



ALTISOURCE PORTFOLIO SOLUTIONS S.A. COMPENSATION CLAWBACK POLICY

This Policy sets out the approach of Altisource Portfolio Solutions S.A. and its subsidiaries (the “Company”) to recouping, or “clawing back,” incentive compensation paid to executive officers in connection with an accounting restatement.

In the event of a restatement, the Company may seek to recoup incentive compensation paid to executive officer(s) to the extent that it was their fraud or intentional misconduct that caused the restatement. The decision is at the sole discretion of the Company, taking into account factors including, but not limited to, the associated costs and benefits.

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Adopted 12 February 2018