

Notification template for Article 131 of the Capital Requirements Directive (CRD) – Other Systemically Important Institutions (O-SIIs)

Template for notifying the European Central Bank (ECB) and the European Systemic Risk Board (ESRB) of the setting or resetting of an O-SII buffer under Article 131(7) CRD and of the identity of O-SIIs under Article 131(12) CRD

Please send/upload this template to:

- macropru.notifications@ecb.europa.eu when notifying the ECB (under Article 5 of the Single Supervisory Mechanism (SSM) Regulation¹);
- [DARWIN/ASTRA](#) when notifying the ESRB.

The ESRB will forward this notification to the European Commission, to the European Banking Authority (EBA) and to the competent and designated authorities of the Member States concerned without delay and will publicly disclose the names of the O-SIIs on its website. This notification will be made public by the ESRB once the relevant authorities have adopted and published the notified macroprudential measure².

E-mailing/uploading this template to the above addresses constitutes official notification; no further official letter is required. To facilitate the work of the notified authorities, please send the notification template in a format that allows the information to be read electronically.

1. Notifying national authority												
1.1 Name of the notifying authority	Financial Market Authority Liechtenstein											
1.2 Country of the notifying authority	Liechtenstein											
2. Description of the measure												
2.1a Institution or group of institutions concerned	On which institution(s) is the measure applied (name and Legal Entity Identifier (LEI) code)? Is the measure applied at: <ul style="list-style-type: none">- The highest level of consolidation?- A sub-consolidated level?- An individual level?											
	<table border="1"> <thead> <tr> <th>Name of institution</th> <th>LEI</th> <th>Consolidation level</th> </tr> </thead> <tbody> <tr> <td>LGT Bank AG</td> <td>5493009EIBTCB1X12G89</td> <td>Consolidated and individual level</td> </tr> <tr> <td>Liechtensteinische Landesbank AG</td> <td>529900OE1FOAM50XLP72</td> <td>Consolidated and individual level</td> </tr> <tr> <td>VP Bank AG</td> <td>MI3TLH110D58ORE24Q14</td> <td>Consolidated and individual level</td> </tr> </tbody> </table>	Name of institution	LEI	Consolidation level	LGT Bank AG	5493009EIBTCB1X12G89	Consolidated and individual level	Liechtensteinische Landesbank AG	529900OE1FOAM50XLP72	Consolidated and individual level	VP Bank AG	MI3TLH110D58ORE24Q14
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¹ Council Regulation (EU) No 1024/2013 of 15 October 2013 conferring specific tasks on the European Central Bank concerning policies relating to the prudential supervision of credit institutions (OJ L 287, 29.10.2013, p. 63).

² On request by the notifying authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.

2.1b Changes to the list of institutions concerned	<p>Please indicate under 2.1a any changes to the list as compared to the last notification, and provide an explanation, if applicable.</p> <p>The list is unchanged from the previous notification.</p>																								
2.2 Level of the buffer applied	<p>At what level is the fully phased-in buffer (in %) applied to the institution(s)?</p> <table border="1"> <thead> <tr> <th>Name of institution</th><th>New O-SII buffer</th><th>Previous O-SII buffer</th></tr> </thead> <tbody> <tr> <td>LGT Bank AG</td><td>2%</td><td>2%</td></tr> <tr> <td>Liechtensteinische Landesbank AG</td><td>2%</td><td>2%</td></tr> <tr> <td>VP Bank AG</td><td>2%</td><td>2%</td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table>	Name of institution	New O-SII buffer	Previous O-SII buffer	LGT Bank AG	2%	2%	Liechtensteinische Landesbank AG	2%	2%	VP Bank AG	2%	2%												
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2.3 Name of the ultimate EU parent institution	<p>Please provide the name and LEI code of the ultimate EU parent institution of the group for each of the O-SIIs identified. if the ultimate EU parent institution is not the concerned institution itself.</p> <table border="1"> <thead> <tr> <th>Name of identified O-SII</th><th>Ultimate EU parent institution</th><th>LEI of ultimate parent institution</th></tr> </thead> <tbody> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table>	Name of identified O-SII	Ultimate EU parent institution	LEI of ultimate parent institution																					
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2.4 Names of subsidiaries	<p>If any of the O-SIIs identified is a parent institution and the buffer is applied at a (sub)consolidated level, please name the subsidiaries of the institution that are notified as O-SIIs (please give names and LEI codes).</p> <table border="1"> <thead> <tr> <th>Name of parent O-SII identified</th><th>Name of O-SII subsidiary</th><th>LEI of O-SII subsidiary</th></tr> </thead> <tbody> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table>	Name of parent O-SII identified	Name of O-SII subsidiary	LEI of O-SII subsidiary																					
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3.2 Timing for publication	What is the date of publication of the notified measure?																								

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3.3 Disclosure	<p>Information about the strategy for the notified measure to the market. Please provide a link to the public announcement, if any.</p> <p>The FMA decision will be published on 28/11/2025. The results of the O-SII analysis are published on the website of the FMA.</p> <p>https://www.fma-li.li/en/supervision-regulation/financial-stability-and-macropredprudential-supervision/macropredprudential-instruments/capital-buffer-for-systemically-important-institutions</p>																																																						
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3.6 Review of the measure	<p>When will the measure be reviewed (Article 131, paragraphs (6) and (12), specify that the buffer, the identification of O-SIIs and their allocation to subcategories must be reviewed at least annually)?</p> <p>The measure will be reviewed annually</p>																																																						
4. Reason for O-SII identification and activation of the O-SII buffer																																																							
4.1 Scores of institutions or group of institutions concerned, as per EBA guidelines on the assessment of O-SIIs (Article 131.3 CRD)	<p>Please list here the names, overall scores and category scores of the O-SIIs identified based on</p> <ol style="list-style-type: none"> size; importance for the economy of the relevant Member State or the Union, capturing substitutability/financial institution infrastructure; complexity, including the additional complexities from cross-border activity; interconnectedness of the institution or (sub-)group with the financial system. <table border="1"> <thead> <tr> <th>Name of institution</th> <th>Size</th> <th>Substitutability</th> <th>Complexity</th> <th>Interconnectedness</th> <th>Overall Score</th> </tr> </thead> <tbody> <tr> <td>LGT Bank AG</td> <td>5680</td> <td>3843</td> <td>7025</td> <td>6319</td> <td>5717</td> </tr> <tr> <td>Liechtensteinische Landesbank AG</td> <td>2574</td> <td>3792</td> <td>1855</td> <td>2467</td> <td>2672</td> </tr> <tr> <td>VP Bank AG</td> <td>986</td> <td>1538</td> <td>614</td> <td>655</td> <td>948</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Please provide other relevant information (indicator values, methodology, calculations and formulas, data sources, information set used for denominators) in a separate Excel file.</p>	Name of institution	Size	Substitutability	Complexity	Interconnectedness	Overall Score	LGT Bank AG	5680	3843	7025	6319	5717	Liechtensteinische Landesbank AG	2574	3792	1855	2467	2672	VP Bank AG	986	1538	614	655	948																														
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<p>4.2 Methodology and indicators used for designation of the O-SII (Article 131.3)</p>	<p>Please provide information on:</p> <ol style="list-style-type: none"> whether you followed the EBA guidelines on the assessment of O-SIIs; which threshold score has been set to identify O-SIIs; whether relevant entities with relative total assets not in excess of 0.02% have been excluded from the identification process; the names and scores of all relevant entities not excluded from the identification process (could be sent in a separate Excel file, see 4.1); whether non-bank institutions have been included in the calculations. <p>a. The identification of the O-SII follows the EBA guidelines according to EBA/GL/2014/10.</p> <p>b. The standard threshold of 350 basis points has been applied.</p> <p>c. All banks were part of the identification process.</p> <p>d. Please refer to the attached Excel file.</p> <p>e. Only banking institutions were considered.</p>															
<p>4.3 Supervisory judgement</p>	<p>Have any of the institutions listed in 2.1 been identified by applying supervisory judgement as laid down in EBA guidelines on the assessment of O-SIIs? If yes, please list the respective institutions and provide information on:</p> <ol style="list-style-type: none"> which of the optional indicators have been used to justify the supervisory assessment decisions, if any, and what the scores were; why these optional indicators are relevant for the Member State; why the bank is systemically important in terms of those particular optional indicators. <p>None of the institutions listed were identified by applying supervisory judgement.</p>															
<p>4.4 Calibrating the O-SII buffer</p>	<p>Please provide information on the criteria and indicators used to calibrate the level of the O-SII buffer requirement and the mapping to institution-specific buffer requirements.</p> <p>With regard to the calibration methodology, the FMA has defined three buckets with different buffer rates depending on the score. The categories differentiate the institutions according to their level of systemic importance depending on the respective score. Each identified institution has to hold an O-SII buffer of at least 1 %. Currently, all of the three identified O-SIIs are allocated to Bucket 1, i.e. signalling “very high” systemic importance. When a bucket change occurs, the new category will apply only if the intermediary falls within that bucket for two consecutive years.</p> <table border="1" data-bbox="568 1410 1415 1599"> <thead> <tr> <th data-bbox="568 1410 663 1439">Scores</th> <th data-bbox="710 1410 826 1439">Category</th> <th data-bbox="1250 1410 1393 1439">O-SII Buffer</th> </tr> </thead> <tbody> <tr> <td data-bbox="568 1446 663 1475">0 – 349</td> <td data-bbox="710 1446 964 1475">No systemic relevance</td> <td data-bbox="1250 1446 1266 1475">–</td> </tr> <tr> <td data-bbox="568 1482 663 1511">350 – 674</td> <td data-bbox="710 1482 1202 1511">Bucket 3 – considerable systemic importance</td> <td data-bbox="1250 1482 1314 1511">1.0%</td> </tr> <tr> <td data-bbox="568 1518 663 1547">675 – 999</td> <td data-bbox="710 1518 1123 1547">Bucket 2 – high systemic importance</td> <td data-bbox="1250 1518 1314 1547">1.5%</td> </tr> <tr> <td data-bbox="568 1554 663 1583">≥ 1000</td> <td data-bbox="710 1554 1171 1583">Bucket 1 – very high systemic importance</td> <td data-bbox="1250 1554 1314 1583">2.0%</td> </tr> </tbody> </table>	Scores	Category	O-SII Buffer	0 – 349	No systemic relevance	–	350 – 674	Bucket 3 – considerable systemic importance	1.0%	675 – 999	Bucket 2 – high systemic importance	1.5%	≥ 1000	Bucket 1 – very high systemic importance	2.0%
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<p>4.5 Effectiveness and proportionality of measure</p>	<p>Please provide a justification for why the O-SII buffer is considered likely to be effective and proportionate to mitigate the risk.</p> <p>The impact of the failure of a systemic bank on the domestic financial sector and the real economy is much larger than the impact of the failure of a non-systemic bank. By increasing the loss-absorbing capacity of systemic institutions, the probability of default is significantly reduced. Due to the large size of Liechtenstein’s O-SIIs relative to the domestic economy, we assess the applied O-SII buffers as being important to safeguarding financial stability.</p>															

5. Sufficiency, consistency and non-overlap of the policy response	
5.1 Sufficiency of the policy response	<p>For a macroprudential policy to be 'sufficient', the policy responses must be deemed to significantly mitigate, or reduce the build-up of, risks over an appropriate time horizon with a limited unintended impact on the general economy.</p> <p>Note that the ESRB will use the assessment of the macroprudential stance as relevant input in assessing the sufficiency of the macroprudential policy in the Member State.</p> <p>Please provide any additional information that the ESRB should consider in assessing the sufficiency of the policy response.</p> <p>The identification process of O-SIIs in Liechtenstein is based on the EBA guidelines (EBA/GL/2014/10). No supervisory judgement is applied. The bucketing approach with different buffer rates should consider differences in the degree of systemic importance. The measures taken are assessed to be sufficient.</p>
5.2 Consistency of application of the policy response	<p>For a macroprudential policy to be 'consistent', the policy instruments meet their respective objectives, as outlined in ESRB/2013/1³, and must be implemented in accordance with the common principles set out in the relevant legal texts.</p> <p>Note that the ESRB assessment of consistency will consider whether the same systemic risks are addressed in a similar way across and within the Member States over time.</p> <p>Please provide any additional information that the ESRB should consider in assessing the consistency of the policy response.</p> <p>The application of an O-SII buffer is both time and cross-country consistent.</p>
5.3 Non-overlap of the policy response	<p>For a policy instrument to be 'non-overlapping', it should aim to address a systemic risk that either differs from a risk addressed by other active tools in the same Member State, or be complementary to another tool in that Member State which addresses the same systemic risk.</p> <ul style="list-style-type: none"> - Are other policy instruments used to address the <u>same</u> systemic risk? - If yes, please explain the need for more than one instrument to address the same systemic risk and how the different instruments interact with each other. <p>No other active instrument addresses the same systemic risks.</p>
6. Cross-border and cross-sector impact of the measure	
6.1 Assessment of cross-border effects and the likely impact on the Internal Market (Recommendation ESRB/2015/2⁴)	<p>Assessment of the cross-border effects of implementation of the measure.</p> <p>a. Assessment of the spillover channels operating via risk adjustment and regulatory arbitrage. The relevant indicators provided in Chapter 11 of the ESRB Handbook on Operationalising Macroprudential Policy in the Banking Sector⁵ and the Framework to assess cross-border spillover effects of macroprudential policies of the ECB Task Force on cross-border spillover effects of macroprudential measures can be used.</p> <p>b. Assessment of the:</p>

³ Recommendation of the European Systemic Risk Board of 4 April 2013 on intermediate objectives and instruments of macro-prudential policy (ESRB/2013/1) (OJ C 170, 15.6.2013, p. 1)

⁴ Recommendation of the European Systemic Risk Board of 15 December 2015 on the assessment of cross-border effects of and voluntary reciprocity for macroprudential policy measures (ESRB/2015/3) (OJ C 97, 12.3.2016, p. 9).

⁵ Available on the ESRB's website at www.esrb.europa.eu.

	<ul style="list-style-type: none"> ○ cross-border effects of implementation of the measure in your own jurisdiction (inward spillovers); ○ cross-border effects on other Member States and on the Single Market of the measure (outward spillovers); ○ overall impact on the Single Market of implementation of the measure. <p>The measure applies to Liechtenstein banks at the consolidated and individual level. Theoretically, there could be an impact on individuals or companies outside of Liechtenstein through cross-border credits or exposures of subsidiaries and branches. However, given the current capitalisation of the identified banks – well above the regulatory requirements, including buffers – the FMA expects the impact to be very low (or even nonexistent).</p>																
<p>6.2 Assessment of leakages and regulatory arbitrage within the notifying Member State</p>	<p>Referring to your Member State's specific characteristics, what is the scope for "leakages and regulatory arbitrage" in your own jurisdiction (i.e. circumvention of the measure/leakages to other parts of the financial sector)?</p> <p>Is there scope for "leakages and regulatory arbitrage" in other jurisdictions?</p> <p>Since the buffer is applied at the consolidated level, jurisdictional shifts of activities within the banking groups due to regulatory arbitrage are impossible. Additionally, given the high capitalisation of the identified institutions, the incentives to circumvent the measures are very limited.</p>																
<p>7. Combinations and interactions with other measures</p>																	
<p>7.1 Combinations between G-SII and O-SII buffers (Article 131.14)</p>	<p>If both G-SII and O-SII criteria apply to the same institution at consolidated level, which of the two buffers is the highest?</p> <table border="1" data-bbox="564 1140 1437 1282"> <thead> <tr> <th>Name of institution</th> <th>O-SII buffer</th> <th>G-SII buffer</th> </tr> </thead> <tbody> <tr> <td></td><td>%</td><td>%</td></tr> <tr> <td></td><td>%</td><td>%</td></tr> <tr> <td></td><td>%</td><td>%</td></tr> </tbody> </table>	Name of institution	O-SII buffer	G-SII buffer		%	%		%	%		%	%				
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<p>7.2 Combinations with systemic risk buffers (SyRBs) (Article 131.15 CRD)</p>	<p>Are any of the institutions identified as O-SIIs subject to a systemic risk buffer?</p> <p>If yes, please provide the following information:</p> <ol style="list-style-type: none"> a. What is/are the systemic risk buffer rate(s)? b. At what level is/are the systemic risk buffer rate(s) applied (i.e. consolidation level and/or individual)? c. Is the sum of the systemic risk buffer rate(s) and the O-SII buffer rate (or the higher of the G-SII and O-SII buffer rates, if a group is subject to a G-SII buffer and to an O-SII buffer at consolidated level) to which the same institution is subject over 5%? <table border="1" data-bbox="564 1630 1421 2034"> <thead> <tr> <th>Name of institution</th> <th>SyRB rate</th> <th>SyRB application level</th> <th>Sum of G-SII/O-SII and SyRB rates</th> </tr> </thead> <tbody> <tr> <td>LGT Bank AG</td> <td>1% for loans secured by residential and commercial property in Liechtenstein</td> <td>Consolidated and individual level</td> <td>3%</td> </tr> <tr> <td>Liechtensteinische Landesbank AG</td> <td>1% for loans secured by residential and commercial property in Liechtenstein</td> <td>Consolidated and individual level</td> <td>3%</td> </tr> <tr> <td>VP Bank AG</td> <td>1% for loans secured by residential and commercial property in Liechtenstein</td> <td>Consolidated and individual level</td> <td>3%</td> </tr> </tbody> </table>	Name of institution	SyRB rate	SyRB application level	Sum of G-SII/O-SII and SyRB rates	LGT Bank AG	1% for loans secured by residential and commercial property in Liechtenstein	Consolidated and individual level	3%	Liechtensteinische Landesbank AG	1% for loans secured by residential and commercial property in Liechtenstein	Consolidated and individual level	3%	VP Bank AG	1% for loans secured by residential and commercial property in Liechtenstein	Consolidated and individual level	3%
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7.3 O-SII requirement for a subsidiary (Article 131.8 CRD)	If the O-SII is a subsidiary of an EU parent institution subject to a G-SII or O-SII buffer on a consolidated basis, what is the G-SII or O-SII buffer rate on a consolidated basis of the parent institution? Does the cap for the subsidiary prevent the implementation of a higher O-SII buffer based on the domestic buffer setting methodology?																
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8. Miscellaneous																	
8.1 Contact person(s)/mailbox at notifying authority	<p>Contact person(s) (name, phone number and e-mail address) and mailbox for further inquiries.</p> <p>Martin Gächter, martin.gaechter@fma-li.li, +423 236 7392</p> <p>Sophia Döme, sophia.doeme@fma-li.li, +423 236 7493</p> <p>Elias Hasler, elias.hasler@fma-li.li, +423 236 7556</p>																
8.2 Any other relevant information																	
8.3 Date of the notification	<p>Please provide the date on which this notification was uploaded/sent.</p> <p>28/11/2025</p>																