OPENDOOR TECHNOLOGIES INC.

CORPORATE GOVERNANCE GUIDELINES

AUGUST 20, 2026

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1. PERSONS SUBJECT TO THESE CORPORATE GOVERNANCE GUIDELINES

The Board of Directors (the "***Board***") of Opendoor Technologies Inc. ("***Opendoor***") has established the following guidelines for each of the members of the Board. These guidelines are designed to give directors a flexible framework for effectively pursuing Opendoor's objectives for the benefit of its stockholders in a manner that is consistent with the Board's fiduciary duties. These guidelines should be interpreted in the context of all applicable laws, the Exchange (as defined below) listing standards, Opendoor's certificate of incorporation and bylaws, and Opendoor's other policies.

2. BOARD COMPOSITION AND SELECTION

2.1 Size of the Board. The Board will establish the number of directors in accordance with Opendoor's certificate of incorporation and bylaws. The Nominating and Corporate Governance Committee will periodically review the appropriate Board size, which may vary to accommodate the availability of suitable candidates and Opendoor's needs, and recommend any changes to the Board.

2.2 Independence of Directors. A majority of the directors on the Board must be independent, except as otherwise provided by the applicable rules of the Exchange (as defined below). The Board will determine the independence of directors pursuant to listing standards of the primary exchange on which Opendoor's common stock is listed ("***Exchange***") and all factors the Board determines to be relevant to the ability of each director to exercise independent judgment in carrying out their Board responsibilities. The Board will make affirmative determinations of director independence, based on information provided by Board members and legal counsel, at such times as may be required by the rules of the Securities and Exchange Commission (the "***SEC***") or Exchange listing standards, or otherwise when determined by the Board or its Nominating and Corporate Governance Committee.

2.3 Management Directors. The Board anticipates that the Chief Executive Officer will serve on the Board. Other members of management may serve on the Board if the Board determines it to be advisable.

2.4 Board Leadership. It is the policy of the Company that the positions of Chief Executive Officer and chairperson of the Board may be held by the same person. In the event that Opendoor does not have an independent chairperson of the Board, the independent directors may designate a lead independent director. The independent chairperson or lead independent director will be responsible for coordinating the activities of the independent directors. In addition to the duties of all Board members, the specific responsibilities of the independent chairperson or lead independent director are to:

- work with the Chief Executive Officer to develop Board meeting schedules and agendas;
- assist the Chief Executive Officer in the review and approval of information and materials to be sent to the Board, including providing the Chief Executive Officer feedback on the quality, quantity and timeliness of the information provided to the Board;

- develop the agenda for and moderate executive sessions of the independent directors;
- assist the Chief Executive Officer in presiding over Board meetings (or, in the case of lead independent director, assist the Chief Executive Officer in presiding over Board meetings when the chairperson is not present);
- act as principal liaison between the independent members of the Board and the Chief Executive Officer;
- convene meetings of the independent directors as appropriate;
- if appropriate, and in coordination with management, be available for periodic consultation and direct communication with major shareholders; and
- perform other duties as the Board may determine from time to time.

2.5 Nomination of Directors. The Board will be responsible for nominating members for election to the Board by Opendoor's stockholders and for filling any vacancies on the Board as provided in Opendoor's certificate of incorporation and bylaws, subject to any limitations provided in Opendoor's certificate of incorporation and any voting agreement that may be in effect. The Nominating and Corporate Governance Committee is responsible for identifying, reviewing, evaluating and recommending candidates to serve as directors of Opendoor, in accordance with its certificate of incorporation and bylaws and consistent with the criteria listed below.

For nominations of potential candidates made other than by the Board, the stockholder or other person making such nomination must comply with any requirements provided therefor in Opendoor's bylaws. Upon request, any candidate nominated will agree in writing to comply with these Corporate Governance Guidelines and all other policies and procedures of Opendoor applicable to the Board.

The Nominating and Corporate Governance Committee will, periodically, review the procedures it has established for the consideration of nominees for election to the Board and the requirements included in Opendoor's bylaws for the nomination of potential candidates for election to the Board other than by the Board.

2.6 Board Membership Criteria. The Board will determine the appropriate characteristics, skills, and experience for the Board as a whole and for its individual members and will consider recommendations for nominees from its Nominating and Corporate Governance Committee. The Board will consider the minimum general criteria below, and may add any specific additional criteria with respect to specific searches, in selecting candidates and existing directors for serving on the Board. The Board believes that candidates for director should have certain minimum qualifications, including the highest personal integrity and ethics, the ability to read and understand basic financial statements, and being older than 21. In considering candidates for Board membership, the Board intends to consider factors it determines to be relevant to Board membership, including (without limitation) any or all of the following:

- relevant expertise to offer advice and guidance to management;
- sufficient time to devote to the affairs of Opendoor;
- excellence in their field;

- the ability to exercise sound business judgment; and
- the commitment to represent the long-term interests of Opendoor's stockholders.

The Board will review candidates for director nomination in the context of the current composition of the Board, Opendoor's operating requirements, the long-term interests of Opendoor's stockholders, and any limitations on or requirements for Opendoor's Board members set forth in Opendoor's certificate of incorporation or bylaws or any voting agreement. In conducting this assessment, the Board will consider age, skills, and other factors that it deems appropriate to maintain a balance of knowledge, experience, and capability on the Board. For incumbent directors, the Board will periodically review those directors' overall service to Opendoor during their term, including the number of meetings attended, level of participation, quality of performance, and any other relationships and transactions that might impair the directors' independence. The Board will also annually determine whether the nominee must be independent for purposes of Exchange listing standards.

2.7 Changes in Board Membership Criteria. The Board wishes to have members who can productively contribute to the success of Opendoor. From time to time, the Board, in its discretion, may change the criteria for Board membership. When this occurs, the Board will evaluate existing members according to the new criteria. The Board may adjust the Board committee assignments for any director who no longer meets the complete criteria for Board membership or request that such director resign from the Board.

2.8 Term Limits. The Board does not believe it should limit the number of terms for which an individual may serve as a director. Directors who have served on the Board for an extended period of time may be able to provide continuity and valuable insight into Opendoor's operations and prospects because of their experience and understanding of Opendoor's history, policies, and objectives. The Board believes that it can ensure that it continues to evolve and adopt new ideas and viewpoints through the director nomination process in these guidelines. The director nomination process is designed to achieve what term limits seek to accomplish.

2.9 Limits on Board and Committee Service. The Board recognizes that a director's ability to fulfill their responsibilities as a director can be impaired if they serve on multiple other boards of directors or board committees. Service on boards and board committees of other companies should be consistent with Opendoor's Code of Business Conduct and Ethics and not impair a director's ability to fulfill their responsibilities to Opendoor. Accordingly, directors should advise the chairperson of the Board or Nominating and Corporate Governance Committee before accepting an invitation to serve on the board of directors or committee of another company. In addition, generally, directors are not expected to serve simultaneously on more than four public company boards, including Opendoor's Board, except with the prior approval of the Board. The Board does not have a limit on private company boards and will consider service on such boards on a case-by-case basis. In addition, if a member of the Audit and Risk Committee wishes to serve on the audit committees of more than three public companies, including the Company's Audit and Risk Committee, the director must notify the Nominating and Corporate Governance Committee prior to accepting the additional service. In the event the Board or Nominating and Corporate Governance Committee determines that a director's ability to fulfill their responsibilities to Opendoor is impaired as a result of non-Opendoor board of directors or board committee obligations, the Board may adjust such director's Opendoor Board committee assignments or request that such director adjust their non-Opendoor board of directors or board committee service or resign from the Board.

2.10 Retirement Age. The Board believes that it is inappropriate to have a retirement age for directors.

2.11 Directors Who Change Their Job Responsibility; Conflict of Interest. A director who materially changes their present job (other than an ordinary course promotion) should notify the Board or the Nominating and Corporate Governance Committee. In the event the Board or Nominating and Corporate Governance Committee determines that a director's ability to fulfill their responsibilities to Opendoor is impaired as a result of such material change, the Board may adjust such director's Opendoor Board committee assignments or request that such director resign from the Board. A director shall offer to tender his or her resignation to the Board if the Board or the Nominating and Corporate Governance Committee has determined that an actual conflict of interest arises with respect to the director which is not waived by the Board. The Nominating and Corporate Governance Committee shall then recommend to the Board whether the Board should accept the offer to resign in light of the director's conflict of interest or request that he or she continue to serve.

3. BOARD RESPONSIBILITIES

3.1 Duties Generally. Stockholders select directors to provide oversight and strategic guidance to senior management. A director's responsibility is to fulfill their fiduciary duties of care and loyalty, and otherwise to exercise their business judgment in the best interests of Opendoor and its stockholders. Board service requires significant time and attention. More specifically, the Board has responsibilities to review, approve, and monitor fundamental financial and business strategies, to assess Opendoor's major risks and consider ways to address those risks, and to select and oversee management. To fulfill their duties, directors must prepare for meetings and discussions with management, participate in Board meetings, review relevant materials (including those that may have been circulated prior to each meeting), and serve on committees if appointed by the Board. Opendoor expects directors to maintain an attitude of constructive involvement and oversight, ask relevant and incisive questions, and demand honest and accurate answers. Directors must act with integrity and demonstrate a commitment to Opendoor, Opendoor's values, business, and long-term stockholder value.

A director should discharge their duties, including duties as a member of any committee on which they serve, in good faith and in a manner the director reasonably believes to be in the best interests of Opendoor and its stockholders. In discharging their duties to Opendoor, Board members will comply with applicable laws and all policies and guidelines of Opendoor, including without limitation, Opendoor's Code of Business Conduct and Ethics.

3.2 Disclosure of Information to the Board. Each director is expected to disclose promptly to the Board and respond promptly and accurately to periodic questionnaires or other inquiries from Opendoor regarding any existing or proposed relationships with Opendoor, including compensation and stock ownership, that could affect the independence of the director. Each director will also promptly inform the Board of any material change in such information, to the extent not already known by the Board.

3.3 Duty of Confidentiality. Directors have an obligation to protect and keep confidential all of Opendoor's non-public information unless Opendoor has authorized public disclosure or unless otherwise required by applicable law. Confidential information includes all non-public information entrusted to or obtained by a director by reason of their position on the Board. This includes information regarding Opendoor's strategy, business, finances, and operations, and will include minutes, reports, and materials of the Board and committees, and other documents identified as confidential by Opendoor. The obligations described above continue even after service on the Board has ended.

Directors may not use such confidential information for personal benefit or to benefit other persons or entities other than Opendoor. Unless authorized by Opendoor or applicable law, directors will refrain from disclosing confidential information to anyone outside Opendoor, especially anyone affiliated with any

entity or person that employs the director or has sponsored the director's election to the Board. These obligations continue even after service on the Board has ended. Any questions or concerns about potential disclosures should be directed to Opendoor's Head of Legal, or, if no individual holds such title, then such other role that performs the functions and responsibilities of the senior most internal legal counsel (the "***Head of Legal***"), who then may communicate with the Chief Executive Officer or the Board or Nominating and Corporate Governance Committee regarding the potential disclosures.

3.4 Board Interaction with Media, Investors and Others. Management, and not the Board or individual directors, should normally speak for the Company. Individual directors (other than the Chief Executive Officer) wishing to communicate with the media, current or potential future investors in Opendoor or any other Opendoor constituency in any manner relating to Opendoor must comply with our Corporate Disclosure Policy and the social media guidelines delineated in Opendoor's Code of Business Conduct and Ethics.

4. Board Meetings

4.1 Number of Meetings. The Board expects to have at least four regular Board meetings each year.

4.2 Attendance and Preparation. Opendoor expects Board members to prepare for, attend and participate in all meetings of the Board and committees on which they serve. Directors should notify Opendoor's Secretary when they will be absent from a meeting. Opendoor will provide directors with appropriate materials before the meeting, except in unusual or exigent circumstances.

4.3 Agenda. The chairperson or lead independent director, together with the Chief Executive Officer, will create a schedule of topics to be discussed during the year and an agenda for each Board meeting. Each Board member is encouraged to suggest topics for the agenda at any time, and each Board member is free to raise subjects that are not on the agenda.

4.4 Executive Session. The independent directors will meet periodically in executive session no less than two times per year or whatever minimum has been set by applicable Exchange listing standards. Executive session discussions may include any topics decided by the attendees.

4.5 Management Participation. Executive officers and other members of senior management are expected to be present at Board meetings at the invitation of the Board. The Board encourages senior management to make presentations and invite to Board meetings managers and other employees who can provide additional insight into the items being discussed.

4.6 Committee Reports. At each regular Board meeting, if requested by the Board, each committee will present a brief summary of the principal subjects discussed, any conclusions reached, and the final actions of the committee. The chairperson of the appropriate committee will present the report. Minutes of committee meetings will be available to any director.

5. Board Committees

5.1 Number of Committees; Independence of Members. The Board will constitute and maintain to the extent required by applicable law or Exchange listing standards: an Audit and Risk Committee, a Compensation Committee, and a Nominating and Corporate Governance Committee. Only independent directors may serve on the Audit and Risk Committee, the Compensation Committee, and the Nominating and Corporate Governance Committee, subject to any available exception. The Board may form, merge, or dissolve additional committees, as it deems appropriate.

5.2 Committee Functions and Charters. All standing committees will have a written charter that describes the committee's responsibilities. Each committee will periodically review its charter and recommend any proposed charter changes to the Board.

5.3 Board Committee Membership. The Board or Nominating and Corporate Governance Committee oversees the Board's committee structure and operations. The Nominating and Corporate Governance Committee may make recommendations to the Board regarding each committee's chairperson and membership at any time. In making those recommendations, the Nominating and Corporate Governance Committee will consider the interests, independence, and experience of the directors and the independence and experience requirements of the Exchange, the rules and regulations of the SEC, and applicable law.

5.4 Committee Meetings and Agenda. Each committee chairperson, in consultation with that committee's members, will determine the frequency, length, and agenda for each committee meeting and the appropriate attendees in light of that committee's charter, the authority delegated by the Board to that committee, and the legal, regulatory, accounting, and governance principles applicable to that committee's functions.

6. Board Access to Management; Use of Outside Advisors

Board members will have access to Opendoor management, subject to such processes as deemed appropriate by the Board or the Nominating and Corporate Governance Committee. Board members are expected to use their judgment to ensure that this contact is not distracting to Opendoor's operations or to management's duties and responsibilities.

The Board and each committee will have the power to hire, at the expense of Opendoor, and will have access to, independent legal, financial, or other advisors that they may deem necessary, without consulting or obtaining the advanced approval of any officer.

7. Director Orientation and Education

All Board members are encouraged to participate in continuing education programs, with any associated expenses to be reimbursed by Opendoor, in order to stay current and knowledgeable about Opendoor's business and industry. The Board or Nominating and Corporate Governance Committee may implement an orientation process for directors that includes background material on Opendoor's policies and procedures, meetings with senior management, and visits to Opendoor's facilities. The Board may also offer continuing education programs to assist the directors in maintaining the level of expertise necessary to perform their duties.

8. Director Compensation

The Compensation Committee will review and recommend to the Board the type and amount of director compensation for Board and committee service for non-management directors. Compensation for non-management directors and committee members should be designed to be aligned with the long-term interests of the stockholders and consistent with market practices of similarly situated companies. In determining compensation, the Board will consider the impact on the director's independence and objectivity.

9. Chief Executive Officer Evaluation

The Board will review the Chief Executive Officer's performance annually. The Board will evaluate

performance based on objective criteria, including how well the business achieves long-term strategic objectives and successfully develops management. The Compensation Committee and Board will use this evaluation when considering the compensation of the Chief Executive Officer.

10. Management Succession Planning

The Board or a duly authorized committee of the Board should develop and periodically review with the Chief Executive Officer a plan with respect to executive officers' succession and consider appropriate individuals who might fill those positions. The Chief Executive Officer should also recommend and evaluate potential successors. The Chief Executive Officer will also review any development plans for those potential successors.

11. Board Assessment

The Nominating and Corporate Governance Committee will oversee an annual assessment of the Board and its committees, the results of which will be discussed with the Board. In addition, each committee shall establish and conduct an annual self-evaluation of its performance and deliver a report, which may be oral, setting forth the results of its evaluation.

12. Review of Corporate Governance Guidelines

The Nominating and Corporate Governance Committee will periodically review and assess the adequacy of these guidelines and recommend any proposed changes to the Board for approval.

13. Questions

If you have any further questions about any aspect of these Corporate Governance Guidelines, please contact the Head of Legal.

(As adopted by the Board of Directors on December 18, 2020, re-approved on December 7, 2021, February 9, 2023, December 21, 2023 and August 20, 2026 and amended on August 22, 2024 and November 20, 2025)