



Recovery and Resolution Planning

Early assessment and targeted implementation plan for your institution



01

New developments in recovery and resolution planning

Overview

Supervisory authorities are increasingly focusing on **early preventive measures** as well as **robust recovery and resolution concepts**. This shifts the emphasis more strongly towards **proactive management of crisis situations**.

Even though there are currently only **isolated formal requirements**, it is clear that these topics will become **increasingly important for all banks in the future** – not just for large institutions.

Therefore, it is worthwhile to take early action. We are happy to **assist you** in analysing the **current status of your institution**, identifying which **measures make sense**, and how these can be **implemented efficiently and purposefully**.

Current regulatory focus topics

Recovery and resolution planning

- Growing importance of recovery and resolution planning.
- Crisis toolkit is expected to be expanded proportionally also for non-SIBs.
- Enhanced early intervention by authorities through adjustments in supervisory law.



Future formal requirements are expected for all banks

Emergency liquidity

- From 2027, the SNB will expand its liquidity assistance programs to all banks.
- Some cantons are already requiring program-participation by their cantonal banks.
- New LiqO-FINMA¹: Banks must be able to provide daily liquidity reports and scenario data during liquidity stress.



Entry into force: 1. Jan 2027

Transition period: 1. Jan 2028

Privileged and secured deposits

- By the end of 2027, banks must implement operational preparatory measures to ensure the timely and proper payout of secured deposits in the event of insolvency.
- This is based on the 2023 revision of the Bank Act and the Bank Ordinance.



Entry into force: 1. Jan 2023

Transition period: 31. Dez 2027

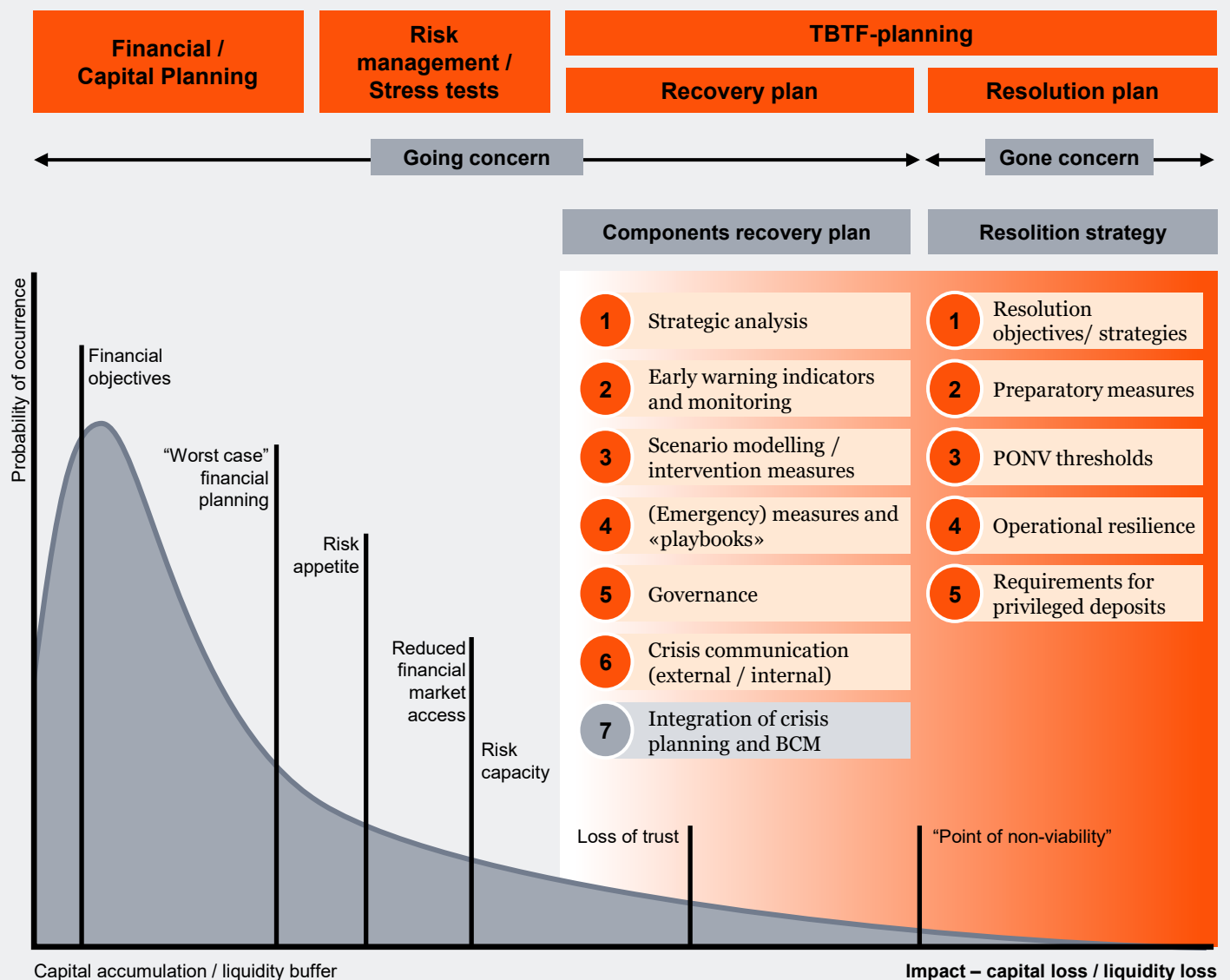
¹ Compare [consultations](#) on the new regulations regarding risk distribution and liquidity for banks and security firms, published on 3 July 2025

02 Expansion of recovery and resolution planning to non-SIB

Focus topics

- The authorities are signalling increased early interventions and an **extension** of the **TBTF-recovery and resolution measures to medium-sized banks¹**.
- The **recovery plan** is prepared by the institution and updated annually.
- The **resolution plan** is developed jointly with FINMA under its responsibility.

Integration of recovery and resolution planning into risk management



¹ Compare key points of the Federal Council on the amendment of the Banking act, dated 6 June 2025, as well as the information sheet «Effective crisis instruments for FINMA»

03

Proposal for a potential implementation plan

Phase 0

Preliminary study for inventory assessment

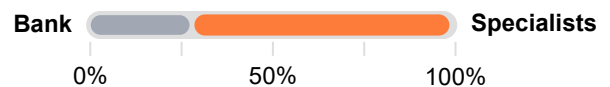
Objective:

- Capturing the **current status quo** and perform a **gap analysis** of existing and anticipated future regulatory requirements.
- **Preparation for increasing regulatory expectations.**

Time requirement¹:



Required resources¹



Phase 1

Tailored implementation plan

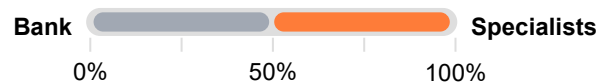
Objective:

- **Adequate** and **proportional** implementation plan for a robust and resilient recovery and resolution framework.
- A project plan tailored to your specific needs.

Time requirement¹:



Required resources¹



Phase 2

Implementation

Objective:

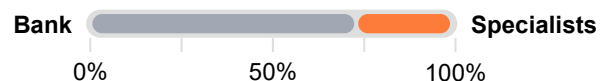
- **Comprehensive recovery and resolution plan** that meets the requirements of supervisory authorities and the financial market
- Seamless integration into the broader framework for operational resilience.

Time requirement¹:

(iterative process in coordination with FINMA)



Required resources¹



¹ The project size and division of the individual phases depend on the size and complexity of the institution. The values provided are based on experience from Category 3 banks with an average level of business model complexity.

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Experience and expertise for your tailored solutions



Diverse experience

In addition to Switzerland, we also possess market-leading experience and benchmarks from the implementation and review of recovery and resolution plans at all systemically important banks in Liechtenstein.



Comprehensive Expertise

Through our ongoing dialogue with FINMA, our expertise is always up to date and aligns with current expectations. This ensures you receive excellent support and representation.



Interdisciplinary Expertise

You benefit from our interdisciplinary expertise, which enables the efficient integration of existing frameworks such as BCM, operational resilience, and stress testing into a comprehensive and coordinated overall concept.

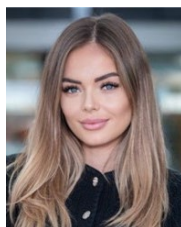
Contact us!



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For fast, accessible support with supervisory regulatory issues, it's worth looking at our offering: [PwC Regulatory Banking Services](#)