



STPS publishes inspection protocol on subcontracting

On 24 November 2025, the Ministry of Labor and Social Welfare (STPS) published the **Inspection Protocol on Subcontracting matters**, whose main purpose is to standardize the criteria and guidelines to be followed by federal labor inspectors during various oversight actions. The document also sets forth the methodology for identifying potential non-compliance and establishes mechanisms for the exchange of

strategic information with authorities such as the Tax Administration Service (SAT), the Mexican Social Security Institute (IMSS), and the National Workers' Housing Fund Institute (INFONAVIT).

This Protocol shall apply to procedures through which the labor authority carries out oversight actions, including REPSE verification visits, inspections related to

subcontracting, and ordinary and extraordinary inspections with a cross-cutting approach. REPSE verification visits will be conducted at companies holding a valid REPSE registration or those seeking to obtain such registration.

Furthermore, the Protocol differentiates between prohibited subcontracting, irregular subcontracting, and simulated

subcontracting, providing specific definitions for each category. It also establishes detailed requirements for reviewing specialized services agreements, as well as other elements and activities aimed at verifying compliance with subcontracting regulations.

Finally, the Protocol provides that inspectors may interview employees during oversight actions to inquire about matters such as the companies from which they receive payments or instructions, any training or courses provided, and whether they perform their entire workday at the company where they render their services.

For further information, please contact our partner:

Bernardo Martínez

cmartinezrivas@deloittemx.com

+ 52 55 5080 7336



tax@hand

Check tax news from Mexico and from different countries:

www.taxathand.com

Aguascalientes

Blvd a Zacatecas No. 845 Piso 4 int 410
Trojes de Alonso
20116, Aguascalientes, Ags.
Tel: (449) 910 8600
Fax: 449) 910 8601

Cancún

Avenida Bonampak SM 6, M 1, lote 1,
piso 10, 77500 Cancún, Q. Roo
Tel: (998) 872 9230
Fax: 998) 892 3677

Chihuahua

Av. Valle Escondido 5500
Fracc. Des. El Saucito E-2, piso 1,
31125, Chihuahua, Chih.
Tel: (614) 180 1100
Fax: 614) 180 1110

Ciudad Juárez

Baudelio Pelayo No. 8450
Parque Industrial Antonio J. Bermúdez
32400, Ciudad Juárez, Chih.
Tel: (656) 688 6500
Fax: (656) 688 6536

Culiacán

Insurgentes 847 Sur, Local 103
Colonia Centro Sinaloa
80128, Culiacán, Sin.
Tel: (33) 1454 2000

Guadalajara

Avenida López Mateos Norte 2405
piso 29, Colonia Italia Providencia
44648, Guadalajara, Jalisco.
Tel: (33) 3669 0404
Fax: (33) 3669 0469

Hermosillo

Blvd. Eusebio Francisco Kino No. 315
Piso 8, Suite 804, Colonia Lomas del
Pitic
83010, Hermosillo, Son.
Tel: (662) 109 1400
Fax: (662) 109 1414

León

Blvd. José Maria Morelos No. 1555 Piso
5 Colonia Granjas del Rosario 37130
León, Gto.
Tel: (477) 214 1400
Fax: (477) 214 1405 y 1407

Mérida

Calle 56 B 485 Prol. Montejo Piso 2
Colonia Itzimna
97100, Mérida, Yuc.
Tel: (999) 913 4032
Fax: (999) 913 4052

Mexicali

Calzada Francisco López Montejano
1342, Piso 7 Torre Sur
Fracc. Esteban Cantú
21320, Mexicali, B.C.
Tel: (686) 905 5200
Fax: (686) 905 5231 y 5232

Ciudad de México

Paseo de la Reforma 505, piso 28
Colonia Cuauhtémoc
06500, México, D.F.
Tel: (55) 5080 6000

Monterrey

Av. Juárez 1102, piso 40
Centro
64000, Monterrey, N.L.
Tel: (81) 8133 7300

Puebla

Edificio Deloitte, Vía Atlixcayotl 5506,
piso 4 Zona Angelópolis
72190, Puebla, Pue.
Tel: (222) 303 1000
Fax: (222) 303 1001

Querétaro

Avenida Antea, No. 1090, piso 7
Colonia Jurica
76100, Querétaro, Qro.
Tel: (442) 238 2900
Fax: (442) 238 2975 y 2968

Reynosa

Carr. Monterrey-Reynosa 210-B, PA
Fracc. Portal San Miguel
88730, Reynosa, Tamps.
Tel: (899) 921 2460
Fax: (899) 921 2462

San Luis Potosí

Av. Salvador Nava Martínez 3125, 3-A
Fracc. Colinas del Parque
78294, San Luis Potosí, S.L.P.
Tel: (444) 102 5300
Fax: (444) 102 5301

Tijuana

Misión de San Javier 10643, Piso 8
Zona Urbana Río Tijuana.
22010, Tijuana B.C.
Tel: (664) 622 7878
Fax: (664) 681 7813

Torreón

Independencia 1819-B Oriente
Colonia San Isidro
27100, Torreón, Coah.
Tel: (871) 747 4400
Fax: (871) 747 4409



Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their societies affiliated to a member firm (hereinafter “Related Entities”) (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and Related Entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and Related Entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/mx/conozcanos to learn more.

Deloitte provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our people deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society, and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte's approximately 457,000 people worldwide make an impact that matters at www.deloitte.com.

As used in this document, Galaz, Yamazaki, Ruiz Urquiza, S.C., has the exclusive legal right to engage in, and limit its business to, providing auditing and other professional services, under the name “Deloitte”. Deloitte Impuestos y Servicios Legales, S.C., has the exclusive legal right to engage in, and limit its business to, providing tax consultancy, legal advisory and other professional services, under the name “Deloitte”. Deloitte Audit Delivery Center, S.C., (formerly, Deloitte Auditoría, S.C.) has the exclusive legal right to engage in, and limit its business to, providing auditing and other professional services, under the name “Deloitte”. Deloitte Asesoría en Riesgos, S.C., has the exclusive legal right to engage in, and limit its business to, providing risk advisory and other professional services, under the name “Deloitte”. Deloitte Asesoría Financiera, S.C., has the exclusive legal right to engage in, and limit its business to, providing financial advisory and other professional services, under the name “Deloitte”. And Deloitte Consulting Group, S.C., has the exclusive legal right to engage in, and limit its business to, providing consulting and other professional services, under the name “Deloitte”.

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms or their Related Entities (collectively, the “Deloitte organization”) is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, Related Entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their Related Entities, are legally separate and independent entities.