



TRANSPARENCY REPORT

REPORTING PERIOD:
JANUARY 1ST, 2025 -
DECEMBER 31ST, 2025

Introduction

Take-Two Interactive Software, Inc. is a global company headquartered at 110 W. 44th Street, New York, NY 10036, United States of America whose group includes all Take-Two entities and labels (individually and collectively, “**Take-Two**”). The following Transparency Report has been prepared and published in accordance with the requirements of Art. 15 of Regulation (EU) 2022/2065 (the “**Digital Services Act**” or “**DSA**”), and sets out details of the content moderation that Take-Two has undertaken during the Reporting Period identified above. Take-Two’s next Transparency Report shall cover the period January 1st, 2026 - December 31st, 2026 and will be published in February 2027.

This Transparency Report is limited to the services that Take-Two provides that: (i) allow players either to: (a) create in-game content using the content creation tools provided by the service (“**Custom Content**”); or (b) upload, ingest, provide, or otherwise generate unique content that is not provided by the service itself (“**user-generated content**” or “**UGC**”); and (ii) enable such Custom Content and UGC to be accessed by, or exposed to, other players of the service through the service. Services that Take-Two provides that do not support such functionality are not included in this Transparency Report¹. For the purposes of this Transparency Report, we refer to Custom Content and UGC as “**Player Content.**”

¹Examples of Custom Content include, but are not limited to, characters / avatars, vehicles, races, and jobs / missions that are created or customised using the game’s content creation tools. Examples of UGC include, but are not limited to, text, voice, or audio-visual communications; code, scripts, or other authorised player-provided modifications to a game’s codebase; images or audio files that are uploaded to a game; in-game usernames created by players; and names for in-game items, groups, or characters.

Proactive Moderation

The enjoyment and safety of Take-Two's players is of paramount importance to Take-Two, and this Transparency Report demonstrates Take-Two's commitment to providing safe, inclusive, and welcoming environments in which players can enjoy our services free of harassment, hate speech, toxic behaviour, sexual abuse, and other offensive content and conduct.

Take-Two's Terms of Service ("ToS") defines the terms and conditions under which players are permitted to access and use our services, incorporates label-specific Community Standards, and includes a robust Code of Conduct which sets out our expectations with regards to player conduct and player-generated content. We enforce violations of our ToS and Community Standards through trust and safety practices managed by our labels, with violations of our ToS or Community Standards resulting in enforcement action that ranges from the issuance of warnings to temporary feature or service suspensions and, in the most egregious of violations, permanent bans. We are consistently evaluating and refining how we apply different types of enforcement actions to Player Content violations relating to different illegal or harmful content categories. This is shown in Table 3 below by the increase in the number of feature access suspensions for "Hate Speech & Discrimination" Player Content in this Reporting Period when compared to the previous reporting period in which more warnings were issued in relation to the same type of Player Content. In the case of illegal Player Content, 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 ("NCMEC") in the USA. During the Reporting Period, Take-Two made 11 such reports to NCMEC in relation to Player Content detected on its services.

In an effort to prevent, or cease, conduct or the distribution of Player Content that violates our ToS or Community Standards, our services may employ proprietary or third-party systems and tools, such as automated word filters and voice, image, or symbol-recognition (e.g. ToxMod or Hive Moderation), and other trust and safety related software, such as Microsoft's PhotoDNA. These systems and tools are designed to complement the player reporting functionality we provide in our services, or via dedicated support websites, and the work of our own human moderators, by ensuring that illegal or harmful Player Content is filtered or blocked before players are exposed to it. This may be done by those tools either automatically flagging Player Content for review by human moderators or, in certain cases, applying enforcement actions to the accounts of violative players. In all cases, human monitoring or review of machine-led actions and detections ensures that discrepancies and biases can be identified and corrected. Recent advances in artificial intelligence and machine learning present opportunities to improve these trust and safety processes, and we are continuing to investigate how we may utilize such emerging technologies in a responsible way that protects the privacy of our players.

Table 1A: EU Authority Orders

Under the DSA, Take-Two may receive from national judicial or administrative authorities in the EU’s Member States (“**National Authorities**”) either: (i) orders to provide information about one or more individual recipients of a service operated by Take-Two (“**Information Orders**”); or (ii) orders to remove Player Content from Take-Two’s services (“**Removal Orders**”). Table 1A sets out the number of Information Orders that were validly served on Take-Two by National Authorities during the Reporting Period in accordance with Take-Two’s [Law Enforcement Guidelines](#). Table 1A does not include any Removal Orders, as Take-Two did not receive any such Removal Orders from any National Authorities during the Reporting Period. Similarly, any EU Member State whose National Authorities did not issue any Information Orders during the Reporting Period are not listed in Table 1A. During the Reporting Period, all Information Orders were actioned by Take-Two within the time limit (if any) set out in the corresponding Information Order.

The ‘Median Response Time’ is the median time taken for Take-Two to notify a National Authority that it has received a submitted Information Order. As Take-Two sends an automated instant response upon receiving any validly served Information Order, we have counted this as zero in all cases. The ‘Median Action Time’ is the median time between Take-Two first receiving an Information Order that has been validly served by a National Authority and Take-Two satisfying the Information Order by providing the requested information.

Table 1A does not include any reactive Player Content moderation undertaken by Take-Two following its receipt of a Player Report or Trusted Flagger Report, or any proactive Player Content moderation undertaken by Take-Two. For information on such other Player Content moderation enforcement, please see Tables 2, 2A, 3, and 3A below.

Table 1A: EU Authority Orders			
Issuing Member State	Information Orders		
	Number	Median Response Time	Median Action Time (Calendar Days)
Germany	2	0	6.5
Ireland	1	0	19
Italy	1	0	10
Lithuania	1	0	15
Romania	1	0	5
Total/Median	6	0	10

Table 1B: Information Orders Categorized by Type of Reported Illegality

Table 1B sets out the number of Information Orders received by Take-Two during the Reporting Period categorized by the type of reported illegality. Such categories are determined by National Authorities at the time of the submission of their Information Order. Take-Two does not take responsibility for any misleading, inaccurate, or incomplete reporting by National Authorities. As with Table 1A, Table 1B does not include any information related to Removal Orders, as Take-Two did not receive any such Removal Orders from any National Authorities during the Reporting Period.

Table 1B: Information Orders by Type of Illegality	
Type of Illegal Content	Number
Fraud/Fraudulent Activity	4
Terrorism or Violent Extremism	1
Category Not Specified	1
Total	6

Table 2: Player Reports

Table 2 sets out the number of actions taken against Player Content following Take-Two’s receipt of a report from a player (“**Player Report**”). While the DSA provides the ability for entities that have been designated as “Trusted Flaggers” by any EU Member State’s national DSA coordinator to report illegal Player Content to service providers (“**Trusted Flagger Reports**”), no such Trusted Flagger Reports were received by Take-Two during the Reporting Period. Table 2 does not include any reactive Player Content moderation undertaken by Take-Two following its receipt of a Removal Order or any proactive Player Content moderation undertaken by Take-Two. For information on such other Player Content moderation enforcement, please see Tables 1A, 1B, 3, and 3A.

Where Table 2 indicates that an action was taken by Take-Two, the Player Content in question was removed from the relevant service or hidden from other players, or a warning may have been sent to the player to remind them of the User Rules contained within Section 6 of Take-Two’s ToS or the relevant Community Standards, where we have the reported player’s electronic contact information.

In addition to the removal of such Player Content from the relevant service, or such Player Content being hidden from other players, the player responsible for such Player Content may have had additional enforcement action taken against their account by Take-Two. Such additional enforcement action may include:

- (i) imposing restrictions on the player’s ability to utilize certain service Player Content functionality;
- (ii) temporarily suspending the player’s access to the relevant feature or mode in which such Player Content appeared;
- (iii) suspending the player from the relevant service entirely for a finite period of time;
- or
- (iv) banning the player from the relevant service entirely.

Each Player Content moderation action undertaken by Take-Two following its receipt of a Player Report is taken on the basis that the Player Content in question violates the User Rules contained within Section 6 of Take-Two’s ToS or the relevant Community Standards.

Table 2: Player Reports			
Categories of Offense	Number of Player Reports	Number of Enforcement Actions Taken	Median Action Time (hours)
Cheating, Hacks or Mods	2,129,274	2,049,705	57.7
Privacy / Doxing	556,639	523,626	26.6
Spam & Fraud	1,363,454	1,172,945	30.4
Realistic Gore or Violence	222,471	215,736	47.6
Suicide or Self-Harm	177,446	170,262	62.7
Adult Sexual Harassment	240,442	229,041	41.1
Adult Sexually Explicit Content	320,790	227,675	19.8
Minor Abuse or Child Sexual Content	199,558	189,723	13.5
Bullying, Threats, Harassment	1,135,444	938,873	38.5
Hate Speech & Discrimination	804,662	776,602	24.0
Terrorism or Violent Extremism	488,831	478,700	72.9
Other Illegal or Harmful Content	355,893	340,734	43.4
Total/Median:	7,994,904	7,313,622	39.8

Table 2A: Player Reports Processed by Automated Means

Table 2A shows the number of Player Reports that were processed during the Reporting Period either with or without a human moderator being involved and the median time taken by Take-Two to action those Player Reports. During the Reporting Period, all Player Reports were processed with the involvement of a human moderator at some point in the process (e.g. as part of the triaging of the Player Report when it is received, when reviewing the Player Report itself to determine its veracity, or when deciding which enforcement action to take and executing such action). As such, we have not included data on the number of Player Reports that were processed exclusively by automated means in either Table 2 or Table 2A and the total number of Player Reports received in Table 2 is equal to the total number of Player Reports received that were not solely processed by automated means in Table 2A. Similarly, because none of the Player Reports processed during the Reporting Period were processed solely by automated means, the Median Action Time listed in Table 2 above, is the same as the median time taken by Take-Two to action all Player Reports not solely processed by automated means set out in Table 2A.

Table 2A: Player Reports Processed Solely or Not Solely by Automated Means				
	Number of Player Reports solely processed by automated means	Median Action Time (hours)	Numbers of Player Reports not solely processed by automated means	Median Action Time (hours)
Total/Median:	0	N/A	7,994,904	39.8

Table 3: Proactive Content Moderation

Table 3 sets out the number of actions taken against Player Content as a result of the proactive Player Content moderation undertaken by Take-Two. Table 3 does not include any Player Content moderation undertaken by Take-Two following its receipt of a Removal Order, Player Report, or Trusted Flagger Report. For information on such reactive Player Content moderation enforcement, please see Tables 1A, 1B, 2, and 2A above.

Where Table 3 indicates that an action was taken by Take-Two, the player responsible for the Player Content in question may have:

- (i) had their Player Content removed from the relevant service;
- (ii) had restrictions imposed on their ability to utilize certain Player Content functionality in the relevant service for a finite period of time;
- (iii) been suspended from the relevant service entirely for a finite period of time;
- (iv) had a warning issued to them to inform them of the violative Player Content;
- and/or
- (v) been banned from the relevant service entirely.

Each proactive Player Content moderation action undertaken by Take-Two is taken on the basis that the Player Content in question violates the User Rules contained within Section 6 of Take-Two’s ToS or the relevant Community Standards.

Categories of Offense	Number of Enforcement Actions Taken				
	Player Content Removed	Feature Access Suspended	Account Suspended	Warning Issued	Account Banned
Cheating, Hacks or Mods	3	0	0	0	6
Privacy / Doxing	23	6	0	1	12
Spam & Fraud	0	0	0	0	27,431
Realistic Gore or Violence	13	0	0	0	3
Suicide or Self-Harm	0	6	0	2	1
Adult Sexual Harassment	5	326,555	1	91,916	4
Adult Sexually Explicit Content	1,760	889	71	240	1,918
Minor Abuse or Child Sexual Content	6	28	1	28	286
Bullying, Threats, Harassment	3	12,575	1	3,616	5
Hate Speech & Discrimination	619	339,598	46	96,702	872
Terrorism or Violent Extremism	141	0	13	0	181
Other Illegal Content	1,870	0	0	0	28
Total	4,443	679,657	133	192,505	30,747

Table 3A: Enforcement Decisions Taken by Automated Means

Table 3A shows the number of enforcement decisions taken in relation to proactive Player Content moderation, that were taken during the Reporting Period either with or without a human moderator being involved in such a decision. The total number of enforcement decisions set out in Table 3A is lower than the total number of enforcement actions set out in Table 3 as in some cases a single enforcement decision will have resulted in multiple enforcement actions being taken (e.g. both the violative Player Content being removed and the respective player’s account being suspended or banned).

Table 3A: Enforcement Decisions Solely or Not Solely Taken by Automated Means		
	Number of enforcement decisions solely taken by automated means	Number of enforcement decisions not solely taken by automated means
Total	528,506	186,474

Table 4: Appeals

Table 4 sets out information regarding: (i) the aggregate number of appeals Take-Two received during the Reporting Period in relation to: (a) Take-Two’s moderation decisions regarding Player Reports; and (b) the proactive Player Content moderation enforcement actions taken by Take-Two, in each case where it is possible for players to raise such an appeal; (ii) the basis on which such appeals were raised, (i.e. whether the player disagreed with the enforcement action taken by Take-Two or Take-Two’s decisions to not take any enforcement action); and (iii) how many of Take-Two’s initial decisions were reversed or upheld following an appeal, in each case broken out by the basis for appeal. In addition, we have provided the median time taken to reach an appeal decision across all appeals during the Reporting Period.

Table 4: Appeals							
Number of Appeals	Basis for Appeal		Number of Initial Decisions Reversed		Number of Initial Decisions Upheld		Median Appeal Decision Time (hours)
	Disagree with Inaction	Disagree with Action	Disagree with Inaction	Disagree with Action	Disagree with Inaction	Disagree with Action	
22,215	3,342	18,744	128	314	3,044	17,017	63.3

European Commission's Standardised Transparency Report Format

Pursuant to Art. 15(3) of the DSA, the European Commission has prescribed a standardised format for Transparency Reports. As such, Take-Two additionally reports its safety data for the Reporting Period in this format, which can be found [here](#).

