



IMPACT REPORT 2024

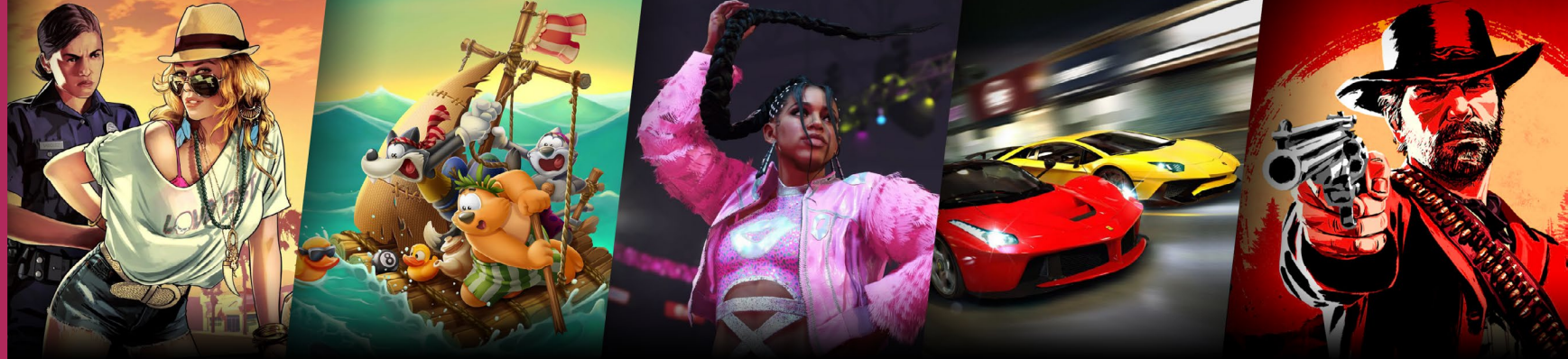




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A LETTER FROM OUR CHAIRMAN AND CEO

Our commitment to corporate responsibility has a profound effect on the way that we conduct our business, our ability to achieve our goals, and our aim to be a positive influence on and a meaningful supporter of future generations. To that end, our approach to sustainability is rooted in three key pillars – our **Colleagues**, our **Communities**, and **Climate**.

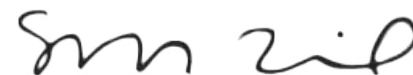
Colleagues - We foster a diverse, inclusive, and safe work environment for all our colleagues. Our workplace culture embodies our core tenets of creativity, innovation, and efficiency, and we believe that our high-performing atmosphere enables us to attract and retain top talent. A key component of our success is our long-standing practice of empowering our creative talent, as we believe that our people are the indispensable creative engine of our business and products. For the past several years, Take-Two has been recognized consistently as an outstanding workplace by our colleagues and renowned news organizations such as Forbes, Fortune, Newsweek, Time, and U.S. News & World Report. This past year, we were proud to enhance our DEI programs with new learning and development initiatives, and by expanding the depth of our Employee Resource Groups. Additionally, as part of our Board’s ongoing efforts to refresh its composition, conduct annual leadership reviews, and to evaluate Board and committee performance, our board appointed LaVerne Srinivasan as our Lead Independent Director in 2023.

Communities - We aim to create significant and sustainable benefits across our various stakeholder communities, including those surrounding our offices and our passionate players who engage with our entertainment offerings. We contribute actively through corporate philanthropy, youth education and community engagement programs, employee volunteering, and partnerships with local and online community organizations and academic institutions. For our player communities, we are committed to ensuring the quality, safety, and security of our products and services, protecting consumer privacy, and engaging in responsible marketing practices.

We believe that consumer trust and satisfaction are essential for our long-term sustainability and growth in the interactive entertainment industry. This past year, we updated our Terms of Service to help ensure that our social and online experiences are inclusive and respectful for all users, and we created a Chief Information Security Officer role to amplify our efforts to set strategy, risk threshold, and responsibilities uniformly across business units.

Climate - In alignment with our core tenets, we are taking action to operate more efficiently and to reduce our emissions across our processes. We remain committed to addressing climate change and its effects by supporting the transition to a lower-carbon economy in our industry and communities. We have developed and submitted a near-term science-based emissions reduction target that is in-line with the Paris Agreement, which required a comprehensive inventory across our organization and value chain. For the second consecutive year, we have disclosed our Scope 1 and 2 emissions across all of our offices, and reported our most relevant Scope 3 categories, covering our climate impact from development to the point of sale. Our colleagues share our passion, as demonstrated by the creation of our global Eco Squad, through which participants can engage, educate, and empower one another to create a more environmentally-conscious workplace and community.

We are exceedingly proud to share these details and more within our 2024 report. We know that there remains more that we can do to address the challenges that affect our colleagues, communities, and industry, and we are committed to evolving and enacting our sustainability strategy further to achieve positive outcomes for all our stakeholders.



STRAUSS ZELNICK
Chairman and Chief Executive Officer

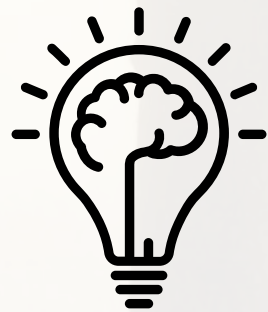


INTRODUCTION

ABOUT US

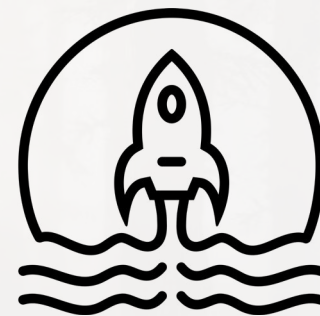
With a diverse portfolio spanning all key platforms and numerous genres, and world-class creative teams, we strive to captivate our global audience by creating the highest quality, most engaging interactive entertainment franchises in our industry.

We aim to achieve our mission by driving our collaborative enterprise through these core tenets:



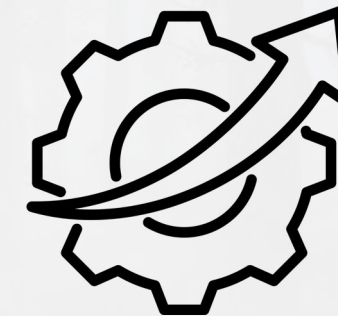
CREATIVITY

When pursuing new products and business opportunities, we prioritize and protect the creative process that is vital to our success.



INNOVATION

Introducing new and original content is a key driver of our growth, and we strive to foster a culture that rewards novel concepts and approaches.



EFFICIENCY

We take steps to optimize efficiency and minimize waste in our operations, while also maintaining high standards of quality and customer satisfaction.

These core tenets, along with our commitment to making Take-Two a welcoming, diverse, and inclusive workplace where we always strive for excellence, are fundamental to our culture. Our values are exemplified and furthered by our sustainability efforts. We believe that our approach enables us to more easily embody and meet our sustainability goals, create and protect value for our shareholders, and contribute to a better future for our planet and communities.



OUR BUSINESS

We develop interactive entertainment for major consoles, personal computers, and mobile platforms, and we translate our games into multiple languages. This approach allows us to captivate to a wide range of players wherever they may be and on whichever device they may be using. We believe that our commitment to creativity and innovation is a distinguishing strength, enabling us to differentiate our products in the marketplace by combining advanced technology with compelling storylines and characters that provide unique gameplay experiences.

2K consistently sets new benchmarks for excellence across a wide array of gaming genres, with offerings such as *NBA 2K*, *PGA TOUR 2K*, and *WWE 2K* (sports and entertainment), *Civilization* and *XCOM* (strategy), and *Borderlands*, *BioShock*, and *Mafia* (action adventure), among other titles.

Private Division is dedicated to introducing new titles from top independent developers, in collaboration with small and mid-size studios, and has built a strong reputation for publishing titles from leading creative talent.

Rockstar Games are the creators of some of the most innovative, critically acclaimed and commercially successful interactive entertainment properties of all time, including the iconic and record-breaking *Grand Theft Auto* series, the *Red Dead Redemption* series, *L.A. Noire*, *Bully*, and many more.

Zynga publishes popular free-to-play mobile games that deliver high quality, deeply engaging entertainment experiences. Zynga's diverse portfolio of popular game franchises has been downloaded more than 6 billion times, and includes titles such as *Empires & Puzzles*, *Match Factory*, *Toon Blast*, and *Top Troops*.



HIGHLIGHTS AND ACHIEVEMENTS

We continued to make meaningful progress across key sustainability areas over the past year.

COLLEAGUES

- Continued to scale DEI learning and development across the organization, building and rolling out 14 customized offerings across the business from trainings designed for individual contributors, leaders, and our executives.
- We are committed to supporting our Employee Resource Groups (ERGs). Last year we added two new groups, La Comunidad and Veterans at Zynga, bringing the total to 24 groups across the organization.

COMMUNITIES

- Expanded our engagement by focusing on our local, our player, and our broader stakeholder communities.
- Updated our Terms of Service to help ensure that our social and online gaming experiences are inclusive and respectful for all users.

CLIMATE

- Committed to setting a near-term emissions reductions goal using The Science Based Targets initiative framework.
- Launched global Eco Squad to engage, educate, and empower each other to create a more environmentally conscious workplace and community.

TAKE-TWO RECOGNITIONS

FORBES AMERICA'S BEST MID-SIZE EMPLOYERS

2020

2021

2022

2023

FORTUNE GREAT PLACES TO WORK

2020

2021

2022

2023

POCKETGAMER.BIZ TOP 50 MOBILE GAME MAKERS

2022

2023

NEWSWEEK'S AMERICA'S GREATEST WORKPLACES FOR DIVERSITY AND WOMEN

2024



ABOUT THIS REPORT

This report provides an overview of Take-Two's sustainability related activities between April 1, 2023 and March 31, 2024 (Fiscal Year 2024), and includes quantitative data for Fiscal Year 2024, unless otherwise noted. The information in this report should be considered historical and not subject to further update by us. A Sustainability Accounting Standards Board (SASB) index is at the end of this report. For more information on our climate strategy, please see our TCFD report on our website.

In this report, any use of the term "materiality" and other similar terms refers to topics that reflect our priority sustainability issues. We are not using such terms as they are used under the securities or other laws of the United States 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 statements that are considered forward-looking statements under federal securities laws and may be identified by words such as "believe," "project," "expect," "anticipate," "estimate," "intend," "strategy," "future," "opportunity," "plan," "may," "should," "will," "would," "will be," "will continue," "will likely result," "strive," "seek," "could," "potential," "predict," 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 (SEC), including in our most recent Annual Report on Form 10-K and the risks summarized in the section entitled "Risk Factors," 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.

Certain information contained here in relating to any goals, targets, intentions, or expectations, including with respect to the United Nations Sustainable Development Goals (SDGs), is subject to change, and no assurance can be given that such goals, targets, intentions, or expectations will be met. The analysis involved in determining whether and how certain initiatives may contribute to the SDGs is inherently subjective and dependent on a number of factors.

There can be no assurance that reasonable parties will agree on a decision as to whether certain services, projects or investments contribute to a particular SDG. Accordingly, investors should not place undue reliance on Take-Two's application of the SDGs, as such application is subject to change at any time and in Take-Two's sole discretion. There can be no assurance that our sustainability policies and procedures as described in this report will continue; such policies and procedures could change, even materially. We are permitted to determine in our discretion that it is not feasible or practical to implement or complete certain of our sustainability initiatives, policies, and procedures based on cost, timing, or other considerations. Further, the receipt of any awards by Take-Two is no assurance that Take-Two's business objectives, including its ESG- or sustainability-related objectives, have been achieved or successful.

Statistics and metrics relating to sustainability matters, including GHG emissions metrics, are estimates and may be based on estimates and assumptions (which may prove to be inaccurate) or developing standards (including Take-Two's internal standards and policies).

Certain information contained herein has been obtained from third parties, and in certain cases has not been updated through the date hereof. While these third-party sources are believed to be reliable, Take-Two makes no representation or warranty, express or implied, with respect to the accuracy, fairness, reasonableness or completeness of any of the information contained herein, and expressly disclaims any responsibility or liability therefor.

OUR APPROACH TO SUSTAINABILITY

We constantly strive to become the most innovative, creative, and efficient company in our industry. By incorporating sustainability into our business, we believe we are better positioned to achieve our mission while generating value for our stakeholders.

Our strategy is centered around people – our colleagues and our communities. We create products with highly collaborative teams to engage and entertain diverse communities. As we develop our approach to sustainability and operating more responsibly, we will prioritize people throughout the process.

In 2021, we identified key sustainability topics by engaging our stakeholders – internal teams, investors, suppliers, distributors, customers, industry groups, and regulators – and leveraging a third-party peer benchmark. The results were evaluated against leading ESG reporting standards and frameworks, including SASB and TCFD.

These relevant topics helped determine our overall approach to Sustainability and the contents of this report. For more details on our materiality assessment, please refer to our previous Impact Report.

We believe in our ability to be a good corporate citizen for our society and planet, while creating long-term business value. The United Nations Sustainable Development Goals (UN SDGs) are designed to help create a better and more sustainable future for all by 2030. We identified six UN SDGs relevant to our business and to which we believe we can make meaningful contributions. Please look for these icons throughout the report to learn more.

OUR SUSTAINABILITY PILLARS



COLLEAGUES

We work to foster a diverse, inclusive, and safe work environment for all our colleagues, and we believe that a genuinely creative, innovative, and high-performing workplace culture attracts and retains top talent. Sound corporate governance maintains the long-term sustainability and ethical integrity of our business. We work to maintain transparent reporting, accountability, and ethical decision-making processes, helping to ensure responsible and effective management.



COMMUNITIES

We aim to create meaningful and sustainable benefits in all the spaces where we operate. We actively contribute to both local and online communities through corporate philanthropy, youth education and community engagement programs, employee volunteering, and partnerships with local and online community organizations and academic institutions. Consumer trust and satisfaction are essential for our long-term sustainability and growth in the gaming industry. We are committed to ensuring the quality, safety, and security of our products and services, protecting consumer privacy, and engaging in responsible marketing practices.



CLIMATE

The climate crisis is a people crisis. As the climate crisis deepens, the impacts on human health, productivity and wellbeing become undeniable. We view emerging environmental issues from a climate perspective. We recognize the need for a transition to a low carbon economy and are actively pursuing ways to reduce our impact.



SUSTAINABILITY OVERSIGHT

We prioritize transparent corporate governance and management to best translate our vision into effective action and respond to the rapidly evolving environmental and social issues facing our industry and business. We understand that robust corporate governance further embeds our efforts throughout the organization and helps ensure engagement at all levels of the business.

Over the past few years, we have established internal processes and controls to help drive our program forward. A key component of our structure is the line of communication between our Sustainability Committee and our Board of Directors.

Our Board of Directors exercises direct oversight of strategic risks to our Company. The Corporate Governance Committee oversees sustainability matters and operational risk relating to insurance. In each case, management periodically reports to our Board of Directors or a relevant committee, which provides guidance on risk appetite, assessment, and mitigation.

Our Sustainability Committee is a senior-level management committee with organization-wide representation that is overseen by the Board's Corporate Governance Committee, which oversees and reviews the Company's sustainability strategy and guides our long-term climate strategy.

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 shareholder value.

Our Internal Audit function supports our sustainability efforts by reviewing and evaluating our internal processes and data governance, and helping design our ERM program.

ENTERPRISE RISK MANAGEMENT

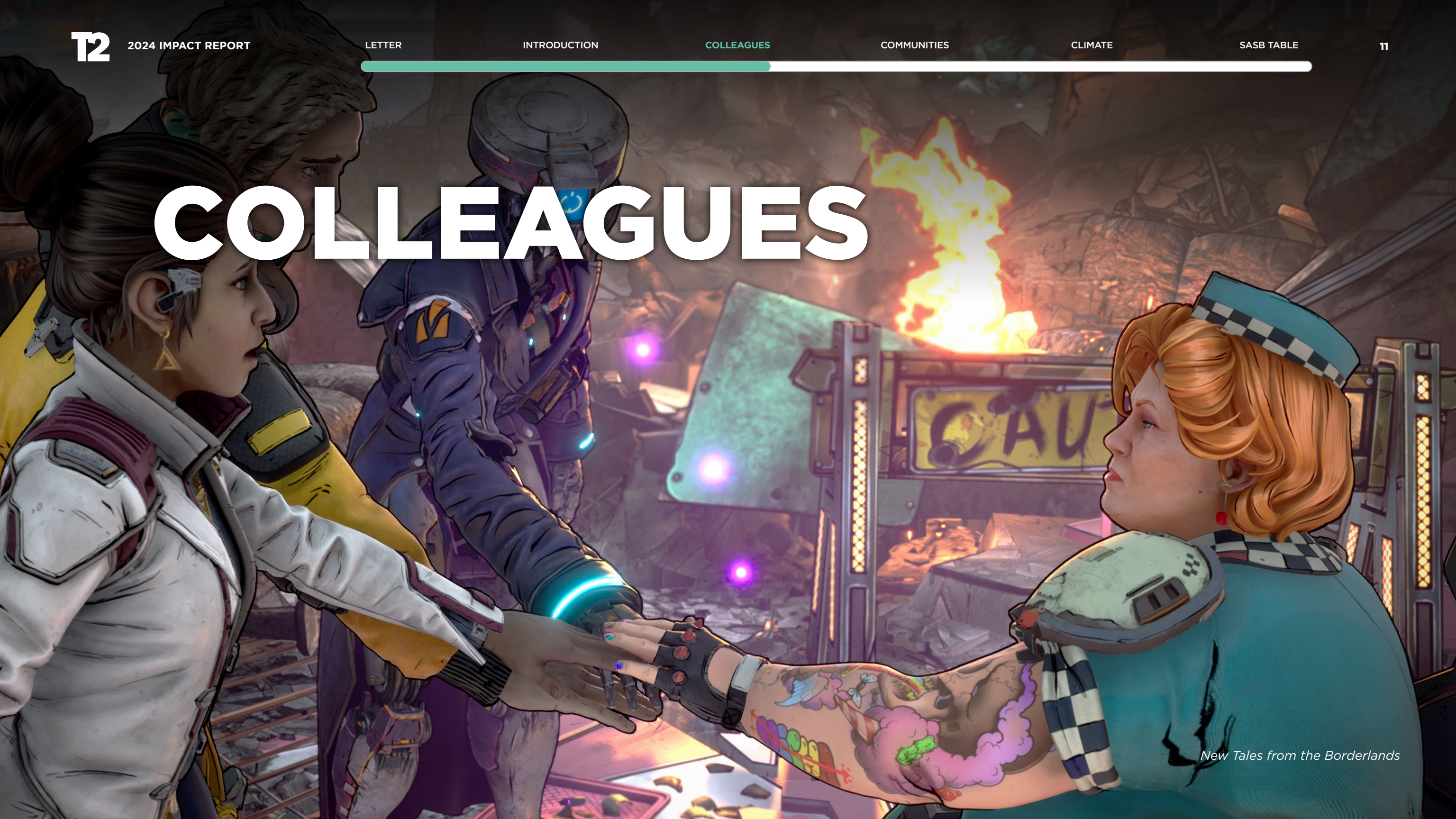
In FY 2024, we incorporated sustainability issues into our enterprise risk management (ERM) program. Our ERM program supports our strategic decision making and increases collaboration between our management team and risk management functions, so we can more effectively and efficiently identify, monitor, and manage key risks to our business.

As part of the ERM process, management assesses the capabilities in place to mitigate risk and updates the Audit Committee and ERM Steering Committee semi-annually on the progress of planned activities and an overall risk outlook. The ERM team works with management to define and report on KRI (key risk indicator) metrics for each risk profile developed across the organization. We intend for these disparate risk profiles and KRI metrics to be synthesized and presented holistically to senior management.

For more detail on our climate risk oversight, please see our latest TCFD report.



COLLEAGUES



OUR GLOBAL WORKFORCE

We are a highly collaborative organization focused on establishing teams positioned for success. We believe that empowering our creative talent is critical to our success, as our people are the indispensable creative engine of our business and products.

Our Global Talent and Engagement teams share the mission of driving development and engagement through strategic partnerships, using data driven insights, tailored resources, communications and experiences to create an environment of innovation, creativity and growth, enabling the best in our colleagues and business.

As of March 31, 2024, our global workforce grew to over 12,000 employees — **62%** of whom are employed outside the U.S. and **78%** of whom are dedicated to product development.

New hires (i.e., employees hired during our FY 2024) represent roughly 16.9% of our total population. Our overall voluntary turnover rate is 7.9%. The tables to the right reflect, respectively, the entire population of colleagues who joined or voluntarily left during the fiscal year.

46%

OF OUR EMPLOYEES ARE LOCATED IN NORTH AMERICA

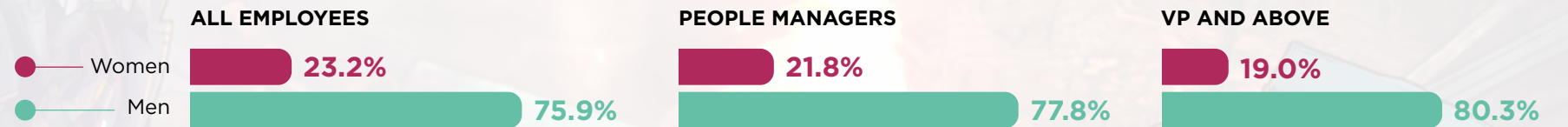
36%

OF OUR EMPLOYEES ARE LOCATED IN EUROPE

18%

OF OUR EMPLOYEES ARE LOCATED IN THE ASIA-PACIFIC REGION

GLOBAL REPRESENTATION

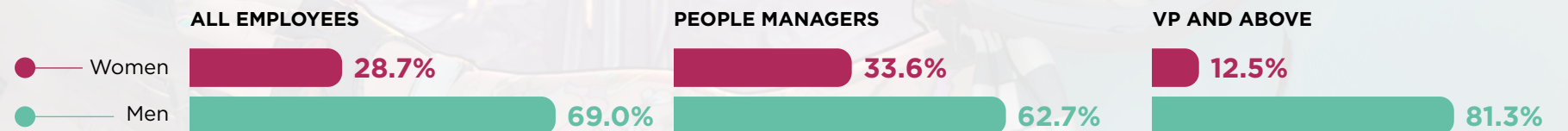


GLOBAL NEW HIRE REPRESENTATION

GLOBAL NEW HIRE REPRESENTATION



GLOBAL VOLUNTARY TURNOVER REPRESENTATION



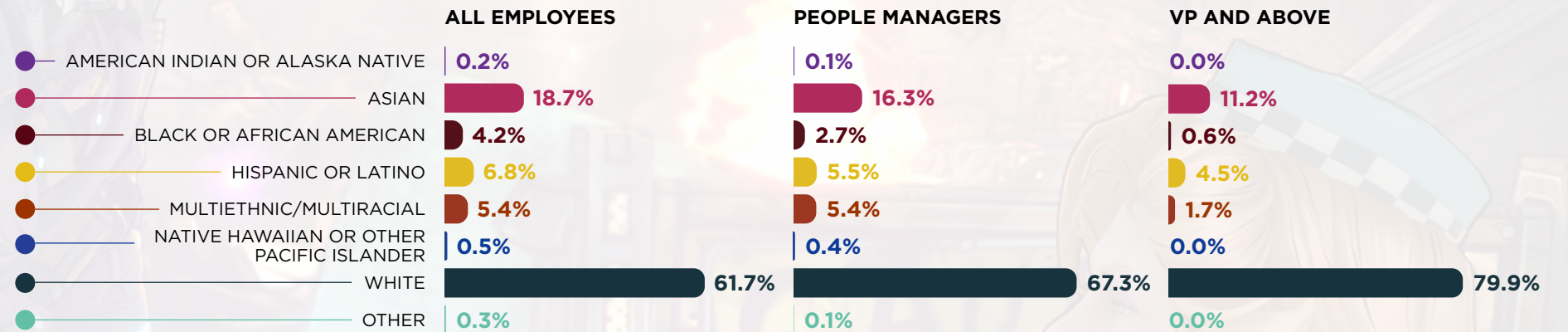
*Percentages are rounded to the 1/10th. Totals may not equal 100% due to rounding or because denominators include people who choose not to disclose.

OUR GLOBAL WORKFORCE

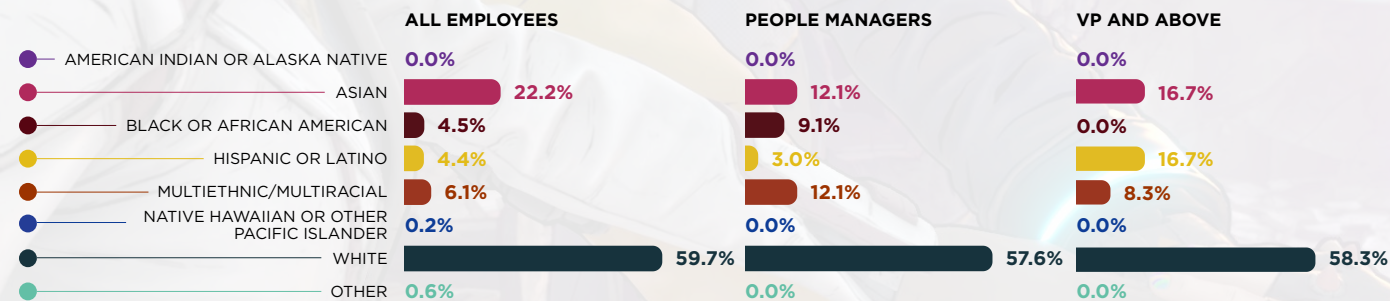
Our colleagues in the US, UK, and India were offered the opportunity to voluntarily disclose their ethnicity information. We are excited to share that 62% of those colleagues have done so. We are committed to working with more of our colleagues who choose to share their ethnicity information, subject to local legal requirements.

Please refer to our consolidated EEO-1 report on our website for additional detail.

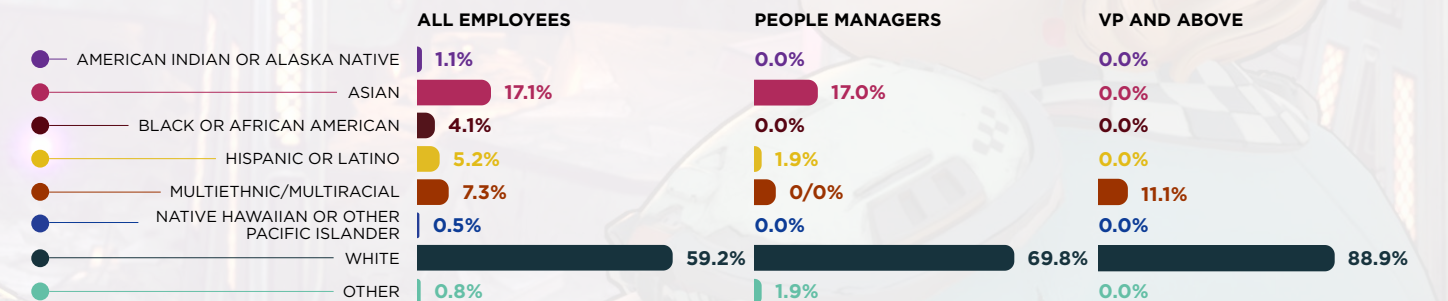
US/UK/INDIA REPRESENTATION



US/UK/INDIA NEW HIRE REPRESENTATION



US/UK/INDIA VOLUNTARY TURNOVER REPRESENTATION



*Percentages are rounded to the 1/10th. Totals may not equal 100% due to rounding or because denominators include people who choose not to disclose.

EMPLOYEE EXPERIENCE

At Take-Two, we believe that our people and our culture are key competitive advantages. We recognize the crucial role that employee experience plays in attracting and retaining industry-leading talent. We work on multiple fronts to cultivate a creative, innovative, and high-performing work environment that enables us to grow our business and help our teams excel.

We invest in a range of programs, benefits, and initiatives to enhance the employee experience, as detailed in the following pages. Take-Two Corporate is pleased to have been recognized in 2023 as a Great or Best Place to Work for a fourth consecutive year.



EMPLOYEE ENGAGEMENT

At Take-Two, we value the engagement of our colleagues and strive to create a positive and inclusive workplace that fosters open communication and feedback. We provide multiple outlets for colleagues to voice their views and ideas:

- **Global Town Halls:** Invite colleagues from across the organization to share perspectives, ask questions to senior management, and voice concerns.
- **Pulse Surveys:** Gather real-time feedback on our workplace culture and environment.
- **Culture Assessments:** Measure alignment between our organizational values and qualities and those of our teams.
- **Employee Resource Groups (ERGs):** Provide community for our colleagues centered on shared identities or common interests.
- **Qualities and Values Workshops:** Encourage collaboration, diversity, and inclusion in our workforce.
- **Open-Door Policy:** Enable less formal exchanges between colleagues and senior executives, with the aim of creating a transparent and inclusive environment where concerns and suggestions are welcomed and addressed.

These engagement mechanisms are varied approaches for providing and gathering feedback, and they allow Take-Two to assess our work environment and identify areas for improvement. We endeavor to create a supportive, dynamic, and stimulating work environment for all our colleagues.

COMPENSATION AND BENEFITS

We design our employee compensation and benefits programs to attract, retain, motivate, and reward top talent operating in a highly competitive and technically sophisticated industry.

We aim to provide market-competitive pay and benefits that are benchmarked against our gaming and technology peers and tailored to the geographies where we operate.

COMPETITIVE COMPENSATION

Our compensation packages are designed to incentivize high performance at both the company and individual levels. We regularly review our compensation models, including thorough industry benchmarking, to take into account evolving internal and external factors.

We also leverage market-based data to link compensation, to individual, enterprise-wide, and business unit performance.

PAY EQUITY ANALYSIS

We will be conducting a pay equity analysis this fiscal year, working with leading experts to support us. We remain committed to aiming for equal pay for equal work throughout our Company.

EMPLOYEE EXPERIENCE (CONTINUED)

TALENT DEVELOPMENT AND PERFORMANCE MANAGEMENT

Our mission in talent development is to curate the ecosystem of learning and people processes to enable our global community to develop, grow and thrive. To support internal advancement, we define clear paths and resources for professional development, including targeted coaching and training opportunities, deliver performance evaluations, and provide compliance training to promote a rewarding and ethical work environment.

- Our global Talent Development teams offer an array of **professional training** programs for colleagues. These range from hard-skill development to non-role-specific leadership training and include programs for managers and customized individual professional development planning. The trainings are available in multiple formats, including e-learning, online sessions and in-person training. In addition, colleagues are allocated development funds to spend as they see fit to support their individual professional goals and skill-building needs.
- Talent Development programs are integrated with our **performance management** process, which centers on open communication, clear expectations, and the tracking of progress against objectives. Management engages in annual review conversations as well as informal feedback sessions and semi-annual or quarterly performance conversations, as needed. Performance management and online goal-setting tools are available to our colleagues throughout this process.
- To support a high-performing work culture, Take-Two provides **compliance training** to help ensure that all employees understand our Global Code of Business Conduct and Ethics and internal policies, and feel confident in their ability to report any inappropriate behavior. For its part, management works to ensure that all hiring, promotion, and compensation decisions are based on objective qualifications, work ethic, and job performance.

Take-Two's succession planning extends to senior managers outside of executives. This continued work enshrines continuity and sustainability in our operations and ensures our core functions remain accessible.

LEARNING AND DEVELOPMENT

We prioritize the growth and development of our colleagues to keep pace with the innovation in our fast-evolving industry and to anticipate future skills that may be required to maintain our commitment to delivering the highest-quality products in our sector. Continual learning and upskilling are critical to our goal of fostering a culture of improvement and innovation. And looking ahead, our corporate and label Talent Development teams will continue to work together to identify and provide enterprise-wide and team-specific learning and development solutions.

In addition to providing professional-development funding and other professional training programs, Take-Two offers Pluralsight and LinkedIn Learning as **e-learning platforms** for our colleagues. Pluralsight teaches technology-related skills for development labels and their development studios, while LinkedIn Learning offers a broader range of courses for enterprise-wide use, covering both technical and soft skills. Both platforms allow for flexible, self-paced learning and provide progress tracking and completion certificates. By investing in these platforms, Take-Two seeks to empower our global teams to flourish in a highly competitive industry.

FY 2024 HIGHLIGHTS

LINKEDIN LEARNING

78,872

VIDEO COMPLETIONS

PLURALSIGHT

2,690

HOURS VIEWED

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.



FITNESS OPTIONS

We host a variety of fitness events across our office locations, with some offering on-site fitness facilities and subsidize qualifying employee spend on fitness.



TIME OFF

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



FAMILY SUPPORT

In certain locations we offer a digital health platform that provides 24/7 specialized virtual care, personal guidance, and trustworthy resources to support family-building and health.



HEALTHCARE

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



GLOBAL BENEFITS SNAPSHOT

WE PROVIDE OUR HIGHLY CREATIVE EMPLOYEES WITH RICH BENEFITS PACKAGES TO MEET DIVERSE NEEDS.

This is a high-level overview of the benefits offered by Take-Two. Not all offerings are global, and benefits are subject to terms of employment and applicable benefit plan rules and may be changed at any time by Take-Two.



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.

RETHINK CARE

Our behavioral and mental health program offers on-demand clinical consulting to support colleagues who are parents and caregivers of children with neurodiverse and neurotypical needs.



GREEN INVESTING

Where possible, we offer ESG-cognizant investment options in our retirement plans.



NEXT LEVEL GIVING

We double-match employee donations to eligible charities through Next Level.



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.



LEVEL UP WELLBEING PROGRAM

We provide an online platform that centralizes a wealth of resources and tools to help people take small but steady steps towards improving any and all aspects of their wellbeing.



EXECUTING OUR DEI STRATEGY

Our commitment to creating a diverse and inclusive workplace hinges on recognizing our people as one of our most valuable assets. We recognize that diversity is crucial for our growth and long-term success – acknowledging the role it plays in generating creativity and innovation. We are dedicated to strategically recruiting talent from all backgrounds in order to broaden our applicant pool as we strive to develop a workforce that is increasingly reflective of our diverse audiences and the global communities we serve throughout our enterprise.

Take-Two's DEI strategy is overseen by the Corporate Governance Committee which is updated on DEI initiatives at least twice a year. Throughout the organization, cross-label DEI teams collaborate to develop and execute initiatives to create a more inclusive environment.

As a company committed to promoting inclusion and advancing representation globally, and driving equity-forward innovation, we are proud of our achievements over the last twelve months. Our collective efforts to advance this work are supported by a global DEI strategy focusing on four pillars. The table below highlights some of these efforts over the past year.

DEI STRATEGIC PILLARS

1. COLLECT AND ANALYZE DATA

Understanding the makeup of our people enables us to better support and empower our communities. We want to ensure that we are well positioned to report on diversity metrics and have ongoing pathways to identify opportunities to increase inclusion and sentiments of belonging.

3. INCREASE ACCESS & OPPORTUNITIES

DEI and Talent Acquisition are focused on a developmental roadmap to support greater equality throughout the lifecycle of our employees, with a specific focus directed toward our recruitment, interviewing, and hiring stages. Talent Development is complementing these efforts through an array of programs.

2. ENHANCE CULTURAL COMPETENCY

Through enhancing cultural competence, we're building skills, values and principles that acknowledge, respect and contribute to effective interactions between individuals and the various cultures that are present (both seen and unseen) within any given environment.

4. STRUCTURED CROSS-LABEL COLLABORATION

We will be stronger and more effective together. Our cross-label DEI teams are already collaborating on industry visibility, employee resource groups and events.

PROMOTING COLLABORATION THROUGH ERGS

We are committed to supporting our Employee Resource Groups (ERGs). We believe these groups are vital in fostering ongoing workplace collaboration and community throughout our organization. Our ERGs each focus on different affinities, while sharing the objectives of creating safe spaces and promoting representation across our workforce. We partner each group with an Executive Sponsor to provide additional support and guidance. Open to all employees from the day they start, these ERGs play a crucial role in cultivating and spreading an inclusive culture, and we are committed to amplifying their impact. Last year, we welcomed two new groups, La Comunidad and Veterans at Zynga.

La Comunidad (the “Community”) seeks to provide a warm and fun environment for Latin and Hispanic-identifying persons, allies, and individuals who would like to share in the rich Latin cultures, and improve the workplace lives of community members.

Veterans at Zynga seeks to empower veterans to conquer new frontiers: fostering camaraderie, leveraging resources, and championing careers through shared experiences, events, and wisdom. The group wants to engage in charitable activities, aid in accessing benefits, and utilizing the resources veterans have to assist veterans in their transition from military service to civilian careers.



OUR CORPORATE GOVERNANCE

We believe that robust corporate governance and responsibility enhance corporate value, while mitigating risks, reducing costs, and identifying market opportunities.

LEADING WITH INTEGRITY

Take-Two is committed to conducting business fairly and ethically, complying with domestic and international laws, and promoting a compassionate, inclusive work environment 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,” which aims to reduce legal, regulatory, reputational, and financial risk for Take-Two, is integrated into our business. We pride ourselves on collaborating and engaging with business and creative personnel at all Company levels and locations, leading to relationships of trust and respect.

EXECUTIVE COMPENSATION

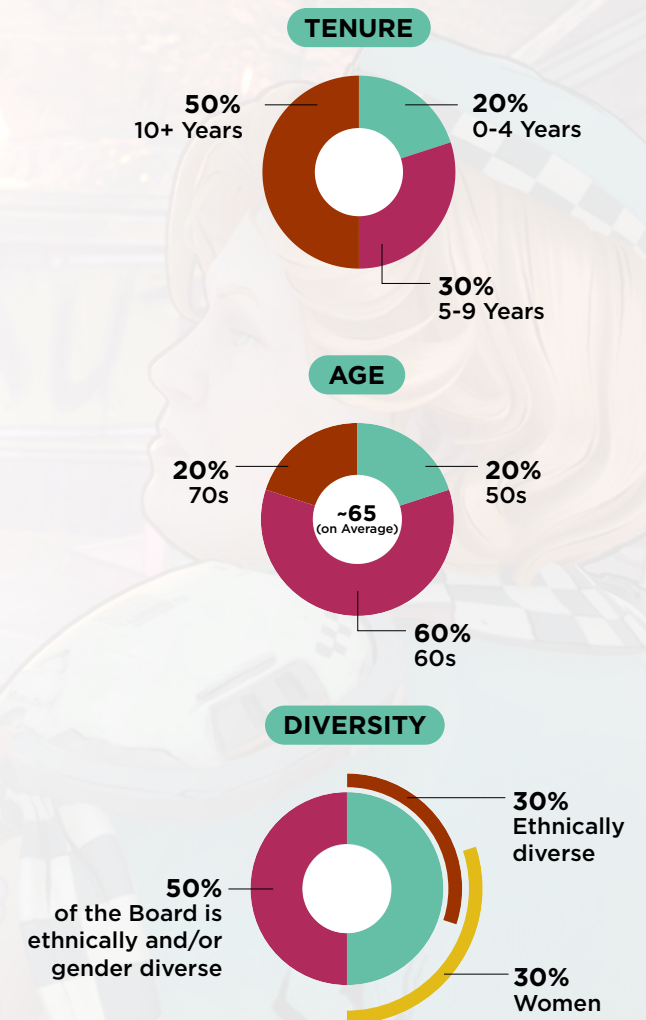
Our Executive Compensation program aligns with shareholder interests and includes best practices such as a clawback policy, bonus caps, double-trigger vesting, significant stock ownership requirements, and prohibition of stock option repricing without shareholder consent. Other elements include limited perquisites, no tax gross-ups for parachute payments, annual compensation risk assessments, and the use of independent compensation consultants.

For detailed information on how our Executive Compensation program supports our governance goals, please refer to our latest Proxy statement.

BOARD DIVERSITY AND REFRESHMENT

We are dedicated to robust governance practices, emphasizing strong corporate governance, effective risk management, and independent oversight. Our Board of Directors appoints a Lead Independent Director with distinct responsibilities, and shareholders can call special meetings and vote via written consent without supermajority requirements. Our governance structure is reinforced by strict policies against hedging, pledging, and insider trading, overseen by our Audit, Compensation, and Corporate Governance Committees.

Our board actively refreshes its composition, conducts annual leadership reviews, and evaluates board and committee performance regularly. With 8 out of 10 directors being independent and a commitment to majority voting for director elections, our board prioritizes accountability and transparency. The diversity in our board’s experience and perspective underscores our robust governance framework. Annual performance reviews of top executives by independent directors affirm our commitment to effective leadership. Our board appointed a new Lead Independent Director, LaVerne Srinivasan, in 2023.



OUR POLICIES AND ETHICAL STANDARDS

We apply all of the policies discussed in this section to Take-Two, its wholly owned subsidiaries and affiliates, and all of their respective directors, officers, employees, consultants, contractors, agents, and others who do business on behalf of the Company.

Our Corporate Governance 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 for our colleagues around the world through online classes and trainings supplemented by live sessions conducted globally.

GUIDING BUSINESS CONDUCT

Our We have a [Global Code of Business Conduct and Ethics](#) (the "Code") that covers numerous topics, including diversity, equality, nondiscrimination, and anti-harassment; conflicts of interest involving various parties; securities laws and insider trading; ensuring fair competition; preventing bribery and corruption of all sorts; tax compliance; policies and avenues for reporting misconduct; audits, investigations, and disciplinary action; and others.

The standards in the Code are mainly based on U.S., UK, E.U., and other applicable international laws. In some cases our standards exceed legal requirements to reflect our values. All employees and contractors agree in writing to abide by the Code, regardless of their roles, territories, or durations of engagement with the Company. The Code is updated as appropriate 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.

ENFORCING OUR GLOBAL CODE OF BUSINESS CONDUCT AND ETHICS

Our commitment to non-discrimination and anti-harassment is clearly outlined in our Global Code of Business Conduct and Ethics. With no exception, harassment on the basis of any protected characteristic is strictly prohibited and there are a variety of ways that it can be reported to ensure that our employees have adequate options.

To encourage communication between our management team and our employees, we promote an open door policy between business, management, and legal groups. Our Policy for Reporting Misconduct details the responsibilities that 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. Our policy is 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 Code, regardless of whether such violation is ultimately determined to have occurred.

Nothing in any Company policy or pronouncement prevents our colleagues from reporting possible violations of law or regulations to an appropriate governmental agency or governmental entity or from making other disclosures protected under any whistleblower provisions provided by law or regulation. No pre-clearance is required from the Company to make such a report or disclosure.

EVALUATING OUR POLICIES

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 help ensure that management's internal controls are designed and operating effectively to monitor compliance with our 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 EthicsPoint Incident Management System (whistleblower hotline) and the maintenance and disclosure of the Code.

REQUIRING COMPLIANCE TRAINING

Senior employees and those in higher-risk departments and geographies are expected to attend live antitrust, anti-corruption, and sanctions and trade training approximately every two years.

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 are an opportunity for the Legal department to interact with a wide variety of business units, colleagues, offices, development studios, and geographic territories, and serve as informal, ongoing risk assessments for each location or group.

On a biennial basis, every Take-Two employee is expected to complete courses regarding our Global Code of Business Conduct and Ethics, Anti-Bribery and Corruption, Antitrust and Competition Law, Sanctions and Trade, Anti-Harassment and Discrimination, and Data Privacy policies.

COMMUNITIES





COMMUNITIES

We continued to make meaningful progress across key areas impacting our local communities, our player communities, and our broader stakeholders communities.

LOCAL

We support our local communities through educational programs and scholarships for underserved youth, with a focus on providing new pathways to gaming professions through broader community partnerships and engagements.

PLAYER

We are committed to providing safe, inclusive, and welcoming environments in which players can enjoy our games free of harassment, hate speech, toxic behavior, and other offensive content and conduct.

CONSUMER TRUST

Ways we are ensuring the quality, safety, and security of our products and services while protecting consumer privacy.

APPROACH BY LABEL

Ways our labels work to creating safe and fair player experiences for all.

BROADER STAKEHOLDERS

We believe strong governance practices are needed throughout our value chain. These practices are built on collaboration, transparency, and formalized policies.

LOCAL COMMUNITIES

We help support our local communities through educational programs and scholarships for underserved and underrepresented youth, with a focus on providing new pathways to gaming professions through broader community partnerships and engagements.

BUILDING EDUCATIONAL PARTNERSHIPS

While our Company enacts and engages with a variety of philanthropic programs, at our core, we help support our local communities through educational programs and scholarships for underserved and underrepresented youth, with a focus on providing new pathways to gaming professions through broader community partnerships and engagements. We're passionate about nurturing the next-generation of creative and business leaders, and we provide vocational and mentoring guidance to help unlock their potential.

To that end, we partner with organizations that offer support and resources to help young people achieve their dreams, such as:

- After School All-Stars
- Covenant House
- The Fresh Air Fund
- Games for Change
- Girls Make Games
- Museum of the Moving Image
- New York Mayor's Office of Media and Entertainment
- Partnership for a Greater New York
- The Paley Center
- The Strong National Museum of Play

We also support the technical and creative programs of the following organizations to help students pursue degrees in game design and have increased pathways into our industry.

- The Animation Project
- CYSTEM
- Harlem Academy
- Harlem Lacrosse
- HOSTOS
- School of Interactive Arts

We are committed to helping provide opportunities to those who are challenged by financial constraints, and to also help end cycles of inequality by endowing scholarship programs with various entities including Gay Gaming Professionals, New York Videogame Critics Circles, and others.

GIVING BACK LOCALLY:

In addition, we take seriously our responsibility to be a good corporate citizen in the communities where we operate, and give back locally through charitable giving, volunteerism, and support for social justice causes, including:

- Funding for the delivery of nutritious food and medical supplies to local shelters.
- Employee volunteerism and giving to social justice organizations.
- Educational, athletic, and other opportunities for underserved communities.
- Work with organizations to support LGBTQIA+ rights.

NEXT LEVEL

Next Level is a key initiative that supports our employees' interests in their communities and beyond. Through this program, the company rewards volunteer efforts and matches employee donations to charitable organizations, up to individual eligibility and match limits. We are proud to support employees who contribute to our philanthropic goals through their financial and personal efforts.

The Next Level program offers three options:

- Charitable Donation Matching: The Company matches 2:1, meaning the Company donates twice the amount of each employee contribution.
- Cash for Caring: Employees are rewarded for donating their time to eligible charities.
- Volunteer Time Off: All eligible employees receive one full workday per year to volunteer.



PLAYER COMMUNITIES

CONSUMER TRUST

UNIVERSAL USER RULES

Take-Two's Terms of Service ("ToS") defines the terms and conditions under which players are permitted to access and use our games. Our ToS includes a robust Code of Conduct which sets out our expectations with regard to player conduct and player-generated content. We enforce violations of our ToS through trust and safety practices managed by our labels, with violations of our ToS resulting in enforcement action that ranges from the issuance of warnings to temporary feature suspensions and, in the most egregious of violations, permanent bans. In the case of illegal content or conduct, we also have processes in place to share appropriate information with law enforcement and other relevant agencies, such as the National Center for Missing and Exploited Children.

MODERATION SYSTEMS AND TOOLS

In an effort to prevent, terminate conduct or the distribution of content that violates our ToS, our games may employ moderation systems and tools, such as automated word filters and voice, image, or symbol-recognition and moderation software. These systems and tools are designed to complement the player reporting functionality we provide in-game or via dedicated support websites and the work of our own human moderators. Recent advances in artificial intelligence and machine learning present opportunities to improve these trust and safety processes, and we are continually investigating how we may utilize such emerging technologies in a responsible way that protects the privacy of our players.

DATA PRIVACY

We actively maintain a holistic and global Privacy Policy that covers data practices for the products, services, and websites that we offer to consumers as well as marketing practices.

ENFORCING CUSTOMER PRIVACY PROTECTIONS

Our Privacy Policy applies to each of our labels and divisions and describes:

- The types of information we collect and our lawful bases for processing this information.
- How we may use and when we may share information and details about data retention.
- Options we provide to our consumers related to managing their accounts, communications, and data.
- Our approach to data belonging to children.
- How we handle international data transfers.
- The measures we take with respect to data security.

Through our Privacy Policy, as well as our Do Not Sell or Share My Personal Information notice, we provide specific information on how we apply the California Consumer Privacy Act with respect to processing the personal information of California residents. We also have a Cookie Policy and use cookie preference tools to present site visitors with our website cookie options, the types of cookies we use, and how users can manage cookies with the preference tools of their browsers.

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

DRIVING ONGOING ASSESSMENTS

At Take-Two, we continue to review and adapt our privacy program to reflect evolving privacy and data protection frameworks. Through our policies and practices, we review data handling practices for our products, services, and websites to incorporate privacy by design, assess and improve the user experience, and maintain appropriate safeguards. We also rely on robust contract terms with third-party data processors.

PLAYER COMMUNITIES

CONSUMER TRUST

INFORMATION SECURITY

EXECUTING ROBUST SECURITY PRACTICES

We understand that the strength of our security relies on the vigilance and knowledge of our workforce. Take-Two regularly conducts cybersecurity training for our colleagues, helping to equip them with the knowledge and skills needed to identify potential threats and act accordingly. We also perform periodic assessments of this training to measure its effectiveness. In addition, Take-Two scrutinizes the security posture and implementation details of relevant third parties to highlight potential cybersecurity risks associated with our vendor or partner engagements and to recommend actionable mitigation measures. These efforts are further supported by policies that help safeguard data privacy and protection.

We strive to develop and implement our products and associated applications as securely as possible and in accordance with accepted best practices. These efforts are reinforced by a continuous improvement model of testing and refinement. By working to proactively address risk at the beginning of the software development life cycle, we aim to minimize or eliminate future critical vulnerabilities.

In FY24 under the direction of our CSIO we amplified our efforts to set strategy, risk thresholds and responsibilities uniformly across business units and to ensure the most robust cyber security governance and the swiftest response to potential threats coming into the launch of our most exciting pipeline to date.

MONITORING OUR ENVIRONMENTS

Take-Two works to implement comprehensive protections across our network and infrastructure to detect and prevent cyber threats and attacks. Our security operations personnel proactively monitor our environments for potentially suspicious activity, escalating critical incidents as appropriate. This approach helps maintain the integrity of our business as well as the best experience for our customers. To help ensure the robustness of our systems, we use tools that actively scan for vulnerabilities that are designed to be remediated immediately if detected. We proactively conduct vulnerability testing to identify and address any potential weaknesses in our infrastructure and applications. We also participate in an external bug bounty program for further coverage. Our multidimensional vulnerability management program helps create a solid foundation for ongoing operations by minimizing disruptions.

ENABLING PRODUCTIVITY AND CUSTOMER SATISFACTION

By prioritizing the protection of sensitive data, building resilient infrastructure, and consistently adhering to industry best practices for data privacy and information security, we remain focused on maintaining a productive environment for our colleagues while also delivering the best possible gaming experience for our customers.



PLAYER COMMUNITIES

CONSUMER TRUST

INFORMATION SECURITY (CONTINUED)

GAME SECURITY GROUP

Governed by the Entertainment Software Association, the Game Security Group fosters collaboration with our peers on commonly faced and emerging cyber threats across the industry. This work helps ensure a safer gaming landscape for all and increases the collective value of our industry to all our stakeholders.

MANAGING CYBERSECURITY RISK

Take-Two is committed to maintaining the highest standards of cybersecurity across our operating environments to protect our customers, games, and data. We depend on dedicated security personnel who work to regularly manage and mitigate cybersecurity risk. Our executive management and Audit Committee receive regular updates on the current cyber risk landscape and the measures implemented to counter identified threats to help ensure that Take-Two leadership is informed of and engaged in our cybersecurity strategy. Take-Two implements a risk-informed approach in managing cybersecurity, with a focus on implementing robust controls and processes to protect against potential threats. Take-Two aims to align with the frameworks of the National Institute of Standards and Technology (NIST), MITRE, and the International Organization for Standardization (ISO), which we believe offer a comprehensive and standardized way of understanding the implications of risk and establishing defenses that are proportionate and effective.



PLAYER COMMUNITIES

APPROACH BY LABEL



2K

2K assesses quantitative and qualitative feedback from diverse sources and builds direct relationships with creators and core players from a wide variety of spaces. Related actions to date include:

- Standardizing and conducting community surveys with in-game integration for *NBA 2K*, *PGA TOUR 2K*, *LEGO 2K Drive*, and *WWE 2K*.
- Creating, launching, and regularly moderating *NBA 2K*, *TopSpin 2K*, *WWE 2K*, and *PGA TOUR 2K* public Discord servers, thereby bringing the conversations and engagement into the label's own backyard, where it can keep players informed with special communications, create a game feedback loop with core players, and help take control of situational conflicts.
- Further developed the *NBA 2K* Player Council, comprising of gameplay playtests and virtual feedback town halls that brings Community Leaders, Creators, and Pros together with *NBA 2K* developers to impact the product and educate these players on the game development cycle and the direct impact their feedback can have.
- Introduced the *NBA 2K24* Logo Gauntlet as a weekly game show, livestreamed on the *NBA 2K* Twitch and YouTube channels, bringing intense competition across *NBA 2K24* game modes, including *MyCAREER* and *MyTEAM* where over 100 contestants from the community battled it out for an opportunity to be crowned champion.
- Hosted *NBA 2K24* Community Day, *LEGO 2K Drive* Community Day, and *WWE 2K24* Community Day pre-launch capture events, which included and supported diverse creators that shared new information most relevant to their audiences, promoting positivity and better all-around engagement.

By prioritizing direct engagement with its online communities, 2K has led by example by seeking to diminish toxicity present on some player platforms.



ROCKSTAR

In a rapidly evolving landscape, Rockstar Games continues to make Player Trust & Safety a priority. Over the past year, Rockstar has implemented an ongoing range of enhancements to player safety, including:

- Developed a new set of Community Guidelines with updated penalties for violative player behavior.
- Implemented new proactive voice chat detection system inside *Grand Theft Auto Online* to rapidly address egregious player behavior.
- Enabled an appeals process for players to appeal enforcements of the Community Guidelines on their account.
- Updated in-game player reporting process to include additional harm categories and features.
- Constructed an ongoing road map for future Trust & Safety improvements to align with the latest technological advances.

Rockstar Games is committed to providing safe and fair player experiences, with their Trust & Safety team continuing to build out the label's efforts in creating equitable spaces for all players.

PLAYER COMMUNITIES

APPROACH BY LABEL



ZYNGA

Zynga is committed to providing a fair and fun gaming experience for its worldwide customer base.

Zynga takes player experience and advertising quality very seriously, utilizing extensive blocklists to help enforce ad quality standards and protect players from negative experiences and sensitive categories. In addition to blocking efforts, a dedicated team at Zynga uses sophisticated ad quality tools to monitor content violations and works to resolve exceptions as quickly as possible by working directly with ad networks.



Zynga games monitor player experience, concerns, and feedback in myriad ways, including:

- Collecting player feedback and responding to players' messages to ensure a positive experience with Zynga games, including the resolution of any issues.
- Using technologies such as Helpshift and AppBot to elevate in-app communications in Rollic's games.
- Maintaining and enforcing guidelines for community interaction, such as:
 - Applying profanity filters that seek to prevent players from using abusive language and/or names in-game, with special processes to address privacy issues or abuse in cases where players find a way to circumvent a game's profanity filters or any other non-gameplay or billing-related concern.
 - Working to track and remove players who do not follow official game guidelines regarding fair and fun gaming experiences, or who may infringe on others' rights to a safe and fun gaming experience within the social aspects of the game.
 - Advocating for and protecting the inclusion of all players regardless of race, cultural background, or sexual identity.

Play Responsibly

Zynga recognizes that finding a responsible balance of play is important, and offers tools to help players set limits on their gameplay and in-game spending.

Innovative Community Engagement

- **CSR2** We created a custom profile sticker dedicated to one of our most engaged players who also manages the CSR Reddit forum as a moderator. The response from the community was extremely positive and the player continues to positively impact the community through moderating the forum. Nearly 130K unique players have used the stickers on their profile and around 60K daily active players have this sticker on their profile.
- **FarmVille:** We have set up a Player Advisory Council for *FarmVille: Country Escape*, which is an official Facebook group managed by the community team. This group is composed of veteran players of the *FarmVille* franchise. They have volunteered to support the game team by giving feature related feedback that has allowed us to improve our features and provide a better game experience for our players. Going forward, we plan to improve the level of collaboration with this community through constant playtests and group calls, ultimately making sure that the community's voices are being heard as we continue building the game.

BROADER STAKEHOLDER COMMUNITIES

SUPPORTING HUMAN RIGHTS

Our Global Policy Regarding Human Rights and Modern Slavery reflects our ethical business practices and commitment to human rights globally. This 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 our hiring, employment, and 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 or any form of modern slavery, either in our organization or in our supply chains.

PROMOTING ETHICAL PRACTICE

Take-Two expects full compliance with anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. It is illegal and unacceptable for suppliers to be involved in any way with the payment or receipt of bribes or corrupt practices.

ENGAGING MEANINGFULLY WITH SHAREHOLDERS

Our Board of Directors places great importance on shareholder engagement. Throughout the year, our management and directors participate in an extensive shareholder engagement program to facilitate ongoing, meaningful discussions on topics that shareholders deem crucial.

We actively engage in dialogues with shareholders, seeking their feedback on a variety of issues including governance, executive compensation, and ESG practices. The insights gained from these interactions inform board deliberations and influence decision-making processes. We value the feedback of our shareholders, as expressed through votes and direct communications.

REQUIRING SUPPLIER COMPLIANCE

We expect all of our suppliers, vendors, consultants, and other third parties with which we engage (“supplier” or “suppliers”) to be committed to our values of honesty, openness, integrity, and respect for fundamental human rights. We undertake due diligence to confirm that suppliers do business in a manner that is fair, ethical, and respectful of human rights. We also expect our suppliers to adhere to the letter and the spirit of our Supplier Code of Conduct in all business dealings with or on behalf of Take-Two. The Supplier Code is available in 15 languages and in abbreviated versions available for very low-risk creative services suppliers.

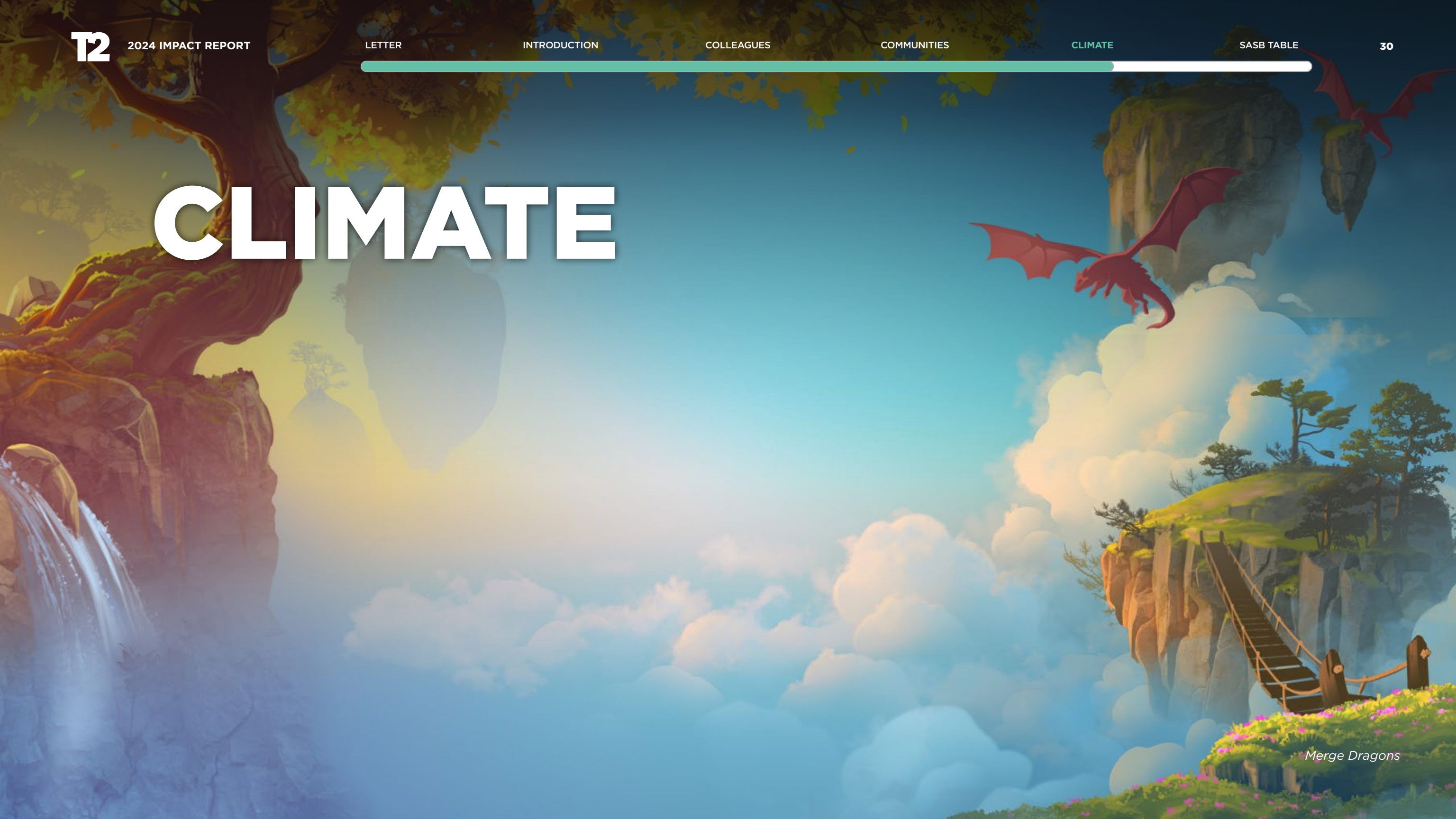
ENGAGING IN POLITICAL LOBBYING

As part of our commitment to transparency and integrity, we emphasize that we do not make political contributions of any kind nor do we directly engage in lobbying activities. We are, however, members of trade groups that participate in lobbying activities. While we may benefit from the lobbying efforts of those trade groups, our focus is on creating value for our stakeholders through sustainable and responsible business practices, and we believe that this approach best serves the interests of our customers, colleagues, and communities.



Harry Potter: Puzzles & Spells

CLIMATE



Merge Dragons



EXECUTING OUR CLIMATE STRATEGY

In alignment with our core tenets, we are taking action to operate more efficiently and reduce our emissions. We are actively committed to addressing climate change and its impacts and supporting the transition to a lower-carbon economy in our industry and communities.

Our current strategy is structured around three key pillars designed to help us mitigate our impact on the climate and engage our stakeholders. We are prioritizing measuring, understanding and reducing our emissions across our organization and value chain. Over the past year, we continued our focus to increase our transparency and improve our climate disclosure. Together, these three pillars work to build a lasting foundation for a continuously developing strategy and will help us reduce our impact.

1. MEASURING OUR CARBON FOOTPRINT:

The foundation of our strategy lies in the accurate measurement of our greenhouse gas emissions. We continue to improve our methodology and processes to calculate our annual footprint more efficiently. Our emissions disclosures undergo limited assurance by an external verification provider each year to further strengthen our overall process.

2. UNDERSTANDING OUR IMPACT:

We worked to identify risks and opportunities related to climate change across short-, medium-, and long-term time horizons using categories defined by TCFD. We seek to diligently assess relevant risks associated with transitioning to a lower-carbon economy, including potential policy, legal, technology, and/or market changes, as appropriate.

3. REDUCING OUR EMISSIONS:

As we improve our measurement and understand our impacts better, we will evaluate methods to reduce our carbon footprint and develop a climate action plan.

CLIMATE TARGET COMMITMENT

Earlier this year, we developed and submitted a near-term science-based emissions reduction target in line with the Paris Agreement. These ambitious targets required a comprehensive emissions inventory across our organization and value chain. Leveraging these targets, we plan to further develop a climate action plan that supports the global need to limit warming to 1.5°C. This commitment is a natural outgrowth of our existing sustainability efforts already in effect across our operations and will accelerate supplier engagement with our partners and peers.



OUR CARBON FOOTPRINT

For the second consecutive year we have disclosed our Scope 1 and 2 emissions across all of our offices, and have reported 9 out of 15 Scope 3 greenhouse gas categories, which includes all categories we deemed most relevant for us, and represents our climate impact from development to the point of sale. These emissions represent the entirety of Take-Two and its subsidiaries globally. Continuing to measure and disclose our emissions is key to tracking our climate commitments as they develop, and identifying areas of high emissions intensity to target with focused initiatives.



21%

OF PURCHASED ELECTRICITY ORIGINATING FROM RENEWABLE ENERGY SOURCES



12,714

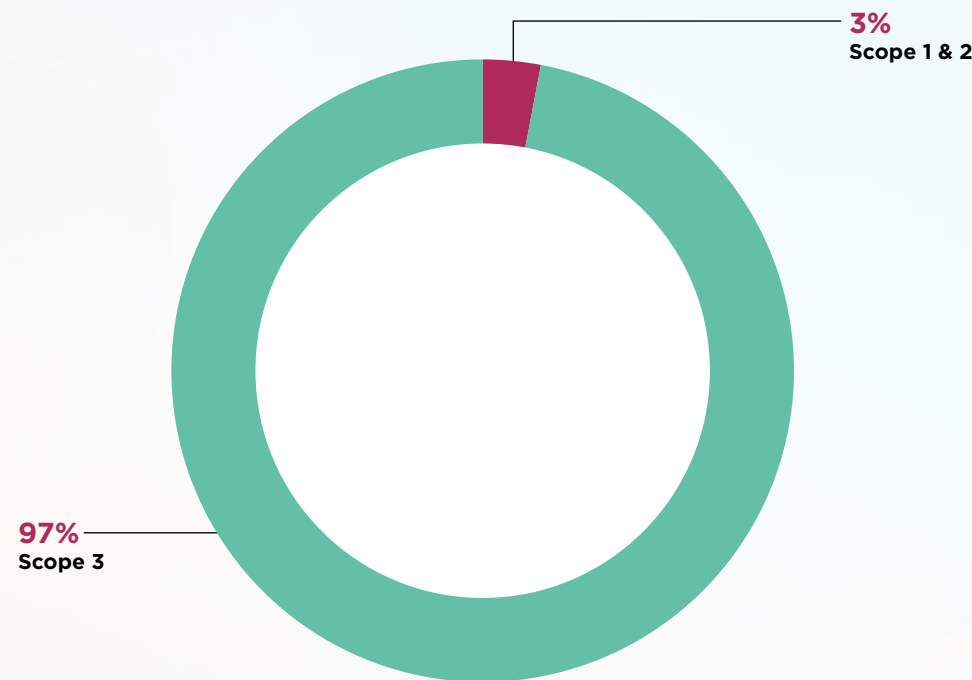
TOTAL ENERGY CONSUMED FROM RENEWABLE SOURCES (MWh)



7.73

SCOPE 1 & 2 EMISSIONS PER AREA (kg CO₂e PER SQUARE FOOT)

FY 2024 CARBON FOOTPRINT



| | Absolute Emissions (MT CO ₂ e) |
|------------------------|---|
| Scope 1 | 2,122 |
| Scope 2 (market-based) | 14,682 |
| Scope 3 | 495,895 |
| Total Emissions | 512,699 |

Each year we receive limited assurance on emissions disclosures from our key emission categories; Our scope 1 and 2 emissions, and GHG protocol categories 3.1 purchased goods and services, and 3.2 capital goods. These represent 90% of our footprint. This assurance occurs concurrently with an internal audit of all published figures in this report. Through transparent reporting we seek to foster collaboration on the issues of sustainability and climate both internally and with our key partners.

DRIVING PROGRESS AT OUR SITES

Our global real estate portfolio includes our offices, on-site data centers, and off-site data centers managed by third-party providers. The majority of our off-site data centers use or leverage renewable electricity that is guaranteed through either a Renewable Energy Certificate (REC) or a Guarantee of Origin (GO), which has aided efforts to reduce our global market-based emissions.

We are focused on further reducing emissions at facilities we directly control and sharing best practices to encourage wider change. Current reduction methods include:

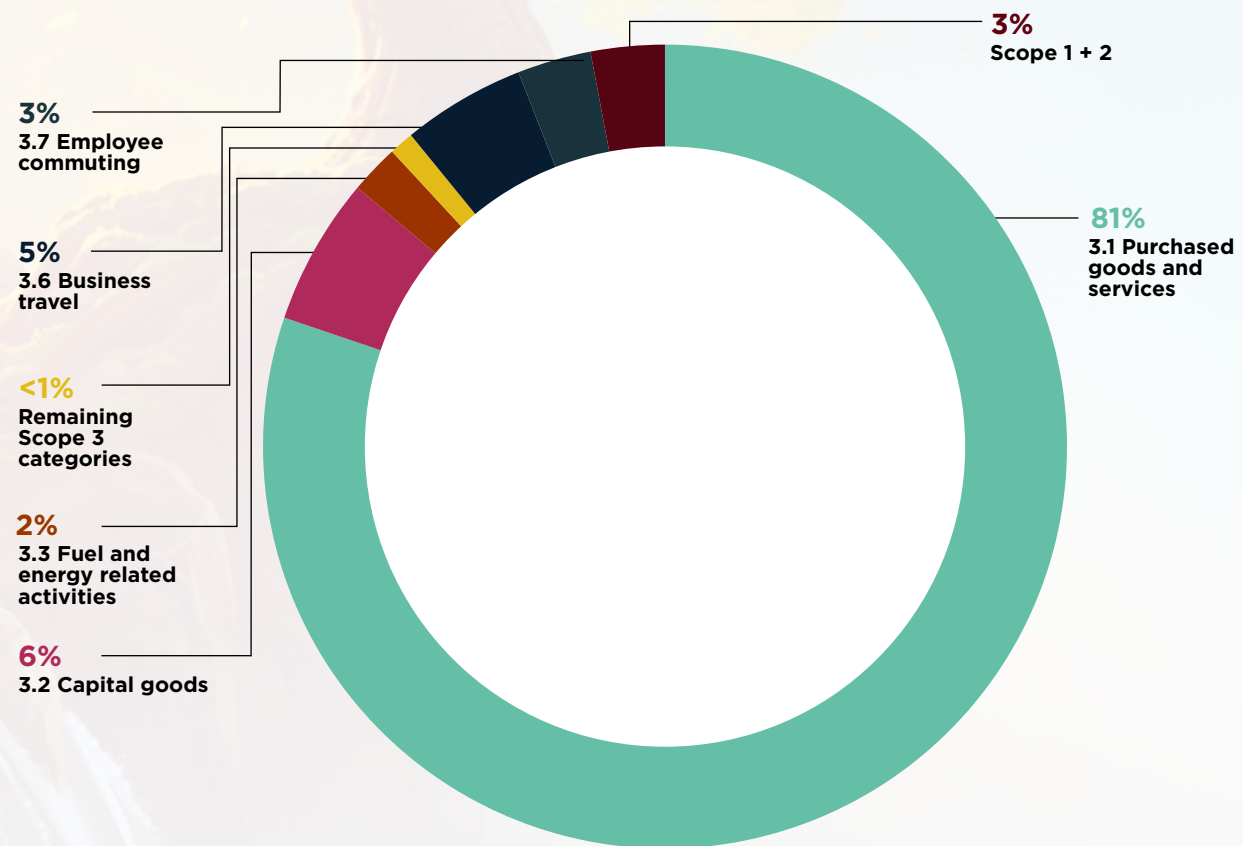
- On-site renewable electricity generation
- Energy-efficiency analysis & measures
- Sustainable procurement practices
- Renewable energy procurement
- Donation, resell, or recycle of hardware
- EV charging connectors
- Ongoing efforts to streamline real estate portfolio

ECO SQUAD LAUNCHED

In 2023, we harnessed the passion of our employees to make a difference and launched our global Eco Squad. Our colleagues are coming together to engage, educate, and empower each other to create a more environmentally conscious workplace and community. With over a hundred members already, we're working on creating the networks and channels needed to support their growth and integrate their activities into our broader climate action plan.



FY 2024 SCOPE 3 EMISSIONS BY CATEGORY

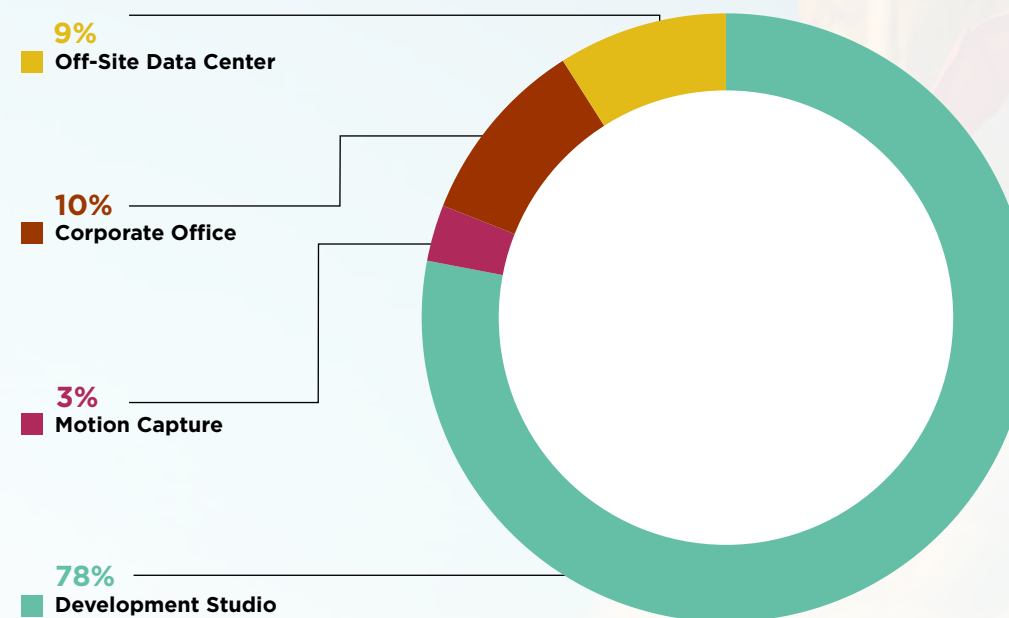


The standards, protocols, and methodologies used to collect activity data and calculate estimated emissions were based on: The Greenhouse Gas Protocol; A Corporate Accounting and Reporting Standard (Revised Edition); The Greenhouse Gas Protocol: Scope 2 Guidance; The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Location-based emissions.

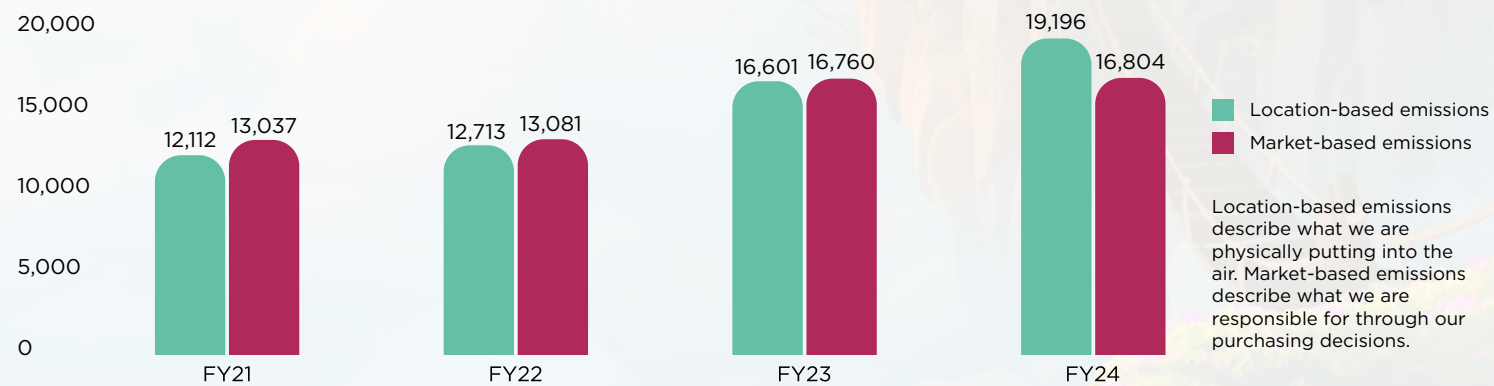
Standard; US EPA Emissions & Generation Resource Integrated Database (eGRID); IEA Emissions Factors 2022; UK Government GHG 2022 Conversion Factor for Company Reporting; Canada GHG Inventory; EPA EnergyStar Portfolio Manager GHG Tech; and the IPCC Fifth Assessment Report (AR5). We received third-party limited assurance verification from Apex Companies LLC against ISO 14064-3 requirements for our estimated Scope 1, Scope 2, Scope 3.1 Purchased goods and services, and Scope 3.2 Capital goods emissions; these four sources of GHG emissions together represent 460,072 tCO2e in FY 2024.

Scope 3.8 Upstream leased assets and Scope 3.12 End-of-life treatment of sold products were excluded from the graph above because they represent less than 0.1% of our estimated GHG emissions.

SCOPE 1 AND 2 EMISSIONS BY OFFICE TYPE



LOCATION- VS. MARKET-BASED EMISSIONS



Location-based emissions describe what we are physically putting into the air. Market-based emissions describe what we are responsible for through our purchasing decisions.

SASB INDEX



SASB INDEX

| Accounting Metric | Category | Unit of Measure | Code | Response and/or Location | Reference |
|---|--------------|--|--------------|---|-------------------------|
| Environmental Footprint of Hardware Infrastructure | | | | | |
| (1) Total energy consumed, (2) Percentage grid electricity and (3) Percentage renewable | Quantitative | Gigajoules (GJ), Percentage (%) | TC-SI-130a.1 | <p>1. FY22: 158,020 GJ FY23: 200,371 GJ FY24: 217,949 GJ</p> <p>This covers our offices and Scope 2 data centers,. Note that Take-Two uses the operational control approach for setting organizational boundaries of GHG emissions and energy. This includes global wholly owned subsidiaries over which T2 has management and operational control, including T2 owned and leased real estate facilities.</p> <p>2. FY22: 84% grid electricity FY23: 87% grid electricity FY24: 87% grid electricity</p> <p>3. FY22: 10% renewable FY23: 13% renewable FY24: 21% renewable</p> <p>Approximately 80% of T2-Managed off-site data centers currently use 100% renewable energy accredited by either Renewable Energy Certificates (REC's) or Guarantees of Origin.</p> | Climate |
| (1) Total water withdrawn, (2) Total water consumed, percentage of each in regions with high or extremely high baseline water stress | Quantitative | Thousand Cubic Meters (m ³), Percentage (%) | C-SI-130a.2 | Due to the nature of game development and publishing, water consumption is not one of T2's main impacts. | Climate |

SASB INDEX

| Accounting Metric | Category | Unit of Measure | Code | Response and/or Location | Reference |
|---|-------------------------|-----------------|------------------------------|---|--|
| Environmental Footprint of Hardware Infrastructure | | | | | |
| Discussion of the integration of environmental considerations into strategic planning for data center needs | Discussion and Analysis | N/A | TC-SI-130a.3 TC-SI-130a.3 | 80% of T2’s managed off-site data centers are linked to Renewable Energy Certificates (REC’s) or Guarantees of Origin. We plan to communicate our facilities and operations sustainability strategy across the company and formalize our programs through an internal playbook for real estate leasing, acquisition and construction, facilities operations, and strategic data center planning to ensure that future activities align with our overall sustainability strategy. The Sustainability committee will drive both the formalization and performance management of our facilities and operations sustainability programs. | Climate |
| Data Privacy and Freedom of Expression | | | | | |
| Description of policies and practices relating to targeted advertising and user privacy | Discussion and Analysis | N/A | TC-SI-220a.1 | <p>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. We provide several options to users to manage their service accounts, communications they receive from us, and how we use their information. These include utilizing email unsubscribe and deletion tools; opting out of interest-based ads; and, depending on location, making a data request.</p> <p>We believe that we label and market our products in accordance with the applicable principles and guidelines of the Entertainment Software Rating Board, (“ESRB”), an independent self-regulatory body that assigns ratings and enforces advertising guidelines for the interactive software industry.</p> <p>In certain geographies such as the E.U and UK, privacy and data protection laws such as the E.U. GDPR and the UK DPA 2018 apply to our operations because we receive and process the personal information of individuals in the E.U and the U.K and we maintain certain local entities that are responsible for processing personal information.</p> | Privacy Policy Form 10-K |

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| Accounting Metric | Category | Unit of Measure | Code | Response and/or Location | Reference |
|--|-------------------------|------------------------|--------------|---|--------------------------------|
| Data Privacy and Freedom of Expression | | | | | |
| Number of users whose information is used for secondary purposes | Quantitative | Number | TC-SI-220a.2 | <p>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.</p> <p>Take-Two does not currently track the number of users whose information is used for secondary purposes.</p> | Privacy Policy |
| Total amount of monetary losses as a result of legal proceedings associated with user privacy | Quantitative | Reporting Currency | TC-SI-220a.3 | If any material losses occur, they will be reported in our Annual Reports on Form 10-K. | Form 10-K |
| (1) Number of law enforcement requests for user information, (2) Number of users whose information was requested, (3) Percentage resulting in disclosure | Quantitative | Number, Percentage (%) | TC-SI-220a.4 | We do not currently track this data. We may share user information to protect the security of our services, servers, network systems, databases, and business and in connection with an investigation of fraud, intellectual property infringements, interference with our rights, property or users, or other activity that is illegal or may expose users or us to legal liability, including as required or requested by law enforcement or other government officials. | Privacy Policy |
| List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring | Discussion and Analysis | N/A | TC-SI-220a.5 | Except as required by law, Take-Two does not report this information. | N/A |

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| Accounting Metric | Category | Unit of Measure | Code | Response and/or Location | Reference |
|--|-------------------------|------------------------|--------------|--|--------------------------------------|
| Data Security | | | | | |
| (1) Number of data breaches, (2) Percentage involving personally identifiable information (PII), (3) Number of users affected | Quantitative | Number, Percentage (%) | TC-SI-230a.1 | Any material data breach incidents would be disclosed in the Company's SEC filings. | Form 10-K |
| Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards | Discussion and Analysis | N/A | TC-SI-230a.2 | Please refer to the Information Security section of this report for a description of our cybersecurity practices. | Information Security |
| Recruiting and Managing a Global, Diverse, and Skilled Workforce | | | | | |
| Percentage of employees that require a work visa | Quantitative | Percentage (%) | TC-SI-330a.1 | As of March 31, 2024, 10% of our U.S. employees require a work visa. | N/A |
| Employee engagement as a percentage | Quantitative | Percentage (%) | TC-SI-330a.2 | Not available at this time, but we plan to track in the future. | N/A |
| Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management, (c) technical employees, and (d) all other employees | Quantitative | Percentage (%) | TC-SI-330a.3 | Please refer to the Diversity, Equity & Inclusion section of our Impact report for these metrics and additional detail around our DEI policies and programs. | Colleagues |
| Intellectual Property Protection & Competitive Behavior | | | | | |
| Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations | Quantitative | Reporting Currency | TC-SI-520a.1 | Any material losses will be disclosed in the Company's SEC filings. | Form 10-K |

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| Accounting Metric | Category | Unit of Measure | Code | Response and/or Location | Reference |
|---|-------------------------|-----------------|--------------|---|--|
| Managing Systemic Risks from Technology Disruptions | | | | | |
| Number of (1) performance issues and (2) service disruptions; (3) total customer downtime | Discussion and Analysis | N/A | TC-SI-550a.1 | Any material technology disruption would be disclosed in the Company's SEC filings. | Form 10-K |
| Description of business continuity risks related to disruptions in operations | Discussion and Analysis | N/A | TC-SI-550a.2 | <p>We rely on the efficient and uninterrupted operation of complex information technology systems and networks, some of which are within Take-Two and some of which are managed or hosted by third-party providers. All information technology systems and networks are potentially vulnerable to damage or interruption from a variety of sources, including but not limited to cyber-attacks, computer viruses, malicious software, security breaches, energy blackouts, natural disasters, terrorism, war, and telecommunication failures. We have also faced and in the future could face sophisticated attacks, including attacks referred to as advanced persistent threats, which are cyberattacks aimed at compromising our intellectual property and other commercially sensitive information, such as the source code and game assets for our software or confidential customer or employee information, which remain undetected for prolonged periods of time.</p> <p>Information technology system disruptions, network failures, or security breaches have negatively affected, and in the future could negatively affect our business continuity, operations and financial results, and the reliability and stability of our products and services. These risks extend to the networks and e-commerce sites of console platform providers and other partners who sell or host our content online. The risk of such threats is heightened by events outside our control, such as the extended period of remote work arrangements due to COVID-19, the Russia-Ukraine war and the Israel-Hamas war.</p> | Information Security Form 10-K |

(continued on the next page)

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| Accounting Metric | Category | Unit of Measure | Code | Response and/or Location | Reference |
|---|-------------------------|-----------------|--------------|--|--|
| Managing Systemic Risks from Technology Disruptions | | | | | |
| Description of business continuity risks related to disruptions in operations | Discussion and Analysis | N/A | TC-SI-550a.2 | <p>(continued from previous page)</p> <p>Along with our partners, we have expended, and expect to continue to expend, financial and operational resources to implement certain systems, processes and technologies to guard against cyber risks and to help protect our data and systems. However, the techniques used to exploit, disable, damage, disrupt or gain access to our networks, our products and services, supporting technological infrastructure, intellectual property and other assets change frequently.</p> <p>In addition, the costs to respond to, mitigate, or notify affected parties of cyberattacks and other security vulnerabilities are significant. Failures to prevent or mitigate security breaches or cyber risks, or detect or respond adequately to a security breach or cyber risk, could result in a loss of anticipated revenue, interruptions to our products and services, our having to incur significant remediation and notification costs, a degradation of user experience, causing consumers to lose confidence in our products and services, prompting regulatory inquiries and significant legal and financial costs.</p> <p>Take-Two takes into account physical risk of our locations and performs 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.</p> | Information Security Form 10-K |



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