

EXHIBIT C

DECLARATION OF SHAWNA BADER-BLAU

I, Shawna Bader-Blau, declare as follows:

1. I am the Executive Director at the Solidarity Center (“SC”). The statements made in this declaration are based on my personal knowledge and my understanding of information made available to me pursuant to my duties as the Executive Director of the Solidarity Center.

The History of the Solidarity Center and Its Relationship with NED

2. The American labor movement has long championed democracy and human rights worldwide. Since the 1890s, U.S. labor leaders have collaborated with global workers to improve rights and workplace conditions. A key milestone came after World War I when the American Federation of Labor (“AFL”) played a major role in establishing the International Labor Organization (“ILO”), which set global standards for worker rights, including the right to form unions – critical to expanding democracy. Recognizing that strong worker rights abroad benefit U.S. workers, the American Federation of Labor and Congress of Industrial Organizations (“AFL-CIO”) launched international programs in the 1960s and 70s, supporting worker rights across the Americas, Africa, Asia, and Europe. In 1997, these efforts merged under new AFL-CIO leadership to form the Solidarity Center, an independent organization dedicated to empowering workers worldwide.

3. Trade unions have played a key role in democracy movements and struggles for freedom from colonialism that brought an end to dictatorship in Brazil, Apartheid in South Africa, and for their role in ushering in an end to an authoritarian regime in Tunisia, the labor movement was honored with the Nobel Prize. Foremost among these examples was Solidarnosc in Poland, which first formed in 1980 before being driven underground by the harsh regime. In large part to strengthen its efforts to aid the work of Solidarnosc, the AFL-CIO leadership, along with others

sharing similar concerns, advanced an idea to build a congressionally-funded organization providing assistance to democracy movements worldwide that later became the National Endowment for Democracy (“NED”). The Solidarity Center is one of NED’s four core institutes.

4. The Solidarity Center’s mission is to strengthen workers’ economic and political power through independent unions. NED helps by funding pro-worker, pro-democracy activists in challenging environments where governments and corporations suppress labor rights. Because democracy is built over decades, NED’s support enables long-term efforts to empower workers and ensure fair representation.

5. By 2024, the Solidarity Center had partnered with unions in over 70 countries, with offices in 32, to help build stronger, fairer democracies worldwide.

6. The SC estimates approximately 52 percent of the organization’s fiscal year 2025 expenditures would come from NED, or around \$39.5 million. The SC typically requests funds from NED on a monthly basis.

The NED Funding Freeze and the Effect on the Solidarity Center’s Operations

7. In 2025, the SC received funds from NED until February 4th and as of that date, the SC had received a total amount of \$5,250,000 for 2025. The SC was informed by NED that its request for payments to the U.S. Treasury department has been completely shut off by the U.S. government. As a result, the SC has not received any additional payments from NED since February 4th. Typically, the Solidarity Center would expect to receive approximately \$3.3 million per month from NED.

8. The NED funding freeze is an existential threat to the Solidarity Center’s mission, its partners, and the workers we serve. Without immediate intervention, our progress in building strong, independent labor movements that support democracy and economic justice will be

undone. As a result of the freeze, the very existence of the SC and some of its partners is uncertain and at grave risk.

9. The Solidarity Center has reduced staffing as a result of the NED funding freeze. Since the NED funding freeze, the Solidarity Center has laid off 6% (7 employees) and furloughed 53% (57 employees) of its headquarters staff in Washington, DC. In the field offices, the SC has laid off 42% of staff (118 employees) and furloughed 17% (47 employees). If access to NED funding is not restored by April 2025, the SC will be forced to reduce its remaining global work force by an additional 50 percent.

10. The SC will stand to lose the vast majority of its talent pool, institutional memory and the experiences that its staff has learned and acquired through their years of experience. In HQ and field offices, staff include organizers, specialists in the field of labor rights and standards, human rights and democracy activists, and labor lawyers. Many of our staff come to the Solidarity Center with experience working for labor unions in the countries where we work, or as community leaders with histories of activism pursuing justice and democracy in local or national movements. These positions require extensive knowledge of and expertise in union building - organizing, collective bargaining, mobilizing workers, and advocacy. As a result of the loss of NED funds, the SC has laid off these uniquely qualified staff.

11. In 2024, the SC operated 32 field offices. Due to earlier funding cuts and restructuring, this number had already dropped to 26 by February 2025, when the NED funding was suspended. As a result of the loss of NED funds, the SC will close an additional 17 of its 26 current field offices, which eliminates 65% of its field presence. The SC will retain just 35% of its field presence through nine significantly reduced field offices with an estimated total of 30-40 field-based staff. Without NED funds, Solidarity Center's operations and registration in numerous

countries around the world are at risk, including in Armenia, Kyrgyzstan, Ukraine, Serbia, Iraq, Kenya, Lesotho, South Africa, Bangladesh, Sri Lanka, Thailand and the Philippines. Office leases in these countries will be terminated and staff will be laid off, leading the SC to be unable to meet the requirements to maintain registration in these countries, thus resulting in the forfeiture of the SC's legal registration. After a legal registration has been forfeited, it can be very difficult to obtain new registrations for civil society organizations like the SC. Thus, once lapsed, legal registration to operate in some of these countries may never be regained.

12. Additionally, the SC would be unable to meet legally-mandated close-out costs, including the cost of deregistering and making legally required payments to staff. For example, in some of the countries in which the SC expects to have to close its offices, the severance and notice obligations required by law may be greater than the funds that SC currently is able to access. This would put the SC at risk of incurring legal judgments and obligations in these countries, which could have consequences for SC's ability to resume work in those countries in the future.

13. SC field offices are led by country program directors, who are often signatory to leases, banking agreements, vendor contracts, and other agreements. In some cases, these country program directors are personally liable as a result of local law. As such, these country program directors are especially vulnerable to legal action by landlords, vendors, former employees, and government entities. This is the case, for instance, in Kenya, Thailand, and Ukraine, where the SC's country program directors are at-risk of such legal action as well as deportation. SC's hard-won reputation in these countries would be irreversibly damaged if SC's staff were subject to such legal sanction.

14. Without NED funds, the SC risks being unable to pay rent for its Washington, DC headquarters office, risking default on the lease and losing its physical presence of the

organization's headquarters. This will negatively impact the organization's credit rating and would make borrowing significantly more expensive.

15. Due to the loss of NED funds, the SC has already begun exploring the bankruptcy protection process. If NED funding is not restored by June 2025 the SC will be forced to file for bankruptcy protection in the United States and its operations might be permanently closed. If operations permanently cease, hundreds of employees would be laid off globally and the SC would close its offices around the world and lose its legal registrations to operate in those countries. SC is unlikely to be able to afford to seek bankruptcy protections in all 70 countries in which it operates, leaving the SC open to potential legal action and liability in those countries.

The Effect of the Funding Freeze on NED Funded Programs and Projects

16. Without NED funds, implementation of NED projects has been severely impacted. This has led to and will lead to various irreparable consequences including the following:

a. In Guatemala and Honduras, two of the countries with the highest homicide rates for trade unionists in the world, NED funds support networks that address anti-union violence. These networks are responsible for documenting and advocating to address incidents of violence from initial harassment to assassinations of union leaders. The networks also provide support for emergency relocation to trade unionists under duress, thereby saving lives. Anti-violence networks in Guatemala and Honduras will lose the majority of their budget due to the NED funding suspension, forcing them to shut down. At the time SC lost access to NED resources in Honduras, 18 workers were receiving emergency support, and one worker was being assisted with the application process to request protective measures with the Inter-American Commission on Human Rights (IACHR). In Guatemala, the network was providing legal support to four collective cases and three individual cases where workers had been

recently threatened with violence including death. These measures are only provided to individuals at immediate risk of being murdered, and this support has now ceased due to the NED funding freeze, putting these individuals back at immediate risk.

b. In Thailand, 8,600 airport workers across the country's six largest airports are in the middle of advocating with employers to gain a collective bargaining agreement that has the potential to dramatically improve working conditions and give workers an ongoing channel of dialogue with the companies in the tourism industry, the most important industry in the country. The loss of NED funding resulted in layoffs of two worker-leaders of this project at a critical time, leaving inexperienced workers without guidance, risking the effort's collapse. Bargaining is set to commence in two weeks. A new union negotiating its first contract will be left without resources, jeopardizing a historic breakthrough for Thai labor rights, weakening democratic participation. Abandoning this project will also cause irreparable damage to the relationship with one of SC's closest partners, the State Enterprises Worker Relations Confederation (SERC).

c. Also in Thailand, the leading labor and migrant worker legal advocacy group, Human Rights and Development Foundation (HRDF), receives about 90% percent of its support from the SC, the majority of this funding (60%) comes from NED. The loss of NED funding has forced HRDF to lay off all its lawyers and close down four field offices in areas of Thailand that employ large numbers of Burmese workers who are vulnerable to trafficking and forced labor. HRDF provides comprehensive legal aid and currently handles approximately 135 ongoing cases across Thailand, providing legal support from its offices in Mae Sot (Special Economic Zone), Chiang Mai, Samut Sakhon, and Phuket. These cases affect over 1,000 workers, mostly Burmese and many refugees who have fled a military

regime, who are awaiting justice and compensation for violations of their worker rights such as forced labor, wage theft and workplace injuries. Without HRDF and their own resources to initiate legal action, these workers are in a state of despair, unable to afford legal representation on their own and with virtually no chance to get the compensation they are owed or the protection they need from human traffickers.

d. In Ukraine, SC used NED funds in its partnership with Labor Initiatives, a Ukrainian national legal aid clinic that offers free representation for workers on issues of labor and employment, freedom of association, workplace whistleblower protections, and critical support for re-employment of veterans and war impacted people with disabilities. Labor Initiatives typically has between 15-20 court cases and 45-55 administrative cases open per month, and the abandonment of these cases would impact hundreds of workers directly, and thousands in the next year. Labor Initiatives also services union collective bargaining agreements that cover more than 70,000 workers. Nearly all Labor Initiatives' work is currently suspended since SC (through its NED funding) was the Initiatives' only funder. In most cases, besides a few high-profile issues that will be taken over by unions, workers receiving assistance from Labor Initiatives on court cases will lack access to representation as a result of the suspension of NED funding.

e. In Venezuela, NED funds are used to provide legal support to trade unionists who have been jailed for exercising their rights. There are approximately 80 jailed trade unionists in Venezuela languishing in prisons with deplorable conditions and being denied medicine and food on a regular basis. Through the SC's support and advocacy, Venezuelan authorities have been providing medicine for life threatening illnesses for jailed trade unionists. If the SC

is not able to demonstrate consistent engagement with Venezuelan authorities, we anticipate within a week jailed trade unionists will stop receiving lifesaving medicine.

f. With support from the SC, the Asia Network for the Rights of Occupational and Environmental Victims (ANROEV) was founded in 1997, sparked by a regional movement of victims and labor rights activists, particularly those from China, advocating for occupational health and safety rights across Asia. Grassroots occupational safety and health (OSH) and victim organizations organize and advocate in the absence of grassroots democracy in both global supply chains and the workplace. SC funding is the network's only source of financial support. Without continued assistance, the network is unable to operate. It cannot offer a platform for member groups to come together and share experiences and lessons learned; support skill training and capacity-building activities; or launch any national or regional campaigns to address OSH issues and amplify the voices of impacted workers, victims, and the communities.

g. In Armenia, SC used NED funding for the training and support of recently elected leaders of the national trade union federation, the Confederation of Trade Unions of Armenia (CTUA), who are reorganizing their organization following principles of internal democracy and who seek to provide improved representation of members on workplace issues. With the suspension of NED funds, the Solidarity Center had to decline signing a contract with an independent researcher for a cost of living study in Armenia. This research was to serve as the foundation for a union-led campaign advocating for an increase in the minimum wage. The issue affects the officially employed labor force of approximately 784,000 workers. The Solidarity Center also canceled capacity-building workshops for the CTUA and independent unions. This decision affected approximately 250 union members, weakening the overall

capacity of CTUA, including its relations with sectoral unions. The cancellation also impacted CTUA youth activities, as the Solidarity Center was the key supporter and facilitator of CTUA's youth programs, engaging about 60 young union leaders. In addition, the Solidarity Center canceled a series of workshops for final-year university students on workplace rights for new workers in the labor force, affecting approximately 250–300 students who would have attended the canceled workshops. Ten union trainers, previously trained by the Solidarity Center, who would have conducted those workshops, have been left without support and have no alternative opportunities to conduct the workshops.

h. Inside Burma and on the border of Thailand and Burma, NED funding to the Solidarity Center helps garment workers producing for multinational corporations to organize democratic and independent unions advocating for rights and dignity within their factories and the garment supply chain. Independent union organizing is suppressed by the military government; one prominent union leader, for example, was abducted, tortured and held incommunicado for five months before being sentenced in November 2023 to seven years of hard labor - without legal representation. The loss of NED funding has exposed these activists and opened the door for retribution against factory level unions in Burma who have been courageous in advancing better working conditions and labor rights despite the risks to their rights and freedoms. SC programs that help workers improve wages and working conditions benefit American workers by evening the playing field and combatting a race to the bottom for wages globally.

i. As related to China, the SC has been supporting a non-governmental organization that advocates for democracy and fundamental labor rights in China with NED funding, providing the salaries of three full-time staff and part-time researchers, as well as expenses

for international alliance-building and advocacy, and training for activists. The SC's support from NED is their sole source of funding. The loss of this funding source has forced the organization to lay off all three staff members in February. If this support is not restored, the group faces imminent closure.

j. Kenya is currently undergoing a review of its labor laws, and NED funding through SC supports Kenya's primary trade union organization, the Central Organization of Trade Unions-Kenya (COTU-K), in various ways including in its capacity to engage the government of Kenya on worker input into the new labor law. Without NED funding, COTU-K will be unable to fully engage in this process, risking changes in labor law being enacted without the voice of workers and labor being included in the process.

k. NED funding has supported legal counsel and representation of documented migrant workers from Kyrgyzstan who are frequently subjected to wage theft. The loss of NED funds means this counsel has been discontinued, leaving these migrants vulnerable to abuse without recourse. The lawyers were representing 350 migrant workers per month on average, and winning approximately \$20,000 per month in lost wages. These migrant workers will not have trained legal representation for such cases without NED funding.

l. In Liberia, the Solidarity Center was working closely with rubber workers on a landmark collective bargaining agreement. This is one of Liberia's largest unions and a key setter of national labor standards. They had organized thousands of contract workers and were seeking union coverage that would secure crucial protections for them, including fair wages and medical care afforded to unionized workers. The loss of NED funds forced SC to furlough staff, eliminating critical technical support. Progress derailed. One worker's wife has already died due to the failure by the company to secure adequate medical care in a timely manner, a

died due to the failure by the company to secure adequate medical care in a timely manner, a benefit that contract workers were advocating for as part of the negotiations. The loss of SC's expertise has weakened the union's ability to advocate for contract workers and delayed progress on attaining union coverage on key labor rights issues.

m. In Serbia, the SC uses NED funding to train and support a 33-member team of OSH Specialists, who have worked closely with the government's workplace health and safety division to identify and remedy safety and health hazards in workplaces across the country. Over the past seven years, over 1,800 union members from two national confederations have received OSH training from the Specialists. The team of OSH Specialists has provided substantial inputs to the Ministry of Labor to develop the four-year National OSH Strategy 2023-2027, as well as recommendations for OSH legislation and regulations. With active and well-trained OSH committees in more workplaces, unions built strong cooperation with the Serbian Association of Employers to pursue joint efforts to create safer workplaces and reduce the risk of occupational hazards. With the suspension of Solidarity Center funding, all training of union members on conducting OSH inspections will be halted. With fewer trained union members, the risk of workplace accidents will increase, leading to more injuries and illnesses on the job. In addition, the OSH Specialists trained union negotiators how to improve collective bargaining agreements to include stronger enforcement of safety and health requirements. Without this specialized training on OSH collective agreement language, unionized workplaces will be less safe. Without NED funding, the OSH program in Serbia will collapse, destroying one of the premier union-management-government workplace safety and health programs in Central and Eastern Europe.

n. The Southern African Trade Union Coordination Council (Trade Union Council) is supported by NED funding through the SC. The Trade Union Council is part of the Southern African Development Community (SADC), which is a tripartite structure that comprises government, business, and labor, with the Trade Union Council representing labor. The SADC was formed by treaty to achieve development and economic growth, alleviate poverty, enhance the standard and quality of life of the peoples of Southern Africa and support the socially disadvantaged through regional integration. Without NED funding, the Trade Union Council will be unable to afford travel and participation in various SADC meetings, crucial for ensuring that labor's voice is advocated for and present. If the Trade Union Council is not present, the meetings will likely continue, but labor will be excluded from critical engagements. This exclusion would reduce labor to a mere formality, with the Trade Union Council only being informed of developments rather than actively participating.

17. Without NED funds, implementation under 45 active subaward agreements totaling over \$2.3M with local partners has been suspended, cutting off critical funding to key partner unions and worker rights organizations that rely on these resources for their work.

18. The abrupt loss of NED funds has inflicted devastating harm on the Solidarity Center's global reputation and credibility, undermining decades of leadership in defending labor rights and democratic values. Once regarded as a steadfast and reliable partner in over 70 countries, the SC now faces the perception of instability and diminished influence, weakening trust among unions, civil society groups, and international allies. Without access to NED funds, the closure of 65% of the SC's field offices, mass layoffs of experienced democracy and labor specialists, and the suspension of vital legal aid and advocacy programs would not only dismantle hard-won protections for vulnerable workers but also create a chilling effect on independent labor

movements. The sudden loss of funds and interruption of programs has forced the SC to break longstanding commitments of support to regional partners, which is perceived by many as an indication that the Solidarity Center will not be a reliable partner in the future. As governments and corporate actors exploit this vacuum, authoritarian regimes and the unscrupulous employers that collude with them to undermine rights are emboldened, worker exploitation increases, and the fragile link between labor rights and democratic stability erodes. This reputational damage is not easily repaired; even if funding is restored, the credibility lost, relationships severed, and institutional knowledge forfeited will have long-term, possibly irreversible, consequences – jeopardizing the very future of the Solidarity Center and its mission to uphold democracy, economic justice, and human rights globally.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 3, 2025, in Washington, DC.

A handwritten signature in blue ink that reads "Shawna Bader-Blau". The signature is written in a cursive style and is positioned above a horizontal line.

Shawna Bader-Blau
Executive Director
Solidarity Center