OPENDOOR TECHNOLOGIES INC.

CODE OF BUSINESS CONDUCT AND ETHICS

August 20, 2026

At Opendoor, we are committed to upholding the highest standards of business conduct and ethics across our family of companies. Our Code of Business Conduct and Ethics, or the *"**Code**,"* reflects our values and commitment to fostering behaviors that live up to our ethical standards.

We expect every employee, officer and director to read and understand the Code and its application to the performance of their business responsibilities, and to develop a sense of commitment to the spirit of the Code, not just the words. While the Code is specifically written for those within and representing our organization, we expect anyone who works on Opendoor's behalf (including agents and contractors) to share our commitment to integrity by following the Code when providing goods and services to Opendoor or on our behalf. We encourage all team members, including agents and contractors, to read the Code and reach out to us with questions or if you ever feel that we are falling short of our commitment.

The Code helps us ensure that all team members are following our company values, but it reflects only part of our commitment. Beyond these written policies, it is the responsibility of each team member to apply common sense, together with their own highest personal ethical standards, in making business decisions where there is no stated guideline in the Code. From time to time, we may adopt additional policies and procedures with which our Opendoor teammates are expected to comply.

It is also important to communicate some of the principles of the Code with close family and friends, as some ethical obligations extend beyond those directly involved in Opendoor's businesses. For example, acceptance of inappropriate gifts by a family member from one of our commercial vendors could create a conflict of interest and result in a Code violation attributable to you. In complying with the Code, you should consider not only your own conduct, but also that of those around you.

1. WE SPEAK UP

If you have a question or concern, ***speak up***! You should not hesitate to ask questions about whether any conduct may violate the Code, voice concerns or clarify gray areas. In addition, you should be alert to possible violations of the Code by others. We want to hear from you and rely on our team members to ensure that our company stays true to its values.

To facilitate compliance with the Code, we have implemented a program of Code awareness, training and review. Opendoor has appointed a Compliance Officer to oversee the program and address any questions or concerns regarding the Code and other Opendoor policies.

If you are aware of a suspected or actual violation of the Code, you have a responsibility to report it. You are expected to promptly provide a compliance resource with a specific description of the violation that you believe has occurred, including any information you have about the persons involved and the time of the violation. If you have any questions regarding what constitutes a violation of the Code, do not hesitate to reach out.

Whether you choose to speak with your manager, the People Team, the Compliance Officer or a committee of our Board of Directors, you should do so without fear of any form of retaliation. Reprisals, threats, retribution or retaliation against any person who has, in good faith, reported a violation or a suspected violation of the Code or other company policies, or against any person who is assisting in good faith in any investigation or process with respect to such a violation, is prohibited. Concerns about retaliation or threatened retaliation should be reported. We will address the situation and take prompt disciplinary action as needed.

How do I share my concerns? The primary ways of reporting concerns are as follows:

- Talk to your manager, the People Team or the Compliance Officer.
- Email the Compliance Officer at ethics@opendoor.com
- Contact our independent, 24/7 toll-free "***EthicsPoint Hotline***" at 844-814-5928 and website at http://opendoortechnologies.ethicspoint.com/, anonymous option available. Whether you identify yourself or remain anonymous, your telephonic or web-based contact with EthicsPoint will be kept strictly confidential to the extent reasonably possible within the objectives of the Code.

If you have a concern regarding accounting, internal accounting controls and auditing matters ("***Accounting Matters")*** that you are not comfortable reporting in one of the ways noted above, you may also notify the Audit and Risk Committee of our Board of Directors. If you have a concern regarding the CEO or a direct report to the CEO that is not an Accounting Matter, and you are not comfortable reporting in one of the ways noted above, you can also reach out to the Nominating and Corporate Governance Committee of our Board of Directors. To reach either committee, please mail your concern to:

Opendoor Technologies Inc.
Attn: Audit and Risk Committee or Nominating and Corporate Governance Committee, as applicable
1295 W Washington St, Ste. 115
Tempe, AZ 85288

You may report your concerns to either committee anonymously. However, we encourage you to provide your name and contact information so that we may contact you to get additional clarity as necessary.

Managers should promptly report any complaints or observations of Code violations to the Compliance Officer. If you believe your manager has not taken appropriate action, you should contact the Compliance Officer directly. The Compliance Officer will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. Neither you nor your manager should conduct any preliminary investigation, unless authorized to do so by the Compliance Officer. We expect everyone involved to cooperate fully and honestly. As needed, the Compliance Officer will consult with the Legal Team, the People Team and/or an appropriate committee of Opendoor's Board of Directors.

It is our policy to employ a fair process by which to determine violations of this Code. If any investigation indicates that a violation of the Code has occurred, we will examine the circumstances and take appropriate action. If we determine that a team member is responsible for a Code violation, they will be subject to disciplinary action up to, and including, termination of employment or other relationship, as applicable, and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.

2. WE LIVE OUR VALUES

It is the policy of Opendoor to promote high standards of integrity by conducting our affairs in an honest and ethical manner. The integrity and reputation of our company depends on the honesty, fairness and integrity brought to the job by each person associated with Opendoor. Unyielding personal integrity is the foundation of corporate integrity.

3. WE AVOID CONFLICTS OF INTEREST

We respect the rights of our team members to manage their personal affairs and investments and do not wish to impinge on their personal lives. That said, team members should be careful to ensure that their personal interests do not interfere in any way with the performance of their duties or the best interests of Opendoor. A conflicting personal interest could result from an expectation of personal gain now or in the future or from a need to satisfy a prior or concurrent personal obligation. Avoiding potential conflicts of interest also means that you should not use, or allow others to use, Opendoor products, services, internal tools, or information in a way that improperly benefits you or someone you know or creates the appearance that you or they have received an advantage over others. We expect our employees to be free from influences that conflict with the best interests of Opendoor. Even the appearance of a conflict of interest where none actually exists can be damaging and should be avoided. Conflicts of interest are prohibited unless specifically authorized.

We understand that you may have questions about what constitutes a conflict of interest. If you have any questions or if you become aware of an actual or potential conflict, you should discuss the matter with your manager or the Compliance Officer. Managers may not make determinations as to whether a problematic conflict of interest exists without first seeking the approval of the Compliance Officer and providing the Compliance Officer with a written description of the activity. If your manager is involved in the potential or actual conflict, you should discuss the matter directly with the People Team or the Compliance Officer. Officers and directors may seek determinations from the Audit and Risk Committee.

4. WE ARE LOYAL

Corporate opportunities discovered through your work here belong first to Opendoor, except as otherwise agreed to by Opendoor. You may not take personal advantage of opportunities for Opendoor that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way. Significant participation in an investment or outside business opportunity that is directly related to our existing or proposed lines of business must be pre-approved by your manager and the People Team.

5. WE MAINTAIN FINANCIAL INTEGRITY

The integrity of our records and public disclosure depends upon the accuracy and completeness of the information supporting the entries to our books of account. We rely on our team members to ensure that our corporate and business records are completed accurately and honestly. The making of false or misleading entries, whether they relate to financial results or other operational results, is strictly prohibited. Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, team members and others with whom we do business. It is of the utmost importance that our books, records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. We require that:

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;

- transactions be supported by appropriate documentation;

- the terms of sales and other commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;

- employees comply with our system of internal controls; and

- no cash or other assets be maintained for any purpose in any unrecorded or "off-the-books" fund.

We also rely on our accounting records to produce reports for our management, directors, stockholders and creditors, as well as for governmental agencies. In particular, we rely upon our accounting and other business and corporate records in preparing the periodic and current reports that we file with the Securities and Exchange Commission (the "***SEC***"). Securities laws require that these reports provide full, fair, accurate, timely and understandable disclosure and fairly present our financial condition and results of operations. Team members who collect, provide or analyze information for or otherwise contribute in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about Opendoor that would be important to enable stockholders and potential investors to assess the soundness and risks of our business and finances and the quality and integrity of our accounting and disclosures. In addition:

- No team member may take or authorize any action that would intentionally cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC or other applicable laws, rules and regulations.

- All team members must cooperate fully with our Accounting Team, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed with the SEC, are accurate and complete.

- No team member should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports accurate in all material respects.

Any team member who becomes aware of any departure from these standards has a responsibility to report their knowledge promptly to a manager, to the Compliance Officer, or via the EthicsPoint Hotline.

6. WE CONDUCT BUSINESS FAIRLY

At Opendoor, we are committed to doing business with fairness, integrity and honesty. We maintain our advantages over competitors through the superior performance of our products and services, not through unethical or illegal business practices. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests. If information is obtained by mistake that may

constitute trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your manager, the Legal Team or the Compliance Officer.

You are expected to deal fairly with our customers, suppliers, team members and anyone else with whom you have contact while performing your job. Be aware that the Federal Trade Commission Act provides that "unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful." It is a violation of the Federal Trade Commission Act to engage in deceptive, unfair or unethical practices and to make misrepresentations in connection with sales activities.

Team members involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on our internal operating procedures and normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of gifts or special favors.

7. WE DO NOT CONDONE BRIBERY OR CORRUPTION IN ANY FORM

Our houses are for sale, we are not. Payment or acceptance, directly or indirectly, of anything of value, with the intent to corruptly influence the recipient to obtain or retain our business or to gain any improper advantage, is prohibited. "Anything of value" includes bribes, kickbacks, facilitation payments, and other improper payments and benefits. This prohibition applies to dealings with current or potential customers, suppliers, vendor representatives, consultants, government officials and employees, competitors, or other parties seeking to establish a business relationship with Opendoor. Such payment must never be either given or accepted, whether directly or indirectly by anyone acting on behalf of Opendoor.

Team members dealing with government organizations should also be particularly alert to any agency rules limiting or prohibiting gifts or other hospitalities. In the course of your business responsibilities for Opendoor, there may be interactions with government officials for various matters. Any facilitation payments or "grease payments" paid to a government official to expedite routine and nondiscretionary activities, such as processing permit and license applications, scheduling inspections, and/or providing infrastructure services (*e.g.*, water, electricity, mail), are strictly prohibited and can violate anti-corruption laws and regulations.

While we understand that business gifts and entertainment are often meant to create goodwill and sound working relationships, it is important that they are not used to gain improper advantage with vendors, service providers, customers or facilitate approvals from government officials. The exchange, as a normal business courtesy, of meals or entertainment (such as tickets to a game or the theatre or a round of golf) is a common and acceptable practice as long as it is reasonable and not extravagant. Unless express permission is received from a manager or the Compliance Officer, gifts and entertainment cannot be offered, provided or accepted by any team member unless consistent with our gifting policy guidelines, and not, (a) in cash or gift cards, (b) susceptible of being construed as a bribe or kickback, (c) made or received on a regular or frequent basis, (d) made while a bid, permit, or approval application is pending or in process with the recipient, or (e) in violation of any applicable laws. This principle applies to our transactions everywhere in the world, even where the practice is widely considered "a way of doing business." Team members should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties. Our customers, suppliers and the public at large should know that our team members' judgment is not for sale. Please refer to our Employee Handbook for further information regarding compliance with our "Vendor Gifts" policy.

Under some statutes, such as the U.S. Foreign Corrupt Practices Act (further described in Section 11.4), giving anything of value, including gifts and hospitalities, to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. Discuss with your

manager or the Compliance Officer any proposed entertainment or gifts if you are at all uncertain about their appropriateness.

8. WE SAFEGUARD AND PROTECT OUR COMPANY ASSETS

All team members are expected to protect our assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. Our physical property, such as office supplies, computer equipment, and buildings, as well as our services, internal tools and data are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. You may not, however, use our corporate name, any brand name or trademark owned or associated with Opendoor or any letterhead stationery for any personal purpose.

All data residing on or transmitted through our computing and communications systems, including email and documents, is the property of Opendoor and subject to inspection, retention and review by Opendoor, with or without a team member's or third party's knowledge, consent or approval, in accordance with applicable law. Any misuse or suspected misuse of our assets must be immediately reported to your manager or the Compliance Officer.

9. WE RESPECT EACH OTHER

Opendoor is devoted to supporting a culture of trust and respect that promotes a positive work environment for all our team members. We are thoughtful, fair, and courteous in our workplace interactions. We are committed to maintaining a diverse workforce and an inclusive work environment. If you see, experience or suspect harassment or discrimination, speak up about it – either directly to the person or through your manager, the People Team or the Compliance Officer.

Opendoor is an Equal Opportunity Employer. Any form of discrimination or harassment by or against our team members is prohibited. Prohibited conduct includes, but is not limited to, the making of unwelcome sexual advances or engaging in any other conduct with sexual overtones which interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. Opendoor prohibits discrimination in employment, employment-related decisions or in business dealings on the basis of an individual's race, age, color, religion, gender, national origin, ancestry, mental or physical disability, medical condition, veteran status, marital status, sexual orientation or any other basis protected by local law or ordinance. We also make reasonable accommodations for disabled employees and applicants, and for the religious beliefs and practices of employees and applicants, as required by law. We follow these principles in all areas of employment including recruitment, hiring, training, promotion, compensation and benefits. Please refer to our Employee Handbook for further information regarding compliance with our "Prohibiting and Preventing Discrimination, Harassment, and Retaliation" policy.

10. WE PROTECT CONFIDENTIAL INFORMATION

As a team member of Opendoor, you may learn of information about Opendoor that is confidential and proprietary. It is important to remember that one of our most important assets is our confidential and proprietary information. You also may learn of information before that information is released to the general public. Team members who have received or have access to confidential information should take care to keep this information confidential.

Examples of confidential information include:

- Technical and systems information, such as systems and hardware configuration information, trade secrets, know-how, research, software codes and designs, algorithms, patent applications processes, engineering designs and drawings.

- Team member, business partner and vendor lists and information.
- Business data, such as product or service ideas or plans, pricing methodologies, cost data, market share data, marketing plans, licenses, business plans, financial forecasts, historical financial data, budgets or other business information.

This information may be protected by patent, trademark, copyright and trade secret laws.

Since we interact with other companies and organizations, there may be times when you learn confidential information about other companies before that information has been made available to the public. You must treat this information in the same manner as you are required to treat our own confidential and proprietary information. There may even be times when you must treat as confidential the fact that we have an interest in, or are involved with, another company.

Share confidential and proprietary information carefully. Every team member has a duty to refrain from disclosing to any person confidential or proprietary information about us or any other company learned in the course of their work with Opendoor, until that information is disclosed to the public through approved channels (usually through a press release, an SEC filing or a formal communication from a member of senior management in compliance with Opendoor's Corporate Disclosure Policy). External business partners must have a non-disclosure agreement (NDA) or contract in place prior to accessing any non-public Opendoor information. This policy requires you to refrain from discussing confidential or proprietary information with outsiders.

You should also take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, electronic devices and laptop computers, should be stored securely. Unauthorized posting or discussion of any information concerning our business, information or prospects on the Internet is prohibited. You may not discuss our business, information or prospects in any "chat room," regardless of whether you use your own name or a pseudonym. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and "quasi-public" areas within Opendoor's offices, such as kitchens and break areas. All Opendoor emails, voicemails and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of Opendoor, except where required for legitimate business purposes.

In addition to the above responsibilities, if you are handling information protected by any privacy policy published by us, such as the privacy policy posted on our website, then you must handle that information in accordance with the applicable policy. We rely on all of our team members to handle confidential information responsibly and use their best judgement. As always, do not hesitate to ask if you have any questions about what you are permitted to disclose.

11. We Use Social Media Responsibly and Respectfully

Remember that what you post reflects not only on you but on Opendoor as well. Any postings to social media, to the extent they involve or impact Opendoor, are subject to our workplace policies, including those prohibiting harassment or discrimination; prohibiting the disclosure of Company confidential, proprietary information or trade secret information; and governing appropriate use of electronic resources.

The following should be considered when using social media:

- **Use Common Sense.** Think before you post. If you make a mistake, acknowledge it and correct it with your followers.
- **Be Accurate.** Ensure any social media post is completely accurate and not misleading. Any

claims made should be properly substantiated.

- **Be Transparent and Upfront.** If you are commenting about Opendoor, or being paid to promote or endorse Opendoor, use your real name and disclose your association with Opendoor. You should also include a disclaimer that your views do not represent those of Opendoor. For example, you should consider such language as "the views in this post reflect my personal views and do not represent the views, position or opinions of my employer."

- **Don't Disparage Others.** You are prohibited from disparaging Opendoor or its employees, officers, and directors to the extent permitted under the National Labor Relations Act. You also shouldn't say negative things about our competitors or respond to negative or disparaging posts about Opendoor or our brand, unless you are an authorized spokesperson identified in our Corporate Disclosure Policy. In some countries, disparagement is illegal and disparagement of an individual can lead to libel or slander claims.

- **Protect Opendoor's Confidential Information.** Do not post sensitive, private or confidential information. If the information has not officially been released by Opendoor, do not discuss it. This includes financial information, product information and legal information. Never post anything marked "*for internal use only*," "*confidential*," "*Top Secret*," "*Classified*" or any variation thereof.

- **Respect the Intellectual Property of Others.** Give credit where credit is due and never violate the intellectual property rights of others. Respect copyrights, trademarks, rights of publicity and other third-party rights. Do not claim authorship of something that is not yours. Similarly, do not cite or reference customers without their approval.

- **Get Training, if Required by your Duties.** If your duties require you to speak on behalf of the Company in a social media environment, you must receive training before you do and follow certain requirements and restrictions regarding your activities, including that you must always disclose your name and your affiliation.

- **Don't Provide References.** You should never provide references or recommendations for stakeholders on social or professional networking sites, as such actions can be attributed to Opendoor and create liability for Opendoor and our employees (such as interference with prospective business contracts and allegations of wrongful termination).

Nothing in these guidelines is intended to restrict or otherwise interfere with your right to engage in any legally protected activities, including the right to self-organize, form, join or assist labor organizations, to bargain collectively with representatives of your choosing or to engage in other concerted activities for the purpose of collective bargaining. For example, these guidelines do not restrict your use of social media to communicate with co-workers or others about the terms and conditions of their employment, such as wages, benefits or working conditions.

12. WE COMPLY WITH LAWS

11.1 Overview. Obeying the law, both in letter and in spirit, is the foundation of the Code. Our success depends upon each team member operating within legal guidelines and cooperating with local, national and international authorities. We expect team members to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. While we do not expect you to memorize every detail of these laws, rules and regulations, we want you to be able to determine when to seek advice from others. If you have a question in the area of legal compliance, it is important that you not hesitate to seek answers from your manager or the Legal Team.

Disregard of the law will not be tolerated. Violation of domestic or foreign laws, rules and regulations may subject an individual, as well as Opendoor, to civil and/or criminal penalties. You should be aware that conduct and records, including emails, are subject to internal and external audits and to discovery by third parties in the event of a government investigation or civil litigation. It is in everyone's best interests to know and comply with our legal obligations.

11.2 Insider Trading. Employees who have access to material, non-public information ("***inside information***") about Opendoor or about other companies with which Opendoor has business dealings are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct our business. Use of inside information by someone for personal gain, or to pass on, or "tip," the inside information to someone who uses it for personal gain, is illegal, regardless of the quantity of shares, and is therefore prohibited. You can be held liable both for your own transactions and for transactions effected by a person who receives the tip, even if indirectly through another person. Team members must exercise the utmost care when handling inside information. Please review Opendoor's Insider Trading and Trading Window Policy for additional information.

11.3 Antitrust. Antitrust laws are designed to protect the competitive process. These laws are based on the premise that the public interest is best served by vigorous competition and will suffer from illegal agreements or collusion among competitors. Antitrust laws generally prohibit:

- agreements, formal or informal, with competitors that harm competition or customers, including price fixing and allocations of customers, territories or contracts;
- agreements, formal or informal, that establish or fix the price at which a customer may resell a product; and
- the acquisition or maintenance of a monopoly or attempted monopoly through anti-competitive conduct.

Certain kinds of information, such as pricing and inventory sales strategies, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social.

Antitrust laws impose severe penalties for certain types of violations. Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where we do business can be difficult, and you are urged to seek assistance from your manager or the Legal Team whenever you have a question relating to these laws.

11.4 International Business Laws. Our team members are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where we otherwise do business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. In addition, we expect team members to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the U.S. These U.S. laws, rules and regulations, which extend to any activities we may conduct outside the U.S., include the Foreign Corrupt Practices Act, U.S. embargoes, U.S. export controls and antiboycott regulations. If you have a question as to whether an activity is restricted or prohibited, seek assistance before taking any action, including giving any verbal assurances that might be regulated by international laws.

13. WAIVERS

Any waiver of the Code for executive officers (including, where required by applicable laws, our chief executive officer, principal financial officer, chief accounting officer or controller (or persons performing similar functions)) or directors may be authorized only by our Board of Directors or, to the extent permitted by the rules of any exchange on which our shares are listed, a duly authorized committee of the Board, and will be disclosed to stockholders as required by applicable laws, rules and regulations.

14. POLITICAL INVOLVEMENT

Our employees are free to support the political process in a variety of ways, such as through personal financial contributions or volunteering for candidates or organizations of their choice. That said, employee personal political activities must not interfere with the performance of your duties and must be done in your personal capacity without suggesting company involvement or support.