

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), 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 on the following page. 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.

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 |
| 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 |
| 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 |
| United Kingdom | 0808-234-0382 |
| United States | 1-866-404-7401 |