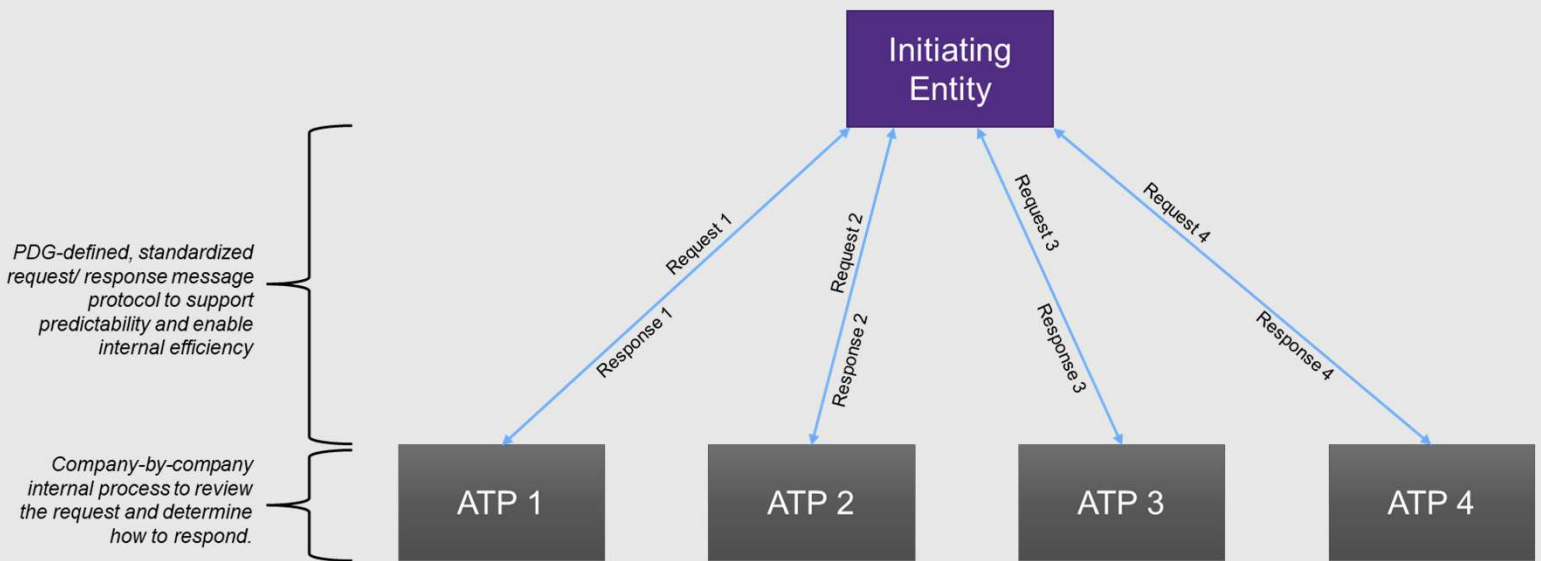


Tracing Model

PDG Blueprint

Beginning November 27, 2023, the exchange of a comprehensive transaction history will sunset, and instead, each trading partner is required to maintain **secure, electronic, interoperable systems and processes** to provide TI and TS in response to a valid request **and** promptly facilitate gathering the information necessary to produce the TI for **each transaction** going back to the manufacturer. To execute this process, the initiating entity—either a trading partner or regulator, when permitted by law—will sequentially request relevant TI data from each authorized trading partner (ATP) who owned the product in question. Each ATP will support the process by providing **its** TI data and contact information for the next ATP in the chain (e.g., a targeted email address, a digital endpoint).



Internal Processes

The PDG-model standardizes the communication *between* the initiating entity and each ATP, but each ATP retains full discretion over its internal process to review, and determine whether/how to respond to, the request.

Automation

The PDG-model does not seek to fully automate the tracing process. A standardized request and response protocol may enable each ATP to automate parts of their process if they so desire, but it is recognized that every request will be unique, and companies are likely to leverage human-in-the-loop processes.

Endpoints

PDG view “information necessary to product the for each transaction” as contact information that will enable the initiating entity to promptly reach the next ATP in the chain. Each ATP must be able to provide such contract information for each of its direct trading partners.