

## **ROCKSTAR GAMES UK LIMITED**

### **U.K. MODERN SLAVERY STATEMENT 2023**

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 Games UK Limited ("Rockstar"), an award-winning video game developer with operations in Dundee, Edinburgh, Leeds, Lincoln and London, believes the Act serves as a valuable tool to combat these illegal practices. Rockstar, together with its parent company, Take-Two Interactive Software, Inc., and its affiliates ("the Company"), is committed to maintaining and improving procedures that help to ensure compliance with the Act.

#### **A. 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. It exists in both developed and developing economies across many business sectors.

#### **B. OUR COMMITMENT**

Our Company is committed to conducting business ethically, 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 chain.

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 all of our suppliers and business partners to maintain these same high standards of conduct, for themselves and their business partners.

#### **C. OUR POLICIES AND PRACTICES**

We constantly evaluate the effectiveness of our business practices, and fortify our policies and procedures. We aim to mitigate, to the greatest extent possible, our Company's key compliance risks. Specifically with respect to modern slavery, we have multiple policies and procedures in place to defend against its entry in our business or supply chains, some of which are outlined below.

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

Our employee recruitment processes 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 resign at any time.

Rockstar is an accredited Real Living Wage employer, which means that it has been certified by the Real Living Wage Foundation as an employer that voluntarily pays its staff at or above the Real Living Wage in the

UK. Moreover, contractors that supply service personnel to or on behalf of Rockstar must confirm they pay those individuals at least at the level of Real Living Wage.

We offer a generous benefits package, with supplementary financial, health and welfare benefits, and family-friendly leave options to support our employees' (and their families') lifestyle choices.

Our Company is committed to providing a work environment that is based upon dignity and respect, and is free from harassment. Employment at any of our locations around the world is dependent upon substantive ability, talent and work ethic, not on an individual's race, colour, 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 other 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**

Our Global Code of Business Conduct and Ethics (the "Global Code") reflects our Company's core values and demonstrates our commitment to conducting business fairly and ethically, and to promoting a work environment that values honesty, openness and integrity. The Global Code applies to Rockstar Games UK Limited, all of our Rockstar affiliates globally, and all directors, officers, employees, consultants, contractors and agents who do business on behalf of our Company (the "Employees and other Covered Individuals").

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 labour, prison labour, or are in violation of any law prohibiting modern slavery or human trafficking. The current version of our Global Code is published under the Policies & Conduct tab of our parent company website at [www.take2games.com](http://www.take2games.com).

### **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 and other Covered Individuals.

We constantly review our Global Code to ensure it is up to date and adequately addresses relevant legal, cultural, and social developments. We recently added a section to our Global Code encouraging Employees and other Covered Persons to be active in public service and in the civic life of their communities, including with respect to charitable and educational activities. We also bolstered our Code's stated commitment to providing an inclusive workplace in which everyone feels respected, heard and safe, and to welcome candidates and colleagues from a variety of social, cultural, racial, ethnic, religious and economic backgrounds.

### **The Global Code Mandates Reporting Any Knowledge or Suspicion of Human Rights Abuses, Slavery, Unlawful Discrimination, Harassment, or any other Violation of Law or of Our Global Code.**

The Global Code requires Employees and other Covered Individuals to report any actual or suspected violations of applicable laws, regulations, or 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 and other Covered Individuals—or anyone who suspects a violation—can make a confidential report.

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.

The Code is available in ten languages. All Employees and Other Covered Individuals must certify their agreement to abide by the Code upon joining the Company.

### **Our Global Policy Regarding Human Rights and Modern Slavery**

Our Global Human Rights and Modern Slavery Policy emphasises our commitment to tackling issues of slavery and conducting our business in a fair and ethical manner. It underscores 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 at [www.take2games.com](http://www.take2games.com) under the Policies & Conduct tab.

Our Employees and other Covered Individuals are encouraged to familiarise themselves with the Global Policy Regarding Human Rights and Modern Slavery, and to use our internal reporting systems for any potential questions or concerns regarding our business, suppliers or supply chain.

### **Our Global Gifts and Entertainment Policy**

Our Company has adopted a Global Gifts and Entertainment Policy that reflects our commitment to operating fairly, ethically, and legally wherever in the world we do business. The Global G&E Policy makes clear that no gift or entertainment may be given or received in exchange for an improper benefit, or to improperly influence a business decision or performance.

### **Diversity and Inclusion**

It is our belief that a multiplicity of experiences, affiliations and perspectives contribute to a stronger, more dynamic and more cohesive global organization. Additionally, we believe strongly in corporate citizenship and support these efforts by way of service projects, volunteerism, and philanthropy. We have supported the mission and work of numerous organizations across the UK while promoting visibility into our industry in hopes of providing greater access and opportunity to underserved communities. Our goal in these efforts is to uplift and leverage our shared values as an organization that values diversity and inclusion.

### **Our Global Policy for Reporting Misconduct**

Our Global Policy for Reporting Misconduct, published under the Policies & Conduct tab at [www.take2games.com](http://www.take2games.com), provides that all persons acting on behalf of our Company must promptly report any actual or suspected violation of applicable law, regulation, or Company policy, including of any of the policies discussed in this Modern Slavery Statement. It details the various ways any person may submit a report of misconduct, confidentially if desired, or anonymously where permitted by law, including:

- In person or by phone to a Company supervisor, member of our legal department, or any Human Resources representative
- In person or by phone to the Company's General Counsel or Head of Internal Audit
- In person or by phone to any member of the Company's Board of Directors

- Through our externally managed Ethics Point service, through its website [take2.ethicspoint.com](https://take2.ethicspoint.com), or by calling Ethics Point toll-free by phone from 23 countries, 24 hours a day and seven days a week

The Policy for Reporting Misconduct outlines the action the Company will take upon receiving a report of misconduct, and notes that all complaints will be investigated promptly and with discretion. It also provides assurance that 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 Global Code of Business Conduct and Ethics, regardless of whether such violation is ultimately determined to have occurred.

### **Our Impact Report**

Our Company aims to operate in a manner that is not only inclusive and welcoming of our employees and communities, but that is also fiscally prudent and environmentally responsible. As part of that effort, we published in August our 2023 Impact Report. That report is accessible at [www.take2games.com](https://www.take2games.com) under the Investors tab.

These efforts are managed by our Company's Sustainability Committee comprised of senior-level management from across the organization. This committee is overseen by the Board of Directors via the Corporate Governance Committee. The mandate of our Sustainability Committee is to ensure that, where appropriate, environmental, social and governance (ESG) considerations are incorporated into our corporate strategy, disclosure, and long-term goals to maintain and advance sustainable shareholder value.

### **D. OUR IN-DEPTH TRAINING PROGRAM TO PROMOTE COMPLIANCE WITH OUR POLICIES AND PRACTICES**

Upon joining our Company, and approximately every two years thereafter, our Employees and other Covered Persons receive intensive online compliance training regarding the requirements of our Global Code, Anti-Bribery and Corruption, Anti-Trust/Competition Law, Anti-Harassment and Discrimination, and Data Privacy, and our Policy for Reporting Wrongdoing.

Online training courses are available in eleven languages, and are periodically updated and refreshed.

In addition to online training sessions, employees in a wide range of business groups, including those in senior and higher-risk positions, are engaged approximately every two years in live compliance training workshops. These workshops provide an opportunity to review and discuss the compliance topics listed above, as well as to provide targeted training to particular business groups regarding our third-party diligence process, our Supplier Code of Conduct, our global Policy Regarding Human Rights and Modern Slavery, and other compliance policies and procedures. These sessions facilitate outreach to a broad range of Employees and other Covered Persons globally, and also serve as informal, ongoing compliance risk assessments for each location or group.

### **E. SEEKING BEST PRACTICES IN OUR SUPPLY CHAINS**

To carry out our business activities, we work with and rely on a variety of third parties.

Our Company's global supply chain is primarily comprised of disc replicators located in the United States, Mexico, Brazil, Ireland, Germany, Austria, China and Japan. We also contract with other businesses that provide printing, distribution, shipping, logistics, marketing, manufacturing, and other services on our behalf ("Suppliers").

The Modern Slavery Statements of our key Suppliers, including replicators, reflect their own prohibitions on any form of forced, involuntary, or child labour, or human rights abuses of any kind, in their operations or those of their suppliers. They also commit to conducting periodic internal and/or independent third-party audits and re-audits of their supply chains to ensure compliance with high labour, employment, health, and safety standards, and to determine areas for improvement.

**Our Third-Party Diligence Process and Our Supplier Code of Conduct**

Suppliers acting on behalf of our Company are required to abide by our Supplier Code of Conduct (“Supplier Code”), published under the Policies & Conduct tab at [www.take2games.com](http://www.take2games.com).

Our Supplier Code echoes the commitment our Company has made, throughout its other policies and core business practices, to conduct business fairly and ethically, comply with all applicable laws and regulations, and to promote a work environment that values honesty, openness, integrity, and respect for fundamental human rights, wherever in the world we operate.

We incorporate the terms of our Supplier Code into our Supplier agreements. We also provide a copy of our Supplier Code—available in thirteen languages—to Suppliers upon engagement.

We conduct risk assessments and undertake pre-engagement risk-based due diligence to confirm Suppliers have historically operated in a manner that is fair, ethical, and respectful of the law and human rights. We also require our Suppliers to adhere both to the letter and the spirit of our Supplier Code in all business dealings with or on behalf of our Company.

Moreover, we require Suppliers to promptly notify us if, in the course of their work for our Company, they become aware that any applicable laws and/or provisions of the Supplier Code have been violated. We also require immediate notification of any criminal or civil legal actions, investigations, fines or other sanctions that relate to their work for our Company.

Our Supplier Code reiterates portions of our Policy for Reporting Misconduct, advising Suppliers of the various methods to report a legal or ethical violation, or provide notice of a legal action, including through our externally managed Ethics Point hotline that is available online or toll-free by phone from 20 countries, 24 hours a day, seven days a week.

We regularly train our Employees and Other Covered Persons about our Supplier Code of Conduct, to ensure that our entire organization is engaging only ethical and law-abiding Suppliers, and holding our existing Suppliers to the same standards of integrity to which our Company has committed.

We also provide training regarding our Supplier Code to certain of our consultants and third-party agents and suppliers, to promote their understanding of and compliance with its obligations.

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This Modern Slavery Statement covers the financial year ending March 2023 and has been approved by the Board of Directors of Rockstar Games UK Limited.

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*Dan Emerson*  
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Signature of Director

October 24, 2023  
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Date

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*Dan Emerson*  
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Director of Rockstar Games UK Limited