

ROCKSTAR NORTH, LIMITED
U.K. MODERN SLAVERY STATEMENT 2019

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.

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 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 Code of Business Conduct and Ethics

The Code of Business Conduct and Ethics of Rockstar North and its Affiliates (the “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. The Code applies to Rockstar North and its Affiliates, and all directors, officers, employees, consultants, contractors and agents who do business on behalf of those companies (the “Employees”).

We significantly revised and updated the Code in 2018, and it was published to Take-Two Interactive Software, Inc.’s website in August 2018. Our updates include highlighting our commitment 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. The current version of our Code is publicly available at <https://ir.take2games.com/corporate-governance/code-conduct?c=86428&p=irol-govConduct>.

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 Human Rights Abuses, Slavery, or any other Violation of Law or Our Code

- 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—or anyone with knowledge of a violation—can make a confidential report. The Code also designates certain senior individuals within the Internal Audit and Legal departments of Take-Two Interactive Software, Inc. to receive such 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 Rockstar North 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

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.

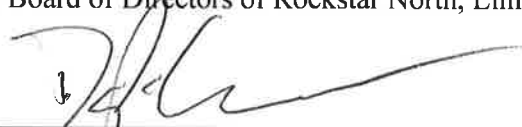
- As set out in our Code and Supplier Code, we seek to guard against any child labour, slave labour, prison labour, modern slavery or human trafficking in any part of our business,

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 2019 and has been approved by the Board of Directors of Rockstar North, Limited.


Signature of Director

Director of Rockstar North Limited


Date