

ROCKSTAR NORTH, LIMITED

U.K. MODERN SLAVERY STATEMENT 2020

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 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. Rockstar North Limited, an award-winning video game developer with operations in Edinburgh, Leeds, Lincoln and London, welcomes the Act and, together with its parent company, Take-Two Interactive Software, Inc. and its affiliated companies ("Affiliates"), are committed to maintaining and improving procedures that help to ensure compliance with the Act. This Modern Slavery Statement is made on behalf of Rockstar North Limited and its Affiliates.

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

Rockstar North and its Affiliates are committed to conducting business ethically and with honesty and integrity, and treating everyone with dignity and respect. We have no tolerance for modern slavery in our organization or in our supply chains.

We are committed to complying with all applicable laws and regulations, and promoting a work environment that values honesty, openness, integrity, and respect for others. Moreover, we promote respect for the fundamental freedoms articulated in the United Nations' Universal Declaration of Human Rights, and seek to combat the abuses of modern slavery such as forced and compulsory labour and human trafficking that exist in both developed and developing economies across a multitude of business sectors.

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 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 in compliance with all applicable laws and regulations including minimum wage and holiday entitlement laws, are competitive with the relevant market, and are reviewed annually. All employment is freely chosen, and employees are free to hand in their notice at any time.

- We offer a generous benefits package, with additional health and welfare options to support our employees' (and their families') lifestyle choices.
- Rockstar North and its Affiliates are committed to providing a work environment that is based upon dignity and respect, and is free from harassment. Employment at any of our locations is dependent upon substantive ability, talent and work ethic, not an individual's race, color, religion, creed, sex or gender, age, national origin or ancestry, physical or mental disability, pregnancy, sexual orientation, gender identity, marital status, veteran status, genetic information, or their characteristics protected by any applicable law. Our commitment to equal employment opportunity applies to all aspects of the employment relationship, from recruitment and hiring through compensation, benefits, discipline and termination.

Our Global Code of Business Conduct and Ethics

The Global Code of Business Conduct and Ethics, which applies to Take-Two Interactive Software, Inc. and all of its Affiliates, including Rockstar North Limited (the "Global Code") reflects our inherent core values and demonstrates our commitment to conducting business fairly and ethically, and promoting a work environment that values honesty, openness and integrity. It also applies to all directors, officers, employees, consultants, contractors and agents who do business on behalf of our companies (the "Employees").

As our Global Code highlights, we are committed to ensuring that none of the products we develop, have manufactured or sell, including promotional materials, are made using child labor, prison labor, or are in violation of any law prohibiting modern slavery or human trafficking. The current version of our Global Code is publicly available at <https://ir.take2games.com/corporate-governance/code-conduct?c=86428&p=irol-govConduct>.

The Global Code Reflects Our Culture

- The Global 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 Global Code Mandates Reporting Any Knowledge or Suspicion of Human Rights Abuses, Slavery, or any other Violation of Law or Our Code

- The Global Code requires Employees to report any actual or suspected violations of applicable laws, regulations, and the Global 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—or anyone with knowledge of a violation—can make a confidential report. The Global Code also designates certain senior individuals within the Internal Audit and Legal departments of Take-Two Interactive Software, Inc. to receive such reports.
- The Global Code also makes clear that anyone who, in good faith, reports any actual or suspected violation of applicable law, regulation or the Global 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 Global Code

- Upon joining Rockstar North and periodically thereafter, our Employees receive training regarding the requirements of our Global 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.

Our Global Policy Regarding Human Rights and Modern Slavery

We have recently introduced our Global Policy Regarding Human Rights and Modern Slavery.

- The policy emphasises our commitment to tackling issues of slavery and conducting our business in a fair and ethical manner. It underlines our respect for the fundamental freedoms outlined in the United Nations' Universal Declaration of Human Rights and outlines the steps we take both within our own business and within our supply chains to combat issues of modern slavery such as forced and compulsory labour and human trafficking. The policy is publicly available here (<https://ir.take2games.com/static-files/0dda2509-5891-498c-9d66-2962930c3a01>).
- As well as being publicly available, our employees are encouraged to familiarise themselves with the policy and, if applicable, they can use our internal reporting systems to report any potential issues or concerns they have regarding our own business or suppliers

Seeking Best Practices In Our Supply Chains

Rockstar North is a video game development studio, which relies primarily on the creative efforts of its employees within the U.K. However, from time to time we also contract with third parties to develop and manufacture promotional items that are used to market our games.

- As set out in our Global 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.

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This Modern Slavery Statement covers the financial year ending March 2020 and has been approved by the Board of Directors of Rockstar North, Limited.

DocuSigned by:

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 Signature of Director

17 November 2020

 Date

Daniel Emerson

 Director of Rockstar North Limited