



SINTEL
GROUP

CODE OF HONOR AND COEXISTENCE

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The Disciplinary Council of SINTELINTERNATIONAL S.A.S., exercising its legal and statutory powers, issues the following CODE OF HONOR AND COEXISTENCE.

Preamble. –

Upon joining SINTELINTERNATIONAL S.A.S., every member of the company commits to complying with and enforcing the Code of Honor and Coexistence, as well as the regulations of SINTELINTERNATIONAL S.A.S. Every fraudulent work action or misbehavior in the work environment affects the entire company.

Therefore, SINTELINTERNATIONAL S.A.S. will take severe measures against any act of inappropriate conduct involving members of its work environment within the terms of this Code. Any member of the Company who has reasonable grounds to believe that a breach of this Code has occurred has the obligation to report it formally and substantiated.

If an employee has difficulty distinguishing whether a behavior or conduct is acceptable or not, it is their responsibility to clarify the uncertainty with their coordinator, Delegate of the Disciplinary Council, or any authority to avoid subsequent accusations. The lack of knowledge of the Code of Honor and Coexistence does not exempt members of the company from responsibility or guilt for violating its rules. It is the responsibility of all members of SINTELINTERNATIONAL S.A.S. to obey and enforce the following Code.

TITLE I PRINCIPLES AND SCOPE OF APPLICATION

Art. 1.- Scope of application. - The rules on ethics in the workplace, in research, and in conduct outlined in this Code are mandatory for all members of the company SINTELINTERNATIONAL S.A.S. in the work activities they carry out on the company's premises, in field trips, or through their social networks or virtual platforms. The procedural rules and sanctions contained in this Code will apply to all personnel of SINTELINTERNATIONAL S.A.S. in accordance with the procedures established in labor legislation.

Based on the above, the scope of application of this Code will be regarding events that may be questioned for being against ethics and the principles detailed in this instrument.

Art. 2.- Principles. - For the interpretation and application of this Code of Honor and Coexistence, the following principles shall be observed:

- i. Act in such a way that the personal and professional opportunities of other individuals within SINTELINTERNATIONAL S.A.S. are not undermined in any way, promoting the foundational principles of honesty, efficiency, respect, and freedom.
- ii. Be honest: do not copy, plagiarize, lie, or steal in any way the work of other employees of the company. Keep all confidential information confidential, without disclosing it.
- iii. Respect all members of SINTELINTERNATIONAL S.A.S. and take care of its infrastructure and equipment. iv. Do not defame another member of SINTELINTERNATIONAL S.A.S. by any means, including virtual means.
- iv. Report to the appropriate authority any action of disrespect to the Code of Honor and Coexistence and the rules governing the labor system by any member, and cooperate in all processes of investigation and judgment of violations of disciplinary and academic rules. vi. Do not engage in any misconduct or inappropriate conduct within and outside the facilities of SINTELINTERNATIONAL S.A.S., as well as through its virtual networks.

Art. 3.- Incorporation of rules by reference. - Without prejudice to the regulations contained in this Code, the norms of the Ecuadorian legal system shall apply as far as relevant.

Art. 4.- On the nature of the processes. - All processes regulated in this Code of Honor and Coexistence are intended to guarantee all the rights of all members of its company, as well as the principles and values of SINTELINTERNATIONAL S.A.S.

Paragraph 1.- The processes followed under this Code are self-regulated under the parameters established in the Labor Code and based on the principle of responsible autonomy; therefore, they are not administrative or judicial processes. Consequently, SINTELINTERNATIONAL S.A.S. does not act as a judicial body, nor does it replace or conduct investigations that fall under the jurisdiction of the police and prosecutor's office; therefore, its internal processes are not comparable to those carried out by the State and its authorities. During

the internal processes outlined in this Code of Honor and Coexistence, SINTELINTERNATIONAL S.A.S. will ensure that due process is respected and guaranteed.

Paragraph 2.- The processes arising from this Code of Honor and Coexistence are reserved for the parties involved and the competent bodies to hear and resolve them.

Paragraph 3.- For the purposes of applying this Code of Honor and Coexistence, the parties are responsible for providing accurate, reliable, and complete information to SINTELINTERNATIONAL S.A.S. for the initiation and development of the processes.

Paragraph 4.- False accusations may be subject to disciplinary proceedings under the terms of this Code of Honor and Coexistence; this does not apply to reports made in good faith that could not be substantiated.

Paragraph 5.- The support and restitution measures offered by SINTELINTERNATIONAL S.A.S. do not replace or constitute a form of prejudgment or reparation for material or non-material damage or harm; the objective of these processes is to contribute to the continuation of work activities and coexistence in the workplace in compliance with the law.

TITLE II

ABOUT THE BODIES THAT APPLY THE CODE OF HONOR AND COEXISTENCE

Art. 5. - The Delegate of the Disciplinary Council. - It is the body of SINTELINTERNATIONAL S.A.S. that receives and processes complaints against authorities, administrative support personnel, and workers related to the Code of Honor and Coexistence and informs the Coexistence Committee, ensuring due process and the right to defense.

Art. 6. - The Coexistence Committee. - It is the body of SINTELINTERNATIONAL S.A.S. that reviews and recommends measures in processes for breaches of ethical behavior when the accused is an authority, administrative support personnel, or a worker.

Art. 7. - President and Vice President. - They are the authorities responsible for resolving complaints of breaches of ethical behavior, according to the recommendation of the Coexistence Committee, except for those cases that, due to their severity, are resolved by the Disciplinary Council.

Art. 8. - Disciplinary Council. - It is the highest collegiate body of SINTELINTERNATIONAL S.A.S. that resolves:

1. Cases that involve a definitive separation sanction of the collaborator by the corresponding Coexistence Committee with its recommendation.
2. Cases of harassment, discrimination, gender violence, psychological or sexual violence against any member of the company, in accordance with the Labor Code, and referred by the corresponding

- Coexistence Committee with its recommendation.
3. Others that correspond according to the bodies of law.

TITLE III

COMMON RULES FOR ALL PROCESSES

Art. 9.- Initiation of the Process. - The processes regulated in this Code can be initiated:

1. By complaint; or
2. Ex officio by the delegate of the Disciplinary Council.

Art. 10.- Content of the Complaint. - The minimum requirements for processing a complaint are:

1. Identification of the complainant, including: full names and surnames, whenever possible.
2. Identification of the accused, whenever possible.
3. Description of conduct, act, or behavior and the facts that motivate the complaint.
4. Institutional email for receiving notifications.
5. Documentary or other evidence, if available.

Art. 11.- Notification. - Relevant actions for the substantiation of the process will be notified to the parties' institutional email. The parties cannot claim lack of knowledge or notification or nullity if they have received these communications in the institutional email, which they are obliged to check and keep active.

Art. 12.- Expiry and Deadlines. - The processes detailed in this Code will expire in 60 days, which will be counted from the notification of the complaint to the accused until the notification of the resolution. After this period, the process will be archived and will not have any effect.

Paragraph 1.- In view of the needs of each case, the bodies responsible for processing the processes detailed in this Code will set specific mandatory deadlines for the performance of actions before that body.

Paragraph 2.- Deadlines run throughout all calendar days and are counted from the day following the notification. Paragraph 3.- Reconsideration and appeal resources are not counted within the sixty-day period.

Art. 13.- Processing in Absence. - Members of the company SINTELINTERNATIONAL S.A.S. are obliged to appear in the processes to which they are summoned by the bodies that apply the Code of Honor and Coexistence.

Art. 14.- [...]. - If the accused, duly notified, does not submit their response and/or does not appear, the process will continue in their absence until its resolution, which will be notified to them.

TITLE IV

ON TYPES OF OFFENSES

Art. 15.- Types of offenses. - Offenses sanctioned by this Code are behaviors or acts contrary to ethical conduct.

Paragraph 1.- Offenses can be minor, serious, and very serious. Depending on the nature of the conduct, the body applying this Code of Honor and Coexistence will determine the severity accordingly.

Paragraph 2.- In the event that the offense may constitute a criminal offense, SINTELINTERNATIONAL S.A.S. will immediately file the corresponding complaint with the Office of the Attorney General, and will initiate, according to the will of the affected party, the internal process regulated in this Code.

Art. 16.- Offenses against behavioral ethics. - Every member of SINTELINTERNATIONAL S.A.S. has the obligation to respect others. Acting against the rights of other individuals will be grounds for disciplinary action.

Paragraph 1.- Offenses against behavioral ethics include any individual or group act aimed at:

1. Obstructing or interfering with the normal course of business activities and short and/or long-term objectives of SINTELINTERNATIONAL S.A.S.;
2. Disturbing peace, harmonious coexistence, and disrespecting morals and good customs;
3. Committing any act of physical or verbal violence against any member of SINTELINTERNATIONAL S.A.S., authorities, citizens, and social groups;
4. Damaging, destroying, or knowingly or negligently endangering institutional facilities, equipment, tools, works of art, and other property owned by SINTELINTERNATIONAL S.A.S., or owned publicly or privately.
5. Not complying with the principles and provisions contained in the Internal Work Regulations, the Ecuadorian Labor Code, Ecuadorian legal regulations, or internal regulations of SINTELINTERNATIONAL S.A.S.
6. Endangering other members of the company.

TITLE V

ON PROCEDURES AGAINST EMPLOYEES AND AUTHORITIES OF

SINTELINTERNATIONAL S.A.S.

Article 17.- Phases of the process. - The process will be organized by the Faculty Committee and supervised by the Delegate of the Disciplinary Council and will consist of the following phases, whenever they are necessary and relevant:

1. Initiation: by written complaint submitted to the Delegate of the Disciplinary Council or initiated by

this same body.

2. Opportunity to respond: The Delegate of the Disciplinary Council will notify the complaint and receive the written response from the accused.
3. Case presentation: The Delegate of the Disciplinary Council will present the case to the Committee on Coexistence.
4. Analysis phase by the Coexistence Committee.
5. Recommendation phase by the Coexistence Committee.
6. Resolution: by the appropriate authority, depending on the case.

Art. 18.- Opportunity to respond. - The accused must submit their written response regarding the allegations within the deadline set by the Delegate of the Disciplinary Council, along with all corresponding evidence.

Art. 19.- Analysis by the Coexistence Committee. - The Coexistence Committee will analyze the case based on the information and documentation provided by the Delegate of the Disciplinary Council. This Coexistence Committee will schedule a date and time to hear from the parties. The non-appearance of the parties will not prevent the process from continuing. This Coexistence Committee will review the evidence presented by the parties, provided that they are considered relevant and necessary by the Coexistence Committee, which aims to prevent the process from being delayed. In addition to the evidence provided by the Delegate of the Disciplinary Council, the Coexistence Committee may gather other evidence when deemed necessary to issue its recommendation.

1. The Coexistence Committee will forward its recommendation to the President and Vice President for their resolution.
2. Only in cases where the Coexistence Committee deems that the sanction is the separation of the accused, the case will be referred for the knowledge and final resolution of the Discipline Council, which may hear the version of the parties on the date and time set by this Council. The non-appearance of the parties will not prevent the process from continuing.
3. The final resolutions of the Discipline Council or the President and Vice President will state the reasons for reaching the conclusion reached and will be notified to the parties.

Art. 20.- Regarding sanctions. - The sanctions are detailed in the following paragraphs:

Paragraph 1.- Sanctions for minor offenses:

1. Remedial measures such as apologies to the aggrieved parties.
2. Verbal warning.
3. Written warning to be filed in the personal record.
4. A combination of the above.

Paragraph 2.- Sanctions for serious offenses:

1. Remedial measures such as apologies to the aggrieved parties.

2. Written warning to be filed in the personal record.
3. Fine in accordance with the Internal Work Regulations.
4. Loss of sponsorship from SINTELINTERNATIONAL S.A.S. for projects, and/or consultancy, and/or training.
5. A combination of the above.

Paragraph 3.- Penalties for very serious offenses:

1. Remedial measures, such as apologies to the aggrieved parties.
2. Written reprimand to be filed in the personal record.
3. Fines, in accordance with the Internal Work Regulations.
4. Loss of sponsorship from SINTELINTERNATIONAL S.A.S. for projects, and/or consultancy, and/or training.
5. Permanent separation from the Company, subject to an approval process.
6. Or a combination of the above.

Art. 21.- Graduation of Penalties. - Taking into account the severity of the offense, the harm caused to third parties and/or the Company, as well as its impact within and outside the company, the competent body will determine the corresponding penalties.

Recurring in the same offense or committing two or more offenses will be considered aggravating factors that imply their categorization as more serious, and therefore the imposition of greater penalties.

TITLE VIII

SPECIAL PROCESS IN CASES OF HARASSMENT, DISCRIMINATION, GENDER-BASED VIOLENCE, PSYCHOLOGICAL, AND SEXUAL VIOLENCE

Preámbulo: SINTELINTERNATIONAL S.A.S. strives to create and maintain a company where all its members can work and learn together in an atmosphere of respect and freedom. Hence, all forms of harassment, discrimination, gender-based violence, psychological, and sexual violence contravene the principles under which the Company operates, are incompatible with the principles of SINTELINTERNATIONAL S.A.S., and are strictly prohibited.

SCOPE OF APPLICATION, PROHIBITED CONDUCTS, PRINCIPLES, AND PROCESS

Art. 22.- Regarding prevention. - The Human Resources Unit will implement prevention policies such as plans, campaigns, programs, workshops, and projects to promote a preventive culture and a work environment free from all forms of harassment, discrimination, gender-based violence, psychological, or sexual violence, regardless of their source.

Art. 23.- Scope of application of the special process. - SINTELINTERNATIONAL S.A.S. will process cases of harassment, discrimination, gender-based violence, psychological, and sexual violence committed

by a member of the company, provided that they have occurred:

1. Within its premises; or
2. In programs and work-related activities outside its premises, provided that they are sponsored or funded by SINTELINTERNATIONAL S.A.S. within its labor context or business scope.

To company members who are victims of harassment, discrimination, gender-based violence, psychological, and sexual violence outside the scope of SINTELINTERNATIONAL S.A.S.'s jurisdiction or whose process may be time-barred, the support measures outlined in this Code will be offered, and compliance with these measures will be mandatory.

Paragraph 1: Incidents governed by this Title that occur outside the scope of SINTELINTERNATIONAL S.A.S.'s jurisdiction or that are time-barred as indicated above, if known by the Delegate of the Disciplinary Council, will not follow this Special Process. Instead, SINTELINTERNATIONAL S.A.S. will act in accordance with the provisions of the current legal framework.

Art. 24.- Subjects. - The procedures and sanctions of this Title apply to:

1. Authorities;
2. Workers and administrative staff.

Art. 25.- Prohibited Conduct. - All behaviors constituting harassment, discrimination, gender-based violence, psychological, or sexual violence that directly or indirectly undermine the affected person's permanence and normal functioning are prohibited.

Paragraph 1: These behaviors may be categorized as minor, serious, or very serious. Depending on the nature of the behavior, the body applying this Code of Honor and Coexistence will determine the severity that corresponds.

Art. 26.- Harassment. - It is a broad term that encompasses any conduct that undermines a person's dignity and results in their belittlement, mistreatment, humiliation, or that threatens or harms their ability to fully develop within SINTELINTERNATIONAL S.A.S. It includes the behavior known as "bullying" or harassment.

Paragraph 1: On sexual harassment: It consists of any sexually oriented conduct carried out without consent or by force, intimidation, coercion, or manipulation. It may occur in person or through electronic, printed, or other means. It may involve repeated actions or may arise from a single incident, including verbal or physical sexual insinuations; requiring, displaying, exposing, revealing, sending, distributing, or sharing sexual or personal photographs or images, messages, or notes by any means without the express consent of the individual.

Art. 27.- Discrimination. - It consists of any conduct involving distinction, exclusion, restriction, or

preference based on personal attributes such as gender identity, sexual orientation, sex, gender, age, disability, HIV/AIDS status, ethnicity, having or developing a catastrophic illness, language, religion, nationality, place of birth, ideology, political opinion, migratory status, marital status, criminal record, aesthetic stereotypes, being pregnant, among others legally recognized.

Art. 28.- Gender-based Violence. - It consists of any harmful act directed against a person based on their gender. It is expressed in all explicit or implicit behaviors that hinder full access to opportunities at SINTELINTERNATIONAL S.A.S. and impede normal work performance due to gender motivations and prejudices.

Art. 29.- Psychological Violence. - It consists of any action or pattern of behavior aimed at causing emotional harm, diminishing self-esteem, affecting honor, provoking discredit, or belittling personal dignity.

Art. 30.- Sexual Violence. - It consists of any action that involves the violation or restriction of the right to sexual integrity and to decide voluntarily about one's sexual and reproductive life, through threats, coercion, use of force, and intimidation.

Art. 31.- Principles. - The analysis of cases of harassment, discrimination, gender-based violence, psychological, and sexual violence will be carried out in accordance with the following principles:

1. Every analysis process will include measures to safeguard the complainants and witnesses of the reported incidents.
2. These behaviors often involve interactions that are not witnessed by others. Therefore, lack of evidence will not be an obstacle to filing a complaint.
3. The accused will have the right to present all relevant exculpatory evidence.
4. Compliance with due process, especially the right to defense, will be ensured. A brief procedure will be sought for all cases.
5. Internal analysis actions within SINTELINTERNATIONAL S.A.S. will be carried out without prejudice to any external legal actions that may be taken.
6. If necessary, SINTELINTERNATIONAL S.A.S. will cooperate with public authorities and provide requested information, without prejudice to specific legal obligations.
7. The final internal resolution is an administrative decision that does not constitute the judgment of a crime, nor can it be used as evidence of the guilt or innocence of the accused.

Art. 32.- Process Specifications and Support Measures. - Due to the seriousness of these offenses, the following will be taken into account in these processes:

1. Support Measures within the Process: Support measures are always available to the victim regardless of their decision to initiate a process. Within the formal process, they are also available to the accused. These include, but are not limited to: workplace support, psychological counseling, referral to legal advice, non-significant and reasonable accommodations.
2. Contact Restriction Measures: SINTELINTERNATIONAL S.A.S. may establish contact restriction

measures to prevent contact between the parties involved in a process. Failure by either party to comply with a contact restriction measure will be considered a very serious offense under the Code of Honor and Coexistence.

3. **Case Confidentiality:** Once a complaint has been filed, some level of disclosure may be necessary to ensure a thorough and fair investigation. SINTELINTERNATIONAL S.A.S. will take appropriate measures to keep the case confidential and will require the parties involved, including witnesses, to maintain confidentiality. In each case, SINTELINTERNATIONAL S.A.S. will take all necessary measures to ensure confidentiality is maintained.
4. **Prohibition of Retaliation:** Any form of coercion against the person making the complaint, those assisting them, or those participating in the investigation or resolution of the case is prohibited. Retaliation includes threats, intimidation, blackmail, or any other adverse action that could affect the employment relationship and case resolution. Retaliation may be subject to disciplinary action under the terms of this Code of Honor and Coexistence.
5. **Support Measures after Resolution:** If the offense is verified, the support measures offered previously may be maintained for the affected person, such as psychological counseling, to help them resume their work process normally.

Art. 33.- Phases of the Process. - The process will be organized by the Delegate of the Disciplinary Council and will consist of the following phases, whenever they are necessary and relevant:

1. Initiation by complaint or ex officio by the Delegate of the Disciplinary Council.
2. Offering of support measures.
3. Opportunity to respond: Response to the complaint by the accused.
4. Option for early resolution.
5. Case analysis.
6. Recommendation by the Coexistence Committee or Competent Authority.
7. Resolution by the competent body.

Art. 34.- Complaint. - Any member of the company who considers themselves affected or becomes aware of the facts must file the complaint in the respective form before the Delegate of the Disciplinary Council when the accused is an authority, administrative staff, or worker.

Paragraph 1: If the complaint is not directly filed before the Delegate of the Disciplinary Council, the member of the company who has received the complaint must notify them to proceed with the analysis of the case. This should be done as soon as the reported conduct is known.

Paragraph 2: Only when the Delegate of the Disciplinary Council receives the complaint, will SINTELINTERNATIONAL S.A.S. have actual knowledge of the incident and activate this process.

Paragraph 3: Once the process has begun, it will not be interrupted until a resolution is reached.

Paragraph 4: The investigation will proceed with or without the participation or cooperation of the complainant.

Art. 35.- Obligation of External Reporting. - If SINTELINTERNATIONAL S.A.S. has actual knowledge of facts that could constitute a crime under Ecuadorian law, it is its unavoidable obligation to report it to the General Prosecutor's Office, in accordance with Article 421 of the Comprehensive Organic Penal Code. Therefore, even without the authorization of the complainant or a written complaint, SINTELINTERNATIONAL S.A.S. will inform the competent public authorities of the facts.

Paragraph 1: The obligation of reporting by SINTELINTERNATIONAL S.A.S. to the competent authorities exists when the facts have occurred within its facilities or in programs and academic activities outside its facilities, provided that they are sponsored or financed by SINTELINTERNATIONAL S.A.S. within its work context or business scope.

Art. 36.- Offering of Support Measures. - Once the Delegate of the Disciplinary Council receives a complaint, support measures will be offered to the complainant, which will continue throughout the analysis of the case and, if deemed necessary, will be maintained after the process ends.

Paragraph 1: If necessary, the accused will also receive support measures during the process.

Art. 37.- Early Resolution. - Depending on the reported facts, this phase may be activated at the discretion of the Delegate of the Disciplinary Council. Its purpose will be to clarify the events to determine the existence or non-existence of a case and to avoid any misunderstanding. In this phase, inquiries will be made to determine the facts, the parties will be allowed to express their views on the matter, and finally, solutions will be proposed. The agreements reached in this meeting will be binding on both parties and will aim to restore a relationship in which the parties can interact freely, with parameters of respect and without feeling any discomfort or coercion.

Paragraph 1: Depending on the circumstances surrounding each case, the interests of the complainant, and in accordance with the Delegate of the Disciplinary Council's criteria, the early resolution phase may be conducted individually with each party without seeking a resolution agreement, but simply to establish the facts to define the need to initiate a formal analysis.

Art. 38.- Formal Analysis. - The Coexistence Committee will analyze the case based on the information and documentation submitted by the Delegate of the Disciplinary Council, respecting the principles of presumption of innocence and protection of victims in accordance with the principles of non-revictimization and victim centrality. This Coexistence Committee will set a date and time to hear the parties. The hearings will be individual. They will have the opportunity to clarify any information or explain the incident, if they wish. Participation in the hearing is voluntary for both parties and is not intended to re-victimize the complainant. The failure of the parties to appear will not prevent the process from continuing. This

Coexistence Committee will consider the evidence presented by the parties, provided that it is considered relevant and necessary, aiming to prevent the process from being prolonged. In addition to the evidence that has been submitted, the Coexistence Committee may gather other evidence and may seek the advice of a member of the company according to the expertise required.

1. The Conviviality Committee will refer the case for the President and Vice President's final knowledge and resolution, who may hear the parties' version on the day and time set by this Council. The non-appearance of the parties will not prevent the process from continuing.
2. The process will conclude with the determination of the findings regarding the commission or non-commission of the offense, the imposed sanctions, and any other support measures that will be provided to the victim. The final resolutions of the President and Vice President will express the reasons for reaching the conclusion reached and will be notified to the parties.

Art. 40.- Conclusion of the process. - The process will conclude with the determination of the findings regarding the commission or non-commission of the offense and the recommendation of the sanctions and any other support measure that will be provided to the victim.

Art. 41.- On sanctions. - The sanctions will be the same as those established for cases of breaches of the Code of Conduct in this Regulation, without prejudice to the legal actions that the aggrieved party and the Company may initiate.

TITLE IX RESOURCES

Art. 42.- Types of appeals. - In all processes of this Code, only appeals for annulment and reconsideration may be filed in accordance with the following articles.

Paragraph 1.- Appeals filed against the resolution shall not suspend its execution.

Art. 43.- On annulment. - Resolutions issued by the President and Vice President imposing a penalty for serious and very serious offenses may be appealed via email to the Disciplinary Council within three days following the notification of the resolution. The parties may be heard again on the day and time set by the Council. The non-appearance of the parties shall not impede the continuation of the process. There shall be no recourse against this decision in the internal system.

Art. 44.- On reconsideration. - Resolutions of the Disciplinary Council may be subject to a request for reconsideration whenever the separation of the accused has been established as a sanction or when the case resolved falls within its exclusive competence, in accordance with the provisions of this Code.

Paragraph 1.- The parties may submit their request for reconsideration within three days following the

notification of the resolution via email. The parties may be heard again on the day and time set by the Council. The non-appearance of the parties shall not impede the continuation of the process.