two's own personnel.

The Code Reflects Our Culture

- The 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.

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

- The Code requires employees to report any actual or suspected violations of applicable laws, regulations, and the 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—or anyone with knowledge of a violation—can make a confidential report. The Code also designates certain senior individuals within the Internal Audit and Legal departments to receive such reports.
- The Code also makes clear that anyone who, in good faith, reports any actual or suspected violation of applicable law, regulation or the Code will not be subject to any disciplinary, retaliatory or adverse employment action of any kind.

We Regularly Train Our Employees and Certain Third Parties to Promote Compliance with Our Code

- Upon joining Take-Two or any of our affiliates, our employees receive training regarding the requirements of our Code, where to turn with any questions and for advice, and how to report any suspected violations, including the option, where legally permissible, of using the confidential reporting hotline. We aim to refresh this training, frequently in person, biennially.
- In addition, we provide training regarding our Supplier Code to certain of our consultants and third-party agents and suppliers, to ensure their understanding of and compliance with its standards.

Best Practices in Our Supply Chains

We work with and rely on a number of suppliers to carry out our business activities.

Our supply chain is primarily comprised of disc replicators located in the United States, Mexico, Brazil, Ireland, Germany, Austria, China and Japan, printers, shipping and logistics providers, advertising agencies, and software licensors. From time to time, we also contract with third parties to develop and manufacture promotional items that are used to market our games.

- As set out in our Code and Supplier Code, we seek to guard against any child labor, slave labor, prison labor, modern slavery or human trafficking in any part of our business, including in our supply chains. We expect our suppliers to uphold the same core values and standards that we set for ourselves.
- Where appropriate, when contracting with third parties, we seek to obtain from those third parties, and from any applicable subcontractors, a representation that they will respect human rights, and not use any child labor, slave labor, prison labor, or engage in any modern slavery or human trafficking in the performance of their services.
- Our key replicators and suppliers have adopted their own human rights policies denouncing modern slavery and human rights abuses of any kind in their operations or in 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 robust labor, employment, health, and safety standards, and to determine areas for improvement.