Jurisdiction: Switzerland

2015 IMN Survey of National Progress in the Implementation of G20/FSB Recommendations

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
I.	**Hedge funds**				
1 (2)	Registration, appropriate disclosures and oversight of hedge funds	We also firmly recommitted to work in an internationally consistent and non-discriminatory manner to strengthen regulation and supervision on hedge funds. (Seoul) Hedge funds or their managers will be registered and will be required to disclose appropriate information on an ongoing basis to supervisors or regulators, including on their leverage, necessary for assessment of the systemic risks they pose individually or collectively. Where appropriate registration should be subject to a minimum size. They will be subject to oversight to ensure that they have adequate risk management. (London)	Jurisdictions should indicate the progress made in implementing the high level principles contained in IOSCO's *Report on Hedge Fund Oversight (Jun 2009)*. In particular, jurisdictions should specify whether: - Hedge Funds (HFs) and/or HF managers are subject to mandatory registration - Registered HF managers are subject to appropriate ongoing requirements regarding: • Organisational and operational standards; • Conflicts of interest and other conduct of business rules; • Disclosure to investors; and • Prudential regulation.	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress :* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☑ **Implementation completed as of:** March 2013 **Issue is being addressed through :** ☑ Primary / Secondary legislation ☐ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: See supervisroy measures regarding hedge funds below. **Short description of the content of the legislation/ regulation/guideline:** The revised collective investment schemes act (CISA) inter alia extends the supervisory scope to include asset managers of foreign collective investment schemes. The prime	**If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:** --- **Planned actions (if any) and expected commencement date:** FINMA is continuously reviewing the adequacy of the regulatory and supervisory framework. - FINMA is part of the IOSCO task force on unregulated entities and takes part in the development of the IOSCO recommendations. **Web-links to relevant documents:** ---

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				brokerage activities of the Swiss banks are subject to constant supervision. - In regard to hedge funds, FINMA has participated in the systemic footprint survey in September 2010 to identify systemically relevant hedge fund activities. - Switzerland applies both a direct and an indirect supervisory approach with respect to hedge funds. Directly supervised (after having received the necessary approval by FINMA) are all domestic hedge funds and foreign ones if they shall be distributed in public in or from Switzerland, regardless of their size. In addition, managers of hedge funds need an authorization. A third element of the direct supervisory approach relates to distribution matters and concerns representatives and distributors of hedge funds. The indirect supervisory approach takes place through hedge funds interfaces with banks. Moreover, certain investment restrictions for insurers exist. --- **Highlight main developments since last year's survey:** --- **Web-links to relevant documents:**	

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				CISA: http://www.news.admin.ch/message/index.html?lang=en&msg-id=47754 **Additional questions:** **1. Please indicate whether Hedge Funds (HFs) are domiciled locally and, if available, the size of the industry in terms of Assets under Management and number of HFs.** At the time being FINMA has not approved any Swiss single strategy HF. (Only funds of hedgefunds but these are not considered hedge funds according to the IOSCO Final Report on HEdge Fund Oversight from June 2009. Also asset Managers of non-Swiss domiciled hedge funds are present in Switzerland.) **2. Please specify the main criteria and numerical thresholds (if applicable) for subjecting HFs and/or HF managers to mandatory registration.** Swiss investment funds, mutual funds as well as HFs, need approval by FINMA irrespective of their size. Asset managers of CIS as well as HF managers principally are subject to manadatory authorisation by FINMA. CIS / HF Managers whose investors are qualified and which meet one of the following requirements are not governed by the	

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				CISA: 1. The assets under management, including the assets acquired through the use of leveraged finance, amount in total to no more than CHF 100 million. 2. The assets under management of the CIS consist of non-leveraged CIS where investors are not permitted to exercise redemption rights for a period of five years after their first investment is made in each of these CIS, and amount to no more than CHF 500 million. 3. The investors are exclusively group companies of the group of companies to which the asset manager belongs. **3. Please specify whether registered HF managers are subject to ongoing requirements regarding organisational and operational standards; conflicts of interest and other conduct of business rules; disclosure to investors; and prudential regulation. If any of these requirements are not applicable, please explain.** Authorised HF managers are subject to ongoing prudential supervision. All of the mentioned requirements apply. The authorisation requirements of art. 14 CISA must be fulfiled at any time. The Ordinance of CIS (CISO) substantiates the mentioned authorisation requirements in art. 10 et seq. and 19 et seq. CISO.	

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				4. Please describe the main challenges (where relevant) and any lessons learned in implementing this reform. The amended CISA (effective on 1 March 2013) basically subjects all Swiss and foreign CIS / HF managers to the duty of authorisation by FINMA. Hence the number of authorised asset managers of CIS has increased from 99 at the end of 2012, to 119 at the end of 2013, to 151 at the end of 2014. And in 2015 the number is still increasing. The organisational structure of the majority of the asset managers of CIS as well as their activities (e.g. asset management of off-shore funds) are complex. Hence, the authorisation requests have to be examined very thoroughly by FINMA. 5. **Are you monitoring the effects of this reform in your jurisdiction? If yes, please share the main findings and any related policy initiatives in response to those findings.** Yes. FINMA is continuously reviewing the adequacy of the regulatory and supervisory framework. However, at the time being there are no particular policy initiatives in relation to the authorisation requirements for asset managers of CIS.	

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2 (3)	Establishment of international information sharing framework	We ask the FSB to develop mechanisms for cooperation and information sharing between relevant authorities in order to ensure effective oversight is maintained when a fund is located in a different jurisdiction from the manager. We will, cooperating through the FSB, develop measures that implement these principles by the end of 2009. (London)	Jurisdictions should indicate the progress made in implementing the high level principles in IOSCO's *Report on Hedge Fund Oversight (Jun 2009)* on sharing information to facilitate the oversight of globally active fund managers. In addition, jurisdictions should state whether they are: - Signatory to the IOSCO MMoU - Signatory to bilateral agreements for supervisory cooperation that cover hedge funds and are aligned to the 2010 IOSCO *Principles Regarding Cross-border Supervisory Cooperation.*	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☑ Final rule (for part of the reform) in force since : CISA 2013 / IOSCO MMoU 2010 ☑ **Implementation completed as of:** March 2013 **Issue is being addressed through :** ☑ Primary / Secondary legislation ☐ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: Full signatory of IOSCO MMoU; conclusion of bilateral MoUs. **Short description of the content of the legislation/ regulation/guideline:** Based on the revised CISA, FINMA will receive information on the activities of asset managers and their funds on a regular basis and will be able to request any information needed for supervisory	**If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:** --- **Planned actions (if any) and expected commencement date:** --- **Web-links to relevant documents:** ---

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				purposes. - The revised CISA also requires that cooperation arrangements with all relevant foreign supervisory authorities are in place, in particular with supervisors in those jurisdictions where the fund is domiciled. - Switzerland (FINMA) is a full signatory (Asignatory) to the IOSCO MMoU since 2010. At the end of July 2013, FINMA had signed MoUs with 28 EU and EEA member states. These regulate the supervision of risks and the collection of data from asset managers, as well as the transfer of data by the relevant supervisory authorities to FINMA. The MoUs also include cross-border supervisory reviews and mutual assistance in the enforcement of the respective laws. In 2014, FINMA signed further agreements on cooperation and the exchange of information with foreign supervisory authorities in relation to foreign CIS being distributed to non-qualified investors in or from Switzerland (art. 120 CISA). --- **Highlight main developments since last year's survey:** --- **Web-links to relevant documents:**	

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				CISA: http://www.news.admin.ch/message/index.html?lang=en&msg-id=47754	

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3 (4)	Enhancing counterparty risk management	Supervisors should require that institutions which have hedge funds as their counterparties have effective risk management, including mechanisms to monitor the funds' leverage and set limits for single counterparty exposures. (London) Supervisors will strengthen their existing guidance on the management of exposures to leveraged counterparties. (Rec. II.17, FSF 2008)	Jurisdictions should indicate specific policy measures taken for enhancing counterparty risk management and strengthening their existing guidance on the management of exposure to leveraged counterparties. In particular, jurisdictions should indicate whether they have implemented principle 2.iii of IOSCO *Report on Hedge Fund Oversight (Jun 2009)*. Jurisdictions should also indicate the steps they are taking to implement the new standards on equity exposures *(Capital requirements for banks' equity investments in funds, Dec 2013)* by 1 January 2017. For further reference, see also the following documents : • BCBS *Sound Practices for Banks' Interactions with Highly Leveraged Institutions (Jan 1999)* • BCBS *Banks' Interactions with Highly Leveraged Institutions (Jan 1999)*	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☑ **Implementation completed as of:** Basel III Jan13/CISA Mar13 **Issue is being addressed through :** ☑ Primary / Secondary legislation ☑ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: Ongoing supervision. **Short description of the content of the legislation/ regulation/guideline:** - FINMA has been reviewing the regulatory and supervisory regime for leveraged counterparties, including hedge funds, also taking into account the IOSCO principles published in June 09. With the recent revision of the Collective Investment Schemes Act (CISA),	**Planned actions (if any) and expected commencement date:** - Consultation on national implement of the "Capital requirements for banks' equity investments in funds, Dec 2013" by January 2017 will take place in Q1 2016. **Web-links to relevant documents:** ---

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				Switzerland aims to achieve compliance with the IOSCO principles. - The exposure of banks to leveraged counterparties is subject to regulation within the capital adequacy framework. FINMA has fully implemented the Basel III standards on counterparty credit risk and the treatment of highly leveraged counterparties as of 1 Jan 2013. In its Basel III FAQ issued in May 2013 FINMA has also clarified that the Basel FAQs form part of the Basel III implementation in Switzerland. - The BCBS reviewed the Swiss implementation of Basel III during an RCAP and assessed the implementation as "compliant". - Prime Brokerage is a focus in the supervision of the IB activities of the two large banks. FINMA has regular meetings with the risk management units of the two large banks to discuss ongoing Hedge Fund (HF) issues. FINMA reviews ad hoc businesses activities and all HF reports both large banks produce. It talks about disputes/haircut adjustments with the large banks and has a dialog with the external and internal audit function on their prime brokerage business. - Prime brokerage business is also an important	

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				part in FINMA's ongoing liquidity supervision of the two large banks. FINMA looks at liquidity in-/outflows from the prime brokerage business and at HF stress models. Strategy/growth plans and as well as onboarding strategies for new HF-clients are regularly discussed. - FINMA regularly reviews several leverage indicators, margin requirements, excess collateral numbers and across several prime broker in a peer analysis. FINMA, respectively its predecessor organization, participated in the interagency working group to review the counterparty risk management practices related to hedge funds under the lead of the FRBNY. - FINMA participated also in all Senior Supervisors Group (SSG) work streams that looked at counterparty credit risk management. A common report was issued that conveyed the SSG perspective on the state of CCR measurement and management practices based on discussions with major industry participants over the past two years. --- **Highlight main developments since last year's survey:** The planned action (ie implementing the "Capital requirements for banks' equity	

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				investments in funds, Dec 2013" by January 2017) was kicked off. Draft regulatory texts have been elaborated in a national working group. Public consultation will take place in Q1 2016. **Web-links to relevant documents:** - CISA: http://www.news.admin.ch/message/index.html?lang=en&msg-id=47754 - Total revision of the Capital Adequacy ordinance to implement Basel III: http://www.efd.admin.ch/dokumentation/medieninformationen/00467/index.html?lang=en&msg-id=44781 - Basel III Circulars: http://www.finma.ch/e/aktuell/pages/mm-rs-umsetzung-b2-tbtf-0120718.aspx - FINMA Basel III FAQ: http://www.finma.ch/d/faq/beaufsichtigte/Seiten/basel-III.aspx	

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II. Securitisation					
4 (6)	Strengthening of regulatory and capital framework for monolines	Insurance supervisors should strengthen the regulatory and capital framework for monoline insurers in relation to structured credit. (Rec II.8, FSF 2008)	Jurisdictions should indicate the policy measures taken for strengthening the regulatory and capital framework for monolines. See, for reference, the following principles issued by IAIS: • *ICP 13* – Reinsurance and Other Forms of Risk Transfer; • *ICP 15* – Investments; and • *ICP 17* - Capital Adequacy. Jurisdictions may also refer to: • IAIS *Guidance paper on enterprise risk management for capital adequacy and solvency purposes (Oct 2008).* • Joint Forum document on *Mortgage insurance: market structure, underwriting cycle and policy implications (Aug2013)*.	☑ **Not applicable** In Switzerland, there are no monoline insurers. Hence, there is no need for regulatory action in this regard. ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☐ **Implementation completed as of:** **Issue is being addressed through :** ☐ Primary / Secondary legislation ☐ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: --- **Short description of the content of the legislation/ regulation/guideline:** --- --- **Highlight main developments since last**	**Planned actions (if any) and expected commencement date:** --- **Web-links to relevant documents:** ---

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II.	**Securitisation**				
				year's survey: --- **Web-links to relevant documents:** ---	

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5 (7)	Strengthening of supervisory requirements or best practices for investment in structured products	Regulators of institutional investors should strengthen the requirements or best practices for firms' processes for investment in structured products. (Rec II.18, FSF 2008)	Jurisdictions should indicate the due diligence policies, procedures and practices applicable for investment managers when investing in structured finance instruments and other policy measures taken for strengthening best practices for investment in structured finance product. Jurisdictions may reference IOSCO's report on *Good Practices in Relation to Investment Managers´ Due Diligence When Investing in Structured Finance Instruments (Jul 2009).* Jurisdictions may also refer to the Joint Forum report on *Credit Risk Transfer-Developments from 2005-2007 (Jul 2008).*	☑ **Not applicable** The extent and materiality of investments in structured finance instruments in Switzerland is low - when there are investments these are in instruments whose jurisdictional domiciles have implemented regulations- thus investors inherit in some part from the application of these rules or legislations (disclosure, specific retention, repositories etc..); So far, Switzerland has no domestic market for Swiss based securitisation thus no specific action has been taken. ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☐ **Implementation completed as of:** **Issue is being addressed through :** ☐ Primary / Secondary legislation ☐ Regulation /Guidelines ☐ Other actions (such as supervisory	**If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:** --- **Planned actions (if any) and expected commencement date:** --- **Web-links to relevant documents:** ---

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				actions), please specify: --- **Short description of the content of the legislation/ regulation/guideline:** --- --- **Highlight main developments since last year's survey:** --- **Web-links to relevant documents:** ---	

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6 (8)	Enhanced disclosure of securitised products	Securities market regulators should work with market participants to expand information on securitised products and their underlying assets. (Rec. III.10-III.13, FSF 2008)	Jurisdictions should indicate the policy measures taken for enhancing disclosure of securitised products. See, for reference, IOSCO's *Report on Principles for Ongoing Disclosure for Asset-Backed Securities (Nov 2012)* and IOSCO's *Disclosure Principles for Public Offerings and Listings of Asset-Backed Securities (Apr 2010)*.	☑ **Not applicable** No Swiss ABS domestic Market ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☐ **Implementation completed as of:** **Issue is being addressed through :** ☐ Primary / Secondary legislation ☐ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: --- **Short description of the content of the legislation/ regulation/guideline:** --- **Highlight main developments since last year's survey:** **Web-links to relevant documents:**	**If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:** **Planned actions (if any) and expected commencement date:** **Web-links to relevant documents:** ---

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III.	**Enhancing supervision**				
7 (9)	Consistent, consolidated supervision and regulation of SIFIs	All firms whose failure could pose a risk to financial stability must be subject to consistent, consolidated supervision and regulation with high standards. (Pittsburgh)	Jurisdictions should indicate: (1) whether they have identified domestic SIFIs and, if so, in which sectors; (2) whether the names of the identified SIFIs have been publicly disclosed; and (3) the types of policy measures taken for implementing consistent, consolidated supervision and regulation of the identified SIFIs. See, for reference, the following documents: BCBS: • *Framework for G-SIBs (Jul 2013)* • *Framework for D-SIBs (Oct 2012)* • *BCP 12 (Sep 2012)* IAIS: • *Global Systemically Important Insurers: Policy Measures (Jul 2013)* • *ICP 23– Group wide supervision* FSB: • *Framework for addressing SIFIs (Nov 2011)*	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☑ **Implementation completed as of:** January 2013 **Issue is being addressed through :** ☑ Primary / Secondary legislation ☐ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: **Short description of the content of the legislation/ regulation/guideline:** -The revised banking act and, based thereon, the revised capital adequacy ordinance, introduced additional requirements for systemically important banks regarding capital, liquidity, risk diversification, and emergency planning. - Switzerland currently has two designated G-SIBs (that are at the same	**Planned actions (if any) and expected commencement date:** A working group led by the Finance Department and comprising representatives of the FINMA and SNB has been mandated to submit proposals for the necessary legal adjustments by the end of 2015. The work plan of the joint working group follows the recommendations in the report of the Federal Council: i) Revision of the calculation method for risk weighted assets (RWA). ii) Recalibration of capital requirements. iii) Modification of capital quality. iv) Modifications of the alleviated provisions for financial groups and individual entities pursuant to Article 125 of the capital adequacy ordinance. v) Determination of a due date for the implementation of the Swiss emergency planning and the improved global resolvability. vi) Supplementing the TBTF regime with mandatory TLAC requirements. The further recommendations of the Federal Council (vii. Legislative adjustments for improved crisis management, and viii. Adjustments to the withholding tax to improve the attractiveness of the bail-in bonds issued

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				time also D-SIBs) and two additional D-SIBs. - Basel III has been fully and timely implemented for all Swiss banks as of January 2013, when the revised ordinance on Capital Adequacy entered into force. - Implementation of resolution and recovery planning and crisis management colleges is ongoing in accordance with the FSB timetable. - Switzerland currently has no designated G-SII. **Highlight main developments since last year's survey:** Article 52 of the Banking Act requires a regular review of the TBTF-provisions with regard to comparability and the extent to which the corresponding international standards are implemented abroad. A high-level group of experts from the private sector, the authorities and academia conducted an in-depth review of Switzerland's TBTF regime and published its recommendations in December 2014. In February 2015 the Federal Council adopted its evaluation report on Switzerland's too-big-to-fail (TBTF) provisions. The Swiss government has endorsed the group's assessment and conclusions. No	in Switzerland) are already being taken into consideration in ongoing legislative adjustments. **Web-links to relevant documents:** http://www.news.admin.ch/NSBSubscriber/message/attachments/38319.pdf http://www.efd.admin.ch/dokumentation/medieninformationen/00467/index.html?lang=en&msg-id=56256 http://www.efd.admin.ch/themen/wirtschaft_waehrung/02315/index.html?lang=en

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				substantial realignment of the regulatory model is envisaged. However, additional measures and adjustments are required to further increase the resilience of systemically important banks (SIBs) and to allow an orderly recovery and resolution process, if needed. The Federal Council has instructed the Federal Department of Finance to prepare the legal adjustments, which primarily concern more stringent capital requirements. **Web-links to relevant documents:** http://www.news.admin.ch/NSBSubscriber/message/attachments/38319.pdf http://www.efd.admin.ch/dokumentation/medieninformationen/00467/index.html?lang=en&msg-id=56256 http://www.efd.admin.ch/themen/wirtschaft_waehrung/02315/index.html?lang=en	

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8 (10)	Establishing supervisory colleges and conducting risk assessments	To establish the remaining supervisory colleges for significant cross-border firms by June 2009. (London) We agreed to conduct rigorous risk assessment on these firms [G-SIFIs] through international supervisory colleges. (Seoul)	Reporting in this area should be undertaken solely by home jurisdictions of G-SIBs and G-SIIs. Please indicate the progress made in establishing and strengthening the functioning of supervisory colleges for G-SIBs and G-SIIs using, as reference, the following documents: BCBS: • Principle 13 of the BCBS *Core Principles for Effective Banking Supervision (Sep 2012)* • *Principles for effective supervisory colleges (Jun 2014)* IAIS : • *ICP 25 and Guidance 25.1.1 – 25.1.6 on establishment of supervisory colleges* • *Guidance 25.6.20 and 25.8.16 on risk assessments by supervisory colleges* • *Application paper on supervisory colleges (Oct 2014)*	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress :* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☑ **Implementation completed as of:** 2009 **Issue is being addressed through :** ☐ Primary / Secondary legislation ☐ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: Establishing supervisory Colleges. **Short description of the content of the legislation/ regulation/guideline:** Establishment of supervisory colleges for large cross-border financial institutions (see below). --- **Highlight main developments since last year's survey:**	**If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:** **Planned actions (if any) and expected commencement date:** **Web-links to relevant documents:** https://www.finma.ch/en/finma/international-activities/supervisory-cooperation/supervisory-colleges/

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				Regarding insurance supervisory colleges, mutual risk assessments were conducted by all college members in last year's physical meetings. Furthermore, an electronic platform for secured information exchange between college members has been installed for all supervisory colleges. **Web-links to relevant documents:** --- **Additional questions:** **1. Please indicate whether supervisory colleges for all G-SIBs/G-SIIs headquartered in your jurisdiction have been established. If not, please explain.** Yes. Supervisory colleges have been established for all four large cross-border financial institutions requiring a college according to the criteria of the FSB (2 banks and 2 insurance firms). For the two banks, arrangements similar to supervisory colleges have been in place since 2000. The insurance firms have been covered by global supervisory colleges since 2008. Supervisory colleges are also in place for other significant financial institutions. The effectiveness of the colleges has been favourably assessed in a benchmarking exercise conducted by	

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				the BCBS Standards Implementation Group. FINMA has established Crisis Management Groups for the two G-SIBs. **2. Please indicate the structure of the supervisory colleges for G-SIBs/G-SIIs in your jurisdiction (core, universal, other) and the reasons why it may differ across firms.** For both Swiss G-SIBs, FINMA has set up a General Supervisory College, a Core Supervisory College, a Crisis Management College for the Crisis Management Group-Members as well as a separate Crisis Management College for APAC-jurisdictions. There are no relevant differences across firms. There are currently no designated G-SIIs in Switzerland.However. supevisory colleges are in place for all five internationally active insurance groups. **3. Please indicate the frequency of meetings over the past year of the supervisory colleges (core, universal, other) for G-SIBs/G-SIIs in your jurisdiction.** For both Swiss G-SIBs, a General Supervisory College is held once a year, a Core Supervisory College twice a year and a Crisis Management College (including a CMC for APAC-jurisdictions) once a year. Regular	

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				exchanges with core regulators also take place at least monthly. **4. Please describe the main objectives of supervisory colleges for G-SIBs/G-SIIs in your jurisdiction and the types of issues that have been discussed over the past year. (e.g. specific area(s) of risk, coordinated risk assessments, joint supervisory work, coordinated supervisory plans). In your response, please indicate briefly some of the main challenges in conducting joint risk assessments and steps taken to address them.** The aim of supervisory colleges is to step up cooperation between supervisory authorities and improve supervision of internationally active groups and conglomerates. At the General Supervisory Colleges of the two G-SIBs in 2014, FINMA discussed key supervisory risk topics and provided an update on recovery and resolution plans. FINMA performed in March 2015 a joint review on alternative trading platforms at its two G-SIBs together with the Federal Reserve Bank of New York and the UK PRA. In October 2015, FINMA took part in a joint review on outsourcing, nearshoring and offshoring lead by the Federal Reserve Bank of New York and State of Connecticut Department of Banking at one of its G-SIBs. Unlike	

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				other authorities, FINMA does not perform a formal joint risk assessment at its General Supervisory Colleges for the two G-SIBs, but discusses common issues between authorities. **5. Please describe the main challenges in the functioning of supervisory colleges for G-SIBs/G-SIIs in your jurisdiction and any plans to enhance the effectiveness of colleges.** The following main challenges were observed during supervisory colleges of our two G-SIBs: - Open dialogue from the authorities and the banks - Active participation of the authorities - Consolidation of issues from the authorities - Adequate seniority of participants Effectiveness of colleges is enhanced through feedbacks received and internal consultations.	

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9 (11)	Supervisory exchange of information and coordination	To quicken supervisory responsiveness to developments that have a common effect across a number of institutions, supervisory exchange of information and coordination in the development of best practice benchmarks should be improved at both national and international levels. (Rec V.7 , FSF 2008) Enhance the effectiveness of core supervisory colleges. (FSB 2012)	Jurisdictions should include any feedback received from recent FSAPs/ROSC assessments on the September 2012 BCP 3 (Cooperation and collaboration) and BCP 14 (Home-host relationships). Jurisdictions should also indicate any steps taken since the last assessment in this area, particularly in response to relevant FSAP/ROSC recommendations. Jurisdictions should describe any recent or planned regulatory, supervisory or legislative changes that contribute to the sharing of supervisory information (e.g. within supervisory colleges or via bilateral or multilateral MoUs).	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☑ Final rule or legislation approved and will come into force on: January 1, 2016 ☐ Final rule (for part of the reform) in force since : ☑ **Implementation completed as of:** Ongoing process **Issue is being addressed through :** ☑ Primary / Secondary legislation ☑ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: National and international cooperation. **Short description of the content of the legislation/ regulation/guideline:** - A new provision will be implemented in the Financial Market Supervisory Act and enter into force on January 1, 2016, stating explicitly that FINMA is allowed to share information with foreign authorities and courts for Resolution	**Planned actions (if any) and expected commencement date:** To the extent practicable and feasible, FINMA endeavours to complete the information exchange and coordination efforts by bilateral or multilateral cooperation agreements. The coordination arrangements for insurance supervisory colleges are envisaged to be signed at the beginning of 2016. Further sectoral agreements are currently negotiated with other supervisory authorities on a bilateral level. **Web-links to relevant documents:** ---

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				purposes (subject to specific conditions being fulfilled). - On a national level, SNB and FINMA share tight links in monitoring the financial sector on the micro as well as macro level and coordinate regulatory initiatives of shared interest. - On an international level, FINMA has long standing relations with the supervisors of important markets important Swiss institutions operate in and has broadened and extended supervisory cooperation, including cooperation on crisis management, following the FSB, BCBS and IAIS work on colleges. - FINMA is particularly participating in the relevant international working groups for ensuring quality and recognition of the IOSCO MMoU and the IAIS MMoU. --- **Highlight main developments since last year's survey:** Cooperation agreements amongst the members of the Crisis Management Group for each of the two Swiss G-SIBs have been successfully established. Furthermore, cooperation agreements within FINMA's insurance supervisory colleges are currently being set up.	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Web-links to relevant documents: ---	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
10 (12)	Strengthening resources and effective supervision	We agreed that supervisors should have strong and unambiguous mandates, sufficient independence to act, appropriate resources, and a full suite of tools and powers to proactively identify and address risks, including regular stress testing and early intervention. (Seoul) Supervisors should see that they have the requisite resources and expertise to oversee the risks associated with financial innovation and to ensure that firms they supervise have the capacity to understand and manage the risks. (FSF 2008) Supervisory authorities should continually re-assess their resource needs; for example, interacting with and assessing Boards require particular skills, experience and adequate level of seniority. (Rec. 3, FSB 2012)	No information on this recommendation will be collected in the current IMN survey due to the recent publication of the FSB thematic peer review report on supervisory frameworks and approaches to SIBs.		

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
IV.	**Building and implementing macroprudential frameworks and tools**				
11 (13)	Establishing regulatory framework for macro-prudential oversight	Amend our regulatory systems to ensure authorities are able to identify and take account of macro-prudential risks across the financial system including in the case of regulated banks, shadow banks[1] and private pools of capital to limit the build up of systemic risk. (London) Ensure that national regulators possess the powers for gathering relevant information on all material financial institutions, markets and instruments in order to assess the potential for failure or severe stress to contribute to systemic risk. This will be done in close coordination at international level in order to achieve as much consistency as possible across jurisdictions. (London)	Please describe major changes in the institutional arrangements for macroprudential policy (structures, mandates, powers, reporting etc.) that have taken place since the financial crisis, including over the past year. Please indicate whether an assessment has been conducted with respect to the adequacy of powers to collect and share relevant information among different authorities on financial institutions, markets and instruments to assess the potential for systemic risk. If so, please describe identified gaps in the powers to collect information, and whether any follow-up actions have been taken.	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress :* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☑ Final rule or legislation approved and will come into force on: FMIA – including revisions of FINMASA and NBA in the appendix – has been approved by Parliament in June 2015 and is expected to enter into force in January 2016. ☐ Final rule (for part of the reform) in force since: ☑ **Implementation completed as of:** February 2010: MoU FINMA/SNB; January 2011: MoU FDF/FINMA/SNB; January 2016: new provisions in NBA and FINMASA **Issue is being addressed through :** ☑ Primary / Secondary legislation ☐ Regulation /Guidelines ☑ Other actions (such as supervisory	**Planned actions (if any) and expected commencement date:** **Web-links to relevant documents:**

[1] The recommendation as applicable to shadow banks will be retained until the monitoring framework for shadow banking, which is one of the designated priority areas under the CFIM, is established.

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				actions), please specify: MoUs among financial market authorities. **Short description of the content of the legislation/ regulation/guideline:** In March 2012, a Financial Stability Working Group (FDF, SNB, FINMA) published a report and proposals on the macroprudential framework (see web-link below). This report included an assessment of the power to collect and share information (for more details, see below). In line with recommendations of that report, within the context of the new FMIA, the SNB will be granted the right to directly access information on financial market participants. Moreover, FINMA and the SNB will be enabled to share information with the FDF (for more details, see below). **Highlight main developments since last year's survey:** In the appendix of the recently adopted FMIA, the NBA and FINMASA have been partially revised to enable FINMA and SNB to share information with the FDF if this contributes to maintaining financial stability. **Web-links to relevant documents:**	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Report of Financial Stability Working Group: http://www.news.admin.ch/NSBSubscriber/message/attachments/35795.pdf FINMA/SNB MoU: http://www.snb.ch/en/mmr/reference/mofu/source FDF/FINMA/SNB MoU: http://www.snb.ch/en/mmr/reference/tripartite/source/tripartite.en.pdf FMIA: http://www.parlament.ch/sites/doc/CuriaFolgeseite/2014/20140061/Schlussabstimmungstext%201%20NS%20D.pdf (in German) **Additional questions:** **1. Please describe the institutional arrangements for financial stability and macroprudential policy in your jurisdiction, including whether a macroprudential authority has been explicitly identified and the respective roles and responsibilities of the central bank and other authorities.** Both the SNB and FINMA have mandates comprising elements of macroprudential oversight. According to the NBA, one of the tasks of the SNB is to contribute to financial stability. Further, the SNB publishes on an annual	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				basis a Financial stability report. FINMA's mandate also has a supra-institutional component which is provided by the FINMASA, according to which financial market oversight has the aim of protecting the functioning of the financial markets. Further, the FDF is responsible for preparing any amendments of laws and ordinances and the Federal Council decides on adjustments of the countercyclical capital buffer upon proposal by the SNB (see answer to question 12). **2. If a macroprudential authority has been explicitly identified in your jurisdiction, please describe its legal basis, mandate, composition, powers (warnings, recommendations, prudential tools, powers of direction, other) and accountability arrangements. Who provides the resources and analytical support for the authority's activities?** See above. Each authority relies on its own analytical resources. FDF and the Federal Council rely in addition on analytical support provided by the SNB and FINMA. **3. Is there an inter-agency body on financial stability or macroprudential matters – distinct from the designated macroprudential authority – in your jurisdiction? If so,**	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				please describe its legal basis, mandate, composition, powers and accountability arrangements. Who provides the resources and analytical support for its activities? There is no formal inter-agency body on macroprudential matters. However, in the MoU signed on January 2011, FDF, FINMA and SNB agreed to meet regularly for an exchange of information and views on financial stability and issues of current interest in financial market regulation. In the event of a crisis that threatens financial stability, they agreed to work closely together and, to this end, set up a joint crisis management organisation. Further, all three are involved in the mechanism to activate the countercyclical capital buffer (see answer to question 12). **4. Please describe the extent to which the macroprudential authority (or other relevant body) is able to collect information on material financial institutions, markets and instruments in order to assess potential systemic risks. In your response, please indicate whether the authorities involved in systemic risk monitoring have specific legal powers to collect information from financial institutions (whether regulated or not) for financial stability purposes, and whether there exist dedicated information gateways (e.g. Memorandum of Understanding)**	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				to share such information among relevant authorities. FINMA has a broad legal power to gather any kind of information from supervised financial market institutions. The SNB has a legal power to collect statistical data and has a broad access to information from operators of payment and securities settlement systems. In the appendix of the FMIA adopted in June 2015, the NBA has been partially revised to create the right to direct access for the SNB to information on financial market participants. Moreover, FINMA and the SNB are authorized to exchange any information collected in this context. The FINMA/SNB MoU, revised in February 2010, provides additional details regarding information exchange between both institutions (see web-link below). In a MoU signed in January 2011, the FDF, the FINMA and the SNB agreed to exchange information on matters relating to financial stability. In the appendix of the recently adopted FMIA, the NBA and FINMASA have been partially revised to enable FINMA and SNB to share information with the FDF.	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
12 (14)	Enhancing system-wide monitoring and the use of macro-prudential instruments	Authorities should use quantitative indicators and/or constraints on leverage and margins as macro-prudential tools for supervisory purposes. Authorities should use quantitative indicators of leverage as guides for policy, both at the institution-specific and at the macro-prudential (system-wide) level…(Rec. 3.1, FSF 2009) We are developing macro-prudential policy frameworks and tools to limit the build-up of risks in the financial sector, building on the ongoing work of the FSB-BIS-IMF on this subject. (Cannes) Authorities should monitor substantial changes in asset prices and their implications for the macro economy and the financial system. (Washington)	Please describe at a high level (including by making reference to financial stability or other reports, where available) the types of methodologies, indicators and tools used to assess systemic risks. Please indicate the use of macroprudential tools in the past year, including the objective for their use and the process used to select, calibrate, and apply them. See, for reference, the following documents: • CGFS report on *Operationalising the selection and application of macroprudential instruments (Dec 2012)* • FSB-IMF-BIS progress report to the G20 on *Macroprudential policy tools and frameworks (Oct 2011)* • IMF staff papers on *Macroprudential policy, an organizing framework (Mar 2011)*, *Key Aspects of Macroprudential policy (Jun 2013)*, and *Staff Guidance on Macroprudential Policy (Dec 2014)*	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress :* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since: ☑ **Implementation completed as of:** Amendments of Capital Adequacy Ordinance: introducing countercyclical buffer (in force since July 2012) and higher requirements for risky mortgages (in force since January 2013); Monitoring: ongoing **Issue is being addressed through :** ☑ Primary / Secondary legislation ☐ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: ongoing monitoring **Short description of the content of the legislation/ regulation/guideline:** A countercyclical capital buffer has been implemented and requirements for mortgage lending activities have been tightened in the Capital Adequacy	**Planned actions (if any) and expected commencement date:** Ongoing monitoring. If appropriate, further decisions on the adjustment of the countercyclical capital buffer or on the regulatory framework, including the potential introduction of additional regulatory measures affecting the demand for mortgages. **Web-links to relevant documents:**

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Ordinance and through self-regulatory guidelines (for more details, see below). **Highlight main developments since last year's survey:** FINMA has approved the amendments to the minimum standards for mortgage financing issued by the SBA (for more details, see below). **Web-links to relevant documents:** Amendments to Capital Adequacy Ordinance: https://www.sif.admin.ch/sif/en/home/dokumentation/finweb/archiv/eigenmittelverordnung.html Report of Financial Stability Working Group: http://www.news.admin.ch/NSBSubscriber/message/attachments/35795.pdf Fact sheet Countercyclical: Swiss National Bank, 'Implementing the countercyclical capital buffer in Switzerland: concretising the Swiss National Bank's role', fact sheet, June 2012 and Press release of 23 January 2014, 'Swiss National Bank proposal to increase the countercyclical capital buffer', available at www.snb.ch, Financial Stability, Publications. Capital buffer: https://www.news.admin.ch/message/index.html?lang=en&msg-id=51758	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Amendments to the self-regulation: https://www.finma.ch/en/news/2014/07/mm-selbstregulierung-hypothekarbereich-20140702/ **Additional questions:** **1. Please describe, at a high level, the types of methodologies, indicators and reports used in your jurisdiction to identify, analyse, communicate and address systemic risks.** Quantitative indicators regularly enter the monitoring and analysis of SNB, FINMA and the FDF. SNB is continuously monitoring a broad range of indicators – among them asset prices, credit volumes – and their implications for financial stability. The SNB also launched an additional quarterly survey on mortgage lending in early 2011. In the survey, the 25 largest banks in the domestic market, representing a total market share of over 80%, are asked about key risk indicators such as loan-to-value ratios and affordability criteria for new mortgages. Further, the SNB publishes on an annual basis a Financial stability report. FINMA has implemented a macroeconomic monitoring process which concentrates on the Swiss domestic real estate market and selected foreign asset markets. **2. Please describe the range of**	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				policy tools (prudential and other) currently available to the authorities for macroprudential purposes.[2] In addition to capital and other regulatory requirements in general, more specific available policy tools include the countercyclical buffer, capital requirements for risky mortgage lending business, self-regulation on lending practices in the mortgage market. Moreover, FINMA can impose specific measures on individual banks where appropriate. **3. Please indicate which tools have been deployed for macroprudential purposes over the past year, including the objective for their use and the process used to select, calibrate, and apply them.** In January 2014, the Federal Council, upon proposal by the SNB, decided to increase the CCB to 2% of risk weighted positions, still restricted to residential mortgage loans, and being effective as of June 30, 2014 (see weblink above). The CCB had been implemented in July 2012 and activated (to a level of 1% of risk	

2 An indicative list of such tools can be found in "Macroprudential Policy Tools and Frameworks – Progress Report to the G20" by the FSB, IMF and BIS (October 2011, http://www.financialstabilityboard.org/wp-content/uploads/r_111027b.pdf); "Staff Guidance on Macroprudential Policy" (December 2014, http://www.imf.org/external/np/pp/eng/2014/110614.pdf) by IMF staff; and "Operationalising the selection and application of macroprudential instruments" (December 2012, http://www.bis.org/publ/cgfs48.pdf) by the CGFS.

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				weighted positions) by the Federal Council upon proposal by the SNB in February 2013. Its objective is to increase the resilience of the banking sector against the consequences of excessive credit growth but also to mitigate the build-up of excesses in mortgage markets. The decision on activation, adjustment and deactivation is made by the Federal Council upon proposal by the SNB and after consultation with FINMA. The SNBs decision on proposing adjustments is based on an approach of guided discretion (see web-link above) based on a set of key quantitative indicators. Second, amendments to the Capital Adequacy Ordinance have been made: First, capital requirements for risky mortgage lending business have been increased, being effective as of January 2013. Complementary, self-regulation in the mortgage market has been tightened, requiring a minimum downpayment of 10% of the real estate transaction coming from a source other than occupational benefits provision (second pillar). In July 2014, FINMA approved further amendments to the minimum standards for mortgage financing issued by the SBA. The revisions to the self-regulation	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				entered into force on 1 September 2014. This includes: i) stricter amortization requirements ii) stricter use of second income for financial sustainability evaluation iii) stricter valuation requirements for residential real estate. **4. Please describe whether and, if so, how the relevant authorities assess the *ex ante* cost and benefits of macroprudential policies and their *ex post* effectiveness.** Assessment of costs and benefits enters, for example, into the decision whether to adjust countercyclical buffer. More generally, the authorities continuously assess the effectiveness of the measures taken.	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
V.	**Improving oversight of credit rating agencies (CRAs)**				
13 (16)	Enhancing regulation and supervision of CRAs	All CRAs whose ratings are used for regulatory purposes should be subject to a regulatory oversight regime that includes registration. The regulatory oversight regime should be established by end 2009 and should be consistent with the IOSCO Code of Conduct Fundamentals. (London) National authorities will enforce compliance and require changes to a rating agency's practices and procedures for managing conflicts of interest and assuring the transparency and quality of the rating process. CRAs should differentiate ratings for structured products and provide full disclosure of their ratings track record and the information and assumptions that underpin the ratings process. The oversight framework should be consistent across jurisdictions with appropriate sharing of information between national authorities, including through IOSCO. (London) Regulators should work together towards appropriate, globally compatible solutions (to conflicting compliance obligations for CRAs) as early as possible	Jurisdictions should indicate the policy measures undertaken for enhancing regulation and supervision of CRAs including registration, oversight and sharing of information between national authorities. They should also indicate their consistency with the following IOSCO document: • *Code of Conduct Fundamentals for Credit Rating Agencies (Mar 2015)* Jurisdictions may also refer to the following IOSCO documents: • Principle 22 of *Principles and Objectives of Securities Regulation (Jun 2010)* which calls for registration and oversight programs for CRAs • *Statement of Principles Regarding the Activities of Credit Rating Agencies (Sep 2003)* • *Final Report on Supervisory Colleges for Credit Rating Agencies (Jul 2013)*	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☑ Final rule (for part of the reform) in force since : Jan 2012 ☑ **Implementation completed as of:** Jan 2012 **Issue is being addressed through :** ☐ Primary / Secondary legislation ☑ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: --- **Short description of the content of the legislation/ regulation/guideline:** Credit rating agencies whose ratings are used for regulatory purposes (e.g. as basis for capital adequacy) have to be recognized by FINMA. The recognition is currently governed by FINMA circular 2012/1 "Rating Agencies" and includes	**If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:** --- **Planned actions (if any) and expected commencement date:** --- **Web-links to relevant documents:** ---

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
		in 2010. (FSB 2009) We encourage further steps to enhance transparency and competition among credit rating agencies. (St Petersburg)		requirements in regard to objectivity, independence, access to ratings, disclosure, resources and credibility. Process and requirements are in line with the standards of the BCBS and with the "IOSCO Code of Conduct Fundamentals for Credit Rating Agencies" (2008). The scope of application covers all institutions supervised by FINMA which use credit ratings for regulatory purposes. --- **Highlight main developments since last year's survey:** **Web-links to relevant documents:** https://www.finma.ch/de/~/media/finma/dokumente/dokumentencenter/myfinma/rundschreiben/finma-rs-2011-02.pdf?la=de	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
14 (17)	Reducing the reliance on ratings	We also endorsed the FSB's principles on reducing reliance on external credit ratings. Standard setters, market participants, supervisors and central banks should not rely mechanistically on external credit ratings. (Seoul) Authorities should check that the roles that they have assigned to ratings in regulations and supervisory rules are consistent with the objectives of having investors make independent judgment of risks and perform their own due diligence, and that they do not induce uncritical reliance on credit ratings as a substitute for that independent evaluation. (Rec IV. 8, FSF 2008) We reaffirm our commitment to reduce authorities' and financial institutions' reliance on external credit ratings, and call on standard setters, market participants, supervisors and central banks to implement the agreed FSB principles and end practices that rely mechanistically on these ratings. (Cannes) We call for accelerated progress by national authorities and standard setting bodies in ending the mechanistic reliance on credit ratings and encourage steps that	Jurisdictions should indicate the steps they are taking to address the recommendations of the May 2014 FSB thematic peer review report on the implementation of the FSB Principles for Reducing Reliance on Credit Ratings, including by implementing their agreed action plans. Jurisdictions may refer to the following documents: • *FSB Principles for Reducing Reliance on CRA Ratings (Oct 2010)* • FSB *Roadmap for Reducing Reliance on CRA Ratings (Nov 2012)* • BCBS Consultative Document *Revisions to the Standardised Approach for credit risk (Dec 2014)*	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☑ Final rule (for part of the reform) in force since : 1 January 2015 ☑ **Implementation completed as of:** 1 January 2015 **Issue is being addressed through :** ☐ Primary / Secondary legislation ☑ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: **Short description of the content of the legislation/ regulation/guideline:** Switzerland participated in the May 2014 FSB thematic peer review on the implementation of the FSB Principles for Reducing Reliance on Credit Ratings. On May 13, 2014, Switzerland published an action plan for implementing the FSB principles for reducing reliance on CRA ratings. This action plan noted that only a few references to ratings have been found	**Planned actions (if any) and expected commencement date:** **Web-links to relevant documents:**

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
		would enhance transparency of and competition among credit rating agencies. (Los Cabos) We call on national authorities and standard setting bodies to accelerate progress in reducing reliance on credit rating agencies, in accordance with the FSB roadmap. (St Petersburg)		in Swiss laws and regulations, most of which are the result of international standards such as the capital adequacy requirements of the Basel Committee on Banking Supervision ("Basel III"). In order to reduce reliance on ratings, the Swiss action plan has foreseen an active involvement in the relevant international bodies on these issues in organizing a workshop. The objective of this workshop that took place on August 28, 2014 was to facilitate the exchange of views and the sharing of best practices among market participants regarding additional information used- and alternatives to CRA ratings in credit risk assessment. This workshop has also raised awareness about potential risks associated with CRAs and their ratings. In addition, some specific regulatory steps have been taken. For instance, references to CRA ratings have been removed from the FINMA Collective Investment Schemes Ordinance by January 2015. Furthermore, updated disclosure requirements (by January 2015) within banking regulation will facilitate credit assessment for market participants. **Highlight main developments since last**	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				year's survey: In order to implement the FSB Principles for Reducing Reliance on CRA Ratings, the Swiss authorities have taken the following actions since 2014: -Participation in the May 2014 FSB thematic peer review on the implementation of the FSB -Publication of an action plan on May 13, 2014 for implementing the FSB principles for reducing reliance on CRA ratings -Organizing a workshop on August 28, 2014 with the Swiss financial market participants to facilitate the exchange of views and the sharing of best practices among market participants regarding additional information used- and alternatives to CRA ratings in credit risk assessment. -Removed from the FINMA Collective Investment Schemes Ordinance references to CRA ratings. The revised ordinance entered into force on Jan 1, 2015 -FINMA updated their disclosure requirements within banking regulation. The updated circular Disclosures Banks entered into force on Jan 1, 2015 **Web-links to relevant documents:**	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Action plan: http://www.news.admin.ch/NSBSubscriber/message/attachments/34816.pdf Press release concerning the action plan: https://www.news.admin.ch/message/index.html?lang=en&msg-id=52926 Press release concerning the workshop: https://www.sif.admin.ch/sif/en/home/dokumentation/medienmitteilungen/medienmitteilungen.msg-id-54245.html CISO-FINMA: https://www.admin.ch/opc/en/classified-compilation/20140344/index.html Press release concerning disclosures: https://www.finma.ch/en/news/2014/11/mm-lr-20141128/	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
VI.	**Enhancing and aligning accounting standards**				
15 (18)	Consistent application of high-quality accounting standards	Regulators, supervisors, and accounting standard setters, as appropriate, should work with each other and the private sector on an ongoing basis to ensure consistent application and enforcement of high-quality accounting standards. (Washington)	Jurisdictions should indicate the accounting standards that they follow and whether (and on what basis) they are deemed to be equivalent to IFRSs as published by the IASB or are otherwise of a high and internationally acceptable quality, and provide accurate and relevant information on financial performance. They should also explain the system they have for enforcement of consistent application of those standards. Jurisdictions may want to refer to their jurisdictional profile prepared by the IFRS Foundation, which can be accessed at: http://www.ifrs.org/Use-around-the-world/Pages/Analysis-of-the-G20-IFRS-profiles.aspx.	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☑ Final rule (for part of the reform) in force since : Jan 2015 ☑ **Implementation completed as of:** Jan 2015 **Issue is being addressed through :** ☑ Primary / Secondary legislation ☐ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: --- **Short description of the content of the legislation/ regulation/guideline:** IFRS (as published by the IASB) and US GAAP are allowed for bank's consolidated financial statements (and required if listed in the main segment of Swiss stock exchange). Swiss Accounting Standards are continously being	**Planned actions (if any) and expected commencement date:** Changes in IFRS and US GAAP with particular focus on the treatment of financial instruments will be analysed and transposed into national regulation where needed. **Web-links to relevant documents:** ---

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				improved and amended in line with internationally accepted accounting standards. Enforcement of consistent application of accounting standards is performed by SIX exchange regulation and the supervisory authority. --- **Highlight main developments since last year's survey:** Revision of Swiss Accounting Standards came into force on January 1, 2015. **Web-links to relevant documents:** FINMA Circular 15/1 Accounting - Banks https://www.finma.ch/en/documentation/circulars/#Order=2	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
16 (19)	Appropriate application of Fair Value Accounting	Accounting standard setters and prudential supervisors should examine the use of valuation reserves or adjustments for fair valued financial instruments when data or modelling needed to support their valuation is weak. (Rec. 3.4, FSF 2009) Accounting standard setters and prudential supervisors should examine possible changes to relevant standards to dampen adverse dynamics potentially associated with fair value accounting. Possible ways to reduce this potential impact include the following: (1) Enhancing the accounting model so that the use of fair value accounting is carefully examined for financial instruments of credit intermediaries; (ii) Transfers between financial asset categories; (iii) Simplifying hedge accounting requirements. (Rec 3.5, FSF 2009)	Jurisdictions should indicate the policy measures taken for appropriate application of fair value accounting. Although not an application of fair value accounting, jurisdictions should additionally be mindful of implementation issues arising from the new accounting requirements for expected loan loss provisioning for impaired loans that are being introduced by the IASB and the FASB, and, for those jurisdictions where specific action is needed to foster transparent and consistent implementation, set out any steps they intend to take. See, for reference, the following BCBS documents: • *Basel 2.5 standards on prudent valuation (Jul 2009)* • *Supervisory guidance for assessing banks' financial instrument fair value practices (Apr 2009)*	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☑ **Implementation completed as of:** Jan 2015 **Issue is being addressed through :** ☑ Primary / Secondary legislation ☑ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: --- **Short description of the content of the legislation/ regulation/guideline:** - IFRS (as published by the IASB) and US GAAP are allowed for bank's consolidated financial statements (and required if listed in the main segment of Swiss stock exchange). Swiss Accounting Standards for banks are continuously being improved and amended in line with	**If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:** Changes in IFRS and US GAAP with particular focus on the treatment of financial instruments will be analysed and transposed into national regulation where needed. **Planned actions (if any) and expected commencement date:** --- **Web-links to relevant documents:** ---

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				internationally accepted accounting Standards. - On a regulatory level, the standards on prudent valuation (as foreseen by Basel 2.5) have been implemented into the FINMA Circulars. --- **Highlight main developments since last year's survey:** Revision of Swiss Accounting Standards entered into force on January 1, 2015 **Web-links to relevant documents:** - FINMA Circular 15/1 Accounting - Banks and FINMA Guidelines on credit risk (FINMA-Circ. 08/19) and on market risk (FINMA-Circ. 08/20): https://www.finma.ch/en/documentation/circulars/#Order=2	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
VII.	**Enhancing risk management**				
17 (20)	Enhancing guidance to strengthen banks' risk management practices, including on liquidity and foreign currency funding risks	Regulators should develop enhanced guidance to strengthen banks' risk management practices, in line with international best practices, and should encourage financial firms to re-examine their internal controls and implement strengthened policies for sound risk management. (Washington) National supervisors should closely check banks' implementation of the updated guidance on the management and supervision of liquidity as part of their regular supervision. If banks' implementation of the guidance is inadequate, supervisors will take more prescriptive action to improve practices. (Rec. II.10, FSF 2008) Regulators and supervisors in emerging markets[3] will enhance their supervision of banks' operation in foreign currency funding markets. (FSB 2009) We commit to conduct robust, transparent stress tests as needed. (Pittsburgh)	Jurisdictions should indicate the policy measures taken to enhance guidance to strengthen banks' risk management practices. Jurisdictions may also refer to FSB's *thematic peer review report on risk governance (Feb 2013)* and the BCBS *Peer review of supervisory authorities' implementation of stress testing principles (Apr 2012)* and *Principles for sound stress testing practices and supervision (May 2009).*	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☑ **Implementation completed as of:** Stress Testing 2008, Liquidity Sound Principles 2013, LCR 2015 **Issue is being addressed through :** ☑ Primary / Secondary legislation ☑ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: Stress tests Test reportings **Short description of the content of the legislation/ regulation/guideline:** - Stress tests for large banks since 2008 as part of ongoing supervision; - FINMA	**Planned actions (if any) and expected commencement date:** - Implementation of the Basel requirements (NSFR) is progressed to be integrated in circular 15/2 (plan: 2016). - circular 08/24 on Supervision and internal control is currently under revision (planned release: summer 2016) - circular 08/21 on Operational Risk is planned to be updated **Web-links to relevant documents:** - Ordinance (liquidity): https://www.news.admin.ch/message/index.html?lang=en&msg-id=53500 - FINMA circular (liquidity): http://www.finma.ch/e/aktuell/pages/mmrs-liquiditaet-banken.aspx - LCR reporting template: http://www.snb.ch/en/emi/LCR

[3] Only the emerging market jurisdictions that are members of the FSB may respond to this recommendation.

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				implemented national LCR regulation with Finance Ministry, SNB and Bank Interest Groups - Circular 08/21 on Operational Risk published in Oct 2013. - The Federal Council issued the final rules on the LCR (ordinance on Liquidity) in June 2014. In accordance with this ordinance FINMA introduced the update of the circular 13/6 which was extended towards the inclusion of the quantitative requirements on the LCR (enacted in July 2014, in force in January 2015) --> circular 15/2. --- **Highlight main developments since last year's survey:** - LCR Minimum requirements in Force since January 2015 - Intraday Liquidity, short-term liquidity risk monitoring tools and Reporting on NSFR: Test-Reporting started in 2015. - Circular 08/21 on Operational Risk in effect since 1 January 2015. **Web-links to relevant documents:** ---	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
18 (22)	Enhanced risk disclosures by financial institutions	Financial institutions should provide enhanced risk disclosures in their reporting and disclose all losses on an ongoing basis, consistent with international best practice, as appropriate. (Washington) We encourage further efforts by the public and private sector to enhance financial institutions' disclosures of the risks they face, including the ongoing work of the Enhanced Disclosure Task Force. (St. Petersburg)	Jurisdictions should indicate the status of implementation of the disclosures requirements of IFRSs (in particular IFRS7 and 13) or equivalent. Jurisdictions may also use as reference the recommendations of the October 2012 report by the Enhanced Disclosure Task Force on *Enhancing the Risk Disclosures of Banks* and *Implementation Progress Report by the EDTF (Aug 2013)*, and set out any steps they have taken to foster adoption of the EDTF Principles and Recommendations.	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☑ Draft in preparation, expected publication by: ☑ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☑ **Implementation completed as of:** 2009 (adjusted in 2012) **Issue is being addressed through :** ☐ Primary / Secondary legislation ☑ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: Ongoing supervision. **Short description of the content of the legislation/ regulation/guideline:** - Since January 1, 2009 banks have to issue a Pillar 3 reporting (Pillar 3 of the BCBS capital requirements); this regulation was adjusted in 2012. In October 2014 an updated version of a FINMA Circular on Pillar 3 disclosure along the BCBS requirements has been	**Planned actions (if any) and expected commencement date:** - Accounting standards will be continuously improved and amended in line with internationally accepted accounting standards (for Swiss Accounting Standards for banks see also 15 above). - Final national rules implementing revised BCBS disclosure standards are planned to be published by end of 2015, taking into account the results of a national consultation on proposed rule-making (July-August 2015). **Web-links to relevant documents:** ---

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				published (update wrt Leverage Ratio and Liquidity Coverage Ratio). - IFRS (as published by the IASB) and US GAAP are allowed for bank's consolidated financial statements (and required if listed in the main segment of Swiss stock exchange). Revision of Swiss Accounting Standards has been accomplished and developments in IFRS and US GAAP have been taken into account. - With respect to enhanced risk disclosures, upon recommendation by FINMA, both Swiss G-SIBs disclose information along the EDTF design. --- **Highlight main developments since last year's survey:** BCBS published revised disclosure requirements in January 2015. National implementation of this revised disclosure framework is underway. Draft text have been elaborated in a national working Group. Public consultation took place during July and August 2015. Publication of final national regulation planned for Q4 2015. **Web-links to relevant documents:** - CS: https://www.creditsuisse. com/investors/doc/csg_financialrep	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				ort_1q14.pdf (page 53) - UBS: http://www.ubs.com/global/en/about_ubs/investor_relations/annualreporting/2014/_jcr_content/par/columncontrol/col1/linklist/link_0.1506214018.file/bGluay9wYXRoPS9jb250ZW50L2RhbS9zdGF0aWMvZ2xvYmFsL2ludmVzdG9yX3JlbGF0aW9ucy9hbm51YWwyMDE0L2FubnVhbC1yZXBvcnQtZ3JvdXAtYW5kLXVicy1hZy0yMDE0LWVuLnBkZg==/annual-report-group-and-ubs-ag-2014-en.pdf (p. 158-165 and other pages referenced therein)	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
VIII. Strengthening deposit insurance					
19 (23)	Strengthening of national deposit insurance arrangements	National deposit insurance arrangements should be reviewed against the agreed international principles, and authorities should strengthen arrangements where needed. (Rec. VI.9, FSF 2008)	Jurisdictions should describe any revisions made to national deposit insurance system, including steps taken to address the following recommendations of the FSB's February 2012 *thematic peer review report on deposit insurance systems:* • Adoption of an explicit deposit insurance system (for those jurisdictions that do not have one) • Addressing the weaknesses and gaps to full implementation of the *Core Principles for Effective Deposit Insurance Systems* issued by IADI in November 2014	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☐ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☑ **Implementation completed as of:** September 2011 **Issue is being addressed through :** ☑ Primary / Secondary legislation ☐ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: **Short description of the content of the legislation/ regulation/guideline:** Deposit insurance coverage has been increased in September 2011 (temporary measures taken in 2008 have been turned into permanent measures). Please refer to the peer review report on deposit insurance systems published in February 2012 for more details. There have been	**Planned actions (if any) and expected commencement date:** In 2014 an independent group of experts on the "further development of financial market strategy" in Switzerland made several recommendations regarding the deposit insurance system. Some of the recommendations are currently being implemented by way of self-regulation through the DIS. Furthermore, the Federal Council requested the administration to examine means of optimising how the deposit protection system works. **Web-links to relevant documents:** Report of independent group of experts: https://www.news.admin.ch/message/index.html?lang=en&msg-id=55545 Media Information Federal Council on planned actions: http://www.efd.admin.ch/dokumentation/medieninformationen/00467/index.html?lang=en&msg-id=57602

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				no substantial changes in legislation since the peer review report. **Highlight main developments since last year's survey:** Since the publication of the peer review report on deposit insurance systems published in February 2012, PostFinance (the financial services unit of state-owned Swiss Post) has received a banking licence and is now covered by the domestic deposit protection scheme. The coordination and the sharing of information between the relevant parties involved in a payout or resolution situation was improved through the conclusion of a Memorandum of Understanding between the private DIS and the supervisory authority in 2014. **Web-links to relevant documents:** http://www.financialstabilityboard.org/publications/r_120208.pdf http://www.esisuisse.ch/en/20140221-3210-veb-mou_ueberarbeitet_final_version_signed-cbl.pdf	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
IX.	**Safeguarding the integrity and efficiency of financial markets**				
20 (24)	Enhancing market integrity and efficiency	We must ensure that markets serve efficient allocation of investments and savings in our economies and do not pose risks to financial stability. To this end, we commit to implement initial recommendations by IOSCO on market integrity and efficiency, including measures to address the risks posed by high frequency trading and dark liquidity, and call for further work by mid-2012. (Cannes)	Jurisdictions should indicate whether high frequency trading and dark pools exist in their national markets. Jurisdictions should indicate the progress made in implementing the recommendation in the following IOSCO reports in their regulatory framework: • *Regulatory issues raised by changes in market structure (Dec 2013)* • *Report on Regulatory Issues Raised by the Impact of Technological Changes on Market Integrity and Efficiency (Oct 2011)* • *Report on Principles for Dark Liquidity (May 2011)*.	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☑ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☑ Final rule or legislation approved and will come into force on: currently planned for 1 January 2016 ☐ Final rule (for part of the reform) in force since : ☐ **Implementation completed as of:** **Issue is being addressed through :** ☑ Primary / Secondary legislation ☐ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: Dark Pools: FINMA conducted Alternative Trading Platform (ATP; including ATS, MTF, SI and Broker-dealer crossing network) Supervisory Reviews in the Americas and EMEA at the two major Swiss banks. The purpose of this review was mainly to assess management oversight and organizational	**Planned actions (if any) and expected commencement date:** FMIA is expected to come into force in January 2016. FINMA currently is revising its own legal frameworks which shall come into force simultaneously with FMIA. **Web-links to relevant documents:**

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				set-up, to review the respective policies, procedures and guidelines and assess the overall governance, to understand the key risks regarding the operation of ATPs, to assess the design of the key controls to prevent and to detect these risks, as well as their operating effectiveness and to examine independent reviews and self-assessments, identified weaknesses and remediation actions taken. In our view, the key risks regarding the operation of ATPs include (1) reputational and litigation risks, (2) system stability issues and (3) market risks due to operational failures as well as counterparty risks. In addition, the regulation of ATPs is increasing on a global scale. The Supervisory Reviews resulted in several findings regarding the above-mentioned topics and risks which are being remediated and mitigated by the banks. High Frequency Trading: FINMA started to gather information on the volume of HFT in the Swiss exchange landscape. FINMA proactively initiated an in-depth-analysis of the control procedures of specific HF-Traders. In addition, FINMA analyzed a Swiss Dark Pool's Service related to the maintenance of a fair and orderly trading system including	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				appropriate systems of market supervision. **Short description of the content of the legislation/ regulation/guideline:** Financial Market Infrastructure Act (FMIA): To strengthen market transparency and financial stability, the Swiss Federal Council launched a reform package that fully implements the G-20 commitments on OTC derivatives and brings financial market infrastructure in line with international standards. This package will also contain elements on market integrity. The Swiss parliament has approved the final version of the FMIA on 19 June 2015. Coming into force is planned for January 2016. Under current law, high frequency trading is subject to the regulation on market manipulation stipulated in Article 33f of the Federal Act on Stock Exchanges and Securities Trading (SESTA). Market participants employing HFT strategies can be non regulated entities and, as such, not subject to FINMA prudential supervision. --- **Highlight main developments since last year's survey:**	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				In June 2015, the Swiss parliament adopted the final version of FMIA. **Web-links to relevant documents:** http://www.parlament.ch/sites/doc/CuriaFolgeseite/2014/20140061/Schlussabstimmungstext%201%20NS%20D.pdf	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
21 (25)	Regulation and supervision of commodity markets	We need to ensure enhanced market transparency, both on cash and financial commodity markets, including OTC, and achieve appropriate regulation and supervision of participants in these markets. Market regulators and authorities should be granted effective intervention powers to address disorderly markets and prevent market abuses. In particular, market regulators should have, and use formal position management powers, including the power to set ex-ante position limits, particularly in the delivery month where appropriate, among other powers of intervention. We call on IOSCO to report on the implementation of its recommendations by the end of 2012. (Cannes) We also call on Finance ministers to monitor on a regular basis the proper implementation of IOSCO's principles for the regulation and supervision on commodity derivatives markets and encourage broader publishing and unrestricted access to aggregated open interest data. (St. Petersburg)	Jurisdictions should indicate whether commodity markets of any type exist in their national markets. Jurisdictions should indicate the policy measures taken to implement the principles found in IOSCO's report on *Principles for the Regulation and Supervision of Commodity Derivatives Markets (Sep 2011)*. Jurisdictions, in responding to this recommendation, may also make use of the responses contained in the update to the survey published by IOSCO in September 2014 on the principles for the regulation and supervision of commodity derivatives markets.	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☑ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☑ Final rule or legislation approved and will come into force on: expected for January 2016 ☐ Final rule (for part of the reform) in force since : ☐ **Implementation completed as of:** **Issue is being addressed through :** ☑ Primary / Secondary legislation ☐ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: **Short description of the content of the legislation/ regulation/guideline:** Financial Market Infrastructure Act (FMIA): This act implements the reforms of the OTC derivatives markets and gives the Federal Council amongst others the power to introduce position limits. With this new regulatory framework, Switzerland will comply with the large majority of the IOSCO Principles. Where it does not comply, this is mostly	**Planned actions (if any) and expected commencement date:** Coming into force of the Financial Market Infrastructure Act (FMIA): expected for January 2016 **Web-links to relevant documents:**

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				attributable to the fact of not having a substantial commodities exchange and not having a regulated market for physically settled contracts at all. **Highlight main developments since last year's survey:** Adoption of the Financial Market Infrastructure Act (FMIA) on June 19, 2015 by the Parliament. **Web-links to relevant documents:** https://www.admin.ch/opc/de/federal-gazette/2015/4931.pdf	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
22 (26)	Reform of financial benchmarks	We support the establishment of the FSB's Official Sector Steering Group to coordinate work on the necessary reforms of financial benchmarks. We endorse IOSCO's Principles for Financial Benchmarks and look forward to reform as necessary of the benchmarks used internationally in the banking industry and financial markets, consistent with the IOSCO Principles. (St. Petersburg)	Collection of information on this recommendation will continue to be deferred given the forthcoming FSB progress report on implementation of the FSB recommendations in this area, and ongoing IOSCO work to review the implementation of the IOSCO Principles for Financial Benchmarks.		

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
X.	**Enhancing financial consumer protection**				
23 (27)	Enhancing financial consumer protection	We agree that integration of financial consumer protection policies into regulatory and supervisory frameworks contributes to strengthening financial stability, endorse the FSB report on consumer finance protection and the high level principles on financial consumer protection prepared by the OECD together with the FSB. We will pursue the full application of these principles in our jurisdictions. (Cannes)	Jurisdictions should describe progress toward implementation of the OECD's *G-20 high-level principles on financial consumer protection (Oct 2011)*. Jurisdictions may also refer to OECD's September 2013 and September 2014 reports on effective approaches to support the implementation of the High-level Principles.	☐ **Not applicable** ☐ **Applicable but no action envisaged at the moment** ☑ **Implementation ongoing:** *Status of progress:* ☐ Draft in preparation, expected publication by: ☑ Draft published as of: 25 June 2014 ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☐ **Implementation completed as of:** **Issue is being addressed through :** ☑ Primary / Secondary legislation ☐ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: **Short description of the content of the legislation/ regulation/guideline:** - In February 2012 FINMA has published a position paper proposing two key measures to improve client protection: (1) clear rules of business conduct for financial services providers, and (2) better product documentation. - On 28 March 2012 the Federal Council instructed the FDF to prepare new	**Planned actions (if any) and expected commencement date:** Entry into force is expected for 2017 or 2018. **Web-links to relevant documents:**

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				legislation on cross-sector regulation of financial products and services and the distribution of these products to clients. The new guidelines is envisaged to strengthen client protection within the Swiss financial market and enhance the competitiveness of the financial centre. Furthermore, the same conditions should be applied for all market participants, thereby creating a level playing field and reducing distortions in competition between providers. Possible key thrusts of the planned regulatory project were published by the FDF on 18 February 2013. - On 25 June 2014, the Federal Council has launched a public consultation on a new Federal Financial Services Act which ended on 17 October 2014. **Highlight main developments since last year's survey:** - On 13 March 2015 the Federal Council took note of the results of the public consultation and took some initial decisions on the direction to be taken on some controversial topics regarding the new Federal Financial Services Act. - On 24 June 2015 the Federal Council took further decisions regarding the new	

No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Federal Financial Services Act and established principles for the shaping of some specific areas on the basis of the results from the public consultation. **Web-links to relevant documents:** Information on Federal Financial Services Act: https://www.sif.admin.ch/sif/en/home/dokumentation/finweb/regulierungsprojekte/finanzdienstleistungsgesetz--fidleg-.html	

XI. Source of recommendations:

Brisbane: G20 Leaders' Communique (15-16 November 2014)
St Petersburg: The G20 Leaders' Declaration (5-6 September 2013)
Los Cabos: The G20 Leaders' Declaration (18-19 June 2012)
Cannes: The Cannes Summit Final Declaration (3-4 November 2011)
Seoul: The Seoul Summit Document (11-12 November 2010)
Toronto: The G-20 Toronto Summit Declaration (26-27 June 2010)
Pittsburgh: Leaders' Statement at the Pittsburgh Summit (25 September 2009)
London: The London Summit Declaration on Strengthening the Financial System (2 April 2009)
Washington: The Washington Summit Action Plan to Implement Principles for Reform (15 November 2008)
FSF 2008: The FSF Report on Enhancing Market and Institutional Resilience (7 April 2008)
FSF 2009: The FSF Report on Addressing Procyclicality in the Financial System (2 April 2009)
FSB 2009: The FSB Report on Improving Financial Regulation (25 September 2009)
FSB 2012: The FSB Report on Increasing the Intensity and Effectiveness of SIFI Supervision (1 November 2012)

XII. List of Abbreviations used:

BBA: Building Block Analysis
CISA: Collective Investment Scheme Act
FDF: Federal Department of Finance
FINMA: Swiss Financial Market Supervisory Authority
HF: Hedge Fund
LPA: Loss Potential Analysis
MoU: Memorandum of Understanding
NBA: National Bank Act
SFBC: Swiss Federal Banking Commission
SNB: Swiss National Bank
SSG: Senior Supervisors Group