Liquidity Resilience 2026 – 2028

New requirements for privileged deposits, liquidity management, and emergency liquidity

00 Why you must act now: New requirements at a glance

Overview

- Supervisory authorities are strengthening prevention and operational crisis preparedness.
- Increasing regulatory requirements in the area of liquidity require banks to implement adjustments over the next two years. The following three priority areas can be observed:
  1. **Preparatory measures for the payout of privileged deposits.**
  2. **New requirements for liquidity risk management (LiqV-FINMA):** Ability to provide daily liquidity and scenario reports in times of stress.
  3. **Expansion of emergency liquidity** for all banks.
- How we can support you: Assessment of current state, tailored measures, and efficient implementation aligned with increasing regulatory expectations.

Liquidity: Focus topics

1 Privileged and secured deposits

- Operational preparatory measures for timely and proper payout of insured deposits in case of bank insolvency.
- Overview of privileged depositors must be created within 72 hours.
- Preparatory measures required for insolvency-related processes.

Revision BankA/BankO
Effective: 1 Jan 2023

Transition period: 31 Dec 2027
Applies to: All banks

2 New requirements in liquidity risk management

- New LiqO-FINMA: Banks must be able to provide daily liquidity reports and scenario data (stress scenarios) during liquidity stress.
- Explicit requirement to integrate funding planning into the liquidity risk management framework.
- Periodic assessment of HQLA criteria is required.

LiqO-FINMA
Effective: 1 Jan 2027 (planned)

Transition period: 1 Jan 2028
Applies to: All banks

3 Expanded SNB emergency liquidity

- From 2027, the SNB expands its emergency liquidity assistance to all banks.
- Preparatory measures will increasingly be expected from banks.

SNB communication
Effective: 1 Jan 2027

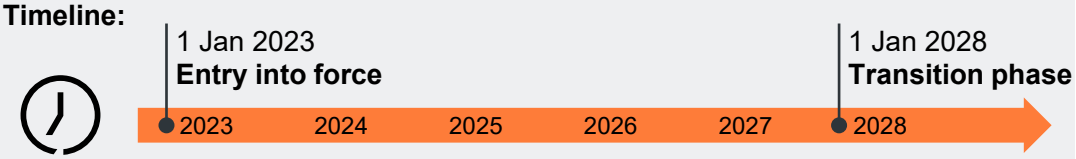
Transition period: -
Applies to: Expected (not explicitly required) for medium-sized to large banks.

01 Preparatory measures for privileged deposits payout

Background

- With the revision of BankA and BankO effective January 1, 2023, banks are **required** to implement preparatory measures for a potential bankruptcy scenario.
- A long transition period until end of 2027 has been provided to address technical challenges.
- **Process and infrastructure complexity** should not be underestimated and must be addressed early.

Timeline:



Requirements		Applicability
Adequate infrastructure	• Adequate IT systems and available personnel • Maintenance of service contracts	**> 2'500 Depositors**
Standardised processes	• Automated processes: Timely contact with depositors and disbursement of deposits	
Depositor list	• Overview of **secured deposits** per depositor • Creation within 72 hours required	**All banks**
Summary statement	• Total balance of **privileged deposits**	
Emergency plan	• Concept for infrastructure and processes within the emergency plan	**Only SIBs**

Recommended process in case of default[1]

1. Stop payment transactions
2. Process provisional payments
3. Convert foreign currency accounts
4. Document finalisation
5. Produce depositor list
6. System data backup
7. Suspend liability conditions
8. Maintain asset conditions
9. Consolidate numbered accounts

Challenges

Processes and infrastructure:
- Stress playbooks, test-runs, operational readiness
- Integration in BCM and crisis planning.

Data:
- Quality, controls, automation

Interfaces:
- Correctness of depositor list
- Technical implementation
- Complex cases, e.g. foreign branches.

1 Compare esisuisse: Specification list of depositors and some general information on the summary statement

02 New requirements for liquidity risk management

Background

- **The FINMA consultation** from July 3, 2025, introduces new preparation measures to restore liquidity.
- Banks must provide **daily liquidity reports** and **scenario data** during stress and integrate **liquidity funding planning** into the overall framework.
- The new LiqV-FINMA replaces the FINMA circular 15/02 „Liquidity risks – banks“, by essentially adopting its requirements and adding new concepts summarised below.

Applicability:
All banks, some relief for categories 4/5 banks

Timeline:

Key changes

Obligation to be able to provide **daily liquidity reports** and **scenario data** during periods of liquidity stress.

Explicit requirement to integrate **funding planning** into the liquidity risk management framework.

Periodic evaluation of the HQLA criteria is required.

Additional points, e.g. no outflows for sanctioned/pledged deposits, treatment of collateral accounts for deposit insurance.

Challenges

Phase out legacy systems and **automate data structures** to minimize manual data interventions.

Quantify funding drivers; perform scenario analysis; validate assumptions and data to explain stress test results.

Redesign liquidity and funding planning, adapt to new rules, and link it with strategy and forecasts.

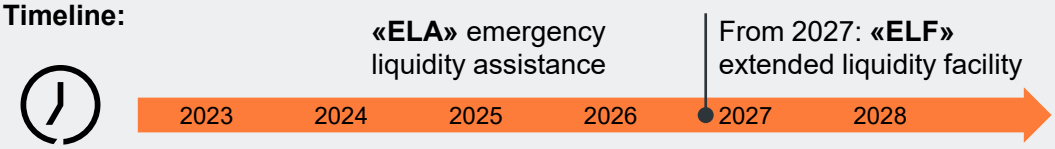
Integration of these concepts into the overarching framework of recovery and resolution planning.

03 Expansion of SNB emergency liquidity programs to all banks

Background

- The SNB provides liquidity assistance as the lender of last resort (LoLR).
- A **high degree of standardisation and automation** is targeted; the existing Emergency Liquidity Assistance (ELA) program is being expanded.
- **Preparatory measures** are critical, including ensuring that collateral can be transferred without issues.
- Participation and preparatory measures are increasingly expected of banks. Some cantons already require their cantonal banks to participate.

Timeline:



Overview emergency liquidity programs

Program	Description	Collaterals
LGHS: Liquidity against mortgage collateral (DE: Liquidität gegen hypothekarische Sicherheiten)	• Pledging mortgage collateral via SIX Terravis • **New:** Expanded preparatory measures	• Digital title deeds • Mortgages domiciled in Switzerland and denominated in CHF • Mortgages with Loan-to-Value (LTV) ≤ 100 % • Excluding agricultural properties • Excluding collateral pledged elsewhere (e.g. 125%-rule)
LGWS: Liquidity against securities (DE: Liquidität gegen Wertschriften)	• Pledging securities via SIX SIS • **New:** Available to all banks (previously only SIBs)	• SNB GC Basket plus «developed markets» • Investment-Grade-Rating, G10+ currencies; certain asset-types • Excluding securities issued from Swiss banks

Challenges

- Integration into the overarching framework or recovery and resolution planning.
- A limited selection of mortgages also offers potential for optimisation (e.g. Using non-digital title deeds for the 125% rule).
- Numerous technical and legal questions (e.g. contractual clause enabling transferability to SNB required).

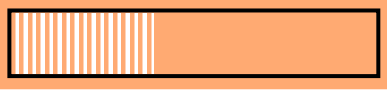
04 From analysis to implementation: Customised PwC project support

Phase 0

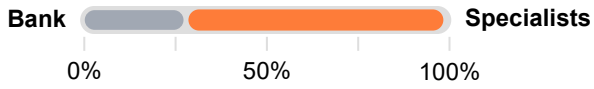
Preliminary assessment

Objective	1 Privileged deposits	2 Liq-risk management	3 Emergency liquidity
	• Process analysis • Assessment of data quality	• Gap assessment regarding the increased requirements	• Baseline assessment • Identification of optimisation potential

Time requirement[1]



Resource need[1]



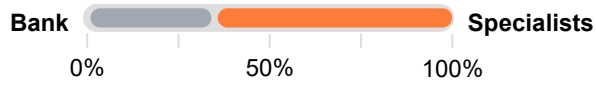
Phase 1

Tailored implementation plan

Objective	1 Privileged deposits	2 Liq-risk management	3 Emergency liquidity
	• Action plan for automation • Planning of test runs • Responsibilities and control points	• Concept for daily reporting capability • Definition of validation and automation measures	• Measures for transferability of collateral • Definition of processes and responsibilities

Time requirement[1]

Resource need[1]



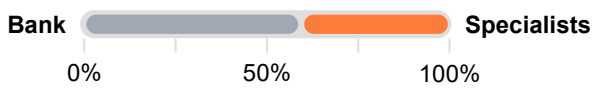
Phase 2

Implementation

Objective	1 Privileged deposits	2 Liq-risk management	3 Emergency liquidity
	• Integration of new processes, documentation • Test runs, crisis playbook • Integration into BCM	• Implementation of standardised processes • Adjustment of governance structures • Integration into BCM	• Conducting Dry-Runs • Documentation of emergency procedures • Integration into BCM

Time requirement[1]

Resource need[1]



[1] The project size and the breakdown of the individual phases depend on the bank's size and complexity. The figures provided are illustrative for medium-sized banks whose business models are of average complexity.

05 Experience and expertise for your tailored solutions

Deep market knowledge in banking

We have many years of audit experience in the Swiss financial sector and identify regulatory expectations and operational challenges at an early stage. This enables practical, proportionate solutions tailored to the system and process landscape.

Comprehensive expertise

Our specialists cover all key topics such as liquidity risk management, funding planning, HQLA valuation, and resolution planning. Through active participation in regulatory dialogues, we ensure that our approaches and recommendations consistently meet the current expectations of the supervisory authorities.

Interdisciplinary expertise

We combine know-how from liquidity risk, BCM, stress testing, data governance, and resolution planning into an integrated approach. This combination enables the seamless integration of new regulatory requirements into existing frameworks and accelerates implementation.

Your contacts

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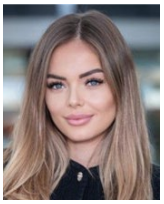

Selina Höfler
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