

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 facility operated by Vidrio Decorativo Occidental, S.A. de C.V. (the Company) in Matamoros, Tamaulipas, 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 the Company's interference in workers' "concerted activities for collective bargaining or protection and to organize, form, and join the union of their choice, . . . [the Company's] domination or interference in union activities, discrimination, or coercion against workers for union activity or support, and [the Company's] refusal to bargain collectively with the duly recognized union."¹ This request for review encompasses all actions taken by the Company to intervene in workers' efforts to support, join, or engage with *Sindicato Nacional Independiente de Trabajadores de Industrias y de Servicios "Movimiento 20/32"* (SNITIS), including by means of threats, harassment, surveillance, reassignments, dismissals, and other coercive acts to prevent workers from exercising the right to strike. This request for review also includes all actions taken by the Company to interfere with its workers' right of free association and collective bargaining by encouraging the constitution and supporting the operation of *Sindicato Independiente de Trabajadores al Servicio de Vidrio Decorativo Occidental S.A. de C.V.* (SITVDO), in order to place SITVDO under the Company's control.

This request for review also includes all actions taken by the Company to interfere in workers' right to determine their collective bargaining representative and to engage in collective bargaining, including by negotiating or agreeing to bonuses and wage adjustments either directly with individual workers or through use of SITVDO as an agent of the Company, during the time period that SNITIS held the Certificate of Representation.

The actions encompassed by this request for review include any action or inaction by the company, through its 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.²

¹ USMCA Article 23-A.2(a).

² 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.").