

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 a facility operated by ThyssenKrupp Springs & Stabilizers de México, S. de R.L. de C.V. (the Company) located in the city and state of San Luis Potosí, México (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 and the incumbent union's¹ interfering in workers' "concerted activities for collective bargaining or protection and to organize, form, and join the union of their choice" and engaging in acts of "employer domination or interference in union activities, discrimination, or coercion against workers for union activity or support."²

This request for review includes all actions taken by the Company and the incumbent union to intervene in, or prevent workers from engaging in, freedom of association and collective bargaining activities at the Facility, including through unlawful firings, reassignment of work areas, surveillance, intimidation, threats, coercive questioning, and other reprisals against workers based on union activity or affiliation.

The actions encompassed by this request for review include any action or inaction by the Company or the incumbent union, through their employees, representatives, or agents, acting individually or in coordination with third parties.

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.³

¹ The name of the incumbent union at the facility is the *Asociación Sindical de Trabajadores de la Industria Metal-Mecánica, Acero y Laminado, Similares y Conexos del Estado de San Luis Potosí, C.T.M.*

² USMCA Article 23-A.2(a).

³ 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.").