



TRANSPARENCY REPORT

REPORTING PERIOD:
FEBRUARY 17TH, 2024 -
DECEMBER 31ST, 2024

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, 2025 - December 31st, 2025 and will be published in February 2026.

This Transparency Report is limited to the services that Take-Two provides that allow users to create user-generated content (“**UGC**”) using the service (either using the content creation tools provided by the service, uploading UGC to the service, or otherwise ingesting or distributing UGC in the service) which other users of the service may then access or be exposed to through the service. Services that Take-Two provides that do not support such functionality are not included in this Transparency Report.



Proactive Content 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. 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 in the USA.

In an effort to prevent, or cease, conduct or the distribution of content that violates our ToS or Community Standards, our services may employ systems and tools, such as automated word filters and voice, image, or symbol-recognition, and other trust and safety related software. 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. 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.

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 UGC from Take-Two’s services (“**UGC 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 UGC Removal Orders, as Take-Two did not receive any such UGC 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 orders, 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 order by providing the requested information.

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

Table 1A: EU Authority Orders			
Issuing Member State	Information Orders		
	Number	Median Response Time	Median Action Time (Calendar Days)
Belgium	1	0	28
France	2	0	13
Germany	6	0	11.5
Lithuania	1	0	22
Poland	1	0	14
Total/Median	11	0	14

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 UGC Removal Orders, as Take-Two did not receive any such UGC 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	2
Hate Speech & Discrimination	2
Illegal Drugs/Narcotics	1
Account Hacking	2
Extortion	2
Category Not Specified	2
Total	11

Table 2: UGC Reports

Table 2 sets out the number of actions taken against UGC following Take-Two's receipt of a report from a player ("**Player UGC 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 UGC 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 content moderation undertaken by Take-Two following its receipt of a UGC Removal Order or any proactive content moderation undertaken by Take-Two. For information on such other content moderation enforcement, please see Tables 1A and 1B, and 3 respectively.

Where Table 2 indicates that an action was taken by Take-Two, the UGC 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 UGC from the relevant service, or such UGC being hidden from other players, the player responsible for such UGC 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 UGC functionality; (ii) temporarily suspending the player's access to the relevant feature or mode in which such UGC 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 content moderation action undertaken by Take-Two following its receipt of a Player UGC Report is taken on the basis that the UGC in question violates the User Rules contained within Section 6 of Take-Two's ToS or the relevant Community Standards. All Player UGC Reports are processed and reviewed by our teams of human moderators and, as such, we have not included data on reports processed exclusively by automated means in Table 2. The Median Action Time listed in Table 2 is the median time taken by Take-Two to action all Player UGC Reports.

Categories of Offense	Number of Player UGC Reports	Number of Enforcement Actions Taken	Median Action Time (hours)
Cheating, Hacks or Mods	1,430,580	1,352,980	273.2
Privacy / Doxing	289,667	233,932	29.8
Spam & Fraud	1,023,953	628,500	42.5
Realistic Gore or Violence	130,812	106,320	22.1
Suicide or Self-Harm	111,008	84,812	37.3
Adult Sexual Harassment	169,106	142,344	20.0
Adult Sexually Explicit Content	237,179	123,483	28.0
Minor Abuse or Child Sexual Content	121,137	90,109	33.0
Bullying, Threats, Harassment	1,691,019	633,135	42.8
Hate Speech & Discrimination	694,415	580,386	29.7
Terrorism or Violent Extremism	278,648	250,589	29.0
Other Illegal or Harmful Content	241,443	224,972	37.5
Total/Median:	6,418,967	4,451,562	31.4

Table 3: Proactive Content Moderation

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

Where Table 3 indicates that an action was taken by Take-Two, the player responsible for the UGC in question may have: (i) had their UGC removed from the relevant service; (ii) had restrictions imposed on their ability to utilize certain UGC 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 UGC; and/or (v) been banned from the relevant service entirely. Each proactive content moderation action undertaken by Take-Two is taken on the basis that the UGC in question violates the User Rules contained within Section 6 of Take-Two's ToS or the relevant Community Standards.

Table 3: Proactive Content Moderation					
Categories of Offense	Number of Enforcement Actions Taken				
	UGC Removed	Feature Access Suspended	Account Suspended	Warning Issued	Account Banned
Cheating, Hacks or Mods	33	0	0	1	16
Privacy / Doxing	63	0	0	0	3
Spam & Fraud	1	0	0	0	3
Realistic Gore or Violence	16	1	0	0	3
Suicide or Self-Harm	0	0	0	0	1
Adult Sexual Harassment	19	25,689	11,330	68,408	17
Adult Sexually Explicit Content	3,408	230	67	882	2,461
Minor Abuse or Child Sexual Content	6	76	0	0	7
Bullying, Threats, Harassment	13	927	564	9,703	9
Hate Speech & Discrimination	528	43,952	25,179	463,191	619
Terrorism or Violent Extremism	40	6	0	1	43
Other Illegal Content	1,789	18	0	7	67
Total	5,916	70,899	37,140	542,193	3,249

Table 4: Appeals

Table 4 sets out information regarding the aggregate number of: (i) Player UGC Reports Take-Two received and proactive content moderation enforcement actions Take-Two took during the Reporting Period (“**Total Reports**”); (ii) enforcement actions taken by Take-Two during the Reporting Period (both reactive and proactive); and (iii) appeals Take-Two received during the Reporting Period in respect of its content moderation efforts.

Table 4: Appeals		
Number of Total Reports	Number of Total Enforcement Actions	Number of Appeals
7,078,364	5,110,959	32,607