



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 under certain circumstances.

The Company may seek to recoup incentive compensation, in whole or in part, paid to current or former executive officer(s) in the event that their willful commission of a material error, fraud or misconduct resulted in: (i) one or more financial restatements; (ii) material reputational harm to, or adverse publicity of, the Company; or (iii) the Company terminating the executive officer for cause. The decision to seek to recoup incentive compensation, either in whole or in part, or to resolve any action related thereto, is at the sole discretion of the Board of Directors or to its Compensation Committee, taking into account factors including, but not limited to, the associated costs and benefits of undertaking such action.

The Company may extend the provisions of this policy and apply them to other senior employees who are not executive officers in its sole discretion.

This policy will be amended if and as required to comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act or other applicable requirements.