

The United States requests, pursuant to Article 31-A.4.2 of the United States-Mexico-Canada Agreement (USMCA), that Mexico conduct a review of whether a Denial of Rights is occurring at the Tecnología Modificada, S.A. de C.V., (the Company) facility in the Oradel Industrial Center in Nuevo Laredo, Tamaulipas (the Facility). As defined in USMCA Article 31-A.2, a Denial of Rights occurs when workers are being denied the right of free association and collective bargaining under laws necessary to fulfill a Party's obligations under the USMCA.

The United States is concerned that workers at the Facility are being denied the right of free association and collective bargaining as a result of interference in workers' union activities. This request for review encompasses all actions taken by the company to intervene in the union activities of *Sindicato Nacional Independiente de Trabajadores de Industrias y Servicios "Movimiento 20/32"* (SNITIS), including dismissing workers for their union activity, surveilling workers to identify SNITIS organizers, making negative comments about SNITIS, and any other action taken in order to discourage support for SNITIS.

The actions encompassed by this request for review include those of any person or entity from the Company, and any of their employees, representatives, or agents.

If Mexico were to determine that there is a Denial of Rights, the United States further requests, pursuant to USMCA Article 31-A.4.2, that Mexico attempt to remediate within 45 days of this request. We look forward to receiving Mexico's notification of whether it intends to conduct the requested review.¹

¹ USMCA Article 31-A.4.2 ("The respondent Party shall have 10 days to notify the complainant Party as to whether it intends to conduct a review.").