

SUPPLIER CODE OF CONDUCT FOR INDIVIDUAL TALENT AND CREATIVE SERVICE SUPPLIERS

1. Introduction

- 1.1** Take-Two Interactive Software, Inc. (together with its subsidiaries and affiliated companies, “**Take-Two**”) is committed to conducting business fairly and ethically, complying with all applicable laws, and promoting a work environment that values honesty, openness and integrity. Our Code of Business Conduct and Ethics reflects this commitment. We also expect and require all of our suppliers, vendors, and third-party partners, including third parties providing talent and creative services, to be committed to these values in all of their business dealings with or on behalf of Take-Two. This commitment shall be reflected by the acceptance of Take-Two’s Supplier Code of Conduct, or, in the case of individual suppliers of talent and creative services, this abbreviated form of our Supplier Code of Conduct for Talent and Creative Service Suppliers.
- 1.2** Suppliers Providing Talent and Creative Services (“**TCS**”) must promptly notify Take-Two if, in the course of their work for Take-Two, they become aware that any applicable laws and/or this Code of Conduct for Individual Talent and Creative Services Suppliers (“**TCS Code**”) have been violated. Take-Two must be notified immediately of any criminal or civil legal actions, investigations, fines or other sanctions against the TCS or its agents that are in any way related to TCS’s work for Take-Two. If TCS fails to do so, Take-Two reserves the right to terminate the business relationship.

2. In Connection With Any Work or Services Performed For or on Behalf of Take-Two, TCS Must Comply With All Applicable Laws and Regulations. *In Particular:*

2.1 No Discrimination or Harassment

TCS must not engage in any form of discrimination or harassment, including on the basis of race, color, religion, creed, sex or gender, age, national origin, physical or mental disability, pregnancy, alienage or citizenship status, veteran status, marital status, sexual orientation, gender identity, genetic information or any other legally protected characteristic (“**Protected Characteristic**”).

Harassment is unwelcome verbal, non-verbal or physical conduct that degrades or shows hostility or dislike toward an individual or his/her relatives, friends, or associates because of a Protected Characteristic, and that (i) creates an intimidating, hostile, or offensive work environment; or (ii) interferes with an individual’s work performance. Abusive conduct and/or bullying on any protected basis is also prohibited. More specifically, sexual harassment is generally defined as unwelcome sexual advances, requests for sexual favors and other verbal or

physical conduct of a sexual nature when, (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, (ii) submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual, or (iii) such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment.

For a copy of the Company's full Policy Prohibiting Discrimination, Harassment, and Retaliation, please contact the local Human Resources representative.

2.2 Protection and Proper Use of Take-Two Assets and Intellectual Property

If Take-Two provides TCS with access to its confidential information, or authorizes TCS to use Take-Two's assets or access its property, TCS must do so only in the manner authorized. TCS must at all times protect Take-Two's information, assets and property from loss, damage, misuse, theft or sabotage.

2.3 Anti-Bribery and Corruption Laws

It is illegal and unacceptable for TCS to be in any way involved in the payment or receipt of bribes, or with corrupt practices. In particular, TCS must not give, offer, receive, or request anything of value (e.g., cash, gifts, business opportunities, charitable donations, favors, etc.) if such is intended to secure an improper benefit. TCS must also not pay or receive bribes through third parties, agents, consultants and other intermediaries. Particular care should be taken when TCS deal, directly or indirectly, with public officials. In particular, TCS may not on behalf of Take-Two, or in relation to any activity of the TCS that may benefit Take-Two, give anything of value to a public official without express, written approval in advance from Take-Two's General Counsel.

2.4 Accurate Records and Proper Payments

TCS should ensure that all books, records, invoices, and/or receipts are accurate and complete.

2.5 Securities Law and Insider Trading

In the course of their work for Take-Two, TCS may be exposed to information about Take-Two or other companies that is not available to the general public. The use of such non-public or "inside" information for securities trading purposes by TCS or any persons to whom they have communicated the information is strictly forbidden.

2.6 Shareholder, Media and Government Relations

TCS may not speak publicly or to any regulatory or governmental agency on behalf of Take-Two without Take-Two's express, written authorization to do so.

2.7 Trade Sanctions and Export Control Laws

TCS must act in accordance with all applicable laws, rules and regulations relating to trade sanctions, export controls, and anti-boycott or blocking activity. Transactions that are at present generally prohibited include those: (a) related directly or indirectly to people or entities in Iran, Cuba, North Korea or certain areas of Ukraine not controlled by the Ukrainian government including Crimea, the Donetsk People's Republic, the Luhansk People's Republic, Kherson and/or Zaporizhzhia; or (b) with Specially Designated Nationals and Blocked Persons. TCS must understand and ensure full compliance with these laws.