

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 to workers at the Tridonex<sup>1</sup> facility in Matamoros, State of 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.

This request for review encompasses all actions or failures to act in the context of efforts by workers at the Facility to affiliate with, or secure representation by, the Sindicato Nacional Independiente de Trabajadores de Industrias y Servicios "Movimiento 20/32" (SNITIS) or, during the period that SNITIS has attempted to organize workers at the Facility, to disaffiliate from the Sindicato Industrial de Trabajadores en Plantas Maquiladoras y Ensambladoras de Matamoros y su Municipio (SITPME). The request also encompasses all actions or failures to act, during the same period, affecting, resulting from, or related to the representation provided to workers at the Facility by SITPME, or otherwise relating to the workers' ability to exercise their right of free association and collective bargaining. The United States requests that the review consider all separations of union-eligible workers (whether affiliated with a union or not) from employment during the relevant period, whether ostensibly voluntary or involuntary. The actions or failures to act encompassed by this review include those of any person or entity, including but not limited to the Company and SITPME.

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.<sup>2</sup>

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<sup>1</sup> Tridonex S. de R.L. de C.V. (Tridonex, or the Company).

<sup>2</sup> 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.").