

POLICY FOR REPORTING MISCONDUCT

1. Violations of Applicable Law, Regulation, or Company Policy Must be Reported

All persons acting on behalf of Take-Two Interactive Software, Inc. and its wholly owned subsidiaries and affiliates (collectively, the “Company”) must act in compliance with all applicable laws, regulations, and the Global Code of Business Conduct and Ethics (“Code”). Such persons, which include employees, consultants, agents, and others, must also promptly report any actual or suspected violations of applicable laws, regulations, the Code (including, in particular, violations involving fraud, embezzlement and kickbacks involving the Company), and the Company’s accounting practices (including record-keeping, internal controls, auditing, and the Company’s disclosure practices) in accordance with the procedures set forth below.

Violations may be reported in any of the following ways:

- In person or by phone to your immediate supervisor, any member of the Legal Department, or any Human Resources Representative;
- In person or by phone to the Company’s Chief Legal Officer or the Head of Internal Audit;
- In person or by phone to any member of the Company’s Board of Directors;
- Online at take2.ethicspoint.com, or by calling the designated Ethics Point Hotline number listed in the table below. The telephone hotline is staffed 24 hours a day, seven days a week, by a communications specialist employed by an outside company. You may report anonymously in countries where that is permitted under local law. However, the Company encourages you to identify yourself to give the Company the best opportunity to verify the report and to conduct a meaningful investigation into the matters raised.
- If you are employed by or provide services to any of our entities in the Czech Republic, Finland, Ireland or Spain, please also see the Company’s EU Whistleblowing Policy, which sets out additional details on the reporting process in those countries.

A report of an actual or suspected violation should be as specific and detailed as possible to allow for proper and complete assessment and remediation. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and address any violations.

All complaints will be investigated promptly and with discretion. At the conclusion of an investigation, remedial and/or disciplinary action will be taken as appropriate.

Any supervisory personnel who receive a report must immediately advise the Company’s Chief Legal Officer by phone or in person, or if not possible or practicable, another member of the Legal Department. Complaints relating to Accounting Matters will be reviewed with Audit Committee direction and oversight by the Chief Legal Officer, head of Internal Audit, or such other persons as the Audit Committee determines to be appropriate.

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. No Company Employee or other Covered Individual may interfere or impede in another employee’s making a report under this Policy, consistent with relevant law, including Section 806 of the Sarbanes-Oxley Act or Section 922 of the Dodd-Frank Act.

Although the company encourages internal reporting of potential violations of law or regulation, nothing in this Policy, or in any other Company policy or pronouncement, should be construed to prevent you from reporting possible violations of law or regulation to an appropriate governmental agency or governmental entity, making other disclosures protected under any whistleblower provisions provided by law or regulation, or requiring any pre-clearance from the Company to make such a report or disclosure.

ETHICS POINT HOTLINE

LOCATION	TOLL-FREE NUMBER
Australia	1-800-76-9163
Canada	1-866-404-7401
China	400-888-0493
Czech Republic	800-144-264
Finland	0800 416141
France	0800-91-8607
Germany	0-800-225-5288, then when prompted, dial 866-404-7401
Hungary	06-800-011-11, then when prompted, dial 866-404-7401
India	000-117, then when prompted, dial 866-404-7401
Ireland	1-800-903-228
Israel	1-809-457-228
Japan	00531-11-0445 (KDD) 0066-33-830675 (Softbank) 0034-800-600326 (NTT)
Netherlands	0800-022-9111, then when prompted, dial 866-404-7401
New Zealand	000-911, then when prompted, dial 866-404-7401
Serbia	0-800-800825
Singapore	800-110-2216
South Korea	00308-13-3058
Spain	900-99-0011, then when prompted, dial 866-404-7401
Switzerland	0-800-890011, then when prompted, dial 866-404-7401
Taiwan	00-801-102-880, then when prompted, dial 866-404-7401
Turkey	0080049240880044
United Kingdom	0808-234-0382
United States	1-866-404-7401