

T2

2021 ESG Report

**ENVIRONMENTAL,
SOCIAL, AND
GOVERNANCE**

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A LETTER FROM OUR CEO

At Take-Two, our strategy is to develop the highest quality, most compelling interactive entertainment franchises in the business and deliver them on platforms that are relevant to our audience. As our Company has grown and thrived throughout the years, we have sought to maintain a unique culture and work environment that is inclusive, diverse, and dynamic for all of our colleagues. With a shared vision for success, our team's professionalism, passion, and purpose are deeply rooted in our core tenets: creativity, innovation, and efficiency. These drive us each day to do our best work and be of service to our colleagues, consumers, and communities.

Now more than ever, we are focusing on and measuring the impact of our environmental, social, and governance (ESG) activities. This year, we are excited to continue our ESG journey by publishing our first dedicated report. This integral step allows us to disclose more data to meet the needs of our stakeholders — including our consumers, employees, business partners, and shareholders.

Over the past couple of years, our society has continued to be confronted with the lasting public health and economic impacts of the coronavirus (COVID-19) pandemic, social injustice, climate change, and so much more. We, as a company, remain committed to helping address these issues and driving positive change across our industry and society.



We know there is still more we can do to address the challenges that impact our colleagues, communities, and industry. Take-Two is committed to helping — and beginning this dialogue is another important step forward in that process. Looking ahead, we are proud to embark on this journey of annually sharing the various actions, strategies, and goals the Company is taking when it comes to our ESG impact.

A handwritten signature in black ink, appearing to read "Strauss Zelnick". The signature is fluid and cursive, written over a white background.

Strauss Zelnick
Chairman and Chief Executive Officer

INTRODUCTION

Our Business Model & Operations

Headquartered in New York City, Take-Two Interactive Software, Inc. (TTWO) is a leading developer, publisher, and marketer of interactive entertainment for consumers around the globe, and publicly traded on the NASDAQ Global Select Market. For more than 25 years, our development teams have created some of the most critically acclaimed and commercially successful entertainment experiences, captivating and engaging audiences around the world.

We develop and publish products principally through Rockstar Games, 2K, Private Division, and T2 Mobile Games. Currently, our products are designed for console systems, personal computers, and mobile devices — including smartphones and tablets — and are delivered through physical retail, digital download, online platforms, and cloud streaming services. We are incredibly proud of our ability to consistently deliver the highest quality titles, as well as of our employees who help to create our unique culture and an inclusive, diverse, and dynamic work environment.

Our ESG Vision

We believe responsible organizations recognize the synergies between corporate citizenship and smart business. At Take-Two, we believe investing in corporate citizenship creates a leading-edge, engaged, and inclusive community that is a source of value for our shareholders and pride for our employees, and that inspires the confidence and trust of our customers. Our commitment to effective corporate citizenship is central to our core mission of becoming the most innovative, creative, and efficient entertainment company in the world.

Understanding This Report

This report provides an overview of Take-Two's ESG-related activities between April 1, 2020 and December 31, 2021 and includes quantitative data for our fiscal year 2021, unless otherwise noted. Our report is centered around our ESG framework. For more information on the development of this framework, refer to [Our Approach to ESG](#) section. A Sustainability Accounting Standards Board (SASB) index and a Task Force on Climate-Related Financial Disclosures (TCFD) index can be found in the [Appendix](#) of this report.

In this report, any use of the term "materiality" and other similar terms refers to topics that reflect our priority ESG issues. We are not using such terms as they are used under the securities or other laws of the U.S. or any other jurisdiction, or as they are used in the context of financial statements and financial reporting.

This report includes estimates as well as other "forward-looking statements" within the meaning of the Private Securities Litigation Reform Act of 1995, section 27A of the Securities Act of 1933, and section 21E of the Securities Exchange Act of 1934. These forward-looking statements generally are identified by the words "believe," "project," "expect," "anticipate," "estimate," "intend," "strategy," "future," "opportunity," "plan," "may," "should," "will," "would," "will be," "will continue," "will likely result," "strive," "seek," "could," and similar expressions. Forward-looking statements are based on current expectations and assumptions that

are subject to risks and uncertainties, including risks that are currently unknown, that may cause actual results to differ materially. These expectations and assumptions are inherently subject to significant business, economic, competitive, regulatory and other risks and uncertainties, many of which are difficult to predict and beyond the Company's control. Accordingly, investors should not place undue reliance on forward-looking statements as a prediction of actual results or actual performance. We describe risks and uncertainties that could cause actual results and events to differ materially in our reports filed with the Securities and Exchange Commission, including in our most recent [Annual Report](#) on Form 10-K and the risks summarized in the section entitled "Risk Factors," the Company's most recent [Quarterly Report](#) on Form 10-Q, and the Company's other periodic filings with the SEC, which can be accessed at www.take2games.com. Additional risks of which the Company is not currently aware could cause actual results to differ." We undertake no obligation to update or revise publicly any forward-looking statements, whether because of new information, future events, or otherwise.

When we use the terms "Take-Two," "Company," "we," "us," or "our" in this report, we mean Take-Two Interactive Software, Inc. and its subsidiaries, on a consolidated basis, unless we state (or the context implies) otherwise.

OUR APPROACH TO ESG

Our ESG Framework

We are proud to share our formalized ESG framework, which was developed in 2021 and reflects the top priority issues of Take-Two and our stakeholders. We began this process in 2019 with the creation of the ESG Committee, a management committee to lead ESG efforts overseen by the Board of Directors via the Corporate Governance and Nominating Committee. In 2020, we partnered with a third party to perform a materiality assessment to prioritize key ESG topics. This assessment included internal interviews with teams across the Company. Other stakeholder input was also collected from various parts of the organization, including investors, suppliers,






distributors, customers, industry groups, and regulators.

We then evaluated the initial results of the ESG assessment and considered the identified topics against leading ESG standards — Global Reporting Initiative (GRI), Sustainable Accounting Standards Board (SASB), and the Task Force on Climate-Related Financial Disclosures (TCFD). We also worked with a third party to conduct a comprehensive benchmark assessment against our closest peers for additional insights to integrate into our initial materiality assessment results.



RED DEAD REDEMPTION 2

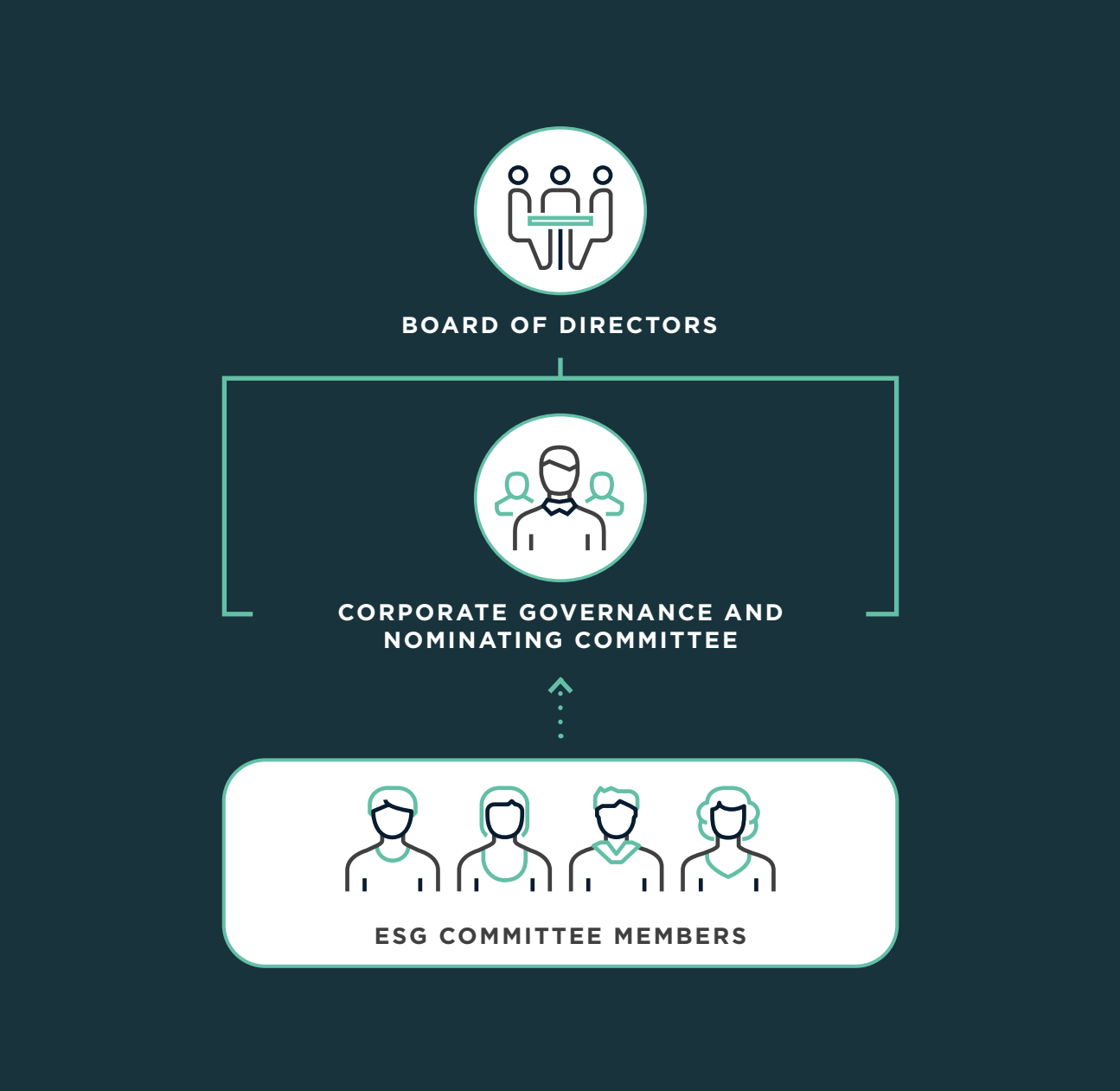
Based on the results of these activities, we were able to narrow down our landscape of salient ESG topics, risks and opportunities into a comprehensive, five-pillar framework. The topics within our ESG framework were validated and approved by process owners in the respective areas of the Company and then reviewed and approved by our ESG Committee and Corporate Governance and Nominating Committee. Our ESG framework is outlined below.

TAKE-TWO ESG FRAMEWORK	
 Our People	Our Employee Experience
	Total Rewards
	Diversity, Equity & Inclusion (DEI)
 Our Communities	Local Communities
	Online Communities
 Consumer Trust	Data Privacy
	Information Security
 Environmental Impact	Our Sustainability Strategy
	Our Energy & Emissions
	Our Supply Chain Footprint
 Our Governance	Corporate Ethics & Behavior
	Business Continuity

We are proud of the progress we have made in the past year. This report includes disclosures around each pillar of our ESG framework. We started the process of managing our performance in each pillar, but our ambition is to formalize and disclose goals, targets, and key performance indicators (KPIs) for each pillar in the future. We recognize that we have work to do to continue to enhance our ESG reporting against our framework and leading practice standards and will continue to disclose more information in the future. We will also leverage our Internal Audit function to assist with reassessing our salient ESG topics each year and continue to align our framework with key stakeholder inputs and leading practices relevant to Take-Two.

Overseeing Our ESG Initiatives

We believe that focusing on ESG creates value for our Company, employees, shareholders, consumers, and other stakeholders — while also helping to mitigate risks, reduce costs, protect brand value, and identify market opportunities. Our ESG Committee is an organization-wide management committee that leads our ESG efforts. This committee is overseen by the Board of Directors via the Corporate Governance and Nominating Committee.



The goal of our ESG Committee is to ensure that ESG considerations are incorporated into our corporate strategy, disclosure, and long-term goals to maintain and advance sustainable shareholder value. Through the work of the Committee, we have:



Retained a consultant that helped us conduct a materiality assessment to identify our most significant ESG-related risks and opportunities.



Engaged a sustainability consulting firm to assess our greenhouse gas (GHG) footprint and help develop an actionable and measurable plan to improve our environmental impact.



Partnered with an established consulting firm to develop a reporting and disclosure strategy to inform stakeholders about our ESG program.



Hired key talent into ESG and DEI roles to drive global strategies and growth throughout our operations.

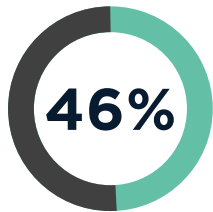
In addition to having an ESG management committee with board oversight, we are working to incorporate ESG into our enterprise risk management (ERM) program. Over time, our goal is for ERM to support our strategic decision making, as well as increase collaboration between our management team and risk management functions, so we can more

effectively and efficiently identify, monitor, and manage key risks to our business.

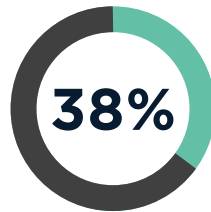
For additional information on our corporate governance, please refer to the [Corporate Governance](#) and [Investor Relations](#) sections of our website.

OUR PEOPLE

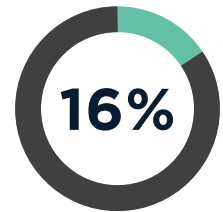
One of our most important assets is our people. We have 7,635 full-time employees as of December 31, 2021 — 59% of whom are employed outside the U.S. and 78% of whom are dedicated to product development. We are constantly focused on our teams' successes, structures, and how best to support them given their particular needs and projects.



OF OUR EMPLOYEES
ARE LOCATED IN
NORTH AMERICA



OF OUR EMPLOYEES
ARE LOCATED
IN EUROPE



OF OUR EMPLOYEES
ARE LOCATED IN THE
ASIA-PACIFIC REGION

Given the largely remote working environment of the past two years, we aimed to ensure our people felt supported in their roles by providing enhanced manager training to help strengthen teams despite the physical distance, broadening our wellness and mental health offerings, encouraging people to step away from their screens when they could, and spending a lot of time listening to employee feedback.

Our number one priority has remained the health and safety of our employees and their families. We are taking a prudent approach related to our return to office cadence and planning. We are strictly following protocols

from local governments and health officials to ensure that we are adhering to their safety standards.

Despite the challenges of the pandemic, creativity and innovation remained core tenets of our organization and the lifeblood of our ongoing success. Our creative teams are renowned for their consistent ability to deliver games that set new benchmarks for excellence. Learn about our culture in the next four subsections: Employee Experience, Total Rewards, Global Benefits Snapshot, and Diversity, Equity & Inclusion (DEI).

Employee Experience

We strongly believe in internal growth opportunities and career development tracks, and recognize the importance of staying current in an ever-changing industry. Our global Learning & Development (L&D) team curates a wide variety of training programs, including hard skill development and non-role-specific leadership development sessions — such as manager program training, one-on-one internal coaching, customized individual development planning, and group training initiatives. We offer e-learning, live training sessions conducted online, and in-person classroom training. Additionally, Take-Two allocates development funds for our employees to spend how they choose on their individual professional goals and the skills they want to build.

Our L&D programs are closely aligned to our performance management process, which provides a platform for evaluating each employee's contributions to our success. Our approach to performance management is centered around regular communications, transparency around expectations, and measuring progress against tangible objectives. Employees have annual review conversations to discuss objectives and progress, as well as informal ongoing feedback. Some studios have also formalized semi-annual or quarterly performance conversations. We offer online performance management and goal setting to help facilitate this process.

We work hard to ensure that all decisions regarding hiring, career progression, and compensation are based on objective qualifications, work ethic, and job performance. Our robust compliance training program is designed to ensure that our employees recognize and report any signs of harassment, discrimination, retaliation, or other inappropriate behaviors in the workplace and that they understand and abide by our Code of Business Conduct and other internal policies.

Beyond formal performance management, we check in with our teams throughout the year with global town hall meetings, pulse surveys, culture assessments, and team qualities and values workshops. Our open-door policy also facilitates regular feedback between employees and senior executives. These opportunities to collect feedback help to ensure we are providing a supportive, dynamic, and stimulating work environment for all of our employees. We are honored to report our low employee turnover rate and that our efforts to create a great employee experience have been recognized by our receipt of the following accolades.

TAKE-TWO INTERACTIVE

-  **GREAT PLACE TO WORK**
Recognized by *FORTUNE* in 2021
-  **BEST BOSS AWARD 2021 (HANGAR 13 STUDIO)**
Hangar 13 Studio Head earned the Best Boss Award as part of the [GamesIndustry.Biz](#) Best Places to Work Awards U.S.
-  **BEST PLACES TO WORK IN NYC**
Listed by *FORTUNE* in 2020 and 2021
-  **FASTEST GROWING COMPANIES**
Recognized by *FORTUNE* in 2020
-  **10% VOLUNTARY TURNOVER IN 2021**
We are proud to disclose our 2021 voluntary employee turnover and believe our focus on the employee experience will continue to improve this number in the future

We are also focused on our talent retention and acquisition strategies. In addition to the development opportunities described above, we place a large focus on recruiting initiatives such as internships and apprenticeship programs. The majority of our studios have these programs in place and many of the individuals who take part in these programs transition into full-time employees. A current focus is to continue to develop further strategies to integrate DEI into the recruitment process, such as creating DEI-specific pipeline programs. Additionally, the majority of our studios have internal referral programs in place, which provide incentives to current employees to refer candidates and help us recruit top-tier talent.

Total Rewards

The main goal for our compensation and benefit programs is to attract, retain, motivate, and reward our employees who operate in a highly competitive and technologically challenging environment. We are a global company, and yet we tailor to local needs. We offer competitive compensation packages, which are designed to incentivize high company and individual performance. We regularly review our compensation packages from both an internal and external standpoint, including thorough industry benchmarking, to help ensure we remain competitive. We seek to link compensation, including annual changes in compensation, to our overall and business unit performance, as well as each individual's contribution. Our compensation packages have both short- and long-term variable component incentives structured within them, which are based on Company and individual performance. The emphasis on overall performance is intended to align our employees' financial interests with the interests of our shareholders. In addition to providing restricted stock units to employees at certain levels, we also offer an Employee Stock Purchase Plan.

We are committed to assessing pay equity and aim for equal pay for equal work throughout our Company. In the coming years, we intend to conduct a Company-wide equity pay analysis to identify any inequities and strategize ways to close any identified gaps. We have completed a job framework architecture programming project to set the foundation for a Company-wide equity pay analysis that we aim to conduct in the future.

In addition to base and variable pay, we also offer a comprehensive benefits package detailed on the next two pages. Twice weekly for the past two years, we hosted Company-wide bootcamps, led by our CEO, to promote physical fitness and employee camaraderie.

Given the great success we have had with a remote working environment these past two years, we rolled out a flexible work arrange-

ment program to give employees the option to work up to two days a week from home, and our publishing labels are considering appropriate flexible work arrangements for their teams as well. Prior to the shift to working remotely during the pandemic, certain business groups were already working under flexible arrangements. We recognize that working under a more flexible schedule may have positive effects on both our employee satisfaction and the impact we have on the climate.



RED DEAD REDEMPTION 2

T2 Global Benefits Snapshot

WE PROVIDE OUR HIGHLY CREATIVE EMPLOYEES WITH A RICH BENEFITS PACKAGE TO MEET THEIR DIVERSE NEEDS.

This is a high-level overview of the benefits offered by Take-Two. Benefits offered are subject to terms of employment and applicable benefit plan rules, and may be changed at any time by Take-Two.

HEALTHCARE



We provide comprehensive coverage through top-tier insurance companies that generally includes medical, dental, vision, and telemedicine.

LIFE, ACCIDENT & DISABILITY



We have policies that provide strong financial protection in the event of illness, accident, disability, or death.

RETIREMENT & SAVINGS



We have competitive retirement and savings plans to help our employees save for a car, a trip, a house, or anything else their hearts desire.

EMPLOYEE STOCK PURCHASE PLAN



We want our employees to share in our success, so they can buy Take-Two stock with at least a 15% discount.

TIME OFF



We have generous time off policies to help ensure our employees rest and relax while spending time with family and friends.

Global Benefits Snapshot (cont.)

FAMILY



We have comprehensive, family-friendly leave policies so our employees can take the time they need to spend with and take care of their loved ones.

FITNESS & WELL-BEING



Our fitness reimbursement program covers a wide variety of expenses to support our employees with their desire to engage in regular physical activity, such as gym memberships, personal trainers, fitness classes, streaming services, sports & recreation fees, and home exercise equipment.



We offer a comprehensive program to support our employees with all aspects of their well-being — physical, emotional, financial, and social. As our employees take small steps toward leading a happier, healthier life — they earn points that they can convert into cash or gift cards.

GIVING BACK



We match the donations our employees make to their favorite charities through Next Level, our global charitable giving program. We also give our employees paid time off to volunteer in their communities, and we organize events to support the causes that are close to our employees' hearts.

ADDITIONAL BENEFITS

LEARNING & DEVELOPMENT



We encourage our employees to live up to their potential through a wide variety of learning and development opportunities. We provide online and classroom resources to allow our employees to expand their skills, deepen their knowledge, and grow both personally and professionally.

EMPLOYEE ASSISTANCE



Our employee assistance programs offer free, confidential counseling, so there is always someone available to help our employees and their family members navigate life's challenges.

EMPLOYEE DISCOUNTS



We offer our employees discounts on our amazing games and merchandise as well as discounts on other products, services, and events.

EVENTS



We celebrate many events throughout the year, such as our winter holiday and summer parties and our video game release events.

SNACKS & TREATS



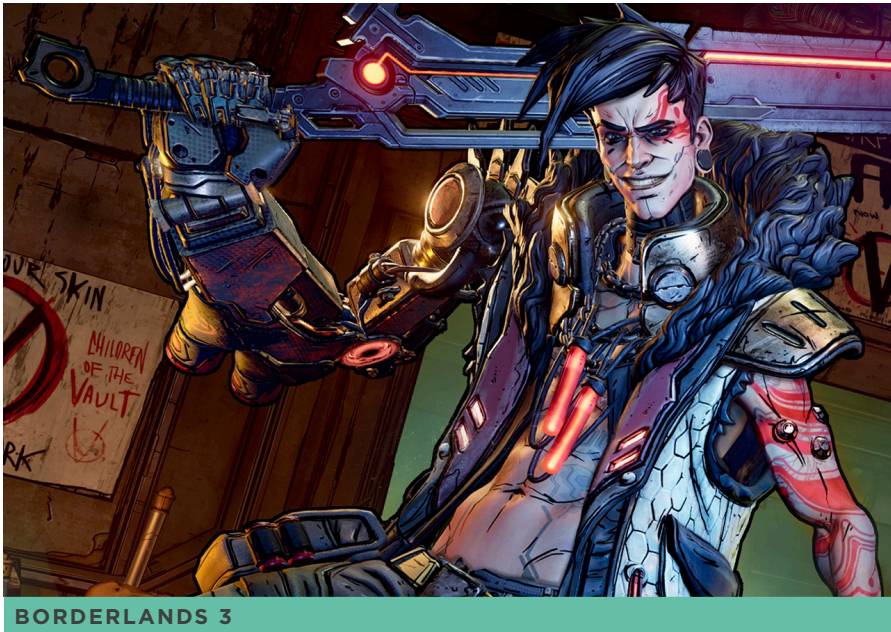
We provide delicious snacks and treats at all our workplaces, such as fresh fruit, hot and cold drinks, and much more!

Diversity, Equity & Inclusion (DEI)

We firmly believe that diverse teams are more valuable and effective, and that diversity is key to our success. We are committed to enhancing diversity at Take-Two and throughout our industry, and we strive to provide an inclusive workplace in which everyone feels respected, heard, and safe.



BORDERLANDS 3



BORDERLANDS 3



We strive to promote and maintain a diverse and inclusive workforce that enables us to deliver entertainment experiences that captivate and engage our diverse community of players, and also makes our organization a place where our employees are proud to work. Our culture of compassion and respect fosters a warm, welcoming environment for all qualified candidates and colleagues. Specific efforts to foster a diverse, inclusive culture include:

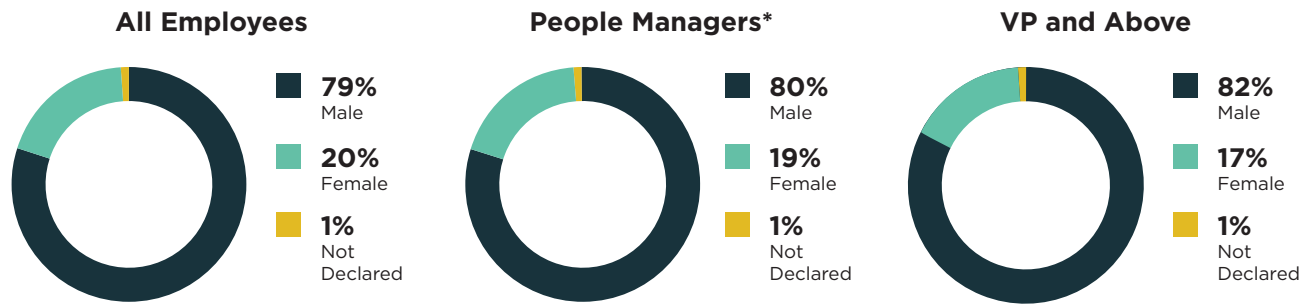
- Hiring DEI leaders throughout Take-Two
- Hosting women-specific events (e.g., Girls Who Code and Women in Games)
- Rolling out training in unconscious bias and inclusive leadership development
- Hosting several speaker series across our labels surrounding Juneteenth, Pride Month, Asian Pacific American (AAPI) Heritage Month, International Women’s Day and Black History Month
- Celebrating cultural differences through various employee resource groups, Company events, and offerings

We are also actively working to promote racial, gender, and LGBTQIA diversity, and disability inclusion in the industry and grow the candidate pool for game development roles through certain educational and community programs, as described in our [Local Communities](#) section.

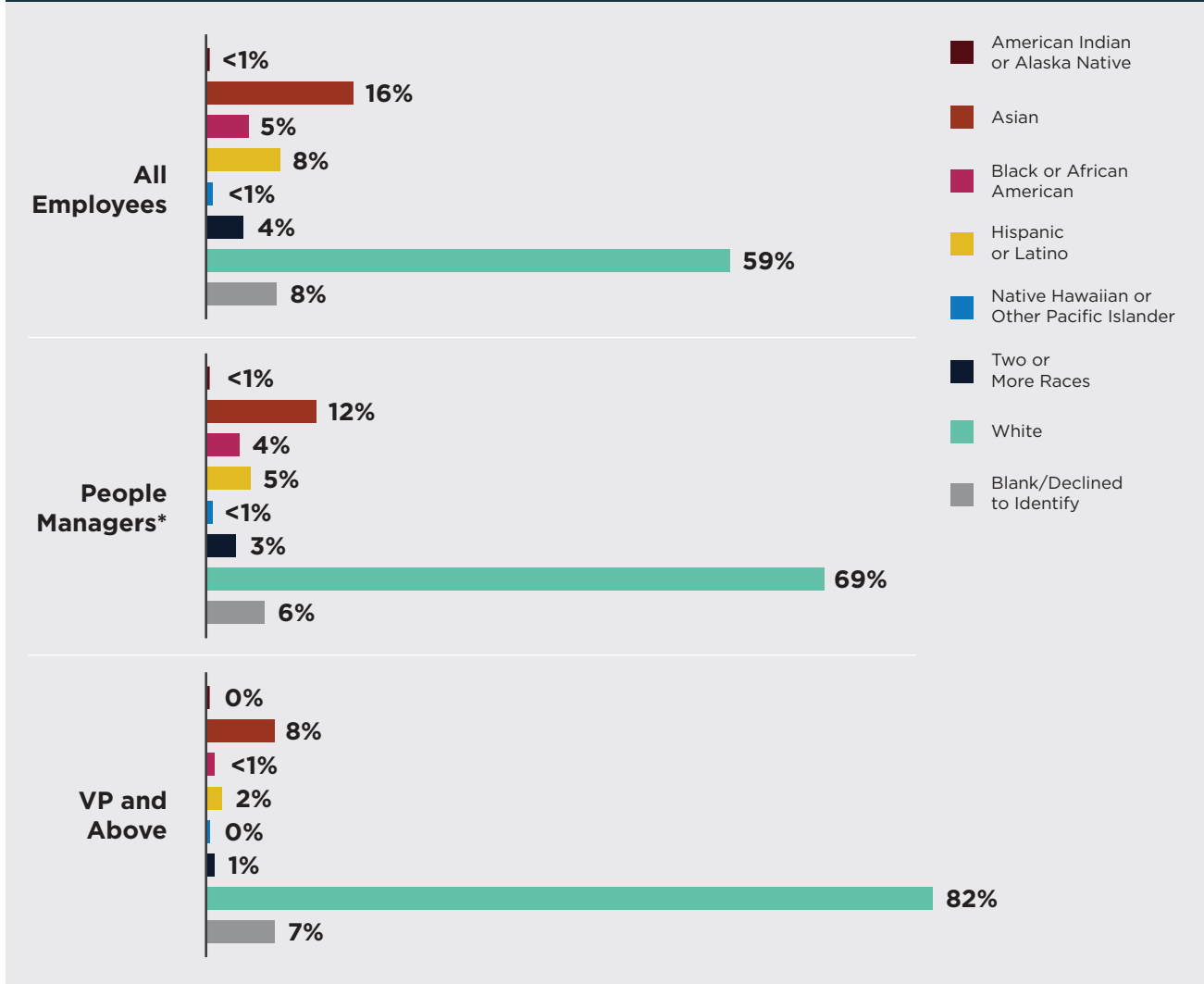
Please refer to our [Global Code of Business Conduct and Ethics](#) — which includes our diversity, equality, non-discrimination, and anti-harassment policy — in the [Our Governance](#) section of this document, as well as our [T2 Diversity Statement](#), for further information surrounding our specific policies and commitments relating to DEI at Take-Two.

For the first time, we are publicly reporting our global gender diversity and our ethnic and racial diversity in the U.S as of December 31, 2021.

Global Percentage of Gender by Management Level



Percentage of Racial/Ethnicity by Management Level in United States



*People Managers are defined as having at least one direct report

OUR COMMUNITIES

Local Communities

As an industry leader, Take-Two recognizes the importance of giving back in the local communities where we operate, as well as the opportunity we have as a global company to make a broader impact on our society. We believe that to foster change — especially for those in underserved and underrepresented communities — activism and engagement needs to be a continuous process with educational programs serving as a core foundation.

We begin that engagement by partnering with organizations that support underserved youth and college students, including mentoring and exposure opportunities through organizations such as After School All-Stars, Covenant House, The Fresh Air Fund, Games for Change, and Girls Make Games.

We also partner with The Animation Project, Gameheads, Harlem Academy, The Hidden Genius Project, and the School of Interactive

Arts to increase the depth and breadth of their technical and creative offerings. These organizations can provide a pathway for minority students to attend one of over 400 U.S. colleges and universities that offer degrees in game design. While pursuing their creative and technical degrees, students are also exposed to industry leaders that share their experiences, acumen, and passion through one-to-one mentoring and internships at our organization.

We also endow scholarship programs with The ESA Foundation, Gay Gaming Professionals, NYU, and USC in support of ending generational cycles of inequality.

Through these programs, we strive to invest meaningfully in the lives of children from underserved and underrepresented communities for more than a decade before they begin their professional journey.



NBA 2K22

Our efforts to support local communities also include:

- Company-sponsored and -matched employee charitable giving platforms
- Funding the delivery of nutritious food and medical supplies to shelters in impoverished communities
- Enacting employee volunteer service projects and giving to organizations working to eradicate social injustice

- Providing educational, athletic, and other opportunities to underserved communities, and working with organizations to support the rights of the LGBTQIA community

Our ongoing success will continue to fuel our compassion, capacity to give back, and commitment to making our world a better place.

Online Communities

Our labels strive to create products that provide safe and welcoming spaces for all players, with a view to fostering healthy communities where they can socialize, cooperate, and compete free of toxicity and harassment wherever possible. To achieve this, the teams have implemented a number of programs with a focus on customer safety.

Customer Safety

In addition to the actions of each label, we are working on top-level improvements to our customer safety resolution model, as well as addressing player toxicity with bespoke programs tailored to the needs of each title. Actions taken so far include:

- Forming a global social analytics and security team to address controls for decreasing toxicity against women
- Unifying listening tools and behavioral telemetry in order to increase responsiveness to player concerns
- Refining community guidelines
- Working to automate disciplinary actions wherever possible — and enabling security features, such as machine learning, to predict certain events or behaviors and discipline people based on these identified actions

CONSUMER TRUST

Data Privacy

As an industry leader in interactive entertainment products, we take our consumers' privacy seriously. We know our consumers put trust in us to take appropriate steps when it comes to data privacy and security. Take-Two actively maintains a holistic global Privacy Policy over our data practices for the products, services, and websites that we offer to consumers, as well as over our marketing practices. This policy applies to each of our labels and divisions.

Our [Privacy Policy](#) describes the types of information we collect and our lawful bases for processing; how we may use and when we may share information and details surrounding data retention; options we provide to our consumers over managing their accounts, communications, and data; our approach to children's data; how we handle international data transfers; and the measures we take with respect to data security. Additionally, through our Privacy Policy and our [Do Not Sell My Personal Information](#) notice, we provide specific information on how we take into account the California Consumer Privacy Act (CCPA) with respect to processing the personal information of California residents.

We also have a [Cookie Policy](#) in place and use cookie preference tools that detail our website visitors' cookie choices, the types of cookies

we use, and how our users can manage cookies using the preference tools or in their browser.

Take-Two takes steps to comply with applicable privacy and data protection laws, including those in the U.S., the United Kingdom (U.K.), and the European Union (E.U.). For example, this includes data that is governed by the E.U. General Data Protection Regulation (GDPR) and U.K. Data Protection Act 2018 (DPA 2018) for the personal information of individuals in the E.U. and the U.K. Certain activities related to processing the personal data of individuals within the E.U. and U.K. are conducted by our U.K. data controller or our local entities in the E.U. and U.K. While our products, services, and websites are directed to a general audience, we also apply privacy and data protection requirements related to personal information from children as appropriate.

Additionally, through our policies and practices, we take steps to review data handling practices for our products, services, and websites to incorporate privacy by design, focus on the user experience, and maintain appropriate safeguards, and we also rely on robust contract terms with third-party data processors.

Information Security

At Take-Two, protecting consumer, employee, and Company information is critical to our business. Along with our partners, we continue to invest financial and operational resources to implement systems and process technologies that guard against cyber risks and help protect our data and systems. To help ensure we have appropriate measures and coverages to respond to the many areas of cyber risk, our framework centers around four components: Governance, Security Engineering, Security Operations, and Vulnerability Management. Examples of activities under each component are included in the following pages.

Our Four Components



Governance

- We regularly conduct in-person and virtual cybersecurity assessments and training for our employees.
- We vet all potential vendors and conduct assessments of existing vendors to help ensure that personal and confidential information is securely managed.
- We have online training that is globally assigned to new employees to help ensure the continuous protection of information for our employees and customers. Our employees are required to retake this training every two years.

Governance (cont.)

- Our Internal Audit department focuses on personal data protection as part of their Studio Operation Reviews. Internal Audit performs various testing over data protection and privacy when assessing information technology and legal compliance at the Studio level.
- Our Audit Committee receives regular reports regarding key cybersecurity, cyber risks, and related matters — including secure processing, storage, and the transmission of personal and confidential information such as the personally identifiable information (PII) of our users. Additionally, through the committee, ongoing discussions take place around the Company’s plans and processes to monitor, control, and minimize risks and exposures when it comes to data privacy, data security, and cybersecurity.

Security Engineering

- We protect our infrastructure by implementing best-in-class security controls and policies which detect and prevent cyber threats.
- We take measures to preserve the integrity of our gaming environments to ensure the best experience for our players.
- To protect our intellectual property, we utilize a Digital Rights Management system in addition to our application security practice, which is maintained by following software development life cycle (SDLC) procedures. These practices allow us to distribute our titles with quality assurance from a cybersecurity and game security standpoint. They also help ensure we are not inviting any data breaches.

Security Operations

- Our security operations center analysts monitor alerts and manage incidents using a combination of expertise and automation.
- To further aid in maintaining information security throughout our Company, our security operations center utilizes a case management system. Through this system, potential security alerts are documented based on pre-defined internal definitions and risk types. Depending on the severity of the alert, it goes through various documented procedures and is stored in a methodology tool.

Vulnerability Management

- We continuously monitor our infrastructure and networks for vulnerabilities, and remediate as appropriate based on severity.
- We participate in bug bounty programs which help ensure we are constantly improving the security of our applications.

ENVIRONMENTAL IMPACT

We believe climate change will have a long-term impact on businesses going forward. Climate change could result in an increase in the frequency or severity of natural disasters such as earthquakes, fires, floods, or significant power outages and other catastrophic events. These events may adversely impact critical infrastructure and have the potential to disrupt our business, our third-party suppliers, the businesses of our customers, or our employees' lives, and may cause us to experience higher attrition, losses, and additional costs to maintain or resume operations. Therefore, climate change must be addressed and considered throughout our business.



GRAND THEFT AUTO V

Our Sustainability Strategy

We understand that one of our responsibilities as a company is to account for our impact on the environment in which we live and operate. In 2021, we formed a Sustainability Subcommittee composed of senior facilities leaders throughout our global portfolio to develop and execute our environmental sustainability strategy. The Subcommittee's objectives include increasing visibility into and measurement of Take-Two's environmental impact, creating strategic goals as the basis of our sustainability strategy, and developing and implementing programs to track progress

against and help achieve our goals as part of a formalized environmental sustainability program.

Going forward, we will seek to improve our use of metrics to monitor and disclose sustainability information related to climate change and consider additional ways we can align with commonly used climate reporting frameworks such as the TCFD. We understand that providing this transparency will continue to be important to our stakeholders and our business.



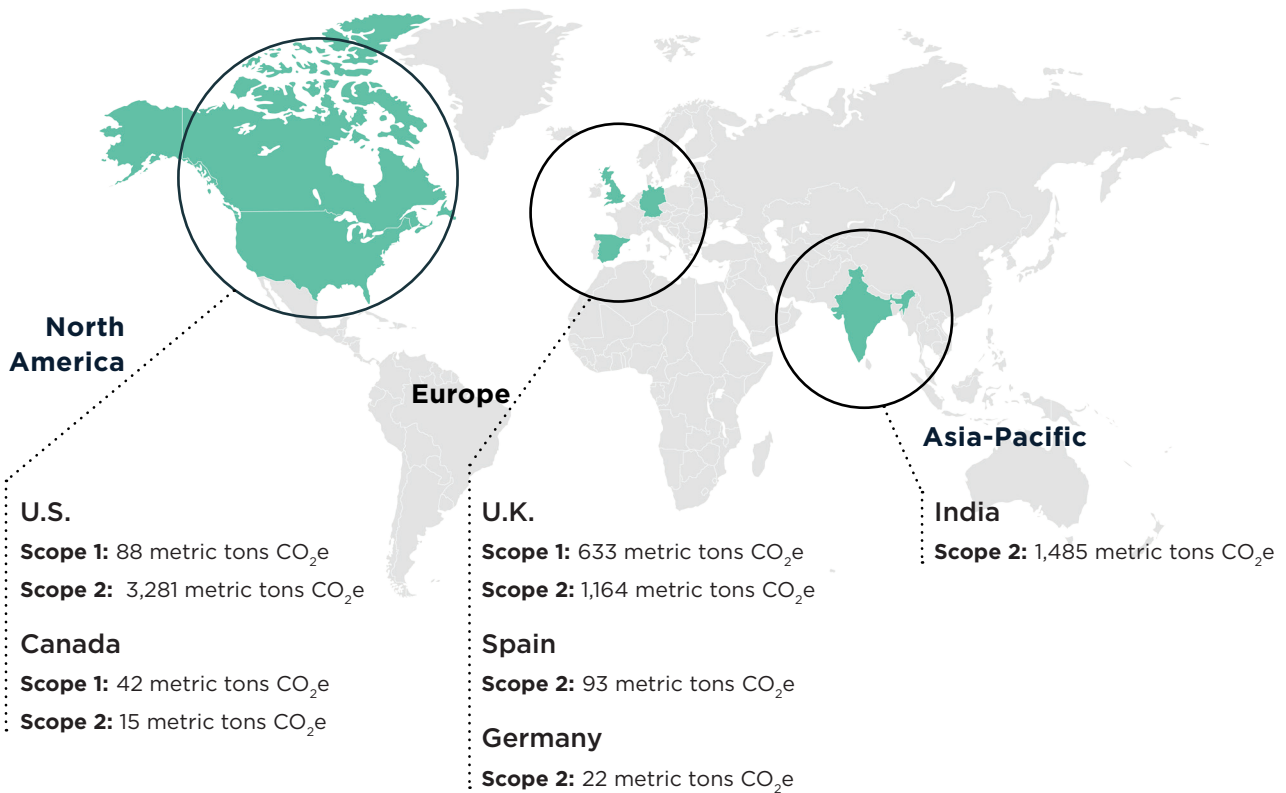
KERBAL SPACE PROGRAM

Our Energy Use & Emissions

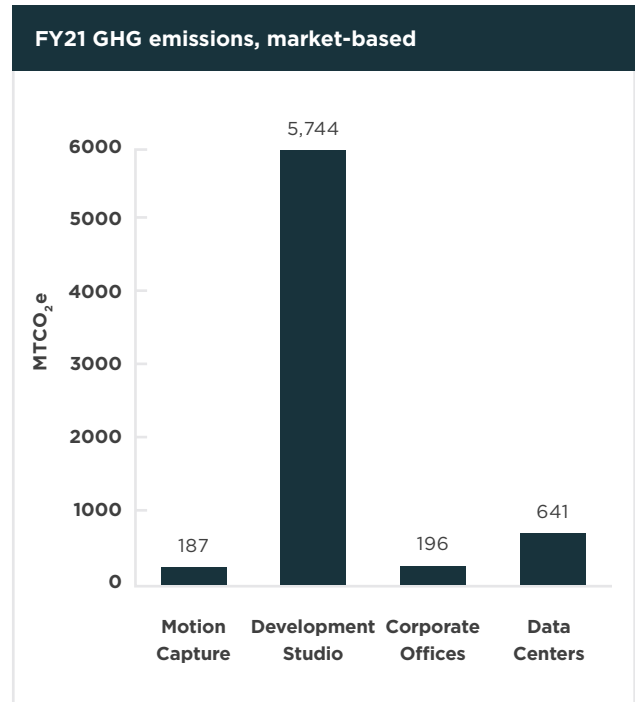
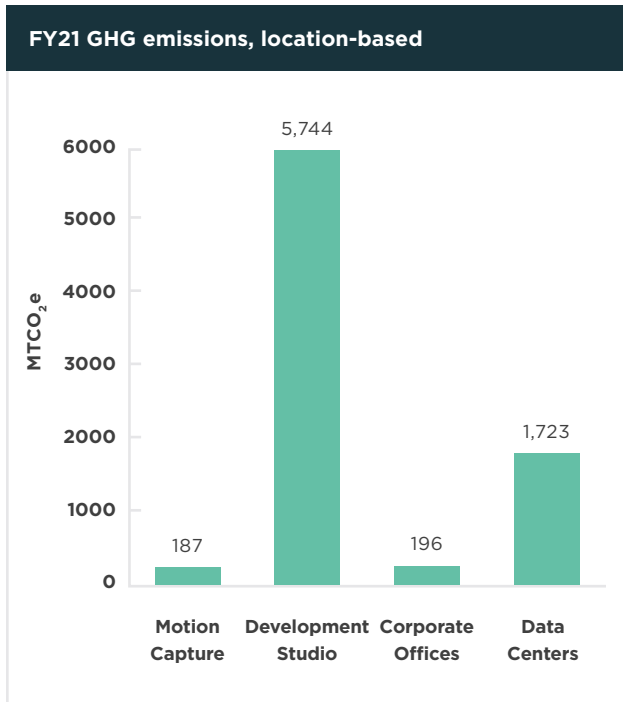
As an interactive entertainment company, we acknowledge that our environmental footprint includes operations within our offices and data centers, as well as our upstream and downstream value chain. The energy and emissions data* in this report cover the majority of our leased properties and data centers. We are working towards including the remainder of the portfolio.


During 2021, we engaged a sustainability consulting firm to assist us in the calculation and reporting of our Scope 1 and 2 GHG footprint across our global portfolio. We also engaged a consultant to begin to evaluate our Scope 3 emissions.

FY21 market-based GHG emissions




*FY21 data was calculated largely based on a regression using FY20 data due to data availability.






16%

OF PURCHASED ELECTRICITY ORIGINATING FROM RENEWABLE ENERGY SOURCES




4,339

TOTAL ENERGY CONSUMED FROM RENEWABLE SOURCES (MWh)



2.18

GHG EMISSIONS PER REVENUE (MTCO₂e PER \$1M IN REVENUE)



7.36

GHG EMISSIONS PER AREA (kg CO₂e PER SQUARE FOOT)

Our global real estate portfolio includes our offices, our onsite data centers, and off-site data centers that are managed by our third-party provider. The onsite data centers have a relatively low impact on our portfolio’s overall environmental performance. Some of our off-site data centers use renewable energy, which has aided efforts to reduce our global market-based emissions.

While we are proud that some of our off-site data centers already run on renewable energy, we plan to develop actionable targets and programs to further reduce our GHG footprint across our other facilities and operations. We plan for our assessment of our GHG footprint during 2021 to be used for creating and building KPIs, targets, and goals related to our Scope 1 and 2 emissions. We plan to calculate our footprint for Scope 3, as well as water and waste metrics in the near future.

We plan to communicate our facilities and operations sustainability strategy across the Company and formalize our programs through an internal playbook for real estate acquisition and construction, facilities operations, and strategic data center planning to ensure that future activities align to our overall sustainability

strategy. The Sustainability Subcommittee will drive both the formalization and performance management of our facilities and operations sustainability programs.

Several of our offices have already implemented mechanisms for waste and energy reductions, such as recycling and composting programs. In the summer of 2021, we completed construction of our new London office. We are proud to say this new facility was built to Leadership in Energy and Environmental Design (LEED) and Fitwel standards. This construction was a part of a pilot program focused on greater strategic initiatives to improve our facilities, track established environmental standards, and expand LEED certifications. Our Global Corporate Headquarters at 110 West 44th Street is in a LEED-certified building.

Our Supply Chain Footprint

To support our operations and products, and to provide the best experiences to our customers, Take-Two regularly invests in up-to-date technology, including more energy-efficient tech solutions that allow us to consider advancements in more eco-friendly technology. As our old equipment is retired, we seek to ensure it is repurposed and reused, if possible, and, if not, that it is properly recycled and disposed of.

We will continue to work to identify other areas within the business where we can help combat climate change. We are discussing and considering additional initiatives and KPIs around our transportation, monitoring our supply chain, and strengthening our third-party relationships. For example, the ESG Committee and Sustainability Subcommittee are exploring the integration of additional sustainability measures into our Supplier Code of Conduct and transportation options. As discussed in the [Our People](#) section, Take-Two rolled out flexible work arrangements which would likely have a positive climate impact due to reduced employee commutes and business travel.

OUR GOVERNANCE

Corporate Ethics & Behavior

Take-Two is committed to conducting business fairly and ethically, complying with domestic and international laws, and promoting a work environment that is compassionate and inclusive, and that values honesty, openness, integrity, and respect for fundamental human rights. We expect everyone working on behalf of Take-Two, including consultants, contractors, directors, employees, and others, to act in accordance with these values. Our commitment to these values is reflected in our corporate policies and procedures, which govern our conduct and the conduct we expect from all with whom we do business.

A “culture of compliance” is integrated into our business, which aims to reduce legal, regulatory, reputational, and financial risk

for Take-Two. We pride ourselves on having frequent collaboration and engagement with business and creative personnel at all levels and locations, which has built a relationship of trust and respect.

Our Corporate Governance and Nominating Committee provides oversight for our corporate policies, procedures, and ethical concerns. Take-Two’s Legal department is responsible for compliance-related issues, as well as providing compliance training to employees through live sessions supplemented by online classes.



CIVILIZATION VI - NEW FRONTIER PASS: ETHIOPIA PACK

Live Compliance Training Sessions

Senior employees and those in higher-risk departments and geographies are expected to attend live antitrust, anti-corruption, and sanctions and trade training every two years. Content is tailored to our Company's, industry's, and employees' particular experiences and challenges. Additional ad hoc training is conducted regarding changes to laws, upon the introduction of new Company policies or procedures, in times of crisis or uncertainty, and upon request from business units. Training sessions provide an opportunity for the Legal department to interact with a wide variety of business units, employees, offices, studios, and territories. These sessions also act as informal, ongoing risk assessments for each location or group.

Online Compliance Training Classes

Our live training sessions are supplemented by online courses. On a biennial basis, all of our employees around the world are expected to complete courses regarding our Global Code of Business Conduct and Ethics (the "Code"), Anti-Bribery and Corruption, Antitrust and Competition Law, Sanctions and Trade, Anti-Harassment and Discrimination, and Data Privacy policies. Our Internal Audit team performs periodic assessments of management's internal controls to ensure the timely consent and completion of required training sessions for all employees.

Take-Two regularly reviews and makes necessary updates to our policies and ethical standards, and our Internal Audit department conducts periodic risk-based assessments to ensure management's internal controls are designed and operating effectively to monitor compliance with those policies and standards. For example, Internal Audit performs an annual assessment of management's entity-level controls, which include the reporting, monitoring, and escalation of reports to the Ethics Point Incident Management System (Whistleblower Hotline), and the maintenance and disclosure of the Code.

Please refer to the information below for highlighted policies and procedures.

Global Code of Business Conduct and Ethics

Our Global Code of Business Conduct and Ethics (“the Code”) is a guide to our ethical decision-making, which is made available in nine languages. The standards in the Code are mainly based on U.S., U.K., E.U., and other international laws that bind us, and in some cases exceed legal requirements to reflect our values. All employees and contractors agree in writing to abide by the Code, regardless of their role, territory, or duration of engagement within the Company. The Code covers the following:

- Diversity, equality, non-discrimination, and anti-harassment
- Electronic media and software
- Protection and proper use of Company assets and property
- Confidential and proprietary information
- Conflicts of interest involving outside employment and directorships, investments, public service, lobbying and political contributions, and other topics
- Accurate books and records
- Complete, accurate, and timely disclosure of material information
- Shareholder, media, and government relations
- Securities laws and insider trading
- Ensuring fair competition
- Preventing bribery and corruption, particularly with respect to dealings with public officials, employee political and civic activity, gifts and hospitality, charitable contributions, and anti-money laundering laws
- Trade sanctions and export controls

Global Code of Business Conduct and Ethics **(cont.)**

- Tax compliance
- Expectations of our suppliers
- Litigation, regulatory, and compliance notification policy
- Policy for reporting misconduct
- Audits, investigations, and disciplinary action
- Relationship with other Company policies
- Waivers of the Global Code of Business Conduct and Ethics

The Code is frequently updated to address legal and cultural developments in several key areas: competition, anti-corruption, sanctions and trade, human rights, anti-discrimination, and civic and political activity.

Supplier Code of Conduct

Our Supplier Code of Conduct applies to vendors, suppliers, consultants, and other third parties with whom we engage. It focuses on the provisions of our GCOBC that are most relevant to external entities (e.g., anti-bribery, anti-corruption, antitrust, labor compliance, etc.), and makes clear that we expect all of our business partners to operate fairly and ethically, comply with domestic and international laws, and promote a work environment that values honesty, openness, integrity, and respect for fundamental human rights, wherever in the world we do business.

By incorporating the Supplier Code into many of our contractual terms, we seek to ensure that our suppliers, vendors, agents, and other third parties uphold Take-Two's high ethical standards in the course of their work for us.

The Supplier Code is made available in 12 languages, with abbreviated versions available for very low-risk creative services suppliers.

Global Policy Regarding Human Rights and Modern Slavery

Our Global Policy Regarding Human Rights and Modern Slavery reflects our ethical business practices and our commitment to human rights globally. The policy:

- Declares our respect for fundamental freedoms articulated in the United Nations Universal Declaration of Human Rights, and reflects our commitment to ensuring best practices in hiring, employment, and in our supply chains.
- Seeks to combat the abuses of modern slavery such as forced and compulsory labor and human trafficking that exist in both developed and developing economies across a multitude of business sectors.
- States that Take-Two has no tolerance for human rights abuses, nor for any form of modern slavery, either in our organization or in our supply chains.

Policy for Reporting Misconduct

We promote an open door policy between the business, management, and Legal groups. Our Policy for Reporting Misconduct details the responsibilities employees, consultants, agents, and others have in promptly reporting any actual or suspected violations of the Company's Code or other policies, the Company's accounting practices, or any other applicable laws or regulations.

Additionally, it describes how to report actual or suspected violations, the investigation process, and whistleblower protections:

- Confidentiality of all reports will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and address any violations.
- 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, regardless of whether such violation is ultimately determined to have occurred.
- Take-Two has an Ethics hotline, staffed 24/7 by a communications specialist employed by third-party partner Ethics Point and a dedicated website

Business Continuity

Take-Two has a Business Continuity Planning Committee, which meets with and provides periodic updates to the Company’s Board of Directors. Additionally, there is a Take-Two Crisis Response Group, which is made up of individuals who support the studios and labels. The response structure is organized into three lines of defense. The first line of defense is each individual studio or office, the second is the labels or divisions, and the third is the Crisis Response Group. By structuring our response this way, we established formalized procedures to ensure issues are escalated to the appropriate levels of management.

Our Company also has a formalized incident escalation program and related policy in place. The program sets the escalation strategy and outlines various management procedures to be followed during incident escalation and resolution.

Take-Two considers a wide variety of business continuity risks with respect to disruptions in operations. We take into account physical risk of our locations and perform risk assessments by site to recognize any hazards and potentially disruptive impacts. We also conduct business impact assessments by business unit — considering financial, reputational, and operational risks. Furthermore, the Company follows ISO 22301 Business Continuity Management Systems and NFPA 1600 standards.

For additional information on risks related to business continuity at Take-Two, please refer to the relevant risk factor section in our [2021 Annual Report](#).



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APPENDIX

ESG Framework Index

	2020 Value	2021 Value
OUR PEOPLE*		
Our Employee Experience		
Voluntary Employee Turnover	7%	10%
Total Rewards		
Pay Equity	GOAL: Aiming for equal pay for equal work throughout our Company	
Diversity, Equity, and Inclusion (DEI)		
Employee Gender Diversity (Global)	Male: 81%	Male: 79%
	Female: 19%	Female: 20%
	Not Declared: <1%	Not Declared: 1%
Employee Racial & Ethnic Diversity (U.S.)	American Indian or Alaska Native: <1%	American Indian or Alaska Native: <1%
	Asian: 15%	Asian: 16%
	Black or African American: 4%	Black or African American: 5%
	Hispanic or Latino: 8%	Hispanic or Latino: 8%
	Native Hawaiian or Other Pacific Islander: <1%	Native Hawaiian or Other Pacific Islander: <1%
	Two or More Races: 3%	Two or More Races: 4%
	White: 61%	White: 59%
	Blank/Declined to Identify: 7%	Blank/Declined to Identify: 8%
OUR COMMUNITIES		
Local Communities		
ESG Framework in development		
Online Communities		
ESG Framework in development		

*OUR PEOPLE DATA COVERS THE CALENDAR YEAR (JANUARY 1 - DECEMBER 31)

ESG Framework Index (cont.)

	2020 Value	2021 Value
CONSUMER TRUST		
Data Privacy		
ESG Framework in development		
Information Security		
ESG Framework in development		
ENVIRONMENTAL IMPACT		
Our Sustainability Strategy		
ESG Framework in development		
Our Energy & Emissions*		
Scope 1 energy consumption	4,078 MWh	4,156 MWh
Scope 2 energy consumption	27,216 MWh	26,956 MWh
Total energy consumption	31,295 MWh	31,112 MWh
Scope 1 GHG emissions	749 MTCO ₂ e	762 MTCO ₂ e
Scope 2 GHG emissions (location-based)	7,060 MTCO ₂ e	7,143 MTCO ₂ e
Scope 2 GHG emissions (market-based)	5,978 MTCO ₂ e	6,061 MTCO ₂ e
Total Scope 1 & 2 GHG emissions (location-based)	7,808 MTCO ₂ e	7,946 MTCO ₂ e
Total Scope 1 & 2 GHG emissions (market-based)	6,726 MTCO ₂ e	6,864 MTCO ₂ e
Our Supply Chain Footprint		
ESG Framework in development		
OUR GOVERNANCE		
Corporate Ethics & Behavior		
ESG Framework in development		
Business Continuity		
ESG Framework in development		

*FY21 data was calculated largely based on a regression using FY20 data due to FY21 data availability.

SASB Index

The table below contains Take-Two's first reporting of our ESG performance with reference to the framework for the Internet Media and Software & IT Services industry standards. We do not currently disclose all indicators included in the standard, but have focused on those most relevant to Take-Two where we have sufficient information. We will continue to evaluate areas for additional disclosure in the future. All data is as of (or for) the period from April 1, 2020 to March 31, 2021, unless otherwise noted.

TOPIC	METRIC	SASB CODE	RESPONSE	REFERENCE
Environmental Footprint of Hardware Infrastructure	Total energy consumed	TC-SI-130a.1	FY20: 113,234 GJ FY21: 112,576 GJ	<u>Our Energy Use & Emissions</u>
	Percentage grid electricity	TC-IM-130a.1	FY20: 100% grid electricity FY21: 100% grid electricity	
	Percentage renewable		FY20: 16% renewable FY21: 16% renewable	
	Trailing twelve-month (TTM) weighted average power usage effectiveness (PUE) for its data centers		We do not currently track this data.	N/A
	Total water withdrawn	TC-SI-130a.2	Not available at this time, but we plan to track in the future.	N/A
	Total water consumed, percentage of each in regions with high or extremely high baseline water stress	TC-IM-130a.2		
	Discussion of the integration of environmental considerations into strategic planning for data center needs	TC-SI-130a.3 TC-IM-130a.3	We are in the process of developing sustainability programs related to strategic data center planning in conjunction with the formalization of our overall sustainability strategy.	<u>Our Energy Use & Emissions</u>

SASB Index (cont.)

TOPIC	METRIC	SASB CODE	2021 RESPONSE	REFERENCE
Data Privacy & Freedom of Expression	Description of policies and practices relating to behavioral advertising and user privacy	TC-SI-220a.1 TC-IM-220a.1	Take-Two actively maintains a holistic global privacy policy over our data practices for the products, services, and websites that we offer to consumers, as well as over our marketing practices.	Data Privacy
	Number of users whose information is used for secondary purposes	TC-SI-220a.2 TC-IM-220a.2	Take-Two's Privacy Policy explains our data practices for the products, services, and websites we offer to consumers, including how we use that information.	Data Privacy
	Total amount of monetary losses as a result of legal proceedings associated with user privacy	TC-SI-220a.3 TC-IM-220a.3	Any material losses will be disclosed in the Company's SEC filings.	Investor Relations
	Number of law enforcement requests for user information	TC-SI-220a.4	We do not currently track this data. Our Privacy Policy details how we handle requests from law enforcement.	Data Privacy
	Number of users whose information was requested	TC-IM-220a.4		
	Percentage resulting in disclosure			
	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	TC-SI-220a.5 TC-IM-220a.5	Except as required by law, Take-Two does not report this information.	N/A
	Number of government requests to remove content; percentage compliance with requests	TC-IM-220a.6	We do not currently track this data.	N/A

SASB Index (cont.)

TOPIC	METRIC	SASB CODE	2021 RESPONSE	REFERENCE
Data Security	Number of data breaches	TC-SI-230a.1	Any material data breach incidents would be disclosed in the Company's SEC filings.	<u>Investor Relations</u>
	Percentage involving PII	TC-IM-230a.1		
	Number of users affected	TC-IM-230a.1		
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	TC-SI-230a.2 TC-IM-230a.2	To ensure we have appropriate measures and coverages to respond to the many areas of cyber risk, we have implemented a framework centered around four pillars: Governance, Vulnerability Management, Endpoint Management, and Security Operations.	<u>Information Security</u>
Recruiting & Managing a Global, Diverse & Skilled Workforce	Percentage of employees that are:	TC-SI-330a.1	11% of our U.S. employees are foreign nationals as of December 31, 2021.	N/A
	Foreign nationals	TC-IM-330a.1		
	Located offshore		We do not capture information on offshore positions.	
	Employee engagement as a percentage	TC-SI-330a.2 TC-IM-330a.2	Not available at this time, but we plan to track in the future.	N/A
	Percentage of gender and racial/ethnic group representation for:	TC-SI-330a.3	Please refer to the Diversity, Equity & Inclusion section of this report for these metrics and additional detail around our DEI policies and programs. We currently do not capture data specific to Technical staff at this time.	<u>Diversity, Equity & Inclusion</u>
	Management	TC-IM-330a.3		
Technical staff				
All other employees				
Intellectual Property Protection & Competitive Behavior	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	TC-SI-520a.1 TC-IM-520a.1	Any material losses will be disclosed in the Company's SEC filings.	<u>Investor Relations</u>

SASB Index (cont.)

TOPIC	METRIC	SASB CODE	2021 RESPONSE	REFERENCE
Managing Systemic Risks from Technology Disruptions	Number of: Performance issues Service disruptions Total customer downtime	TC-SI-550a.1	Any material technology disruption would be disclosed in the Company's SEC filings.	<u>Investor Relations</u>
	Description of business continuity risks related to disruptions in operations	TC-SI-550a.2	Take-Two considers a wide variety of business continuity risks with respect to disruptions in operations. We take into account physical risk of our locations and perform risk assessments by site to recognize any hazards and potentially disruptive impacts. We also conduct business impact assessments per business unit, exploring financial, reputational, and operational risks. Furthermore, the Company follows ISO 22301 Business Continuity Management Systems and NFPA 1600 standards.	<u>Business Continuity</u>

SASB Index: Activity Metrics

ACTIVITY METRIC	SASB CODE	TAKE-TWO DATA RESPONSE	REFERENCE
Number of licenses or subscriptions	TC-SI-000.A	Not available at this time, but we plan to track in the future.	N/A
Percentage cloud-based			
Entity-defined measure of user activity	TC-IM-000.A	Not available at this time, but we plan to track in the future.	N/A
Data processing capacity	TC-SI-000.B	Not available at this time, but we plan to track in the future.	N/A
Percentage outsourced			
Amount of data storage	TC-SI-000.C	Not available at this time, but we plan to track in the future.	N/A
Percentage outsourced			

TCFD Index

The table below is Take-Two’s first reporting of our ESG performance with reference to the recommendations of the TCFD. We will continue to evaluate areas for additional disclosure in the future and plan to disclose more comprehensive information in our 2022 CDP response.

SECTION	TCFD DISCLOSURE RECOMMENDATIONS	CONTENT IN THIS REPORT
Governance	Disclose the organization’s governance around climate-related risks and opportunities.	<p><u>Overseeing Our ESG Initiatives</u></p> <p>In 2019, Take-Two formed an ESG Committee that reports to the Board of Directors via the Corporate Governance and Nominating Committee on a quarterly basis.</p> <p><u>Our Sustainability Strategy</u></p> <p>In 2021, we formed a Sustainability Subcommittee composed of senior facilities leaders throughout our global portfolio to develop and execute our sustainability strategy.</p>
Strategy	Disclose the actual and potential impacts of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning.	<p>Take-Two has started to identify, assess, and seek to manage climate-related risks and opportunities, but we are still in the early stages of integrating this information into our strategic and financial planning.</p> <p><u>Environmental Impact</u></p> <p>At Take-Two, we believe climate change will have a long-term impact on businesses going forward. Climate change could result in an increase in the frequency or severity of natural disasters, such as earthquakes, fires, floods, or significant power outages and other catastrophic events. These events may adversely impact critical infrastructure, have the potential to disrupt our business, our third-party suppliers, or the business of our customers, and may cause us to experience higher attrition, losses, and additional costs to maintain or resume operations. Therefore, we aim to address and consider climate change throughout our business.</p>

TCFD Index (cont.)

SECTION	TCFD DISCLOSURE RECOMMENDATIONS	CONTENT IN THIS REPORT
Risk Management	Disclose how the organization identifies, assesses, and manages climate-related risks.	<p><u>Overseeing Our ESG Initiatives</u></p> <p>Take-Two’s internal audit group is currently developing an Enterprise Risk Management (ERM) platform that will monitor and highlight ESG topics as a risk category.</p> <p><u>Our ESG Framework</u></p> <p>Take-Two performed a broader materiality assessment that increased our awareness of climate-related topics, but we are still in the process of developing data collection and analysis processes that will allow us to monitor these topics effectively.</p>
Targets	Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities.	<p><u>Our Energy Use & Emissions</u></p> <p>Take-Two is currently in the process of developing data collection and analysis processes that will allow us to monitor and manage our emissions more effectively. We have also started to identify, assess, and manage climate-related risks and opportunities, but we have yet to quantify their impacts on the business in different scenarios. Once these processes have been implemented, we will be better equipped to set an emissions target, as well as other sustainability goals.</p> <p><u>Our Supply Chain Footprint</u></p> <p>We will continue to work with the Sustainability Subcommittee to seek to identify areas within the business where we can help combat climate change. We are discussing and considering additional initiatives and KPIs.</p>

THANK YOU



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