

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 Unique Fabricating de México, S.A. de C.V. (Unique Fabricating) facility located at Acceso III, Benito Juárez in Santiago de Querétaro, Querétaro (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, including in relation to actions that interfere with their right to organize, select, and engage with a union of their choice. This request for review encompasses all actions taken by Unique Fabricating to encourage support for the *Sindicato Nacional Presidente Adolfo López Mateos de Trabajadores y Empleados del Comercio en General y Escuelas Particulares, Similares y Conexos de la República Mexicana*, part of *la Federación Autónoma del Sindicalismo Independiente en México* (FASIM), or deter support for the *Sindicato Nacional de Trabajadores de la Transformación, Construcción, Automotriz, Agropecuaria, Plásticos y de la Industria en General, del Comercio y Servicios Similares, Anexos y Conexos del Estado de Querétaro*, “Ángel Castillo Reséndiz”, including with respect to denying all access to workers at the Facility; actions and events related to a meeting facilitated by Unique Fabricating on October 6, 2022, at the Facility with FASIM; and actions and statements by the Querétaro Secretaría del Trabajo relating to the union activities of workers at the Facility.

The actions encompassed by this request for review include those of any person or entity, including Unique Fabricating and the Querétaro Secretaría del Trabajo, and any of their 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.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.”).