

Fair sustainability claims: what does the AFM expect from you?

In short In 2024 and 2025, the AFM conducted an exploratory study of sustainability claims by financial market participants. We studied how these relate to the principles of the [Guidelines on Sustainability Claims](#). We find that market participants are using the guidelines, but that there is room for improvement in particular with regard to the specificity of claims and the ease of finding the information to substantiate claims. To assist market participants, this update shares the four key areas for improvement using good and bad examples. It also explains the key takeaways from our exploratory study. In the coming year, we will pay extra attention to ensuring that sustainability claims are fair. We expect market participants to further improve their sustainability claims where necessary.

The four key areas for improvement

Colours, images, words – consumers quickly form an impression. A sustainability claim is therefore more than text on a website or text in an advertisement: it is a story that raises expectations. A sustainability claim must be correct, clear and not misleading (or for pensions: balanced).¹

The AFM notes that marketing language clashes with clear and specific explanations, and substantiation is often difficult to find. Our exploratory study also shows that it is possible for financial market participants to meet the legal requirements. The financial sector plays an important role in the transition to a sustainable society. Clear and fair information about sustainability ensures that consumers and participants have the right expectations. Consumers find specific and well-substantiated claims more credible.²

The AFM's exploratory study of banks, insurers, investment firms and pension providers in 2024 and 2025 reveals four areas where improvement is needed. We provide examples to support these improvements.³

The four key areas for improvement:

1. Ensure that sustainability claims are factually accurate and representative.
2. Specify what a sustainability claim means for the market participant or the product.
3. Ensure that substantiation is easy to find.
4. Provide necessary explanations for claims on climate neutrality, ESG ratings and impact.

¹ For the legal framework, see the requirements on the provision of information in the [Guidelines on Sustainability Claims](#)

² [Consumers' perception of sustainability claims, ACM 2023](#)

³ The examples are inspired by sustainability claims from the exploratory study and have been aggregated and anonymised. In practice, we always assess each case individually.

1. Ensure that sustainability claims are factually accurate and representative

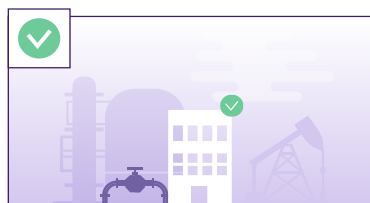
Consumers must be able to trust that information is correct. Inaccurate claims are not correct⁴ and may be misleading. If claims are not representative, consumers may gain an impression of greater sustainability than is actually the case and purchase a product that does not match their preferences. Unrepresentative claims may be unclear and/or misleading.

Additional clarification on this area for improvement

- Be accurate: make sure the claim is factually accurate and does not contain any contradictions. Check regularly whether the information is still accurate. Also, be alert to consistency within and between different information carriers.
- Be transparent: describe both the positive and negative aspects of the sustainability impact. Fair communication strengthens trust.

- Be honest about efforts made: do not emphasise small benefits for consumers if they do not present a representative picture of the sustainability efforts.
- Use realistic visuals: only use images that give a true impression of the situation. Place images in an appropriate context.
- Pay attention to the overall impression: be aware of the overall impression that the combination of words and images may create. Make sure the claims present a balanced picture.

Good examples

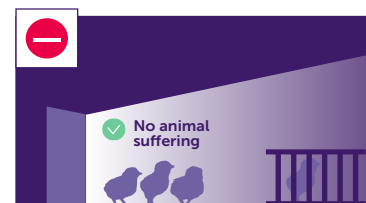


"With our investment product, you invest in the most sustainable companies in their sector. Be aware that this means that we do not only invest in wind turbines, but also in the most sustainable companies within the oil and gas sector."

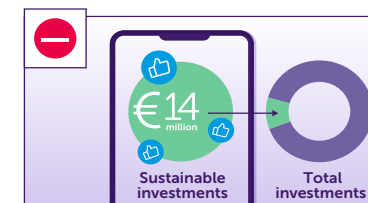


A financial product includes images of projects financed by this product that give a representative picture of what the product invests in.

Bad examples



"This financial product never invests in companies that cause animal suffering." However, the conditions show that investments can be made in companies that derive a maximum of 5% of their turnover from the sale of products that cause animal suffering.



"Last year, we invested 14 million euros in sustainable products." There is no mention that this is only 10% of the total amount invested.

⁴ In the sense of requirements on the provision of information as specified in the Guidelines on Sustainability Claims.

2. Specify what a sustainability claim means for the market participant or the product

Vague descriptions or sustainability claims that do not contain all the necessary information can give an incorrect, unbalanced or incomplete picture of the market participant or product. Unspecific claims may be unclear and/or misleading.

Additional clarification on this area for improvement

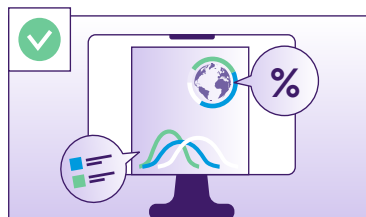
- Avoid vague language: use clear and specific language to indicate what your company or product is doing in terms of sustainability. Consumers find specific claims more understandable and credible
- Provide relevant context: supply all the information needed to understand the claim. Where necessary, use (representative) examples to specify a claim.
- Substantiate sustainability claims: if a claim cannot be substantiated, do not make the claim.

- If necessary, present information in layers: first give a key message and provide additional explanation where necessary. Make sure that each layer of information is correct, clear and not misleading (or balanced). Even if a reader chooses not to continue the link, the claim must still present a fair representation.
- Place the information needed to substantiate the claim as close as possible to the claim itself, so that the claim independently meets the relevant disclosure standards.

Good examples



A company explains how the money is invested, with concrete and representative examples of projects in which investments have been made.



A company places an infographic on the website to visualise the sectors in which the money raised has been invested.

Bad examples



It is not clear whether the company supports this ambition with specific actions.



There is no substantiation as to what this is based on.

3. Ensure that substantiation is easy to find

Make sure that all relevant information related to the sustainability claims are easy to find. Information should not be obscured by irrelevant information. If information is hard to find, it may be unclear.

Additional clarification on this area for improvement

- Put yourself in the reader's shoes: make sure information relevant to understanding the claim can be found quickly and easily – without having to click too often. This can be done, for example, by means of a link in the claim itself, pop-ups or infographics.
- Make sure you have a solid structure: when referring to lengthy documents, such as an annual report or investment policy, it is useful to provide the reader with tools that enable them to quickly find the relevant passages.
- Also make sure the explanation is relevant to the substantiation of the claim: lengthy texts that are not relevant can be confusing and carry the risk that the reader will not be able to assess the value of the claim. It is important that there is a clear link between the claim and the substantiation.
- Check whether information to substantiate the claim is available: are all the documents referred to actually on the website and are they easy to find?

Good examples



"The premium for this insurance is invested in accordance with our sustainability policy." If readers click on the words 'sustainability policy', they are immediately redirected to relevant parts of the sustainability policy.

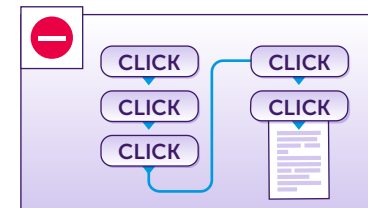


A company substantiates its claim with a long document only available in English. To assist the reader, a Dutch summary has been included.

Bad examples



A company claims to include biodiversity in its investment decisions. To substantiate this, the company provides a link to its 200-page sustainability policy, only four pages of which deal with biodiversity. There is no clear table of contents, which makes it difficult for the reader to find this information.



To find relevant supportive information, customers must first click on 'More information', 'Frequently asked questions', 'What are our ambitions?' and finally on 'Read more about how we pursue our goals'.

4. Provide necessary explanations for claims on climate neutrality, ESG ratings and impact

In our exploratory study, we found that claims about climate neutrality, ESG ratings and impact often lacked information that readers need to assess the value of such claims. We therefore provide additional guidance on these topics.

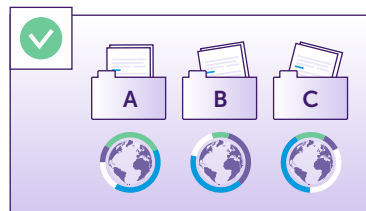
Additional clarification on this area for improvement

- For sustainability claims that relate to medium-term to long-term objectives, such as climate neutrality, explain how these objectives will be achieved. Provide or refer to information needed to understand the claim. The following non-exhaustive list of questions can be used to assist with this:
 - What does the company mean by 'climate neutral' (e.g. only CO₂ or also CO₂ equivalents or other greenhouse gases)?
 - What level of emissions did the company have in the first year and what year was that?
 - What level of emissions does the company have now (what progress has been made)?
 - What is the company's ambition when it comes to the ratio between emission reduction and emission offset?
 - How does the company compensate for the remaining emissions (is this based, at least in part, on uncertain or unproven technologies)?
 - What intermediate goals does the company set and what actions does the company associate with them?
- For sustainability claims that are linked to third-party assessments or certifications (such as labels, ESG ratings or scores), explain what this assessment or certification means. Also, indicate what it is based on, the scale on which the rating or score is based and by whom it was issued. Also, make sure any reference to such scores is up to date.
- For impact claims: only make such claims if there is actually additional, intentional and measurable impact. Explain how the investor makes an impact.

Good examples

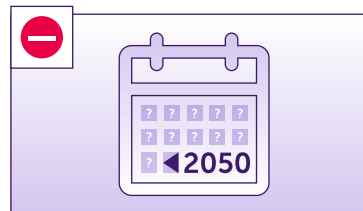


A reference to a certification on the website, clearly stating the year to which that certification applies and what the certification entails.

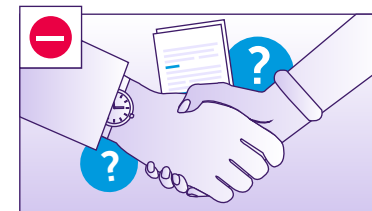


For each model portfolio, an investment firm explains how the investments contribute to the sustainability goals set and reports on this periodically.

Bad examples



A bank indicates that its goal is to be climate-neutral before 2050. It does not explain in which specific year the goal must be achieved, how it must be achieved or what progress has been made.



"If you choose to invest with us, you contribute to improving biodiversity." This does not explain how the investor creates additional impact.

Key takeaways from the exploratory study

This exploratory study assessed the quality of sustainability claims on the websites of financial market participants on the basis of the principles set out in the [Guidelines on Sustainability Claims](#). The study focused on 43 sustainability claims from twenty banks, insurers, investment firms and pension providers.

Many sustainability claims are not sufficiently specific, giving rise to a mismatch risk

Our exploratory study shows that many sustainability claims are currently insufficiently specific. They often contain vague language, making it unclear what exactly is meant by the claim. Examples are statements such as “We think a sustainable world is important” or “Our investments pay attention to society”. Such wording is vague and does not give a clear representation of the actual efforts or results. At the same time, these expressions raise expectations in the reader, leading to a high risk of mismatch.

Substantiation of many claims is difficult to find

In addition, we note that the information required to substantiate many claims is difficult to find. In some cases, it is not available at all, while in other cases it is located nowhere near the claim – requiring the reader to click many times – or in a place that is otherwise difficult to find, for example in a document consisting of dozens of pages, not all of which are relevant to the claim.

Financial market participants are taking extra steps

Our exploratory study also shows that financial market participants are taking steps to improve their communication. We have had

conversations with all investigated companies about the findings of the exploratory study. In these conversations, many market participants indicated that they used the principles of the Guidelines on Sustainability Claims in their communications. They also indicated that they would re-examine their claims in response to the findings from the exploratory study. Some of the companies surveyed also adjusted their claims, either in response to our findings or at their own initiative before we contacted them. In a number of cases, the investigated claim proved to be incorrect and constituted a violation. These claims have all since been adjusted.

What does the AFM do?

Sustainability in the financial sector is a strategic priority of the AFM. In 2026, the AFM will conduct another study into the quality of sustainability claims. The AFM expects all claims to be correct, clear and not misleading (or balanced). The principles of the Guidelines on Sustainability Claims and the areas for improvement in this ESG update provide support for the sector. We expect market participants to further improve their claims where necessary.

If you encounter obstacles or have identified areas for improvement in the market, please send an e-mail to: ESG-update@afm.nl. We will answer your messages where possible and use them to identify the major obstacles. The AFM will provide the best possible clarification by further supplementing our information. More information can be found on our [Sustainability page](#).