

Notification template for Articles 133 and 134(5) of the Capital Requirements Directives (CRD) – Systemic risk buffer (SyRB)

Template for notifying the European Central Bank (ECB) and European Systemic Risk Board (ESRB) of the setting or resetting of one or more systemic risk buffer rates pursuant to Article 133(9) CRD and to request that the ESRB issue a recommendation to other Member States to reciprocate the measure under Article 134(5) 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);
- notifications@esrb.europa.eu when notifying the ESRB.

The ESRB will forward the notification to the European Commission, the European Banking Authority (EBA) and the competent and designated authorities of the Member States concerned without delay. 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 and scope of the notification	
1.1 Name of the notifying authority	Financial Market Authority Liechtenstein
1.2 Country of the notifying authority	Liechtenstein
1.3 Type of measure (also for reviews of existing measures)	<p>Which SyRB measure do you intend to implement?</p> <p><input type="checkbox"/> Activate a new SyRB</p> <p><input type="checkbox"/> Change the level of an existing SyRB</p> <p><input type="checkbox"/> Change the scope of an existing SyRB (incl. changes to a subset of institutions or exposures)</p> <p><input type="checkbox"/> De-activate an existing SyRB</p> <p><input checked="" type="checkbox"/> Reset an existing SyRB (review)</p>

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authority, it may be agreed with the Head of the ESRB Secretariat that this notification, or a part thereof, should not be published for reasons of confidentiality or financial stability.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

<p>2.1 Institutions covered by the intended SyRB</p>	<p>Please indicate whether the SyRB applies to:</p> <p><input checked="" type="checkbox"/> All institutions authorised in the Member State</p> <p><input type="checkbox"/> One or more subsets of credit institutions in the sector (please provide the names and identifiers (Legal Entity Identifier (LEI) code) of institutions covered)</p> <table border="1" data-bbox="620 518 1472 743"> <thead> <tr> <th>Name of institution</th> <th>LEI code</th> <th>Consolidation level</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table> <p><input type="checkbox"/> A subsidiary whose parent is established in another Member State. (Please provide the names and identifiers (LEI code) of subsidiaries)</p> <table border="1" data-bbox="620 844 1472 1114"> <thead> <tr> <th>Name of subsidiary</th> <th>Name of the parent</th> <th>LEI code of the subsidiary</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table> <p>If the SyRB applies to a subset of institutions, please describe the criteria for selection of the relevant institutions.</p>	Name of institution	LEI code	Consolidation level																			Name of subsidiary	Name of the parent	LEI code of the subsidiary																					
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<p>2.2 Exposures covered by the SyRB (Article 133(5) CRD)</p>	<p>Please indicate the exposures to which the SyRB applies:</p> <p><input type="checkbox"/> (a) all exposures located in the Member State that is setting the buffer;</p> <p><input checked="" type="checkbox"/> (b) the following sectoral exposures located in the Member State that is setting the buffer:</p> <ul style="list-style-type: none"> (i) <input checked="" type="checkbox"/> all retail exposures to natural persons that are secured by residential property; (ii) <input checked="" type="checkbox"/> all exposures to legal persons that are secured by mortgages on commercial immovable property; (iii) <input type="checkbox"/> all exposures to legal persons excluding those specified in point (ii); (iv) <input type="checkbox"/> all exposures to natural persons excluding those specified in point (i); <p><input type="checkbox"/> (c) subsets of any of the sectoral exposures identified in point (b). Please specify the subsets in Section 2.3;</p> <p><input type="checkbox"/> (d) all exposures located in other Member States;</p> <p><input type="checkbox"/> (e) exposures located in third countries.</p>																																													

2.3 Subsets of sectoral exposures	<p>Where the systemic risk buffer applies to subsets of any of the sectoral exposures identified (see point 2.2 (c)), please specify:</p> <ul style="list-style-type: none"> - The elements of the dimensions and subdimensions that were used to identify the subset(s) of sectoral exposures as laid down in the EBA Guidelines on the appropriate subsets of exposures in the application of SyRB: <table border="1" data-bbox="625 422 1462 705"> <thead> <tr> <th data-bbox="625 422 1049 455">Dimensions/subdimensions</th><th data-bbox="1049 422 1462 455">Elements</th></tr> </thead> <tbody> <tr> <td data-bbox="625 455 1049 489">1. Type of debtor or counterparty sector</td><td data-bbox="1049 455 1462 489">Natural und legal persons</td></tr> <tr> <td data-bbox="625 489 1049 523">1.a <i>Economic activity</i></td><td data-bbox="1049 489 1462 523"></td></tr> <tr> <td data-bbox="625 523 1049 557">2. Type of exposure</td><td data-bbox="1049 523 1462 557">Real estate exposure</td></tr> <tr> <td data-bbox="625 557 1049 590">2.a <i>Risk profile</i></td><td data-bbox="1049 557 1462 590"></td></tr> <tr> <td data-bbox="625 590 1049 624">3. Type of collateral</td><td data-bbox="1049 590 1462 624">Residential and commercial property</td></tr> <tr> <td data-bbox="625 624 1049 658">3.a <i>Geographical area</i></td><td data-bbox="1049 624 1462 658">Liechtenstein</td></tr> </tbody> </table> <ul style="list-style-type: none"> - Assessment conducted in accordance with Section 5 of the EBA Guidelines on the systemic relevance of the risks stemming from this subset, taking into account: <ul style="list-style-type: none"> (i) size (ii) riskiness (iii) interconnectedness. - Why it would not have been appropriate to set the systemic risk buffer at the level of a sector (as in point 2.2(b)) to cover the risk targeted? 	Dimensions/subdimensions	Elements	1. Type of debtor or counterparty sector	Natural und legal persons	1.a <i>Economic activity</i>		2. Type of exposure	Real estate exposure	2.a <i>Risk profile</i>		3. Type of collateral	Residential and commercial property	3.a <i>Geographical area</i>	Liechtenstein																
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2.4 Exposures located in other Member States and in third countries	<p>If the systemic risk buffer applies to exposures located in other Member States or third countries (see points 2.2(d) and (e)), please include the names of those countries</p> <p>Not applicable as the SyRB does not apply to exposures located in other Member States or third countries. .</p>																														
2.5 Buffer rate (Article 133(9)(e) CRD)	<p>Specify the intended SyRB rate. If different buffer requirements apply to different exposures or subsets of exposures, please specify for each exposure indicated under 2.2.</p> <p>Please indicate any changes to the list in 2.1 of institutions concerned and in the buffer rates given in point 2.5 as compared to the last notification, and provide an explanation, if applicable.</p> <table border="1" data-bbox="625 1455 1462 1969"> <thead> <tr> <th data-bbox="625 1455 890 1489" rowspan="2">Exposures</th> <th data-bbox="890 1455 1208 1489" rowspan="2">New SyRB rate</th> <th data-bbox="1208 1455 1462 1489" rowspan="2">Previous SyRB rate</th> <th data-bbox="1208 1489 1303 1522" rowspan="2">All institutions (SyRB rate)</th> <th data-bbox="1303 1489 1462 1522" rowspan="2">Set of institutions (range of SyRB rates)</th> </tr> <tr> <th data-bbox="625 1489 890 1522"></th> <th data-bbox="890 1489 1208 1522"></th> <th data-bbox="1208 1489 1462 1522"></th> <th data-bbox="1208 1522 1303 1556"></th> <th data-bbox="1303 1522 1462 1556"></th> </tr> </thead> <tbody> <tr> <td data-bbox="625 1522 890 1686">(a) All exposures located in the Member State that is setting the buffer</td><td data-bbox="890 1522 1208 1686">% % - %</td><td data-bbox="1208 1522 1462 1686"></td><td data-bbox="1208 1686 1303 1720"></td><td data-bbox="1303 1686 1462 1720"></td></tr> <tr> <td data-bbox="625 1686 890 1754">(b) <i>The following sectoral exposures located in the Member State that is setting the buffer:</i></td><td data-bbox="890 1686 1208 1754"></td><td data-bbox="1208 1686 1462 1754"></td><td data-bbox="1208 1754 1303 1787"></td><td data-bbox="1303 1754 1462 1787"></td></tr> <tr> <td data-bbox="625 1754 890 1850">(i) All retail exposures to natural persons that are secured by residential property</td><td data-bbox="890 1754 1208 1850">1% % - %</td><td data-bbox="1208 1754 1462 1850"></td><td data-bbox="1208 1850 1303 1884">1%</td><td data-bbox="1303 1850 1462 1884"></td></tr> <tr> <td data-bbox="625 1850 890 1969">(ii) All exposures to legal persons that are secured by mortgages on commercial immovable property</td><td data-bbox="890 1850 1208 1969">1% % - %</td><td data-bbox="1208 1850 1462 1969"></td><td data-bbox="1208 1969 1303 2003">1%</td><td data-bbox="1303 1969 1462 2003"></td></tr> </tbody> </table>	Exposures	New SyRB rate	Previous SyRB rate	All institutions (SyRB rate)	Set of institutions (range of SyRB rates)						(a) All exposures located in the Member State that is setting the buffer	% % - %				(b) <i>The following sectoral exposures located in the Member State that is setting the buffer:</i>					(i) All retail exposures to natural persons that are secured by residential property	1% % - %		1%		(ii) All exposures to legal persons that are secured by mortgages on commercial immovable property	1% % - %		1%	
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(iii) All exposures to legal persons excluding those specified in point (ii)	%	% - %		
(iv) All exposures to natural persons excluding those specified in point (i)	%	% - %		
(c) All exposures located in other Member States	%	% - %		
(e) Exposures located in third countries	%	% - %		
(f) <i>Subsets of any of the sectoral exposures identified in point (b):</i>				
(i) Please specify the subset [Dimension/subdimensions]	%	% - %		

If different buffer requirements apply to different subsets of institutions, please specify for each institution mentioned under 2.1.

Set of institutions				
Exposures	Name of institution	LEI code	New SyRB rate	Previous SyRB rate
			%	
			%	
			%	

3. Timing for the measure

3.1 Timing for the decision	What is the date of the official decision? <u>For SSM countries when notifying the ECB</u> : provide the date on which the decision referred to in Article 5 of the Single Supervisory Mechanism Regulation (SSMR) will be taken. 15/12/2025
3.2 Timing for publication	What is the proposed date of publication of the notified measure? 15/12/2025
3.3 Disclosure	Information about the strategy for communicating the notified measure to the market. Do you also intend to publish the justification for the SyRB? If not, why do you consider that publication could jeopardise the stability of the financial system? The justification for the sectoral SyRB is published on the FMA website: https://www.fma-li.li/de/aufsicht-regulierung/finanzstabilitaet-und-makroprudanzielle-aufsicht/ausschuss-fuer-finanzmarktstabilitaet/risikohinweise-und-empfehlungen https://www.fma-li.li/en/supervision-regulation/financial-stability-and-macroprudential-supervision/financial-stability-council/warnings-and-recommendations
3.4 Timing for application	What is the intended date of application of the measure? 15/12/2025
3.5 Phasing in	What is the intended timeline for phase-in of the measure (if applicable)? No phasing in.

	<p>Until when will the measure presumably be in place? What are the conditions for its deactivation? On what indicators would the decision be based? Please specify whether you intend to review the measure before the maximum period of two years foreseen in Article 133(8)(b) CRD.</p> <p>3.6 Review/deactivation of the measure</p> <p>The SyRB for Liechtenstein's banking sector is intended to be reviewed at least every two years. The measure is also intended to be in place as long as systemic risks associated with the high level of private household indebtedness is assessed to be significant. If systemic risks continue to increase, in particular due to rising risks related to private household debt, the authorities in Liechtenstein will consider increasing the buffer rate as part of its regular review of the systemic risk buffer, unless other (and more accurate) macroprudential tools are available to address the systemic risks.</p>
<p>4. Reasons for the notified SyRB</p>	
<p>4.1 Description of the macroprudential or systemic risk in your Member State (Article 133(9)(a) of the CRD)</p>	<p>Where applicable, please classify the risks targeted by the notified SyRB under the following categories:</p> <ul style="list-style-type: none"> (i) risks stemming from the structural characteristics of the banking sector <ul style="list-style-type: none"> - Size and concentration of banks - Ownership structure - Other structural risks (ii) risks stemming from the propagation and amplification of shocks within the financial system <ul style="list-style-type: none"> - Exposure concentration/asset commonality - Commonality in bank business models - Financial interconnections and contagion (iii) risks to the banking system stemming from either the real economy or specific sectors <ul style="list-style-type: none"> - Economic openness - Sectoral risks from the private non-financial sector, households and the public sector (iv) Other risks <p>Please specify:</p> <ul style="list-style-type: none"> - Whether these risks are widespread across the whole financial sector? - Or whether they are concentrated only in one or more subsets of the sector? <p>A significant structural systemic risk in Liechtenstein is the high level of household indebtedness relative to GDP and income and the associated risks for the banking sector, mainly due to the high volume of mortgage loans in some of the banks' portfolios. This exposure concentration and commonality in bank business models for some banks can threaten the resilience of the whole banking sector in case of a decrease of household income, price corrections or an abrupt increase in interest rates. If these risks would materialize, bank write-downs and losses will likely increase, in particular, with respect to loans to heavily indebted households. The risks observed need to be addressed by capital buffers to increase the resilience of all banks supplying real estate loans located in Liechtenstein, for which reason the sectoral systemic risks buffer includes the risk positions both towards natural and legal persons. The buffer rate was calibrated based on likely losses in an assumed stress scenario and past crisis costs (see 5.1).</p>

	<p>The activation of the sectoral systemic risk buffer aims to increase the resilience of the banking sector against the risks of high household indebtedness. For a detailed analysis of the risks in the Liechtenstein real estate sector, see the Financial Stability Reports 2018-2025 and the FMA report from 2021 on "Liechtenstein's Mortgage and Real Estate Market: Current Developments and Risks from a Financial Stability Perspective" (only available in German).</p>
<p>4.2 Reasons why the dimension of the macroprudential or systemic risks threatens the stability of the financial system in your Member State (Article 133(9)(b) CRD)</p>	<p>Reasons why the macroprudential or systemic risks threaten financial stability and justifying the systemic risk buffer rate.</p> <p>In Liechtenstein, the high level of mortgage assets on bank balance sheets and the associated high indebtedness of the private household sector have been identified as systemic cluster risks. Mortgage lending in Liechtenstein is an important business segment for some Liechtenstein banks. Household debt (relative to GDP) in Liechtenstein is among the highest across European countries. Private household debt decreased from its highest levels of around 120% in 2018 to around 104% of GDP as of end 2024, with the largest share of household debt consisting of mortgage loans. Despite several risk-mitigating factors, the structurally high level of household debt represents a systemic risk for the Liechtenstein banking sector that needs to be addressed accordingly. The higher risk appetite of households - e.g. through a stock or bond portfolio running in parallel to the mortgage loan - is associated with corresponding risks in the event of a financial market downturn and could result in a downward spiral in the Liechtenstein banking sector, also with regard to the collateral of the loans (e.g. real estate), with corresponding procyclical effects. Therefore, banks are affected to varying degrees by this systemic risk due to different proportions of mortgage loans.</p> <p>An abrupt increase in interest rates, a loss of employment or a decline in real estate prices could lead to large defaults on loans and, as a consequence, to high write-downs for banks if borrowers cannot service their debt/interest payments. In this situation, some Liechtenstein banks could suffer large capital losses that could potentially threaten their existence despite their robust level of capitalization. Higher capital requirements can therefore improve the risk-bearing capacity of banks vis-à-vis this systemic cluster risk.</p>
<p>4.3 Indicators used for activation of the measure</p>	<p>Provide the indicators triggering activation of the measured. When notifying the ECB, please provide the data on which the decision is based, if possible (preferably in an Excel file).</p> <p>Besides indicators for systemic cluster risk and systemic vulnerabilities, the following indicators are used:</p> <ul style="list-style-type: none"> • Mortgage loan volume (stock + flow) • Mortgage loan growth (stock + flow) • Household debt ratio (% of GDP) • Building activity • LSTI, LTV, ICR, NPL ratios, interest rate fixation periods, exception-to-policy loans (regarding affordability and LTV), DSCR etc. <p>Please also see the detailed analysis of the risks in the Liechtenstein real estate sector in the FMA report from 2021 on "Liechtenstein's Mortgage and Real Estate Market: Current Developments and Risks from a Financial Stability Perspective", where a broad set of indicators is used to assess the risks in the Liechtenstein real estate market as well as the most recent Financial Stability Report 2025.</p>

<p>4.4 Effectiveness and proportionality of the measure (Article 133(9)(c) CRD)</p>	<p>Explanation why the draft measures are deemed likely to be effective and proportionate to mitigate the risk. E.g. how will the effectiveness of the measure be assessed? Based on which indicators? What are the expected transmission mechanisms?</p> <p>The sectoral SyRB of 1% for exposures secured by real estate in Liechtenstein is considered effective and proportionate due to the structural risks based on past crisis costs and stress scenarios. At the same time, by strengthening the resilience of the banking system, the measure effectively contributes to mitigating the identified structural risks in the Liechtenstein banking sector. Setting a sectoral systemic risk buffer for real estate exposures increases the resilience specifically of the banks providing real estate financing. These institutions have a higher risk-bearing capacity in case of a materialization of the risks described in 4.1. The results of stress scenarios on the one hand and historical crisis costs in the EEA and Switzerland on the other hand indicate that a sectoral SyRB ratio of 1% for mortgages in Liechtenstein is conducive to maintaining the resilience of the banking system to the identified systemic risks and can thereby effectively promote financial stability in Liechtenstein. In addition, the buffer is proportionate, as it does not prohibit any kind of lending, but instead brings about minor changes to the relative prices of certain lending segments. Furthermore, the Liechtenstein banking sector has a solid capital base. All Liechtenstein banks hold a capital surplus above the overall regulatory capital requirements. No higher costs for the real economy or negative effects on GDP are expected to result from the recalibration of the SyRB. The costs for the real economy are estimated at a negligible level. The measure will be assessed on a regular basis by the FMA. The Financial Stability Council will continue to discuss and assess the measures and the development of real estate related risks in the banking sector in its future meetings.</p>
<p>4.5 Reason why the systemic risk buffer is not duplicating the functioning of the O-SII buffer provided for in Article 131 CRD (Article 133(9)(f) CRD)</p>	<p>Where the systemic risk buffer rate applies to all exposures, please justify why the authority considers that the systemic risk buffer is not duplicating the functioning of the O-SII buffer provided for in Article 131 CRD.</p> <p>Not applicable, as the SyRB applies to sectoral exposures located in Liechtenstein.</p>
<p>5. Sufficiency, consistency and non-overlap of the policy response</p>	
<p>5.1 Sufficiency of the policy response</p>	<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 this assessment of the macroprudential stance as relevant input in assessing the sufficiency of the macroprudential policy in the Member States.</p> <p>Please provide any additional information that the ESRB should consider in assessing the sufficiency of the policy response.</p> <p>The systemic risk buffer is assessed to be sufficient based on past crisis costs in the EU and Switzerland and stress scenarios, by assuming an abrupt and substantial rise in interest rates, which has negative effects on banks' funding conditions and credit risk. After considering the risk-mitigating factors in Liechtenstein, the calibration results in a sectoral SyRB for all Liechtenstein banks of 1% of the risk amount of the loans secured by immovable property in Liechtenstein. The sectoral SyRB thus aims at strengthening the resilience of the banking sector to the identified real estate risks. The systemic risk buffer is however only one measure to mitigate the build-up of real estate related</p>

	<p>systemic risks. In combination with various borrower-based measures (BBM) that are already in place as well as additional BBM that became effective in July 2024, the policy mix is considered to be sufficient to address the identified structural risks in an efficient and effective manner.</p>
5.2 Consistency of application of the policy response	<p>For a macroprudential policy to be 'consistent', the policy instruments must be deemed to 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 systemic risk buffer is consistent with the objectives as outlined in ESRB/2013/1 and is applied under Article 133 of the CRD and in accordance with Article 104 Banking Act. In addition, the buffer is consistently applied in line with the macroprudential policy in Liechtenstein, with the objective to maintaining high capital buffers to enhance the resilience of the banking sector in Liechtenstein against real estate-related systemic risks. The introduction of the measure has been extensively discussed in the Financial Stability Council and the FMA.</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 to the risk addressed by other active tools in the same Member State, or to 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>The instrument aims to increase the resilience of the banking sector against macroprudential systemic risks. There are no policy instruments available to address the same systemic risk.</p>
6. Cross-border and cross-sector impact of the measure	

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).

<p>6.1 Assessment of cross-border effects and the likely impact on the Internal Market (Article 133(9)(d) of the CRD and Recommendation ESRB/2015/2⁴)</p>	<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> <ul style="list-style-type: none"> o cross-border effects of implementation of the measure in your own jurisdiction (inward spillovers); o cross-border effects on other Member States and on the Single Market of the measure (outward spillovers); o overall impact on the Single Market of implementation of the measure. <p>As the SyRB only targets domestic exposures secured by immovable property of banks located in Liechtenstein, cross-border effects (neither inward nor outward spillover effects) and the likely impact of the measure on the Internal Market are expected to be negligible.</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>Given that the SyRB is applied on a consolidated and individual basis for all banks, we do not expect any leakages and regulatory arbitrage in Liechtenstein. Also, leakages and circumventions to other financial sectors is expected to be very limited to non-existent.</p>
<p>6.3 Request for reciprocation by other Member States (Article 134(5) CRD and Recommendation ESRB/2015/2)</p>	<p>Does the authority intend to ask the ESRB to issue a recommendation to other Member States to reciprocate the measure in accordance with Article 134(5) CRD?</p> <p>Choose an item.</p> <ul style="list-style-type: none"> - If yes, please provide in Section 6.4. the justification for that reciprocity. - If no, what are the reasons for not requesting reciprocation? <p>No. Given the high concentration of the Liechtenstein banking sector (the three largest institutions cover over 90% of total assets and lending), the limited activities of foreign banks in the domestic mortgage market as well as the design of the SyRB only addressing real estate property exposures domiciled in Liechtenstein, the reciprocation by other Member States is not required.</p>
<p>6.4 Justification for the request for reciprocation by other Member States</p>	<p>To request reciprocation, please provide the following:</p> <ul style="list-style-type: none"> - a concise description of the measure to be reciprocated; - the financial stability considerations underlying the reciprocity request, including the reasons why the reciprocity of the activated measure is deemed necessary for its effectiveness; - the proposed materiality threshold and justification for that level.

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.

(Article 134(5) CRD and Recommendation ESRB/2015/2)	<p>If the ESRB deems the request for reciprocation to be justified, the description provided will form the basis for translation into all EU official languages for the purposes of an update of Recommendation ESRB/2015/2.</p> <p>If the ESRB deems the request for reciprocation to be justified, the description provided will form the basis for translation into all EU official languages for the purposes of an update of Recommendation ESRB/2015/2.</p> <p>Liechtenstein authorities do not request reciprocation by other Member States.</p>																																
7. Combination of the SyRB with other buffers																																	
7.1 Combination with G-SII and/or O-SII buffers (Article 131(15) CRD)	<p>Is the sum of the systemic risk buffer rate and the higher of the O-SII/G-SII buffer rates to which the same institution is subject above 5%?</p> <p>No.</p> <p>Please provide a list of the institutions subject to a G-SII or an O-SII buffer, indicating the G-SII or O-SII buffer and the sum of the G-SII/O-SII and SyRB buffers (a combined buffer rate of over 5% requires authorisation by the Commission).</p> <table border="1" data-bbox="628 871 1457 1282"> <thead> <tr> <th data-bbox="668 871 843 923">Name of institution</th><th data-bbox="922 871 1017 923">G-SII/O-SII buffer rate</th><th data-bbox="1065 871 1256 923">O-SII consolidation level</th><th data-bbox="1287 871 1446 923">Sum of G-SII/O-SII and SyRB rates</th></tr> </thead> <tbody> <tr> <td data-bbox="668 945 843 979">LGT Bank AG</td><td data-bbox="970 945 994 979">2%</td><td data-bbox="1065 945 1240 997">Individual and consolidated level</td><td data-bbox="1335 945 1375 979">3%</td></tr> <tr> <td data-bbox="668 1001 843 1057">Liechtensteinische Landesbank AG</td><td data-bbox="970 1001 994 1035">2%</td><td data-bbox="1065 1001 1240 1057">Individual and consolidated level</td><td data-bbox="1335 1001 1375 1035">3%</td></tr> <tr> <td data-bbox="668 1069 843 1102">VP Bank AG</td><td data-bbox="970 1069 994 1102">%</td><td data-bbox="1065 1069 1240 1125">Individual and consolidated level</td><td data-bbox="1335 1069 1375 1102">3%</td></tr> <tr> <td data-bbox="668 1136 843 1170"></td><td data-bbox="970 1136 994 1170">%</td><td data-bbox="1065 1136 1240 1170"></td><td data-bbox="1335 1136 1375 1170">%</td></tr> <tr> <td data-bbox="668 1181 843 1215"></td><td data-bbox="970 1181 994 1215">%</td><td data-bbox="1065 1181 1240 1215"></td><td data-bbox="1335 1181 1375 1215">%</td></tr> <tr> <td data-bbox="668 1226 843 1260"></td><td data-bbox="970 1226 994 1260">%</td><td data-bbox="1065 1226 1240 1260"></td><td data-bbox="1335 1226 1375 1260">%</td></tr> <tr> <td data-bbox="668 1271 843 1304"></td><td data-bbox="970 1271 994 1304">%</td><td data-bbox="1065 1271 1240 1304"></td><td data-bbox="1335 1271 1375 1304">%</td></tr> </tbody> </table>	Name of institution	G-SII/O-SII buffer rate	O-SII consolidation level	Sum of G-SII/O-SII and SyRB rates	LGT Bank AG	2%	Individual and consolidated level	3%	Liechtensteinische Landesbank AG	2%	Individual and consolidated level	3%	VP Bank AG	%	Individual and consolidated level	3%		%		%		%		%		%		%		%		%
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7.2 Combination with other systemic risk buffers (Article 133(11) and (12) CRD)	<p>Indicate all sets or subsets of exposures that would be subject to one or more systemic risk buffers with a combined systemic risk buffer rate in the ranges below:</p> <ul style="list-style-type: none"> - above 3% and up to 5% - above 5% <p>Indicate whether any subsidiaries of a parent in another EU Member State would be subject to a combined systemic risk buffer rate above 3%</p> <p>Not applicable. No subsidiary of a parent in another Member State is subject to a combined systemic buffer rate above 3%, as there are no subsidiaries of a parent in another Member State operating in Liechtenstein. .</p>																																
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>Sophia Döme: sophia.doeume@fma-li.li, +423 236 7493 Martin Gächter: martin.gaechter@fma-li.li, +423 236 7392</p>																																

8.2 Any other relevant information	
8.3 Date of the notification	Please provide the date on which this notification was uploaded/sent. 15/12/2025