BEUC The European Consumer Organisation

The Consumer Voice in Europe

REPORT

SELLING SUSTAINABILITY

How sustainable investments can breach consumer law



November 2026

The European Consumer Organisation (BEUC) is the largest organisation promoting the general interests of Europe's consumers. Founded in 1962, it proudly represents 42 independent national consumer organisations from over 31 European countries. Together with our members, we inform EU policies to improve people's lives in a sustainable and fair economy and society.

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WHY IT MATTERS TO CONSUMERS

Consumers want to play their role in the transition to sustainable products and services. But greenwashing slows this transition down and financial services is no exception to this. It undermines consumer confidence in, and motivations for, saving for retirement and investing via sustainable investment products. More broadly, it suppresses the incentives for genuinely sustainable products to be offered to consumers. Consumers should be able to make informed decisions about financial products and services. Informed decision-making is only possible when consumers are not misled about the nature of what is offered to them.

WHAT THIS REPORT IS ABOUT

This report takes a consumer-focused look at sustainable finance and the greenwashing risks that go along with it. Widespread greenwashing remains a market-wide issue in financial services, rather than an issue with a single company. Allowing consumers to be misled by greenwashing has very real and harmful impacts for individual consumers, but also for sustainability efforts overall. This report underlines that, alongside the existing rules that apply to sustainable finance products, there are horizontal consumer laws, such as the recently applied Empowering Consumers Directive, that are relevant rulebooks for protecting consumers against misleading and unfair commercial practices, including in financial services.

To provide an example of how consumer protection laws apply to sustainable finance products, this report includes a case study on one financial services group, Allianz. Through analysis of the communications and products offered by Allianz and its subsidiaries in a selection of European markets, this report identifies a number of instances where practices come up short when assessed against European consumer protection rules.

INTRODUCTION: SUSTAINABLE FINANCE AND CONSUMER TRUST

1. Consumer demand for sustainable investment products

Many consumers across Europe are making efforts to live more sustainably in many ways, including in their financial lives. Data from Eurobarometer revealed that the majority of Europeans want to make sure that their money does not harm the planet or society. A 2025 BEUC consumer survey done in 11 European countries found that while more than 40% of consumers would consider investing in sustainable products, almost a third are unsure. Mistrust in green claims is a leading cause of this uncertainty.

This sentiment is well-founded, as the financial system can have a significant impact on the environment. Financial services companies, including banks, insurers, and investment managers, are all fundamental parts of doing business in today's world. This reality means that finance companies can have a big impact on what choices are made by companies in the rest of the economy. As the EU looks to private investment to support the transition to a sustainable economy, not just public financing, the financial services sector has a big role to play in steering business decisions towards more sustainable choices.

With increasing numbers of consumers looking for sustainable options when it comes to investment products, the market has responded quickly to offer such products, at least on paper.

More than 40% of consumers would consider investing in sustainable products, almost a third are unsure.



Trust is key

The investment products sold to consumers should match up to their expectations when it comes to sustainability. Building consumer trust in financial services can only be achieved by ensuring that consumers do not end up being misled. BEUC's 2025 survey revealed that the experience of being misled by a greenwashed investment product can leave a lasting impression on consumers. This includes feeling manipulated, losing trust in green claims overall, being discouraged from sustainable investing, and even abandoning the provider who sold them the product.

Consumers can face harms from being misled by such products, including psychological or financial harm. Consumer trust in green claims more broadly can be eroded. While consumers who want to sell their product to buy another which aligns better with their values may face exit fees, tax liabilities, fees for a new product, and realise losses if selling during a market downturn. This is a feature of investment products that distinguishes them from other consumer products.

While trust is key for consumers, it also matters more broadly. Firstly, financial services providers should be concerned about misleading their customers with unfair sustainability claims. BEUC's 2025 survey revealed that 34% of consumers who have been misled by a greenwashed product would stop doing business with the product's provider. Greenwashing scandals can also create reputational risks for businesses.

Secondly, EU competitiveness can benefit from more active retail investor participation in capital markets. The European Commission's initiative, the Savings and Investments Union (SIU), aims to allow Europeans to grow their own wealth while boosting EU growth and competitiveness. To achieve this, it is essential that consumers can trust that the products they are being offered match their expectations. Greenwashing in sustainable finance products will undermine that.

2. Persistent greenwashing risks for consumers

As consumer demand for sustainable investments became clear, financial service providers moved quickly to offer products marketed as sustainable. To promote transparency, the EU introduced the Sustainable Finance Disclosure Regulation (SFDR), which required financial market participants to disclose sustainability information about their businesses and products. However, transparency rules have not eradicated issues related to the validity and comparability of sustainability-related claims and products.

In fact, the SFDR has been mis-used by market participants. The SFDR disclosure rules classify funds that wish to promote sustainability as Article 8, or Article 9 if the fund sets sustainable investment as its objective. These classifications have limited rules and do not concretely require funds to avoid certain investments or activities.

Despite the lack of criteria, many providers have treated Article 8 and 9 product classifications "as quasi-labels", further contributing to greenwashing. The transparency rules introduced by the SFDR may be useful to experts, but retail investors generally do not have the expertise or time to assess a product's sustainability from these disclosures, and whether it matches up to how a product's sustainability is promoted.

European lawmakers recently agreed to a review of the SFDR rules to address these shortcomings. Unfortunately, the reviewed framework will not hold investment products, and the companies that create them, to strict rules that match consumer expectations about sustainable investing. The new Transition category, for example, will allow investments in companies that are developing new fossil fuel projects.

Previous legal actions

Given the widespread and systemic nature of greenwashing in sustainable finance, many previous efforts to draw attention to the issue have been launched in the past. Amongst BEUC's members, national consumer associations, protecting consumers from greenwashing is an ongoing activity.

In Germany, Stiftung Warentest has an investment fund comparison tool which, alongside other information, ranks the sustainability of thousands of products according to stringent and publicly available criteria. These include checking a product's exposure to sustainable activities, like renewable energy, and exposure to unsustainable or unethical businesses, such as fossil fuels, tobacco, and gambling.

The Fair Finance Guide, an initiative of our Swedish member Sveriges Konsumenter, actively identifies greenwashing in Swedish investment products. For example, an investigation by the Fair Finance Guide has identified investments made by Sweden's public pension funds in companies supporting the military junta in Myanmar.

The German consumer centre in Baden-Württemberg (part of BEUC member vzbv) previously launched actions against investment firms offering misleading sustainable investments, including DWS, which resulted in the firm agreeing to change its advertising claims.

NGOs have also taken up the fight against greenwashing in sustainable finance. ClientEarth launched an action in 2024 targeting several BlackRock investment funds that were being marketed as "sustainable", despite these funds having invested over $1bn in fossil fuel companies, including companies that are actively expanding their fossil fuel activities through new projects and capacity. In response to new fund naming guidelines from the European Securities and Markets Authority (ESMA), BlackRock changed the names of many of its funds which were previously labelled as sustainable.

ClientEarth's action built on research by Reclaim Finance. In their analysis of 430 passively managed funds that are presented as taking sustainability criteria into account, 70% of these funds made investments in companies that are engaged in fossil fuel expansion.

Analysis such as this provides an insight into how widespread across the sustainable investment market such greenwashing is.

Outside of financial services, misleading green claims have been scrutinised more closely as of late. Notable instances include a landmark case against fossil fuel company TotalEnergies in a French court, where commercial communications made by the firm were found to be misleading, in light of TotalEnergies' continued expansion of fossil fuels.

BEUC recently submitted a complaint to the Consumer Protection Cooperation (CPC) Network regarding greenwashing through misleading commercial practices by energy companies across several markets in Europe.

3. The case against fossil fuel expansion in sustainable investments

The expansion of fossil fuel activities, and the funding of companies engaged in it, is both incompatible with scientific realities and retail investor expectations.

The International Energy Agency (IEA) has stated simply that to achieve net zero, there should be no investment in new fossil fuel supply. The IPCC found that existing and planned fossil fuel projects exceed the remaining carbon budget to stay within 1.5°C. The EU itself is legally bound to its climate goals of reaching net zero by 2050 by the European Climate Law.

BEUC research showed that 71% of sustainable investors want investments that will focus on transitioning high-emission sectors towards sustainability, with 62% stating that such investments should avoid fossil fuel expansion.

The recently agreed review of the SFDR missed an opportunity to make the exclusion of fossil fuel expansion a regulatory minimum standard for investment products that are promoted as transition-focused.



IMPACT AND CONSUMER HARM

Greenwashing in retail investment products has broad consequences in terms of consumer harm and wider impacts on sustainability and society.

1. Undermining consumers' informed decision-making

The evidence is clear that consumers increasingly want to engage with sustainable products. This also includes ensuring that their savings and investments align with their environmental concerns.

Eurobarometer revealed that it is important to over 60% of consumers that their savings and investments do not harm the planet. BEUC's own survey in 2025 demonstrated that the majority of retail investors would expect their sustainable investments to avoid companies that engage in, among other aspects, fossil fuel expansion (62%), socially harmful practices (60%), and governance-related issues (61%). 31% would even accept lower potential returns to avoid such activities. The survey further found that the most common reaction, among 41%, to discovering a product is not as sustainable as it appeared would be feelings of manipulation.

EIOPA, as part of its 2022 and 2023 Consumer Trends Reports, asked consumers about sustainable life insurance and pension products. The 2023 results noted an increase in consumer awareness of such products. However, 44% of consumers disagreed that sustainability-related documentation was easy to understand, while 24% didn't know. This reinforces the 2022 finding that 75% of consumers agree that one cannot know whether a product is sustainable because the documentation is too complex.

Consumers make decisions about whether to purchase a product or not by considering, among others, its environmental or sustainability characteristics. By misleadingly presenting an investment product to be more sustainable than it truly is, consumers may choose a product that they would not otherwise have chosen. Therefore, consumer harm is created: firstly, consumers' ability to make informed choices is seriously diminished, and secondly, consumers do not receive the product they sought.

2. Economic harm

Harm to a consumer's economic interest may also arise from being misled by unfair sustainability claims.

Many consumers might never realise that they have been misled and that their investment is not as green as they were told. Product complexity limits their ability to assess it themselves; EIOPA found that 77% don't know how to verify a product's sustainability claims. If consumers do find out that their product does not match their expectations, they unfortunately have limited recourse. It is not as simple as bringing a product back to the shop to exchange for another one.

Consumers may choose to complain to the product provider or to a supervisory authority, hoping an effective remedy can be offered. However, some consumers would simply choose to sell the offending product. BEUC's 2025 survey found that 22% of consumers would sell their investment product if they discovered it was less sustainable than it was promoted, but not at a loss. 8% would even sell at a loss.

Consumers who sell their product may face high and varied costs along with a significant administrative burden. Depending on the product, consumers may have to pay: exit fees, which can be higher if the product is sold before it has reached maturity; transaction or brokerage fees; and taxes such as capital gains tax or transaction tax. On top of that, consumers might lock in losses if they sell during a market downturn. This is a feature of investment products that distinguishes them from other consumer products.

Analysis by ESMA found that greenwashing controversies did not have a clear financial impact on the company involved. Financial services providers who make misleading claims about their products' sustainability characteristics will often address their unfair practices, not by cleaning up their products, but by removing the sustainability-related claims, as was the case for some BlackRock funds and DWS. While this is effective in preventing additional consumers from being misled, it does not address the fact that those who already invested are now in a product which does not match their preferences.

This scenario is perfectly exemplified in the market reaction to the introduction by ESMA of guidelines on the use of sustainability-related terms in investment fund names. By changing the name of an investment fund from a sustainability- or environmental-related term, fund providers were able to avoid the need to divest their clients' money from fossil fuel-related activities. ESMA analysis showed that €11.5bn of fossil fuel exposure, 66% of fossil fuel exposure previously invested through sustainability- and environmental-named funds, was simply renamed and remained invested in fossil fuels, but using different names.

Providers should clean up their products, rather than change the name, by adjusting the investment strategy to ensure that the actual portfolio of investments avoids exposure to activities that run counter to the sustainability claims, such as fossil fuels.

3. Wider impact on sustainability and societal harm

Greenwashing in investment products, a misleading commercial practices, cause wider impacts on sustainability and societal harm rather than "just" individual impacts on consumers who were misled.

Selling investments that do not match consumer expectations frustrates the attempts by consumers to direct capital towards sustainable activities and away from unsustainable activities. Funds that, despite their promotion as green, continue to invest in unsustainable activities are essentially misallocating capital to environmental laggards. This outcome removes the incentive that companies should have to become more sustainable and therefore benefit from the capital flowing into green investment funds.

More broadly, consumer trust in all types of sustainability claims, not just in finance, is undermined by greenwashing in investment products, as found by BEUC's survey. Resultingly, damage may be done to initiatives to offer consumers sustainable products through reputable sustainability labels such as the EU Ecolabel.

Additionally, widespread greenwashing in investment products weakens the incentives for a supply of genuinely sustainable alternatives to emerge. If investment product providers can mislead retail investors through the unfair promotion of products' sustainability with little negative outcomes when their practices are exposed, it is unlikely that products that match consumer expectations will emerge if manufacturing such products requires commitment of additional time and resources by an asset manager. Moreover, if retail investors already believe they have invested in a sustainable fund, as indicated in B2C communications and are unable to determine otherwise, the demand for a genuinely sustainable alternative is diminished.

REGULATORY FRAMEWORK TO TACKLE GREENWASHING IN THE FINANCIAL SECTOR

At the European level, retail financial services products promoted as sustainable should be assessed through both horizontal consumer law (lex generalis) and specific financial regulation (lex specialis).

1. Horizontal consumer law: the safety net

The study prepared to accompany this report highlights that the Unfair Commercial Practices Directive (UCPD), as amended by the Empowering Consumers for the Green Transition Directive (ECGTD), applies to sustainability-related claims made in connection with retail financial products. Claims made in a product or fund name can run afoul of the UCPD as well as claims presented on consumer-facing websites and regulatory disclosures that form part of consumers' pre-purchase decision-making.

In cases where sector-specific rules exist, the UCPD still applies as a 'safety net'. In this way, the UCPD complements and addresses gaps in other EU laws. Compliance with disclosure requirements under the SFDR or other financial legislation does not exempt firms from scrutiny under consumer protection law where sustainability-related claims are likely to mislead consumers.

Sustainability-related claims which fall within the scope of the UCPD must avoid misleading or treating consumers unfairly. The amendments introduced by the ECGTD created a list of 'blacklisted' practices which shall be considered unfair in all circumstances, including generic environmental claims, entire product or entire business claims ('halo claims'), offset-based product claims, and non-verified sustainability labels. Additionally, misleading actions regarding the environmental characteristics or future environmental performance, and misleading omissions of environmental information related to the product or the business can be considered an unfair commercial practice, subject to a transactional decision test.

2. Lex specialis: an imperfect solution

The SFDR sought to regulate the sustainable investment market, introducing disclosure requirements for investment products and their providers. The SFDR created two classifications of sustainable investment products: Article 8, 'light green', products and Article 9, 'dark green', products.

These classifications have become de facto product standards. Regulatory clarifications stated that Article 9 products should only make investments that meet the SFDR definition of Sustainable Investment. This resulted in a large reclassification of Article 9 funds to the weaker Article 8. The majority of SFDR products are Article 8. Outside of disclosure requirements, there are no minimum standards or rules put in place by the SFDR as to what can be counted as an Article 8 product.

ESMA introduced guidelines on sustainability-related fund names, applicable since 2025. The guidelines set out normative rules for funds that use certain sustainability-related terms. The rules include activities that must be excluded, like fossil fuels. Analysis by Morningstar has shown that market participants reacted by removing sustainability-related terms altogether, switching to terms that had less stringent rules, or adjusting investment strategies.

The response to the Guidelines revealed gaps that remain in the framework. Funds have been adopting new terms to signal sustainability (e.g. 'Select,' 'Screened,' 'Advanced,' 'Committed'). Unfortunately, the Guidelines do not prevent investments in companies that are expanding their fossil fuel operations. Additionally, large, diversified conglomerates which include fossil fuel subsidiaries can often comfortably stay within the Guidelines' thresholds for excluding fossil fuels.

ALLIANZ'S ADVERTISING PRACTICES UNDER THE MICROSCOPE

1. Why Allianz?

Allianz is one of the world's largest insurance and asset management service providers. It is, among financial services providers, a recognisable consumer-facing brand. Allianz, with 97 million customers across almost 70 countries, is especially active in Europe, with 50% of business done in Germany and Western and Southern Europe.

Allianz offers consumers across the EU investment services, including the provision of insurance-based investment products and investment funds.

Relative to other types of institutions that provide financial services to consumers, insurers have a broad reach across Europe. European retail banks are largely organised along national lines, while insurers, such as Allianz, are quite often found across many Member States. Allianz is active, in one form or another, across almost the entirety of the EU.

BEUC and its members investigated misleading green claims from Allianz. Greenwashing remains, however, a market-wide issue in financial services and should not be understood as a problem caused only by a single company, as described above.

2. Methodology

From May 2026 through to October 2026, BEUC and national consumer associations gathered evidence of sustainability-related claims made by Allianz and its relevant subsidiaries on their consumer-facing websites. The ECGTD has applied since 27 September.

These commercial websites allow consumers to explore which products are available and to arrange a meeting or call with the Allianz subsidiary to complete the sales process. In some instances, the commercial websites include sections that provide further sustainability-related information. These sections often include links to other materials which are published or hosted on the corporate website of the global Allianz group.

Screenshots of the gathered claims are included in the findings section below, with the full catalogue of evidence gathering included in the Annex. Alongside entity and product B2C communications, BEUC conducted a look-through portfolio analysis, where possible, of several "sustainable" products and the underlying investment funds. Through the 2025 Annual Report of Allianz Global Investors, the complete portfolios of many of the funds are available. The fund portfolios were checked for companies which appear in the Global Coal Exit List (GCEL) and the Global Oil and Gas Exit List (GOGEL), two databases of fossil fuel companies compiled by the German NGO Urgewald.[1]

The report builds on the findings and conclusions of 'Legal Study on the Application of the UCPD (Directive 2005/29/EC) to environmental claims about retail financial products' published alongside this report.

1 The analysis in this study used the 2025 versions of both GCEL and GOGEL.

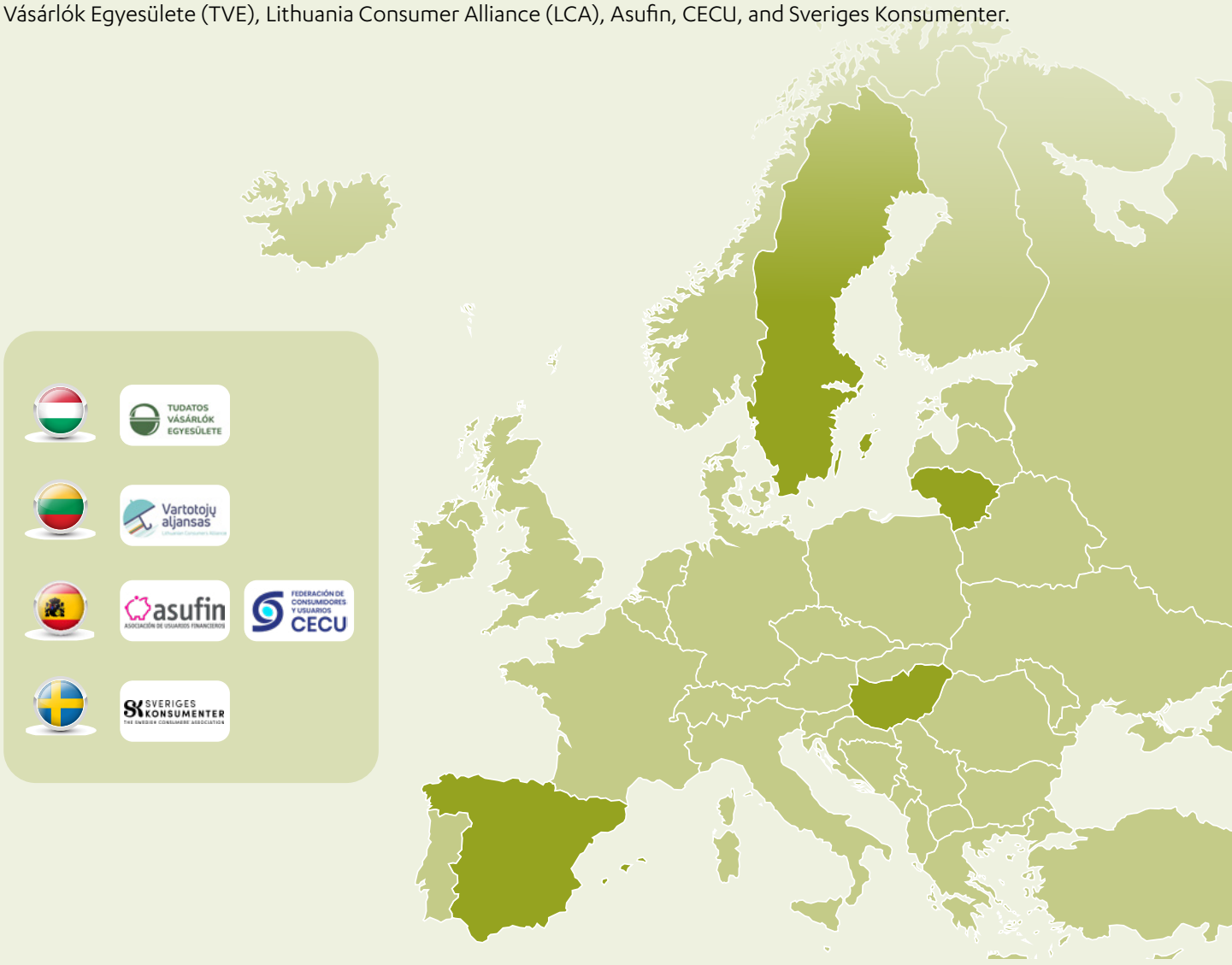
Challenges in evidence gathering

Investment products are not always directly available to consumers. In many cases, accessing products requires consumers to meet with a financial advisor who will suggest products to the consumer. This is especially the case when it comes to insurance-based investment products such as those offered by insurers like Allianz and its subsidiaries.

This situation hides part of the sales process behind an opaque layer. While BEUC research has shown that consumers often feel that they are not provided with a sufficient understanding of sustainability factors related to their investment, it is challenging to access information from those closed-door advisory meetings. EU rules on financial advice require financial advisors to ask consumers about their sustainability preferences, but concerns about how well consumers and advisors understand the sustainability information persist.[2] EIOPA carried out a mystery shopping exercise looking at the advisory process for insurance-based investment products (IBIPs). The results of this exercise were published in June 2025. Among the findings, it was noted that consumers very rarely received sustainability information related to the products they were offered.

Participating members

To illustrate the issue of greenwashing facing consumers who engage with sustainable finance, BEUC gathered evidence from a selection of European countries; namely, Hungary, Lithuania, Spain, and Sweden. The evidence gathering was done in conjunction with national consumer associations who are members of BEUC: Tudatos Vásárlók Egyesülete (TVE), Lithuania Consumer Alliance (LCA), Asufin, CECU, and Sveriges Konsumenter.



2 Financial advice is regulated by the Markets in Financial Instruments Directive II (MiFID II), and for insurance-based investment products (IBIPs), the Insurance Distribution Directive (IDD).

3. Key Findings

BEUC and its members conducted evidence gathering that encompassed several markets, subsidiaries and products. The evidence gathering and subsequent analysis led to the identification of several commercial practices which should be considered as unfair and misleading when viewed through a consumer protection law lens. The commercial practices have been assessed against the rules of the UCPD as amended by the ECGTD.

How sustainable are the 'sustainable' funds promoted by Allianz?

The look-through portfolio analysis incorporated 51 underlying UCITS funds sold by Allianz and its subsidiaries in the four markets sampled for this report. Our objective was to assess whether the sustainability-related claims made about these products were reflected in their actual investments. Where possible, analysis was done on funds that were available either as standalone investment products or through unit-linked insurance products that allow consumers to select from a list of underlying funds. The analysis focused on products making sustainability-related disclosures under the SFDR and therefore excluded Article 6 products that do not take sustainability into account.

We analysed 51 unique funds. Nine of these funds did not invest in equity, and as our analysis only looked at exposure to companies via equity holdings, the bonds held by these funds were not analysed for consistency with the sustainability claims. Therefore, we assess the holdings of 42 unique equity-investing funds that supposedly consider sustainability aspects.



28 funds had fossil fuel exposure above 1% of the total portfolio, with four funds above 10%.

33 of the supposedly sustainable funds had exposure to fossil fuel companies found on the Urgewald lists. That is over three-quarters of the 42 equity-investing funds assessed.





Of the 33 funds that had flagged investments, **all 33 had investments in companies** that are engaged in unconventional **fossil fuel extraction** or are expanding (or have plans to expand) their fossil fuel activities.



Only nine equity-investing funds did not have exposure to fossil fuel companies on the Urgewald lists.

Funds with green claims in the name were not less likely to have fossil fuel exposure. In fact, it was generally highly-concentrated thematic funds which were found to have **zero exposure to fossil fuel companies**.[3]

3 The funds Allianz Global Artificial Intelligence, Allianz Cyber Security, Allianz Global Water, Allianz Pet and Animal Wellbeing, and Allianz Food Security did not hold any GCEL/GOGEL companies. However, that does not mean those products live up to their sustainability claims. For example, Allianz Pet and Animal Wellbeing invests in companies which were given the worst possible score by the Business Benchmark on Farmed Animal Welfare, which assesses companies' policies and performance regarding animal welfare.

Funds available via Allianz that have exposure to fossil fuels

Fund Name	Total % Fund in GOGEL/ GCEL Companies	% in Active Expansion/ Unconventional
iShares Global Clean Energy ETF (ICLN)	14.76%	14.76%
Allianz European Equity Dividend	11.56%	11.56%
Allianz US Large Cap Value	10.13%	10.13%
Allianz India Equity	10.03%	10.03%
Allianz German Equity	9.42%	9.42%
Allianz Global Equity Insights	8.66%	8.66%
Allianz Japan Equity	6.90%	6.9%
Allianz Climate Transition Europe	6.29%	6.29%
Allianz Smart Energy	5.9%	5.9%
Allianz China A Opportunities	5.56%	5.56%
Allianz Europe Equity SRI	4.68%	4.68%
Allianz Total Return Asian Equity	4.54%	4.54%
Allianz China A-Shares	4.48%	4.48%
SPDR S&P 500 Fossil Fuel Reserves Free ETF (SPYX)	3.59%	3.37%
Allianz Europe Equity Growth Select	3.48%	3.48%
Allianz Asia Ex China Equity	3.45%	1.93%
Allianz All China Equity	3.22%	3.22%
Allianz Global Equity Growth	3.16%	3.16%
Allianz Global Sustainability	3.15%	3.15%
Allianz Europe Equity Growth	2.97%	2.97%
Allianz China Equity	2.81%	2.81%
iShares Low Carbon Optimized MSCI ACWI ETF (CRBN)	2.78%	2.66%
Allianz Best Styles US Equity	2.45%	2.45%
Allianz Dynamic Multi Asset Strategy SRI 75	2.26%	2.26%
Allianz Dynamic Multi Asset Strategy SRI 50	1.92%	1.92%
Allianz Best Styles US Small Cap Equity	1.59%	1.59%
Allianz Dynamic Allocation Plus Equity	1.40%	1.4%
Allianz Clean Planet	1.13%	1.13%
Allianz Dynamic Multi Asset Strategy SRI 30	0.98%	0.98%
Allianz Dynamic Multi Asset Strategy SRI 15	0.81%	0.81%
Allianz Better World Dynamic	0.42%	0.42%
Allianz Better World Moderate	0.31%	0.31%
Allianz Better World Defensive	0.19%	0.19%

What did consumers see?

While BEUC's analysis has revealed that many of these funds, which supposedly consider environmental and social characteristics, make investments in fossil fuel companies, this level of analysis should not be expected of individual consumers when shopping for an investment product.

Therefore, it is important to check how the funds highlighted above are finding their way to consumers. In the below sections, we contextualise the products offered to consumers and how such practices could be in breach of European consumer law alongside their investments in an unsustainable and environmentally damaging business that is fossil fuels. We present in this section some examples of greenwashing and provide the full analysis of the evidence collection in the annex of this report.

Generic environmental claims

Generic environmental claims where a trader cannot show recognised excellent environmental performance are considered as unfair in all circumstances and are prohibited under Point 4a of Annex I UCPD (consolidated version). Several generic environmental claims have been identified.



Figure 7: The product FAQs promote the funds as following sustainable investment criteria, without substantiating what the criteria are. [Translated: 'The Allianz Dynamic Multi Asset Strategy SRI (DMAS) fund range provides a flexible and dynamic solution to meet investors' needs. Investors can choose between Allianz DMAS SRI 15, DMAS SRI 30, Allianz DMAS SRI 50, and Allianz DMAS SRI 75, depending on their risk profile. These funds offer a multi-asset solution with an active management strategy that adheres to sustainable investment criteria and combines global equities and fixed income with other asset classes that have the potential to generate additional returns.'] Source: https://www.allianz.es/allianz-plan-extra.html (consulted 22/07/2026 and 19/10/2026).

The Allianz España product webpage for Allianz Plan Extra encourages consumers to invest in the product, stating, via a frequently asked questions section, that the product's funds "adhere to sustainable investment criteria." Additionally, the four available funds all use the acronym "SRI" ("sustainable and responsible investment"). The linked legal documents page does not include the required sustainability disclosures for the funds available via this product. The claim made here is not substantiated in any manner on the webpage, and excellent environmental performance is not demonstrated, likely amounting to a **generic environmental claim**. Additionally, the portfolio analysis revealed that consumers who invest via this product would be exposed to companies active in the fossil fuel sector, including those developing new projects.

Funds available via Allianz Plan Extra

Fund Name	% Fund exposure to fossil fuels	% in Active Expansion/ Unconventional
Allianz Dynamic Multi Asset Strategy SRI 75	2.26%	2.26%
Allianz Dynamic Multi Asset Strategy SRI 50	1.92%	1.92%
Allianz Dynamic Multi Asset Strategy SRI 30	0.98%	0.98%
Allianz Dynamic Multi Asset Strategy SRI 15	0.81%	0.81%

Note: These funds have varying levels of exposure to equity. The portfolio exposure to equity is indicated by the number in the fund name, i.e. the fund ending in '15' invests only 15% of assets in equity.

Halo claims

The practice of making environmental claims about the entire product or the entire business while the claim only relates to a part of the product or business, also known as 'halo claims,' is additionally prohibited. Under Point 4b of Annex I of UCPD (consolidated version), this practice is considered unfair under all circumstances. Such claims specifically highlight a certain part environmental characteristic of the product or business, creating an unjustified impression that it applies overall to the product or business.



Figure 1: The sustainability page features a prominent image of a ball representing the Earth, along with a message about Allianz España's offer of sustainable solutions. [Translated: 'Towards a more sustainable future (...) As global leaders in Insurance and Assistance, we are committed to offering you innovative and sustainable solutions that look after you and the world we share.'] Source: https://www.allianz.es/sostenibilidad.html (consulted 07/07/2026 and 19/10/2026).

Allianz España prominently includes several business-to-consumer (B2C) communications on its consumer-facing website. The 'Sustainability' page of the website is accessible at all times throughout the website, as it is hyperlinked on the main header. The Sustainability page makes a number of communications about the trader's business. The section states that Allianz España "is committed to offering you innovative and sustainable solutions that look after you and the world we share." A message from the CEO begins with "Sustainability is a firm commitment at Allianz Seguros." Further down, it states, "Our commitment to sustainability focuses on making a positive impact on the environment." The page includes a prominent header image of a green and blue sphere representing the Earth. At the top of the page, there is a button to be contacted by a salesperson, while at the bottom of the page, consumers are invited to write to Allianz via WhatsApp or request a call, directly connecting the entity-level claims to Allianz España products. These communications amount to a **halo claim** about the trader's entire business, as they give consumers the impression that all of the trader's business is sustainable.

In some markets, Allianz Global Investors (Allianz GI), the main asset management subsidiary for the Allianz Group, distributes Allianz funds via third-party platforms to consumers, including in Sweden. Several Allianz funds are available from Avanza, Nordnet, and the mandatory state Premiepensionen system. Among the available Allianz funds, there are a number which promote environmental characteristics via the fund name. "Climate Transition Europe", "Smart Energy", and "Europe Equity SRI" (sustainable and responsible investment) were identified as using sustainability-related terms. Look-through portfolio analysis of these funds found that they exposed consumers to fossil fuel companies, including developers of new fossil fuel projects. The fund naming likely amounts to a **halo claim** that is unfair in all circumstances, as it misrepresents the products to consumers, as only a part of the funds fit the environmental aspects promoted. Although it is outside of our fossil fuel-focused analysis, there are other exposures to sectors that consumers may find questionable regarding their sustainability, such as weapons manufacturers, luxury goods, and large banks.

Funds with sustainability-related terms in the name available to Swedish consumers

Fund Name	% Fund exposure to fossil fuels	% in Active Expansion/ Unconventional
Allianz Climate Transition Europe	6.29%	6.29%
Allianz Smart Energy	5.90%	5.9%
Allianz Europe Equity SRI	4.68%	4.68%
Allianz Global Sustainability	3.15%	3.15%
Allianz Clean Planet	1.13%	1.13%

Non-verified sustainability labels

The use or promotion of a non-verified sustainability label is another commercial practice which is deemed unfair in all circumstances by Point 2a of Annex I of the UCPD (consolidated version). Sustainability labels must be established by public authorities or based on a certification scheme. Certification schemes for sustainability labels must, inter alia, have third-party verification and be transparent.



Figure 2: [Translated: 'Why invest with us? ... Sustainability Certificate: Our funds have a sustainability certificate that supports our responsible investment and commitment to the environment.'] Source: https://www.allianz.es/content/dam/onemarketing/iberolatam/allianz-es/inversiones/productos/unit-linked/folleto_fondovida.pdf (consulted 22/07/2026 and 19/10/2026).

Allianz España's unit-linked life insurance FondoVida product links to a product brochure, encouraging consumers to invest because the funds have a sustainability certificate that supports Allianz España's responsible investment and commitment to the environment. The statement is accompanied by a green band to the left and, above, a picture of a person's hand touching some growing crops. Additional information is not provided. Key details as to who provides the certification, according to what criteria, and the monitoring of compliance with such a certificate are not given. The lack of further substantiation of the textual claim to prove that it meets the high standards set by the UCPD means the communication made in the sustainability brochure likely amounts to the use of a **non-verified sustainability label**, which is considered in all circumstances an unfair practice.

Misleading actions

Misleading actions that are considered unfair are commercial practices that deceive, or are likely to deceive, the average consumer in relation to the environmental characteristics of the product on the future environmental performance.

Unlike the blacklisted practices described above, which are unfair in all circumstances (as per Annex I of UCPD), misleading actions are subjected to a transactional decision test. This means the practice concerned must cause, or be likely to cause, the consumer to take a transactional decision that they would not have otherwise taken.

Environmental characteristics of the product

Environmental characteristics are, under Article 6(1)(b) of the UCPD, seen as main characteristics of a product. To this end, B2C communications about a product's environmental characteristics must be sufficiently clear, precise, accurate and substantiated with up-to-date information.



Figure 3: The description for the Modern Energy Trends Equity Fund, one of the asset funds available via the Life Program and Care Program products. Source: https://www.allianz.hu/hu_HU/lakossagi/elet-es-egeszseg/eszkozalapok.html (consulted 24/07/2026 and 20/10/2026).[4]

[Translated: 'The fund primarily invests in shares of companies dealing with "green energy" (alternative energy sources, energy efficiency) and low-carbon emissions. The Environmentally Conscious Equity Fund does not achieve the diversification level of classic equity funds, as it invests most of its funds in a narrower sector of the economy. Given this, and the sometimes significant price movements in the equity markets, the fund is considered a medium-high risk investment.']

Allianz Hungária offers several life insurance products through which consumers can select from a range of 'Eszközalapok' ('Asset funds'). Some of the asset funds make environmental claims in their names and accompanying descriptions: the 'Modern Energy Trends Equity Fund' is described as focusing on "companies dealing with alternative energy sources, energy efficiency and low carbon emissions", and companies that should "benefit the most from meeting global environmental challenges." The 'Sustainable Growth Equity Euro Fund' is described as investing in companies that are "committed to sustainable economic development - i.e., those that focus on the long-term preservation of natural resources" and companies that "follow business practices based on sustainable growth."

BEUC's portfolio analysis identified several underlying investments which are inconsistent with the environmental characteristics promoted in the names and descriptions of the asset funds, specifically in the 'Modern Energy Trends' and 'Sustainable Growth' asset funds. In fact, many of the underlying funds invest in companies that are involved in fossil fuel activities, including expansion.

BEUC research demonstrated that fund names influence decision-making for the majority of investors. Further, ESMA has noted that fund names can have a significant impact on a consumer's investment decision. Therefore, such communications should be considered to have passed the transactional decision test. Therefore, BEUC expects that the use of such sustainability terms in the asset fund names represents a **misleading action on the environmental characteristics of the products**.

4 The description references "Environmentally Conscious Equity Fund", but this name is not found elsewhere, it is assumed to simply be a mistake.

Allianz Hungária asset funds available through life insurance products

Asset fund	Underlying fund (% of asset fund)	% Underlying fund in fossil fuels	% in Active Expansion/ Unconventional
Modern Energy Trends Equity Fund	iShares Global Clean Energy ETF (ICLN) (10%)	14.76%	14.76%
	SPDR S&P 500 Fossil Fuel Reserves Free ETF (SPYX) (30%)	3.59%	3.37%
	iShares Low Carbon Optimized MSCI ACWI ETF (CRBN) (46%)	2.78%	2.66%
	Invesco WilderHill Clean Energy ETF (PBW) (10%)	0.00%	0.00%
Sustainable Growth Equity Euro Fund	Allianz Global Sustainability (94%)	3.15%	3.15%
Climate and Environmental Protection Fund	Nordea 1 – Global Climate and Environment Fund (92%)	0.00%	0.00%

In contrast, the 'Climate and Environmental Protection Equity Fund' completely avoids companies that appear in the GCEL and GOGEL lists. This asset fund is described as investing in companies that "provide environmental solutions and contribute to social solutions", and that are "engaged in economic activities that are considered environmentally or socially sustainable." While the asset fund sets a good example in avoiding fossil fuel activities, the presentation of the asset fund could benefit from clearer links to its relevant regulatory documentation and clearer explanation on its positive contribution.

Misleading omissions

Additionally, misleading omissions are prohibited under Article 7(1) of the UCPD. As in the case of misleading actions, misleading omissions are also subject to a transactional decision test. A commercial practice can be found to be a misleading omission if material information that a consumer would need to take an informed transactional decision is omitted, and therefore causes a consumer to take a transactional decision that they would not otherwise take.

Misleading omissions can also relate to information requirements established under EU law. In the case of SFDR-classified investment funds managed by Allianz GI, including those distributed to consumers in Sweden and those which make up the unit-linked insurance product sold by Allianz España and Allianz Hungária, certain gaps have been identified in the information disclosed relating to fossil fuel exposures. While it is mandatory for product managers to disclose the exposure of their fund to companies active in the fossil fuel sector, Allianz GI does not disclose a fund's exposure as a simple percentage. Referring to NACE sectoral classifications, it is claimed that a simple percentage of exposure to the fossil fuel sector cannot be disclosed. In contrast, such a limitation was not claimed by Allianz GI in reporting its company-wide exposure to fossil fuels. The failure to disclose a simple and clear measurement of a fund's exposure to companies active in the fossil fuel sector is likely a **misleading omission**, passing the transactional decision test, as the exposure of a fund to fossil fuels is a relevant factor for many consumers interested in sustainable investments, as shown by BEUC's 2025 survey.

Lithuania: The exception to the rule?

In stark contrast to the misleading promotion of environmental characteristics in the examples above, evidence gathering carried out in Lithuania of Allianz Lithuania did not reveal any worrying signs of greenwashing. Sustainability is not a dedicated feature of Allianz Lithuania's offering to consumers. The only mentions of sustainability are in its disclosure of SFDR sustainability information.

It should be appreciated that research shows that Lithuanian consumers do still care about sustainability. Eurobarometer's survey on retail investment found that 65% of Lithuanians want to ensure their savings do not fund businesses that negatively impact the planet, exceeding the EU average of 62%. This demonstrates that sustainability considerations are relevant to many Lithuanian retail investors when making investment decisions. In this light, Allianz Lithuania's lack of apparent green claims suggests that financial market participants can operate in a market where consumer interest in sustainable finance exists without relying on potentially misleading sustainability-related marketing claims. BEUC's own research shows that this can have the opposite effect if consumers realise that they have been misled, creating feelings of being manipulated and also leading consumers to stop engaging with the service provider who misled them.

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