

# Mexico Alert: Inspection Protocol Applicable for Subcontracting Matters

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On Nov. 24, 2025, the Secretariat of Labor and Social Welfare (the STPS) published the Inspection Protocol Applicable for Subcontracting Matters (the Protocol), which sets out the procedure and indicators applicable to verification and/or inspection visits carried out by the STPS, to ensure proper compliance with labor regulations.

The Protocol seeks to identify and sanction: (i) irregularities in information and documentation, (ii) prohibited subcontracting, (iii) irregular subcontracting, (iv) simulated subcontracting and (v) violations to general working conditions.

The verification shall be carried out through workplace visits, document reviews and interviews. Such visits are classified in the following manner:

- a. Verification visits to be carried out on the premises of those that request their registration or that are registered in the Registry of Specialized Service Providers or Specialized Works (REPSE)
- b. Inspections to be carried out on the premises of contractors, beneficiaries and, in general, at any workplace in which specialized services are rendered or where workers are made available to a third party
- c. Ordinary and extraordinary inspections regarding matters of: (i) general working conditions (CGT), (ii) safety and hygiene (SH) and (iii) training and education (CyA).

It is important to note that the indicators subject to verification may vary depending on the type of visit.

One of the most relevant aspects of the Protocol relates to the documents that may be reviewed in regards to the companies that benefit from specialized services pursuant to the REPSE, which include: (i) general information, (ii) documents regarding the production process or economic activity, (iii) documentation proving that workers (both direct employees and subcontracted workers) are registered with the IMSS and (iv) documentation relating to the subcontracting regime, including contracts, purpose of agreements, number of subcontracted workers, non-performance by subcontracted workers of activities inherent to the company's corporate purpose, as well as identification and distinction between direct employees and subcontracted workers. In order to verify compliance with applicable regulations, the STPS may also exchange information with other authorities and conduct interviews directly with workers.

Lastly, in the event a breach is detected, the Protocol foresees penalties ranging from 2,000 to 5,000 times the Unit of Measurement and Update (currently, from MXN \$226,280.00-\$5,657,000.00).

The Protocol's issuance requires that both specialized service providers and beneficiaries establish effective prevention and compliance mechanisms, especially considering the severity of the

foreseen penalties.

To read en español, [click here](#).

For more information, please contact any of the following attorneys: