

The risk of measuring risk:

Why high tracking error may be the prudent choice in a concentrated market

Filippo Neumaier, Analyst, Redwheel Value and Income

September 2026

Risk, in the world of equity portfolio management, is rarely a simple concept.

The origin of the word is a topic of some debate. Its most plausible etymological route traces back to the medieval Latin 'resecare' - literally, 'to cut' - which passed into the merchant nautical language of the Mediterranean as 'risicum'. In the seafaring commerce of that era, the expression described a specific and deliberate behaviour: the practice of sailing closer to the shoreline to save time, shaving distance at the cost of exposing the vessel - and its cargo - to reefs, rocks, and shallow water.

A captain with a habit of cutting corners was, by definition, considered risky by those with capital at stake, who bore the financial consequences of his decisions; and it is from this association between cutting a shorter course and courting ruin that the modern concept of financial risk was born.

That the vocabulary of risk emerged from maritime trade is no accident. The original risk-bearers were merchants and underwriters pricing the possibility that a ship, and everything it carried, might simply not come back. The language they reached for - of uncertain seas, of things irretrievably lost, of deliberate choices made in full knowledge of what could be left behind - has never entirely left us. What has changed, over centuries of financial evolution, is not the essence of the problem but the sophistication of the instruments we use to measure and manage it.

From absolute to relative risk

Many intellectual traditions have shaped how finance thinks about risk today. Benjamin Graham - the father of value investing - defined it simply and stubbornly as the probability of permanent loss of capital. Volatility, in Graham's framework, was noise: emotional discomfort, not financial damage. A business bought at a price well below its intrinsic value was, by definition, a low-risk investment, even if its share price gyrated violently in the interim.

Harry Markowitz, on the other hand, recast risk in purely statistical terms as the variance of returns around an expected value - and in doing so gave birth to modern portfolio theory, the efficient frontier, and the entire architecture of quantitative risk management that institutional investors use today.

The tension between these two traditions - one viewing risk as the permanent loss of capital, the other as short-term volatility in relative returns - reflects two fundamentally different notions of risk that pull a portfolio manager in opposite directions. For decades, one metric has served as a kind of north star for institutional investors judging whether a fund manager is 'on risk' or 'off risk' relative to their benchmark: tracking error.

At its core, tracking error measures how much a portfolio's returns deviate from those of its benchmark over time, technically, the standard deviation of the difference between the two return series. A tracking error of zero means the portfolio mirrors the index perfectly; as active decisions diverge, through stock omission, sector tilts, or concentration differences, tracking error rises accordingly.

The metric has genuine virtues: it is simple, communicable, and easy to explain to trustees, risk committees, and clients. Its shortcomings, however, are significant. It measures relative risk rather than absolute risk, penalises positive deviations as

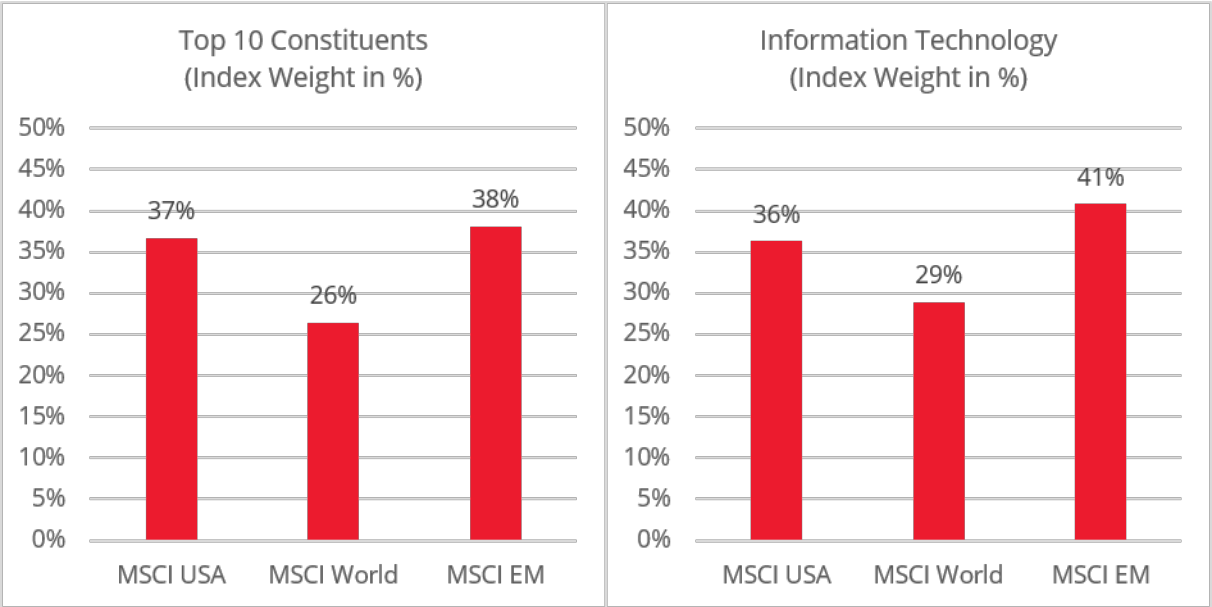
harshly as negative ones, and - most critically - treats the benchmark as a neutral, risk-free reference point. When that assumption breaks down, as it does when the benchmark itself becomes concentrated, overvalued, and potentially fragile, the entire framework begins to produce dangerously misleading signals.

The benchmark has changed: Concentration at historic extremes

To understand why tracking error needs reassessing, one must first appreciate how radically the composition of major equity indices has shifted. Over the past two decades, equity markets have become dramatically more concentrated , the product of several powerful and mutually reinforcing forces that, taken together, have funnelled an extraordinary share of market capitalisation into a shrinking number of names.

Across the MSCI USA, the MSCI World, and the MSCI Emerging Markets indices, the same pattern repeats: a shrinking number of names accounting for a growing share of total index weight, and a sectoral composition increasingly skewed towards technology at the expense of the broader economy. An investor who owns any of these indices passively is, in each case, making a far more concentrated bet than the index’s name suggests.

Charts 1 and 2: Major indices are highly concentrated and dominated by technology

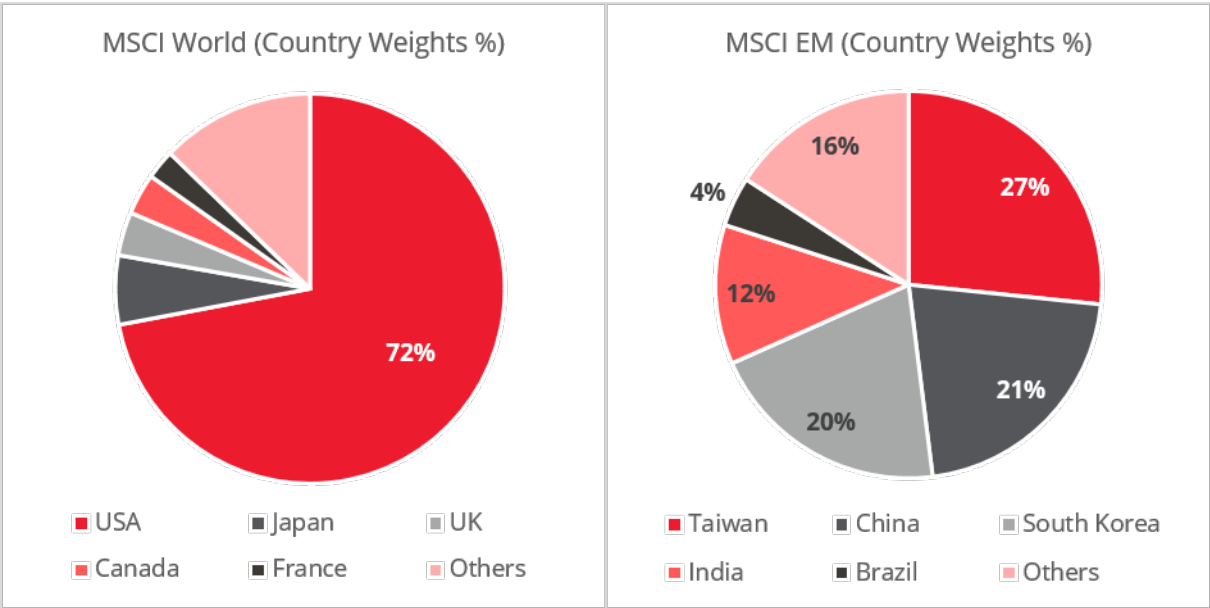


Source: MSCI, 31 July, 2026. The information shown above is for illustrative purposes only and is not intended to be, and should not be interpreted as, recommendations or advice.

The concentration is not limited to individual names or sectors, it extends to geography as well. The MSCI World index, despite its name implying broad global exposure across 23 developed markets, allocates approximately 72% of its weight to a single country: the United States. The MSCI Emerging Markets index, an index nominally spanning the developing world from Latin America to South-East Asia is, in practice, almost half invested in just two economies, Taiwan and South Korea, both of which derive the overwhelming majority of their index weight from a single industry: semiconductor manufacturing.

In each case, the diversity suggested by the name has been quietly eroded by the mechanics of market-cap weighting.

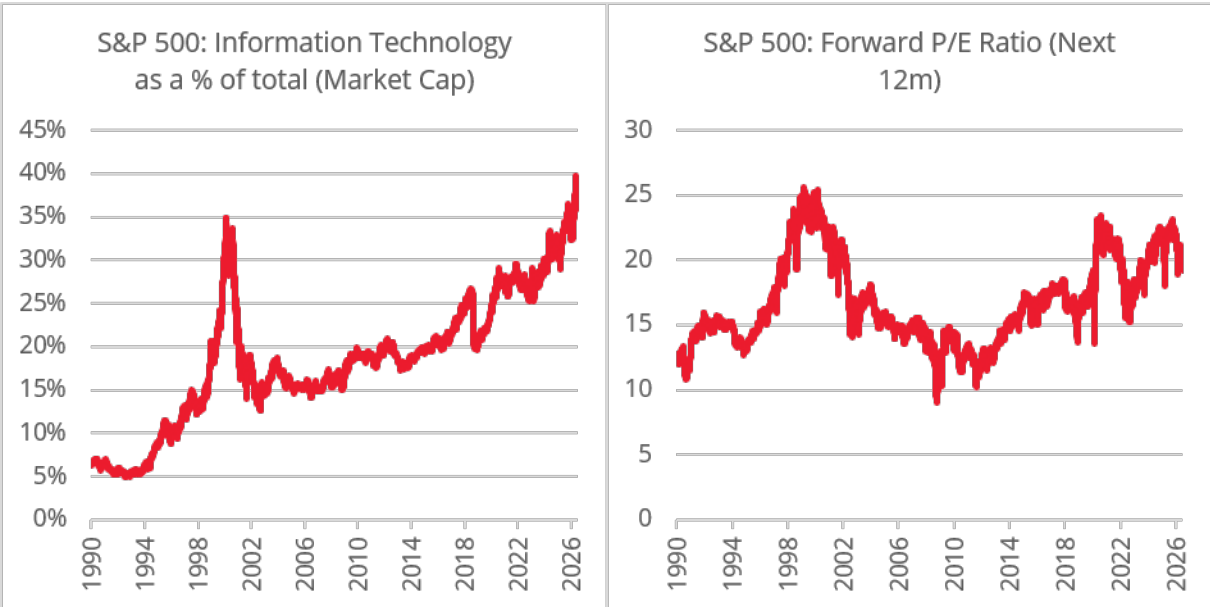
Charts 3 and 4: The US, Taiwan and South Korea dominate global equity indices



Source: MSCI, 31 July, 2026. The information shown above is for illustrative purposes.

Concentration alone would be cause for concern, but combined with elevated valuations, it compounds into something considerably more serious: a market in which a small cluster of richly priced leaders exerts outsized influence on returns, leaving investors acutely exposed if sentiment toward those names shifts or their growth disappoints.

Charts 5 and 6: Both index concentration levels and valuations are elevated

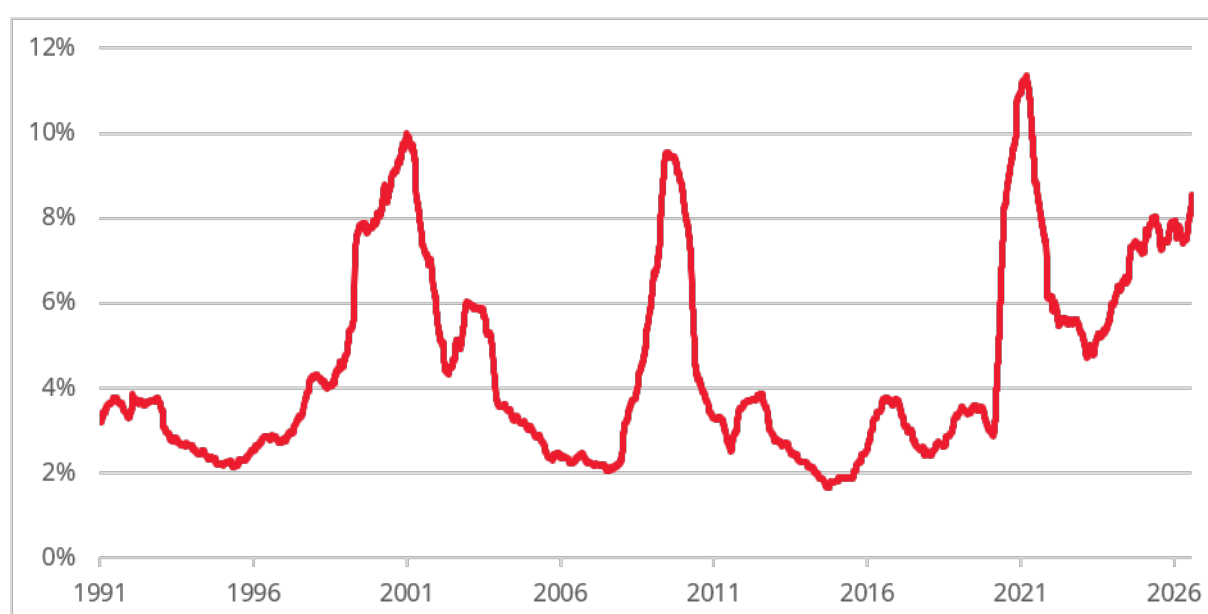


Source: Bloomberg, Redwheel, 31 July 2026. Bloomberg 12-m forward P/E estimates. The information shown above is for illustrative purposes. Past performance is not a guide to future results. The prices of investments and income from them may fall as well as rise and an investor's investment is subject to potential loss, in whole or in part. Forecasts and estimates are based upon subjective assumptions.

To illustrate this dynamic, we attempted to isolate - as cleanly as possible - the effect of benchmark concentration on tracking error, by examining how the return differential between the cap-weighted S&P500 and its equal-weighted counterpart has evolved over time. The exercise is instructive precisely because of its simplicity: both indices hold the same underlying stocks, and the only variable between them is the weight assigned to each constituent. In theory, therefore, any tracking error that emerges between the two should reflect the effect of concentration. The chart below plots this relationship over time, and what it appears to suggest is that tracking error between the two versions of the same index has risen materially in recent years, broadly in line with the increase in concentration documented in the previous sections. If that interpretation is correct, it would imply that a meaningful portion of the tracking error observed in actively managed portfolios today may reflect not the riskiness of the manager's active bets, but simply the growing distance between a diversified portfolio and an increasingly concentrated benchmark.

Past precedents, and where they fall in the timeline of financial history, are in themselves interesting to note.

Chart 7: Tracking error (rolling 12m): S&P500 Equal Weighted vs S&P500 Cap Weighted



Source: Bloomberg, Redwheel. 31 July 2026. The information shown above is for illustrative purposes. Past performance is not a guide to the future. No investment strategy or risk management technique can guarantee returns or eliminate risks in any market environment.

Reframing tracking error: When deviation means diversification

When a benchmark is highly concentrated in a handful of expensive, correlated stocks, high tracking error does not necessarily signal bold active positioning, it may simply be the arithmetic consequence of holding a genuinely diversified portfolio. The converse is equally important, and more troubling: a low tracking error portfolio today implicitly embeds a large, concentrated bet on expensive technology mega-caps, whether its managers intended one or not.

Fund managers who decline to replicate the index and instead build a more evenly weighted portfolio of businesses trading at more reasonable valuations will generate material tracking error. Risk systems will flag it as anomalous, but the logic is sound: they are owning cheaper businesses, more diversely held, with less dependence on a single macro narrative. By the oldest definition of prudent investing, they may be taking less risk, not more.

When risk is in the benchmark

The argument set out in this piece is not merely theoretical. The Redwheel Global Intrinsic Value strategy is running a tracking error of 10.5% against its benchmark, a number that conventional risk frameworks would typically classify as high.¹ And yet the performance profile that accompanies that tracking error tells a rather different story: an upside capture ratio in excess of 108%, meaning the portfolio has participated fully - and then some - in the market's gains; and a downside capture ratio of approximately 50%, meaning that when markets have fallen, the portfolio has absorbed roughly half of those losses.¹

That asymmetry is not accidental. It is the direct consequence of owning businesses purchased at a meaningful discount to their intrinsic value, companies where the price paid provides a structural cushion against adverse outcomes, while leaving the full benefit of equity ownership intact when conditions improve. Value, properly applied, is not a constraint on returns; it is a source of resilience. And resilience, in a market as concentrated and as expensively priced as the one we currently inhabit, is precisely what a conventional low-tracking-error portfolio systematically fails to provide.

The conventional framework tells investors that a fund with elevated tracking error is a risky fund. The evidence suggests the opposite: it is a fund that has declined to take the risks embedded in its benchmark, and when the benchmark itself is where the risk resides, that distance becomes a refuge.

Key Information

No investment strategy or risk management technique can guarantee returns or eliminate risks in any market environment. Past performance is not a guide to the future. The prices of investments and income from them may fall as well as rise and investors may not get back the full amount invested. Forecasts and estimates are based upon subjective assumptions about circumstances and events that may not yet have taken place and may never do so. The statements and opinions expressed in this article are those of the author as of the date of publication, and do not necessarily represent the view of Redwheel. This article does not constitute investment advice and the information shown is for illustrative purposes only.

CONTACT US

Please contact us if you have any questions or would like to discuss any of our strategies.

E invest@redwheel.com | W www.redwheel.com

¹ Redwheel, 31 July 2026

Disclaimer

Redwheel ® and Ecofin ® are registered trademarks of RWC Partners Limited ("RWC"). The term "Redwheel" may include any one or more Redwheel branded regulated entities including, RWC Asset Management LLP which is authorised and regulated by the UK Financial Conduct Authority and the US Securities and Exchange Commission ("SEC"); RWC Asset Advisors (US) LLC, which is registered with the SEC; RWC Singapore (Pte) Limited, which is licensed as a Licensed Fund Management Company by the Monetary Authority of Singapore; Redwheel Australia Pty Ltd is an Australian Financial Services Licensee with the Australian Securities and Investment Commission; and Redwheel Europe Fondsmæglerselskab A/S ("Redwheel Europe") which is regulated by the Danish Financial Supervisory Authority.

Redwheel may act as investment manager or adviser, or otherwise provide services, to more than one product pursuing a similar investment strategy or focus to the product detailed in this document. Redwheel and RWC (together "Redwheel Group") seeks to minimise any conflicts of interest, and endeavours to act at all times in accordance with its legal and regulatory obligations as well as its own policies and codes of conduct.

This document is directed only at professional, institutional, wholesale or qualified investors. The services provided by Redwheel are available only to such persons. It is not intended for distribution to and should not be relied on by any person who would qualify as a retail or individual investor in any jurisdiction or for distribution to, or use by, any person or entity in any jurisdiction where such distribution or use would be contrary to local law or regulation.

This document has been prepared for general information purposes only and has not been delivered for registration in any jurisdiction nor has its content been reviewed or approved by any regulatory authority in any jurisdiction.

The information contained herein does not constitute: (i) a binding legal agreement; (ii) legal, regulatory, tax, accounting or other advice; (iii) an offer, recommendation or solicitation to buy or sell shares in any fund, security, commodity, financial instrument or derivative linked to, or otherwise included in a portfolio managed or advised by Redwheel; or (iv) an offer to enter into any other transaction whatsoever (each a "Transaction"). Redwheel Group bears no responsibility for your investment research and/or investment decisions and you should consult your own lawyer, accountant, tax adviser or other professional adviser before entering into any Transaction. No representations and/or warranties are made that the information contained herein is either up to date and/or accurate and is not intended to be used or relied upon by any counterparty, investor or any other third party.

Redwheel Group uses information from third party vendors, such as statistical and other data, that it believes to be reliable. However, the accuracy of this data, which may be used to calculate results or otherwise compile data that finds its way over time into Redwheel Group research data stored on its systems, is not guaranteed. If such information is not accurate, some of the conclusions reached or statements made may be adversely affected. Any opinion expressed herein, which may be subjective in nature, may not be shared by all directors, officers, employees, or representatives of Redwheel Group and may be subject to change without notice. Redwheel Group is not liable for any decisions made or actions or inactions taken by you or others based on the contents of this document and neither Redwheel Group nor any of its directors, officers, employees, or representatives (including affiliates) accepts any liability whatsoever for any errors and/or omissions or for any direct, indirect, special, incidental, or consequential loss, damages, or expenses of any kind howsoever arising from the use of, or reliance on, any information contained herein.

Information contained in this document should not be viewed as indicative of future results. Past performance of any Transaction is not indicative of future results. The value of investments can go down as well as up. Certain assumptions and forward looking statements may have been made either for modelling purposes, to simplify the presentation and/or calculation of any projections or estimates contained herein and Redwheel Group does not represent that that any such assumptions or statements will reflect actual future events or that all assumptions have been considered or stated. There can be no assurance that estimated returns or projections will be realised or that actual returns or performance results will not materially differ from those estimated herein. Some of the information contained in this document may be aggregated data of Transactions executed by Redwheel that has been compiled so as not to identify the underlying Transactions of any particular customer.

No representations or warranties of any kind are intended or should be inferred with respect to the economic return from, or the tax consequences of, an investment in a Redwheel-managed fund.

This document expresses no views as to the suitability or appropriateness of the fund or any other investments described herein to the individual circumstances of any recipient.

The information transmitted is intended only for the person or entity to which it has been given and may contain confidential and/or privileged material. In accepting receipt of the information transmitted you agree that you and/or your affiliates, partners, directors, officers and employees, as applicable, will keep all information strictly confidential. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information is prohibited. Any distribution or reproduction of this document is not authorised and is prohibited without the express written consent of Redwheel Group.

The risks of investment are detailed in the Prospectus and should be considered in conjunction with your investment adviser. Please refer to the Prospectus, Key Investor Information Document (UCITS KIID), Key Information Document (PRIIPS KID), Summary of Investor Rights and other legal documents as well as annual and semi-annual reports before making investment decisions; these documents are available free of charge from RWC or on RWC's website: <https://www.redwheel.com/> and available in local languages where required. RWC as the global distributor has the right to terminate the arrangements made for marketing Redwheel Funds in certain jurisdictions and to certain investors. Redwheel Europe is the sub-distributor of shares in Redwheel Funds in the European Economic Area ("EEA") and is regulated by the Danish Financial Supervisory Authority. This document is not a solicitation or an offer to buy or sell any fund or other investment and is issued in the UK by RWC and in the EEA by RW Europe. This document does not constitute investment, legal or tax advice and expresses no views as to the suitability or appropriateness of any investment and is provided for information purposes only. The views expressed in the commentary are those of the investment team.

Funds managed by Redwheel are not, and will not be, registered under the Securities Act of 1933 (the "Securities Act") and are not available for purchase by US persons (as defined in Regulation S under the Securities Act) except to persons who are "qualified purchasers" (as defined in the Investment Company Act of 1940) and "accredited investors" (as defined in Rule 501(a) under the Securities Act).

This document does not constitute an offer to sell, purchase, subscribe for or otherwise invest in units or shares of any fund managed by Redwheel. Any offering is made only pursuant to the relevant offering document and the relevant subscription application. Prospective investors should review the offering memorandum in its entirety, including the risk factors in the offering memorandum, before making a decision to invest.

Redwheel Funds is a Luxembourg domiciled UCITS SICAV authorised by the CSSF and recognised in the UK under the Overseas Funds Regime. It is not authorised by the UK Financial Conduct Authority. UK investors will not have access to the UK Financial Ombudsman Service (FOS) or the Financial Services Compensation Scheme (FSCS) in respect of or in the event that the Redwheel Funds' Management Company or Depositary and Administration Agent (As defined under the Offering Document of Redwheel Funds) is unable to meet its liabilities to investors. UK investors may contact the Management Company which will, on request, provide details of how to make a complaint and how to access any applicable out of court complaints procedures in Luxembourg.