



In its 34<sup>th</sup> year, Risk and Reward provides a platform for Invesco's investment professionals to produce original research and investment strategy content. This Q2 2023 edition contains four additional articles. Contact your local Invesco representative for the full edition.

The possibility of a hefty tax bill can be a heavy burden for a portfolio with considerable gains. In the United States, realized gains are taxed and unrealized gains are not. Investors may defer or even forgo a necessary portfolio adjustment to manage tax charges. To address this issue, we outline a framework for transitioning a legacy portfolio towards a more diversified target portfolio with a given annual tax budget.

**Portfolio needs and preferences often change over time. For instance, asset owners may want to reduce portfolio risk when they get older, incorporate ESG criteria or re-establish portfolio diversification when outsized gains of certain positions lead to significant concentration. All of these activities involve realizing gains and, depending on the tax system, may result in a substantial tax bill. A nuanced transition approach is therefore required, which incorporates both the need for portfolio adjustment and the desire to limit its tax impact.**

be split into annual tax budgets, i.e., maximum yearly taxation totals until the transition is complete. At the beginning of each year, the annual tax budget is utilized fully by realizing gains, after which the portfolio is managed on a tax-neutral basis for the rest of the year – matching any realized gains with realized losses until the budget is refreshed at the beginning of the following year. This disciplined and gradual build-up of the desired target portfolio can avoid the substantial one-time tax bill that could come with a portfolio replacement all at once.

We begin by calculating the total tax burden incurred to fully transition a legacy portfolio into a target portfolio. This tax bill can then

#### Long-term transition strategy

To start, we create a simple long-term transition strategy to convert a legacy



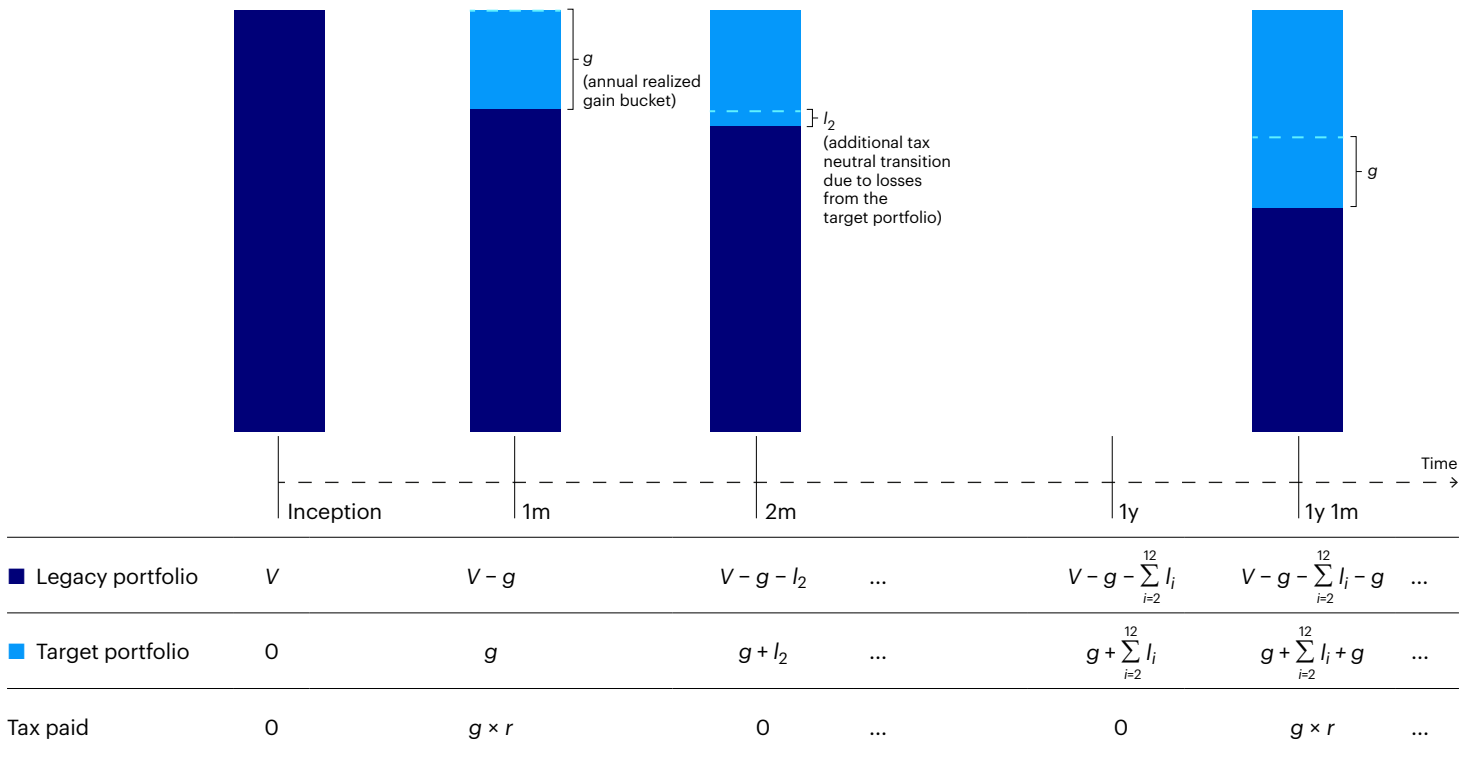
**About risk:** The value of investments and any income will fluctuate (this may partly be the result of exchange rate fluctuations) and investors may not get back the full amount invested.

This publication is intended only for Professional Clients and Financial Advisers in Continental Europe (as defined on the back cover); for Qualified Clients/Sophisticated Investors in Israel, for Professional Clients in Dubai, Ireland, the Isle of Man, Jersey and Guernsey, and the UK; for Sophisticated or Professional Investors in Australia; for Professional Investors in Hong Kong; for Institutional Investors and/or Accredited Investors in Singapore; for certain specific sovereign wealth funds and/or Qualified Domestic Institutional Investors approved by local regulators only in the People's Republic of China; for certain specific Qualified Institutions and/or Sophisticated Investors only in Taiwan; for Qualified Professional Investors in Korea; for certain specific institutional investors in Brunei; for Qualified Institutional Investors and/or certain specific institutional investors in Thailand; for certain specific institutional investors in Indonesia; for qualified buyers in Philippines for informational purposes only; for Qualified Institutional Investors, pension funds and distributing companies in Japan; and for one-on-one Institutional Investors in the USA. This document is restricted to investors who are (i) Accredited Investors as such term is defined in National Instrument 45-106, and (ii) Permitted Clients as such term is defined in National Instrument 31-103. It is not intended for and should not be distributed to, or relied upon, by the public or retail investors.

Figure 1

**Overview of the transition process**

We assume taxes are paid from funds outside the portfolio and do not reduce the money invested



Source: Invesco.

portfolio into a better-diversified target portfolio. We first set a yearly tax budget, which equals the annual realized gain budget ( $g$ ) multiplied by the individual tax rate ( $r$ ). In January of every year of the transition period, we sell as many assets from the legacy portfolio – which typically has meaningful embedded gains – until the annual tax budget is fully utilized and invest the pre-tax proceeds of the sale into the target portfolio (this assumes that there are enough funds to meet the tax bill without selling part of the investment altogether). We repeat this process each year until the transition is complete.

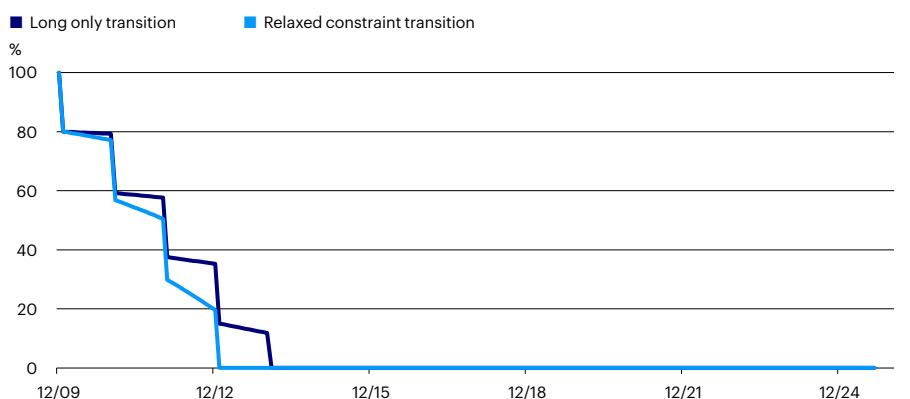
By using the entire annual tax budget at the beginning of each year, we speed up

the transition. And we can speed it up even further by using losses from the target portfolio over the following eleven months to convert an additional part of the legacy portfolio without additional tax cost. Figure 1 illustrates the process.

Importantly, the annual tax budget is always respected – regardless of market moves. For example, when equities are strong, the target portfolio is unlikely to suffer meaningful losses throughout the year, resulting in minimal additional transition opportunities. On the other hand, if equities are weak, there may be significant losses that can be harvested, allowing a faster transition without additional tax payments.

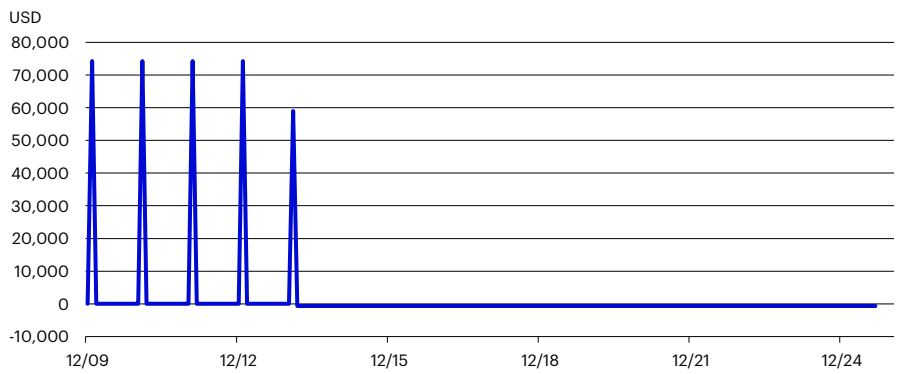
Figure 2

**Evolution of the legacy portfolio during the transition**



Source: Invesco. For illustrative purposes only.

Figure 3  
Tax paid



Source: Invesco.

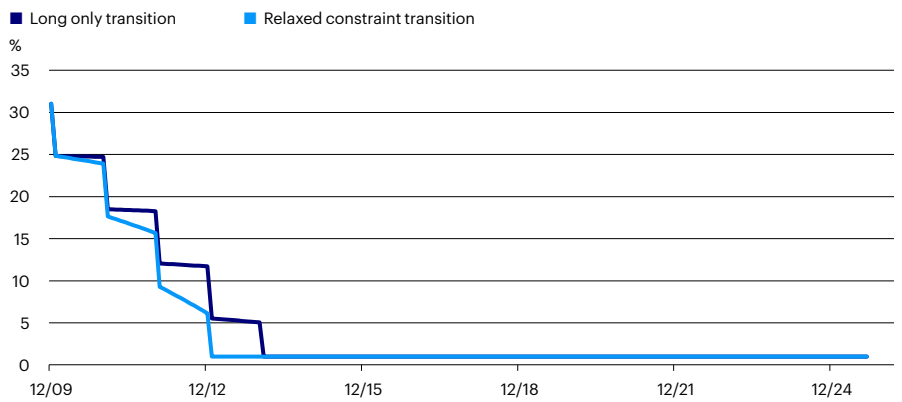
**Case study: Transitioning a highly concentrated portfolio**

In this example, we seek to transition USD 1,000,000 of a single stock.<sup>1</sup> Assuming that all gains are long term, under US tax law the initial tax liability would be USD 371,000 (= 0.371 × USD 1,000,000) if we were to completely liquidate the portfolio and reallocate to a new portfolio. So instead of incurring that entire tax bill immediately, it would be interesting to transition this concentrated portfolio into an index-oriented diversified

portfolio over time. To accomplish this, we consider two potential target portfolios: a long-only S&P 500 portfolio and a relaxed constraint tax-optimized S&P 500 strategy that can employ modest amounts of shorting and leverage. Figure 2 shows how the transition would take place (assuming no market movements) and how both transition portfolios would evolve over time.

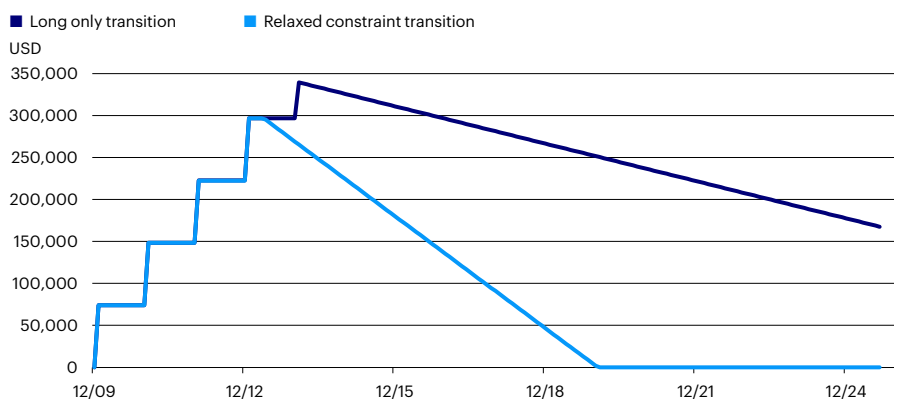
We can see that the transition happens gradually, with the majority occurring at the beginning of each year and

Figure 4  
Tracking error against target benchmark



Source: Invesco.

Figure 5  
Cumulative taxes paid



Source: Invesco.



The more significant the losses harvested from the target portfolio, the faster the transition will occur.

incremental shifts occurring during the remaining months. As stated previously, the annual tax budget is fully spent in the first month of the year (figure 3). After the first month, there are no more tax payments, but the transition continues, as gains from the legacy portfolio can be offset by losses harvested from the target portfolio. The relaxed constraint portfolio employs enhanced tax loss harvesting techniques, thereby allowing more tax-neutral transitioning and resulting in a faster transition.

In figure 4, we look at the tracking error during the transition between the client portfolio – which contains both legacy assets and newly invested assets in the target portfolio – and the benchmark. We can see that tracking error gradually declines from 30% (when the portfolio is highly concentrated and contains only 1 stock) to 1% (when the desired diversification and investment objective is achieved). Mirroring the stepwise transition of the legacy portfolio, the tracking error also declines gradually. At the beginning of each year, when most of the gains are realized, the tracking error declines meaningfully, while we observe marginal decreases during the calendar year due to further tax-neutral transitions.

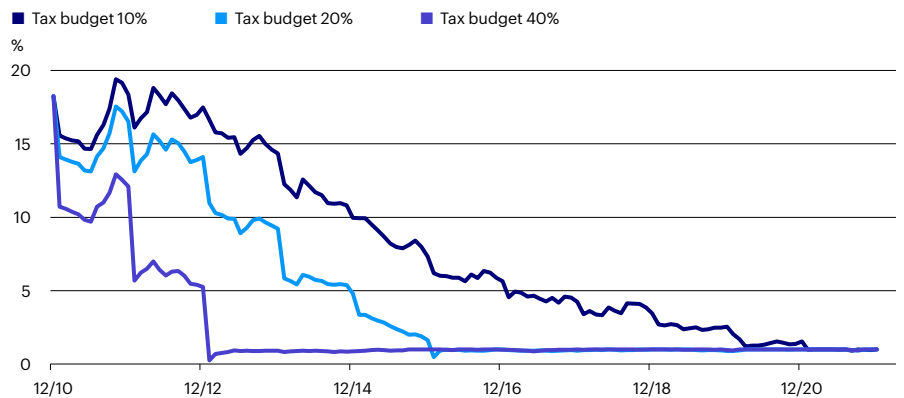
Once the portfolio's tracking error relative to the benchmark has reached 1%, we deem the portfolio fully transitioned – from then on, it can be managed in a standard, tax-optimal way, subject to risk controls.<sup>2</sup>

Finally, it is worth highlighting the potential benefits of a relaxed constraint transition over a long-only transition. Firstly, the planned transition tends to happen much faster so that the investment objective is achieved more quickly. The more significant losses harvested from the target portfolio result in a faster transition. So even for the same annual tax budget, the relaxed constraint process is more efficient at achieving its transition objective. Secondly, a relaxed constraint transition strategy can continue to generate significant tax alpha after the transition is complete. Thus, investors can completely transition from a highly concentrated portfolio with considerable gains into a diversified portfolio with meaningful ongoing tax savings post transition (figure 5).

#### Suitability-based tax and risk preferences

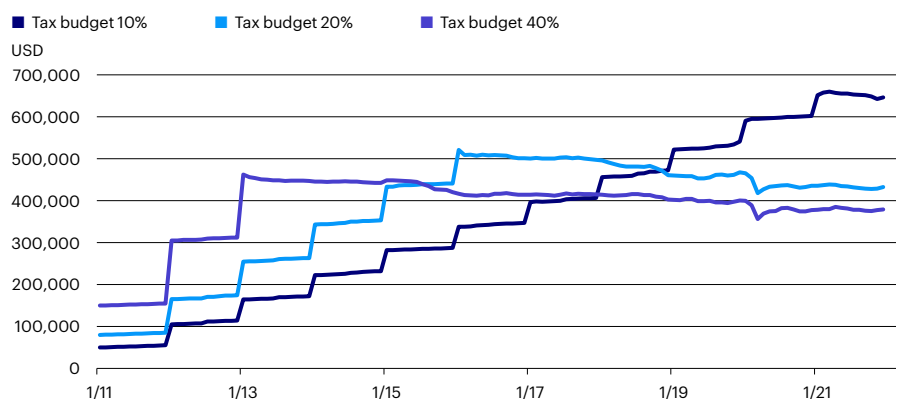
To test how the proposed transition framework functions in practice, we produce a simulation using historical market data with settings in line with the model above. The objective is to transition

Figure 6  
Tracking error against target benchmark



Source: Invesco.

Figure 7  
Cumulative tax paid



Source: Invesco. Transition analysis shown utilizes the long-only construction methodology.

a highly concentrated portfolio with considerable unrealized gains into a long-only diversified portfolio with a risk target similar to the S&P 500. Again, the legacy portfolio contains only one stock with a \$1,000,000 market value made up entirely of long-term gains. We start the analysis in December 2010 and continue it for 10 years based on our previous assumptions.

To illustrate different preferences and journeys, we compare three different annual tax budgets – 10%, 20% and 40% of the total tax liability at transition (or strategy) inception. A higher tax budget leads to a quicker transition with more diversification and a higher tax bill upfront.

Interestingly, for all three tax budgets, the transition pattern is very similar but, as expected, results in varying timeframes for full transition. As figure 6 shows, the full transition (hitting the desired target portfolio and diversification) is achieved more quickly with a higher tax budget. In our backtest, it takes approximately two years for an investor with a tax budget of 40% to complete the transition, while it takes roughly 10 years for a tax budget of 10%.

In the long run, we find that the portfolio with a higher tax budget pays the least taxes. While this may at first seem counterintuitive, figure 7 illustrates the dynamic. The portfolio with a higher tax budget transitions sooner to the tax-optimal strategy, thereby enabling more

loss harvesting. Those harvested losses are valuable, as they can be used to offset future gains elsewhere in the portfolio (or some other account held by the same investor). Thus, in many instances, it is more favorable from a tax perspective to transition faster. A higher tax budget early on allows more losses to be harvested from the desired portfolio later down the line, which can enhance long-term after-tax wealth.

Although the above case study considers an extreme example of a concentrated portfolio with high unrealized gains, this long-term transition framework can also handle other types of portfolios – even when they are broadly diversified and hold depreciated assets. The framework can also incorporate pooled vehicles like ETFs and, in some instances, mutual funds as well.

### Conclusion

Tax-efficient portfolio transitions can substantially limit investor's tax burden while still allowing the desired diversification and portfolio exposures. Whether a faster or a slower transition is more appropriate may depend on the asset owner's individual circumstances. Nevertheless, a faster transition will often be more favorable in the long run, despite the likelihood of higher tax payments upfront. This kind of approach allows more losses to be harvested from the target portfolio once the transition is complete, which can enhance total after-tax wealth over time.

### Notes

1 For simplification, transaction costs are assumed to be zero.

2 More about tax optimization and tax-optimal index tracking strategies can be found in Gupta et. al. (2022).



### References

AQR (2020): Tax-Efficient Portfolio Transition: A Tax-Aware Relaxed-Constraint Approach to Switching Equity Managers, Working Paper, AQR Capital.

Aperio (2016): Tax Transition Analysis, Working Paper, Aperio Group.

Gupta, T. and N. Agarwal(2022): Opportunity out of complexity, Risk & Reward #2/2022.

Tol, R. (2017): Comparing Transition Track Records: An Attempt to Create Like-for-Like Comparisons, The Journal of Trading 12 (2) 44-49.

Santodomingo, R. and M. Kincheloe (2018): Transitioning from Active to Passive? It Doesn't Have to Be Taxing, Working Paper, Parametric Portfolio Associates.



**Important Information:** Invesco does not provide legal or tax advice and we encourage you to consult your own lawyer, accountant or other advisor before making an investment. "Pre-tax returns," "earnings before taxes," and similar terms refer to gains made before liquidation and other taxes incurred when gains are realized. Nothing in this document should be construed as encouraging or seeking unlawful tax avoidance. Note that all examples and strategies described in this paper are based on the US tax code.



## About the authors



### **Nikunj Agarwal, CFA®**

Quantitative Research Analyst  
Nikunj Agarwal is responsible for all aspects of Research at Custom Equities, including developing and refining strategies and offerings, providing deliverable solutions to clients and supporting internal academic research.



### **Tarun Gupta, Ph.D.**

Managing Director, Global Head of Research & Investment Technology  
Tarun Gupta joined the team to focus on innovative research to enhance quantitative research strategies and spearhead development of investment technology. He also serves as a member of the IQS management team responsible for strategic planning and direction. In addition, Tarun is leading the build-out of customized and tax-managed equity capabilities to advance the firm's efforts in the direct indexing space.



### **Jacob (Hongzhao) Guan**

Quantitative Research Analyst  
Jacob Guan is a quantitative researcher for Custom Equities. He is responsible for developing tax-optimized investment strategies and building innovative research technologies with advanced customization capabilities. Jacob also provides quantitative analysis and support for the portfolio management team.



### **Josh Rogers**

Client Portfolio Manager  
Josh Rogers is Lead Client Portfolio Manager for Custom Equities. He is focused on commercialization efforts and serves as an expert on the firm's platform of systematically implemented separately managed accounts (SMAs), which provide both tax optimization and customization capabilities.

## About risk

The value of investments and any income will fluctuate (this may partly be the result of exchange rate fluctuations) and investors may not get back the full amount invested.

## Important information

**This publication is intended only for Professional Clients and Financial Advisers in Continental Europe (as defined below); for Qualified Clients/Sophisticated Investors in Israel, for Professional Clients in Dubai, Ireland, the Isle of Man, Jersey and Guernsey, and the UK; for Sophisticated or Professional Investors in Australia; for Professional Investors in Hong Kong; for Institutional Investors and/or Accredited Investors in Singapore; for certain specific sovereign wealth funds and/or Qualified Domestic Institutional Investors approved by local regulators only in the People's Republic of China; for certain specific Qualified Institutions and/or Sophisticated Investors only in Taiwan; for Qualified Professional Investors in Korea; for certain specific institutional investors in Brunei; for Qualified Institutional Investors and/or certain specific institutional investors in Thailand; for certain specific institutional investors in Indonesia; for qualified buyers in Philippines for informational purposes only; for Qualified Institutional Investors, pension funds and distributing companies in Japan; and for one-on-one Institutional Investors in the USA. This document is restricted to investors who are (i) Accredited Investors as such term is defined in National Instrument 45-106, and (ii) Permitted Clients as such term is defined in National Instrument 31-103. It is not intended for and should not be distributed to, or relied upon, by the public or retail investors. By accepting this document, you consent to communicate with us in English, unless you inform us otherwise.**

**The publication is marketing material and is not intended as a recommendation to invest in any particular asset class, security or strategy. Regulatory requirements that require impartiality of investment/investment strategy recommendations are therefore not applicable nor are any prohibitions to trade before publication. The information provided is for illustrative purposes only, it should not be relied upon as recommendations to buy or sell securities.**

For the distribution of this document, Continental Europe is defined as Austria, Belgium, Bulgaria, Denmark, Finland, France, Germany, Greece, Hungary, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Netherlands, Norway, Portugal, Romania, Spain, Sweden and Switzerland.

All articles in this publication are written, unless otherwise stated, by Invesco professionals. The opinions expressed are those of the author or Invesco, are based upon current market conditions and are subject to change without notice. This publication does not form part of any prospectus. This publication contains general information only and does not take into account individual objectives, taxation position or financial needs. Nor does this constitute a recommendation of the suitability of any investment strategy for a particular investor. Neither Invesco Ltd. nor any of its member companies guarantee the return of capital, distribution of income or the performance of any fund or strategy. Past performance is not a guide to future returns.

This publication is not an invitation to subscribe for shares in a fund nor is it to be construed as an offer to buy or sell any financial instruments. As with all investments, there are associated inherent risks. This publication is by way of information only. This document has been prepared only for those persons to whom Invesco has provided it. It should not be relied upon by anyone else and you may only reproduce, circulate and use this document (or any part of it) with the consent of Invesco. Asset management services are provided by Invesco in accordance with appropriate local legislation and regulations.

Certain products mentioned are available via other affiliated entities. Not all products are available in all jurisdictions.

**Canada:** In Canada this document is restricted to investors who are (i) Accredited Investors as such term is defined in National Instrument 45-106, and (ii) Permitted Clients as such term is defined in National Instrument 31-103.

**Israel:** This document may not be reproduced or used for any other purpose, nor be furnished to any other person other than those to whom copies have been sent. Nothing in this document should be considered investment advice or investment marketing as defined in the Regulation of Investment Advice, Investment Marketing and Portfolio Management Law, 1995 ("the Investment Advice Law"). Investors are encouraged to seek competent investment advice from a locally licensed investment advisor prior to making any investment. Neither Invesco Ltd. nor its subsidiaries are licensed under the Investment Advice Law, nor does it carry the insurance as required of a licensee thereunder.

This publication is issued:

- In **Australia** by Invesco Australia Limited (ABN 48 001 693 232), Level 26, 333 Collins Street, Melbourne, Victoria, 3000, Australia which holds an Australian Financial Services Licence number 239916.  
The information in this document has been prepared without taking into account any investor's investment objectives, financial situation or particular needs. Before acting on the information the investor should consider its appropriateness having regard to their investment objectives, financial situation and needs.  
This document has not been prepared specifically for Australian investors. It:
  - may contain references to dollar amounts which are not Australian dollars;
  - may contain financial information which is not prepared in accordance with Australian law or practices;
  - may not address risks associated with investment in foreign currency denominated investments; and - does not address Australian tax issues.
- In **Austria and Germany** by Invesco Asset Management Deutschland GmbH, An der Welle 5, 60322 Frankfurt am Main, Germany.
- In **Belgium, Denmark, Finland, France, Greece, Ireland, Italy, Luxembourg, Netherlands, Norway, Spain and Sweden** by Invesco Management S.A., President Building, 37A Avenue JF Kennedy, L-1855 Luxembourg, regulated by the Commission de Surveillance du Secteur Financier, Luxembourg.
- In **Jersey, Guernsey, the Isle of Man, Israel and the UK** by Invesco Asset Management Limited, Perpetual Park, Perpetual Park Drive, Henley-on-Thames, Oxfordshire, RG9 1HH, United Kingdom. Authorised and regulated by the Financial Conduct Authority.
- In **Dubai** Invesco Asset Management Limited, Index Tower Level 6 - Unit 616, P.O. Box 506599, Al Mustaqbal Street, DIFC, Dubai, United Arab Emirates. Regulated by the Dubai Financial Services Authority.
- in **Hong Kong** by INVESCO HONG KONG LIMITED 景順投資管理有限公司, 45/F Jardine House, 1 Connaught Place, Central, Hong Kong.
- In **Japan** by Invesco Asset Management (Japan) Limited, Roppongi Hills Mori Tower 14F, 6-10-1 Roppongi, Minato-ku, Tokyo 106-6114; Registration Number: The Director-General of Kanto Local Finance Bureau (Kin-sho) 306; Member of the Investment Trusts Association, Japan and the Japan Investment Advisers Association.
- in **Singapore** by Invesco Asset Management Singapore Ltd, 9 Raffles Place, #18-01 Republic Plaza, Singapore 048619.
- in **Switzerland** by Invesco Asset Management (Schweiz) AG, Talacker 34, 8001 Zurich, Switzerland.
- In **Taiwan** by Invesco Taiwan Limited, 22F, No.1, Songzhi Road, Taipei 11047, Taiwan (0800-045-066). **Invesco Taiwan Limited is operated and managed independently.**
- In **Canada** by Invesco Canada Ltd., 120 Bloor Street East, Suite 700, Toronto, Ontario, M4W 1B7.
- In the **US** by Invesco Advisers, Inc., 1331 Spring Street NW, Suite 2500, Atlanta, GA 30309.

Data as of June 30, 2023 unless otherwise stated.

Copyright © 2023 Invesco. All rights reserved.

[www.invesco.com](http://www.invesco.com)