Altisource Portfolio Solutions S.A. ("Altisource" or the "Company") is committed to full and accurate financial disclosure in compliance with applicable laws, rules and regulations and to maintaining its books and records in accordance with applicable accounting policies, laws, rules and regulations. This Code of Ethics for Senior Financial Officers (this "Code"), applicable to the Company's Chief Executive Officer, Chief Financial Officer and the members of the Chief Financial Officer's financial leadership team (each, a "Senior Financial Officer" and, together, "Senior Financial Officers"), sets forth specific policies to guide the Company's Senior Financial Officers in the performance of their duties. As Senior Financial Officers, you perform a task that is critical to the Company. This Code is designed to assist you in that task.

Altisource's Code of Business Conduct and Ethics, which this Code is intended to supplement, sets forth the fundamental principles and key policies and procedures that govern the conduct of all of us in our business. You are bound by the requirements and standards set forth in the Code of Business Conduct and Ethics, as well as those set forth in this Code and other applicable policies and procedures.

Compliance with Rules and Regulations

Altisource is committed to conducting business in accordance with all applicable laws, rules and regulations and in accordance with the highest standards of business ethics. As a Senior Financial Officer, you must comply with all applicable laws, rules and regulations. In addition, you also have leadership responsibilities that include: (i) creating a culture of high ethical standards and commitment to compliance; (ii) maintaining a work environment that encourages employees and other associates to raise concerns; and (iii) promptly addressing any relevant concerns raised by employees or other associates.

Conflicts of Interest

In order to maintain the highest degree of integrity in the conduct of Altisource's business and your independent judgment, you must avoid any activity or personal interest that creates or appears to create a conflict between your interests and the interests of Altisource. A conflict of interest occurs when your private interests interfere in any way, or even appear to interfere, with the interests of Altisource. You should be guided by the requirements and principles set forth in the Code of Business Conduct and Ethics. You should conduct the Company's business in an honest and ethical manner and never act in a manner that could cause you to lose your independence and objectivity. Any transaction or relationship that could reasonably be expected to give rise to a conflict must be reported to the Audit Committee of the Board of Directors (the "Audit Committee").

Although we cannot list every conceivable conflict, the following are some common examples that illustrate actual or apparent conflicts of interest:

- You or a member of your family has an ownership interest in, is employed by or serves as a director of an entity that competes with the Company, does business with the Company, such as a customer, supplier or business partner, or is a recipient of charitable contributions made by the Company. This paragraph shall not apply to ownership of less than five percent (5%) of the stock of a publicly owned company, except when you or a member of your family are in a position to influence or affect the business relationship between the Company and such publicly owned company in a material way and the business relationship could have a material impact on Altisource or such publicly owned company

- You or a member of your family participates in a joint venture, partnership or other business arrangement or investment with Altisource that you learned of through the use of corporate property or information or your position at the Company

- You or a member of your family receives improper personal benefits as a result of your position in the Company

Before making any investment, accepting any position or benefits or participating in any transaction or business arrangement that creates or appears to create a conflict of interest, you must obtain the written approval of the Audit Committee. For more information on what may constitute a conflict of interest, see Management Directive No. 7 – Conflicts of Interest and Other Responsibilities of Associates.

Disclosures in Periodic Reports

As a public company, Altisource is required to file various periodic reports with the Securities and Exchange Commission ("SEC") and other regulators. It is Company policy to make full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws and regulations in all required periodic reports, and required or related public communications. In order to ensure the Company's ability to report its financial condition accurately as required, you are responsible for ensuring a strong control environment, including the adequacy of design of control and ongoing monitoring of operational effectiveness of key controls, especially those that relate to the accuracy and completeness of the financial processes of Altisource. Accordingly, you are responsible for conducting the appropriate due diligence prior to approving/authorizing any process that is assigned to you to ensure compliance with Altisource finance policies, standards, directives, procedures, programs and guidelines. You are prohibited from knowingly misrepresenting or providing misleading material information about the Company to others, including the Company's independent auditors.

Compliance with this Code

If you have questions about this Code, you should seek guidance from the Chief Legal and Compliance Officer. If you know of or suspect a violation of applicable laws or regulations or the Code, you must immediately report that information to the Chief Legal and Compliance

Officer or the Audit Committee. No one will be subject to retaliation because of a good faith report of suspected misconduct.

Waivers of the Code

The Company will waive application of the policies set forth in this Code only when circumstances warrant granting a waiver and then only in conjunction with any appropriate monitoring of the particular situation. Waivers of this Code may be made only by the Board of Directors or the Audit Committee and will be disclosed as required under applicable law, rules and regulations, including SEC rules and Nasdaq listing standards.

Violations

Violations of this Code will subject the individual to disciplinary action, which may include reprimand, reduction in salary, demotion or dismissal, depending upon the seriousness of the offense as determined by the Audit Committee.

No Rights Created

This Code is a statement of the fundamental principles and key policies and procedures that govern the Company's Senior Financial Officers in the conduct of Altisource's business. It is not intended to and does not constitute an employment contract or assurance of continued employment, and does not create any rights in any employee, client, supplier, competitor, shareholder or any other person or entity.

## ACKNOWLEDGMENT

I have received and read the Code of Ethics for Senior Financial Officers (the "Code"), and I understand its contents. I agree to comply fully with the standards, policies and procedures contained in the Code and the Company's related policies and procedures. I understand that I have an obligation to report to the Chief Legal and Compliance Officer or the Audit Committee of the Board of Directors any suspected violations of the Code of which I become aware. I certify that, except as fully disclosed in accordance with the terms of this Code, I have not engaged in any transactions or activities that would constitute an actual or apparent conflict with the interests of the Company. I further certify that, except as noted below, I am otherwise in full compliance with the Code and any related policies and procedures:

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_____
Signature

_____
Printed Name

_____
Date