

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 Industrias Tecnos, S.A. de C.V. (the Company), located in Cuernavaca, Morelos, Mexico (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 their union activities. This request for review includes all actions taken by the Company and by the *Sindicato Único de Trabajadores de la Industria Química, Plástica, Metálica y Transformadora de toda clase de Productos, Derivados, Similares y Conexos de la República Mexicana* (Sindicato Químico), a Mexican union affiliated with the *Confederación de Trabajadores de México* (CTM), to discriminate against workers based on their union sympathies. These actions include dismissals, threats of reprisals, and coercion or pressuring of workers to support Sindicato Químico or refrain from supporting another union, including potentially through coordination between Sindicato Químico and the Company.

The actions encompassed by this request for review include any action or inaction by the Company, through its employees, representatives, or agents, or by the Sindicato Químico or its leadership, members, 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.").