

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 Volkswagen de México, S.A. de C.V. facility, located in Cuautlancingo, Puebla, Mexico (the Company). 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 includes all actions taken by the Company to intervene in workers' union activities and the affairs of the *Sindicato Independiente de Trabajadores de la Industria Automotriz Similares y Conexos Volkswagen de México* (the union), a Mexican union, and all actions taken by the union that discriminate among workers based on their union activities. These actions include the coordination of the union with the Company to dismiss workers and other reprisals by the Company or union against workers based on their service as union representatives, affiliation with prior union administrations, candidacy in union elections, or engagement in other union activities.

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 union or its members, 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.<sup>1</sup>

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<sup>1</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.").