

## **TAKE-TWO INTERACTIVE**

### **U.K. MODERN SLAVERY STATEMENT**

The U.K. Modern Slavery Act 2015 (the "Act") requires certain businesses to prepare and publish an annual modern slavery statement setting out the steps and ongoing efforts that the business has undertaken during the fiscal year to ensure that slavery and human trafficking are not taking place in their own businesses or in any of their supply chains. We welcome the introduction of the Act.

Take-Two Interactive Software, Inc. is a leading developer, publisher and marketer of interactive entertainment for consumers around the globe. The Company develops and publishes products principally through its two wholly-owned labels, Rockstar Games and 2K. Our products are designed for console systems and personal computers, including smartphones and tablets, and are delivered through physical retail, digital download, online platforms and cloud streaming services. Take-Two's common stock is publicly traded on NASDAQ under the symbol TTWO.

This modern slavery statement is made on behalf of Take-Two Interactive Software UK Limited and Take-Two GB Limited, pursuant to section 54(1) of the Act, and sets out the steps taken by all of those organisations during the relevant financial year. Take-Two Interactive Software UK Limited and Take-Two GB Limited are subsidiaries of Take-Two Interactive Software, Inc. and operate in the UK. In this statement, we outline the actions we are taking to guard against the presence of modern slavery in our supply chain, which include working with our partners and suppliers to help combat these issues.

#### **WHAT IS MODERN SLAVERY?**

Modern slavery is a violation of fundamental human rights, and is a crime. It takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, and exists in both developed and developing economies across different business sectors.

#### **OUR COMMITMENT**

Take-Two is committed to conducting business ethically and with honesty and integrity, and treating everyone with dignity and respect. We have no tolerance for modern slavery.

We expect the same high standards of conduct from all of our suppliers and business partners. We also expect that our suppliers will hold their own suppliers to the same high standards.

#### **OUR SUPPLY CHAINS**

In order to carry out our business activities, we work with and rely on a number of suppliers.

Our supply chain is primarily comprised of disc replicators, printers, shipping and logistics providers, advertising agencies, and software licensors. From time to time, we also contract with third parties to develop and manufacture promotional items that are used to market our games.

#### **OUR POLICIES AND PRACTICES**

We have a number of procedures in place that guard against modern slavery having a role in our business or supply chains.

##### **Our Hiring and Employment Practices**

- Our employee recruitment processes globally, including in the United Kingdom, are robust and in line with all applicable employment laws and regulations. We conduct "right to work" document checks and ensure all employees are 16 years of age or older.
- Compensation and other rewards are market-related, and reviewed annually.

- We offer an enhanced benefits package, with additional health and welfare options to support our employees' (and their families') lifestyle choices.

### **Our Code of Business Conduct and Ethics**

Our Code of Business Conduct and Ethics (the "Code") reflects Take-Two's inherent core values and demonstrates our commitment to conducting business fairly and ethically and promoting a work environment that values honesty, openness and integrity. The Code applies to Take-Two Interactive Software UK Limited and Take-Two GB Limited (as well as Take-Two's business globally), as well as all directors, officers, employees, consultants, contractors and agents who do business on behalf of Take-Two (the "Employees").

During the last financial year, we have significantly revised and updated the Code, and it was published to our website in August 2018. Our updates include highlighting that Take-Two Interactive Software UK Limited and Take Two GB Limited are committed to ensuring that none of the products that we develop, have manufactured or sell, including promotional materials, are made using child labour, prison labour or are in violation of any law prohibiting modern slavery or human trafficking.

We are also introducing a supplier-facing Code of Business Conduct and Ethics (the "Supplier Code") which includes further controls in relation to the conduct of third parties with whom we do business. We are providing the Supplier Code to third parties we engage with, as we enter into new agreements with them, promoting their compliance with these same standards.

### **The Code Reflects Our Culture**

- The Code sets out our commitment to ethical business practices, and provides a guide to ethical decision-making. It strictly prohibits any form of illegal discrimination or harassment in the Company, and encourages and promotes equal opportunities for all Employees.

### **The Code Mandates Reporting Any Knowledge or Suspicion of Slavery**

- The Code requires Employees to report any actual or suspected violations of applicable laws, regulations, and the Code. It sets out a clear process, and several different options, for reporting any such violations, including a telephone number of an independent third-party with whom Employees can make a confidential report. The Code also designates certain senior individuals within the business to receive such Employee reports.
- The Code also makes clear that anyone who, in good faith, reports any actual or suspected violation of applicable law, regulation or the Code will not be subject to any disciplinary, retaliatory or adverse employment action of any kind.

### **We Regularly Train Our Employees To Promote Compliance With Our Code**

- Upon joining Take-Two and periodically thereafter, our Employees receive training regarding the requirements of our Code, where to turn with any questions and for advice, and how to report any suspected violations, including the option, where legally permissible, of using the confidential reporting hotline.

### **Seeking Best Practices In Our Supply Chains**

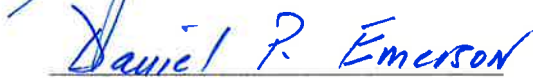
- As set out in our Code and Supplier Code, we seek to guard against any child labour, slave labour, prison labour, modern slavery or human trafficking in any part of our business, including in our supply chains. We expect our suppliers to uphold the same core values and standards that we set for ourselves.
- Where appropriate, when contracting with third parties, we seek to obtain from those third parties, and from any applicable subcontractors, a representation that they will not use any child labour, slave

labour, prison labour, or engage in any modern slavery or human trafficking in the performance of their services.

This modern slavery statement covers the financial year ending March 2018 and has been approved by the boards of Take-Two Interactive Software UK Limited and Take-Two GB Limited.



Signature of Director



Name of Director

Director of Take-Two Interactive Software UK Limited  
and Take-Two GB Limited

Date: 5 November 2018