

Needham Small Cap Growth Fund

Schedule of Investments

September 30, 2020 (Unaudited)

	<i>Shares</i>	<i>Value</i>
Common Stocks (99.0%)		
Aerospace & Defense (3.0%)		
Parsons Corp. (a)	162,200	\$ 5,440,188
Biotechnology (1.0%)		
Voyager Therapeutics, Inc. (a)	165,000	1,760,550
Communications Equipment (26.4%) (d)		
ADTRAN, Inc.	114,600	1,175,223
Cambium Networks Corp. (a)	770,000	12,989,900
Ciena Corp. (a)	5,000	198,450
EMCORE Corp. (a)	1,385,000	4,501,250
Infinera Corp. (a)	1,250,000	7,700,000
Inseego Corp. (a)	675,000	6,966,000
KVH Industries, Inc. (a)	800,000	7,208,000
ViaSat, Inc. (a)(b)	200,000	6,878,000
		<u>47,616,823</u>
Diversified Telecommunication Services (1.6%)		
Vonage Holdings Corp. (a)	290,000	2,966,700
Electronic Equipment, Instruments & Components (8.8%)		
Akoustis Technologies, Inc. (a)	550,000	4,488,000
Coherent, Inc. (a)	8,404	932,256
Frequency Electronics, Inc. (a)	156,429	1,581,497
II-VI, Inc. (a)	17,500	709,800
TTM Technologies, Inc. (a)	35,000	399,350
Vishay Intertechnology, Inc.	200,000	3,114,000
Vishay Precision Group, Inc. (a)	185,000	4,684,200
		<u>15,909,103</u>
Energy Equipment & Services (4.4%)		
Aspen Aerogels, Inc. (a)	733,006	8,026,416
Food Products (0.0%)		
Vital Farms, Inc. (a)	692	28,047
Health Care Equipment & Supplies (6.5%)		
CryoLife, Inc. (a)	60,000	1,108,200
Inogen, Inc. (a)	160,000	4,640,000
Merit Medical Systems, Inc. (a)	40,000	1,740,000
Sientra, Inc. (a)	450,000	1,530,000
ViewRay, Inc. (a)	780,000	2,730,000
		<u>11,748,200</u>
Health Care Technology (0.1%)		
American Well Corp. (a)	3,457	102,465
IT Services (5.5%)		
BigCommerce Holdings, Inc. (a)	8,574	714,214
Limelight Networks, Inc. (a)	1,600,000	9,216,000
Rackspace Technology, Inc. (a)	1,650	31,829
		<u>9,962,043</u>
Life Sciences Tools & Services (3.2%)		
Fluidigm Corp. (a)	780,000	5,795,400
Oil, Gas & Consumable Fuels (1.2%)		
Navigator Holdings, Ltd. (a)	257,044	2,148,888
Semiconductors & Semiconductor Equipment (21.0%)		
Advanced Energy Industries, Inc. (a)	10,000	629,400
AXT, Inc. (a)	1,675,000	10,251,000
Cohu, Inc.	251,383	4,318,760

MaxLinear, Inc. (a)	362,232	8,418,271
PDF Solutions, Inc. (a)	52,000	972,920
Photronics, Inc. (a)	789,724	7,865,651
Veeco Instruments, Inc. (a)	469,343	5,477,233
		<u>37,933,235</u>
Software (11.4%)		
8x8, Inc. (a)	360,950	5,612,773
Alteryx, Inc. (a)	17,500	1,987,125
Duck Creek Technologies, Inc. (a)	7,170	325,733
FireEye, Inc. (a)	475,000	5,863,875
Mimecast Ltd. (a)	50,000	2,346,000
New Relic, Inc. (a)	10,000	563,600
Pluralsight, Inc. (a)	110,871	1,899,220
Sumo Logic, Inc. (a)	1,728	37,670
Zuora, Inc. (a)	185,000	1,912,900
		<u>20,548,896</u>
Technology Hardware, Storage & Peripherals (4.9%)		
Intevac, Inc. (a)	1,050,000	5,785,500
Super Micro Computer, Inc. (a)	90,000	2,376,000
Western Digital Corp.	20,000	731,000
		<u>8,892,500</u>
Total Common Stocks		
(Cost \$155,315,141)		<u>\$ 178,879,454</u>
Short-Term Investments (0.8%)		
Money Market Fund (0.8%)		
Dreyfus Treasury Securities Cash Management - Institutional Class, 0.01% (c)		
(Cost \$1,501,201)	1,501,201	<u>1,501,201</u>
Total Investments (99.8%)		
(Cost \$156,816,342)		180,380,655
Other Assets in Excess of Liabilities (0.2%)		332,640
Net Assets (100.0%)		<u><u>\$ 180,713,295</u></u>

Percentages are stated as a percent of net assets.

Industry classifications may be different than those used for compliance purposes.

- (a) Non-income producing security.
- (b) Security position is either entirely or partially held in a segregated account as collateral for securities sold short, aggregating a total market value of \$2,063,400.
- (c) Rate shown is the seven-day yield as of September 30, 2020.
- (d) As of September 30, 2020, the Fund had a significant portion of its assets invested in Communications Equipment.

Distribution of investments by country or territory of incorporation, as a percentage of Total Investments, is as follows (Unaudited):

Country	Long
United States [^]	<u>100.0%</u>
Total	<u><u>100.0%</u></u>

[^] United States allocation includes Short-Term Investment-Money Market Fund of 0.8%

Needham Aggressive Growth Fund

Schedule of Investments

September 30, 2020 (Unaudited)

	<i>Shares</i>	<i>Value</i>
Common Stocks (99.8%)		
Aerospace & Defense (0.6%)		
Parsons Corp. (a)	11,400	\$ 382,356
Biotechnology (0.1%)		
Moderna, Inc. (a)	600	42,450
Building Products (2.0%)		
Alpha Pro Tech, Ltd. (a)	76,500	1,130,670
Jewett-Cameron Trading Co., Ltd. (Canada) (a)	7,500	57,825
		<u>1,188,495</u>
Commercial Services & Supplies (0.2%)		
Clean Harbors, Inc. (a)	2,000	112,060
Communications Equipment (6.6%)		
ADTRAN, Inc.	36,950	378,922
Cambium Networks Corp. (a)	17,500	295,225
KVH Industries, Inc. (a)	369,400	3,328,294
		<u>4,002,441</u>
Construction Materials (1.4%)		
Smith-Midland Corp.	137,500	845,625
Electrical Equipment (9.8%)		
Vicor Corp. (a)	77,000	5,985,210
Electronic Equipment, Instruments & Components (3.1%)		
Arlo Technologies, Inc. (a)	40,000	210,400
IPG Photonics Corp. (a)	7,000	1,189,790
National Instruments Corp.	2,500	89,250
Vishay Precision Group, Inc. (a)	15,000	379,800
		<u>1,869,240</u>
Energy Equipment & Services (2.5%)		
Aspen Aerogels, Inc. (a)	138,100	1,512,195
Entertainment (0.1%)		
World Wrestling Entertainment, Inc.	2,250	91,058
Food Products (0.1%)		
Vital Farms, Inc. (a)	1,000	40,530
Health Care Equipment & Supplies (3.6%)		
CryoPort, Inc. (a)	30,500	1,445,700
LeMaitre Vascular, Inc.	22,500	731,925
		<u>2,177,625</u>
Health Care Providers & Services (0.5%)		
Laboratory Corp. of America Holdings (a)	500	94,135
Quest Diagnostics, Inc.	2,000	228,980
		<u>323,115</u>
Health Care Technology (0.4%)		
American Well Corp. (a)	1,155	34,234
Omniceil, Inc. (a)	3,000	223,980
		<u>258,214</u>
Household Products (2.3%)		
Oil-Dri Corp. of America	39,500	1,412,915
IT Services (3.1%)		
Akamai Technologies, Inc. (a)(b)	14,500	1,602,830
BigCommerce Holdings, Inc. (a)	2,900	241,570
Rackspace Technology, Inc. (a)	600	11,574
		<u>1,855,974</u>
Life Sciences Tools & Services (0.7%)		

Bruker Corp.	11,000	437,250
Machinery (0.7%)		
FreightCar America, Inc. (a)	55,600	126,768
Westinghouse Air Brake Technologies Corp.	5,000	309,400
		<u>436,168</u>
Professional Services (0.7%)		
CRA International, Inc.	11,000	412,170
Real Estate Investment Trusts (REITs) (2.5%)		
American Tower Corp.	300	72,519
Equinix, Inc.	2,000	1,520,260
		<u>1,592,779</u>
Semiconductors & Semiconductor Equipment (35.0%) (d)		
AXT, Inc. (a)	57,500	351,900
Entegris, Inc.	93,000	6,913,620
FormFactor, Inc. (a)	23,000	573,390
MKS Instruments, Inc.	23,000	2,512,290
Nova Measuring Instruments, Ltd. (Israel) (a)(b)	63,000	3,284,820
PDF Solutions, Inc. (a)(b)	334,000	6,249,140
Photronics, Inc. (a)	22,500	224,100
SiTime Corp. (a)	5,000	420,150
Taiwan Semiconductor Manufacturing Co., Ltd. (Taiwan) - ADR	7,500	608,025
Veeco Instruments, Inc. (a)	11,000	128,370
		<u>21,265,805</u>
Software (5.5%)		
The Trade Desk, Inc. - Class A (a)	1,200	622,536
Altair Engineering, Inc. (a)	1,500	62,970
Appian Corp. (a)	1,500	97,125
ChannelAdvisor Corp. (a)	24,000	347,280
Duck Creek Technologies, Inc. (a)	1,440	65,419
Everbridge, Inc. (a)	2,000	251,460
fuboTV, Inc. (a)	5,000	45,000
GSE Systems, Inc. (a)(e)	1,052,625	1,094,730
Q2 Holdings, Inc. (a)	8,000	730,080
Sumo Logic, Inc. (a)	578	12,600
		<u>3,329,200</u>
Specialty Retail (3.1%)		
CarMax, Inc. (a)(b)	20,500	1,884,155
Technology Hardware, Storage & Peripherals (14.5%)		
Apple, Inc.	56,000	6,485,360
Intevac, Inc. (a)	90,450	498,380
Super Micro Computer, Inc. (a)	69,500	1,834,800
		<u>8,818,540</u>
Trading Companies & Distributors (0.7%)		
Transcat, Inc. (a)	13,500	395,550
Total Common Stocks		
(Cost \$21,964,641)		<u>\$ 60,671,120</u>
Short-Term Investments (0.2%)		
Money Market Fund (0.2%)		
Dreyfus Treasury Securities Cash Management - Institutional Class 0.01% (c)		
Total Short-Term Investments		
(Cost \$137,625)	137,625	<u>137,625</u>
Total Investments (100.0%)		
(Cost \$22,102,266)		60,808,745
Total Securities Sold Short (-0.1%)		(74,352)
(Proceeds \$30,839)		
Other Assets in Excess of Liabilities (0.1%)		<u>77,765</u>

Net Assets (100.0%)

\$ 60,812,158

Percentages are stated as a percent of net assets.

Industry classifications may be different than those used for compliance monitoring.

- (a) Non-income producing security.
- (b) Security position is either entirely or partially held in a segregated account as collateral for securities sold short, aggregating a total market value of \$2,690,140.
- (c) Rate shown is the seven-day yield as of September 30, 2020
- (d) As of September 30, 2020, the Fund had a significant portion of its assets invested in the Semiconductors & Semiconductor Equipment industry.
- (e) Affiliated security. Please refer to Notes to the Financial Statements.

ADR American Depositary Receipt

Distribution of investments by country or territory of incorporation, as a percentage of Total Investments, is as follows (Unaudited):

<u>Country</u>	<u>Long</u>
United States [^]	91.7%
Canada	1.9%
Taiwan	1.0%
Israel	5.4%
Total	<u>100.0%</u>

[^] United States allocation includes Short-Term Investment-Money Market Fund of 0.2%

Needham Aggressive Growth Fund

Schedule of Securities Sold Short

September 30, 2020 (Unaudited)

	<i>Shares</i>	<i>Value</i>
Securities Sold Short (-0.1%)		
Communications Equipment (0.0%)		
Ubiquiti, Inc.	200	<u>\$ 33,332</u>
Software (-0.1%)		
Dynatrace, Inc. (a)	1,000	<u>41,020</u>
Total Securities Sold Short (-0.1%)		<u>\$ 74,352</u>
(Proceeds \$30,839)		

- (a) Non-income producing security.

Distribution of investments by country or territory of incorporation, as a percentage of Total Securities Sold Short, is as follows (Unaudited):

<u>Country</u>	<u>Short</u>
United States	100.0%
Total	<u>100.0%</u>

Needham Aggressive Growth Fund

Schedule of Securities Sold Short

September 30, 2020 (Unaudited)

	<i>Shares</i>	<i>Value</i>
Securities Sold Short (-0.1%)		
Communications Equipment (0.0%)		
Ubiquiti, Inc.	200	\$ <u>33,332</u>
Software (-0.1%)		
Dynatrace, Inc. (a)	1,000	<u>41,020</u>
Total Securities Sold Short (-0.1%)		
(Proceeds \$30,839)		\$ <u>74,352</u>

(a) Non-income producing security.

Distribution of investments by country or territory of incorporation, as a percentage of Total Securities Sold Short, is as follows (Unaudited):

Country	Short
United States	<u>100.0%</u>
Total	<u><u>100.0%</u></u>

Needham Growth Fund
Schedule of Investments
September 30, 2020 (Unaudited)

	<i>Shares</i>	<i>Value</i>
Common Stocks (98.7%)		
Aerospace & Defense (0.8%)		
Parsons Corp. (a)	27,000	\$ 905,580
Biotechnology (4.1%)		
Gilead Sciences, Inc.	73,500	4,644,465
Moderna, Inc. (a)	1,200	84,900
		<u>4,729,365</u>
Building Products (0.2%)		
Alpha Pro Tech, Ltd. (a)	8,500	125,630
DIRTT Environmental Solutions (Canada) (a)	71,500	113,685
		<u>239,315</u>
Commercial Services & Supplies (0.2%)		
Clean Harbors, Inc. (a)	3,500	196,105
Communications Equipment (7.0%)		
ADTRAN, Inc.	69,000	707,595
Cambium Networks Corp. (a)	90,000	1,518,300
Inseego Corp. (a)	20,000	206,400
KVH Industries, Inc. (a)	550,000	4,955,500
ViaSat, Inc. (a)(b)	19,500	670,605
		<u>8,058,400</u>
Electrical Equipment (4.7%)		
Vicor Corp. (a)	70,000	5,441,100
Electronic Equipment, Instruments & Components (4.7%)		
Arlo Technologies, Inc. (a)	40,000	210,400
Corning, Inc.	32,500	1,053,325
FARO Technologies, Inc. (a)	10,000	609,800
FLIR Systems, Inc.	7,500	268,875
Frequency Electronics, Inc. (a)	30,000	303,300
II-VI, Inc. (a)	15,000	608,400
IPG Photonics Corp. (a)	6,250	1,062,312
TTM Technologies, Inc. (a)	2,500	28,525
Vishay Intertechnology, Inc.	60,000	934,200
Vishay Precision Group, Inc. (a)	15,000	379,800
		<u>5,458,937</u>
Energy Equipment & Services (4.1%)		
Aspen Aerogels, Inc. (a)	427,500	4,681,125
Entertainment (0.2%)		
World Wrestling Entertainment, Inc.	4,500	182,115
Food Products (0.0%)		
Vital Farms, Inc. (a)	1,000	40,530
Health Care Equipment & Supplies (7.5%)		
Becton Dickinson & Co.	19,000	4,420,920
CryoLife, Inc. (a)	5,500	101,585
CryoPort, Inc. (a)	43,500	2,061,900
Medtronic PLC (Ireland)	20,000	2,078,400
		<u>8,662,805</u>
Health Care Providers & Services (0.7%)		
Laboratory Corp. of America Holdings (a)	2,000	376,540
Quest Diagnostics, Inc.	3,750	429,337
		<u>805,877</u>
Health Care Technology (0.1%)		
American Well Corp. (a)	2,253	66,779
Household Products (0.4%)		

Oil-Dri Corp. of America	14,500	518,665
Industrial Conglomerates (0.4%)		
Honeywell International, Inc.	2,500	411,525
Interactive Media & Services (0.3%)		
Alphabet, Inc. (a)	250	366,400
IT Services (3.6%)		
Akamai Technologies, Inc. (a)(b)	33,500	3,703,090
BigCommerce Holdings, Inc. (a)	5,664	471,811
Rackspace Technology, Inc. (a)	1,150	22,184
		4,197,085
Life Sciences Tools & Services (8.9%)		
Bruker Corp.	1,000	39,750
Thermo Fisher Scientific, Inc.(b)	23,250	10,265,340
		10,305,090
Media (4.4%)		
Comcast Corp.	110,000	5,088,600
Oil, Gas & Consumable Fuels (0.2%)		
Navigator Holdings, Ltd. (a)	27,500	229,900
Real Estate Investment Trusts (REITs) (0.2%)		
American Tower Corp.	1,250	302,163
Semiconductors & Semiconductor Equipment (28.3%) (d)		
Applied Materials, Inc.	9,000	535,050
AXT, Inc. (a)	399,550	2,445,246
Entegris, Inc.	115,000	8,549,100
FormFactor, Inc. (a)	130,000	3,240,900
Lam Research Corp.	2,500	829,375
MKS Instruments, Inc.	22,500	2,457,675
Nova Measuring Instruments, Ltd. (Israel) (a)	50,000	2,607,000
PDF Solutions, Inc. (a)	450,000	8,419,500
Photronics, Inc. (a)	120,000	1,195,200
SiTime Corp. (a)	12,500	1,050,375
Taiwan Semiconductor Manufacturing Co., Ltd. (Taiwan) - ADR	9,000	729,630
Veeco Instruments, Inc. (a)	50,000	583,500
		32,642,551
Software (7.2%)		
The Trade Desk, Inc. - Class A (a)	5,000	2,593,900
8x8, Inc. (a)	31,550	490,603
Alteryx, Inc. (a)	1,500	170,325
Appian Corp. (a)	7,000	453,250
ChannelAdvisor Corp. (a)	37,500	542,625
Coupa Software, Inc. (a)	2,500	685,600
Duck Creek Technologies, Inc. (a)	4,723	214,566
Everbridge, Inc. (a)	11,500	1,445,895
FireEye, Inc. (a)	10,000	123,450
GSE Systems, Inc. (a)	24,029	24,990
Q2 Holdings, Inc. (a)	16,500	1,505,790
Sumo Logic, Inc. (a)	1,126	24,547
		8,275,541
Specialty Retail (5.8%)		
CarMax, Inc. (a)	72,500	6,663,475
Technology Hardware, Storage & Peripherals (4.3%)		
Apple, Inc.	10,800	1,250,748
Intevac, Inc. (a)	185,900	1,024,309
Super Micro Computer, Inc. (a)	97,500	2,574,000
Western Digital Corp.	1,500	54,825
		4,903,882
Trading Companies & Distributors (0.4%)		
Air Lease Corp.	17,500	514,850

Total Common Stocks (Cost \$41,660,944)		\$ 113,887,760
Short-Term Investments (1.2%) Money Market Fund (1.2%) Dreyfus Treasury Securities Cash Management - Institutional Class 0.01% (c) (Cost \$1,347,198)	1,347,198	<u>1,347,198</u>
Total Investments (99.9%) (Cost \$43,008,142)		115,234,958
Total Securities Sold Short (-0.1%) (Proceeds \$37,275)		<u>(124,350)</u>
Other Assets in Excess of Liabilities (0.2%)		<u>224,299</u>
Net Assets (100.0%)		<u><u>\$ 115,334,907</u></u>

Percentages are stated as a percent of net assets.

Industry classifications may be different than those used for compliance monitoring purposes.

- (a) Non-income producing security.
- (b) Security position is either entirely or partially held in a segregated account as collateral for securities sold short, aggregating a total market value of \$1,970,015.
- (c) Rate shown is the seven-day yield as of September 30, 2020.
- (d) As of September 30, 2020, the Fund had a significant portion of its assets invested in the Semiconductors & Semiconductor Equipment industry.

ADR American Depositary Receipt

Distribution of investments by country or territory of incorporation, as a percentage of Total Investments, is as follows (Unaudited):

Country	Long
United States^	95.1%
Canada	0.2%
Taiwan	0.6%
Ireland	1.8%
Israel	2.3%
Total	<u><u>100.0%</u></u>

^ United States allocation includes Short-Term Investment-Money Market Fund of 1.2%

Needham Growth Fund

Schedule of Securities Sold Short

September 30, 2020 (Unaudited)

	<i>Shares</i>	<i>Value</i>
Securities Sold Short (-0.1%) Communications Equipment (-0.1%) Ubiquiti, Inc.	500	<u>\$ 83,330</u>
Software (0.0%) Dynatrace, Inc. *	1,000	<u>41,020</u>
Total Securities Sold Short (-0.1%) (Proceeds \$37,275)		<u><u>\$ 124,350</u></u>

(a) Non-income producing security.

Distribution of investments by country or territory of incorporation, as a percentage of Total Securities Sold Short, is as follows (Unaudited):

Country	Short
United States	<u>100.0%</u>
Total	<u><u>100.0%</u></u>

Needham Growth Fund
 Schedule of Securities Sold Short
 September 30, 2020 (Unaudited)

	<i>Shares</i>	<i>Value</i>
Securities Sold Short (-0.1%)		
Communications Equipment (-0.1%)		
Ubiquiti, Inc.	500	\$ <u>83,330</u>
Software (0.0%)		
Dynatrace, Inc. *	1,000	<u>41,020</u>
Total Securities Sold Short (-0.1%)		
(Proceeds \$37,275)		\$ <u>124,350</u>

(a)Non-income producing security.

Distribution of investments by country or territory of incorporation, as a percentage of Total Securities Sold Short, is as follows (Unaudited):

Country	Short
United States	<u>100.0%</u>
Total	<u><u>100.0%</u></u>

Notes to Schedule of Investments (Unaudited)

September 30, 2020

1. Organization

Needham Growth Fund (“NGF”), Needham Aggressive Growth Fund (“NAGF”) and Needham Small Cap Growth Fund (“NSCGF”) (each, a “Portfolio” and collectively, the “Portfolios”), are portfolios of The Needham Funds, Inc. (the “Company”), which is registered under the Investment Company Act of 1940, as amended (the “1940 Act”), as a diversified, open-end management investment company. The Company was organized as a Maryland corporation on October 12, 1995. NGF, NAGF, and NSCGF each currently offer two classes, the Retail Class and the Institutional Class. The Institutional Class commenced operations on December 30, 2016.

Each Portfolio is an investment company and accordingly follows the investment company accounting and reporting guidance of the Financial Accounting Standards Board (“FASB”) Accounting Standards Codification Topic 946 “Financial Services – Investment Companies.”

2. Significant Accounting Policies

The following is a summary of significant accounting policies followed by the Company in the preparation of its financial statements. These policies are in conformity with accounting principles generally accepted in the United States of America (“GAAP”).

Security Valuation: Portfolio securities for which market quotations are readily available are stated at the last sale price reported by the principal exchange for the security as of the exchange’s close of business. Securities for which no sale has taken place during the day and securities which are not listed on an exchange are valued at the mean of the highest closing bid and lowest asked prices. Exchange traded options are valued at the last reported sale price on any exchange on which the option is principally traded. If no sales are reported on a particular day, the options will be valued at the mean between the highest closing bid and lowest asked prices across the exchanges where the option is traded. Non-exchange traded options will also be valued at the mean between the last bid and asked quotations. For options where market quotations are not readily available, value will be determined in accordance with the fair value procedures described below. All other securities and assets for which (a) market quotations are not readily available, such as in the case of a market or technical disruption that prevents the normal trading of a security held by a Portfolio, (b) market quotations are believed to be unrepresentative of fair market value, such as in the case of a thinly traded security, or (c) valuation is normally made at the last sale price on a foreign exchange and a significant event occurs after the close of that exchange but before the New York Stock Exchange closes, are valued at their fair value as determined in good faith by the Board of Directors (the “Board”) in accordance with Fair Value Procedures established by the Board. The Company’s Fair Value Procedures are implemented and monitored by a Fair Value Committee (the “Committee”) designated by the Board. When a security is valued in accordance with the Fair Value Procedures, the Committee determines a value after taking into consideration any relevant information that is reasonably available to the Committee. Some of the more common reasons that may necessitate that a security be valued pursuant to these Fair Value Procedures include, but are not limited to: the security’s trading has been halted or suspended; the security has been delisted from a national exchange; the security’s primary trading market is temporarily closed at a time when under normal conditions it would be open; or the security’s primary pricing source is not able or willing to provide a price. The securities of each Portfolio may also be valued on the basis of valuations provided by a pricing service approved by, or on behalf of, the Board.

Portfolio securities listed or traded on securities exchanges, including American Depositary Receipts (“ADRs”), are valued at the closing price on the exchange or system where the security is principally traded or at the NASDAQ Official Closing Price. If there have been no sales for that day on the exchange or system, a security is valued at the mean of the highest closing bid and lowest asked prices on the exchange or system where the security is principally traded.

Fair Value Measurements: Valuation inputs used to determine the value of the Portfolios’ investments are summarized in the three broad levels listed below:

Level 1 — Unadjusted quoted prices in active markets for identical assets and liabilities that the Funds have the ability to access.

Level 2 — Observable inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly or indirectly. These inputs may include quoted prices for the identical instrument in an inactive market, prices for similar instruments, interest rates, prepayment speeds, credit risk, yield curves, default rates and similar data.

Level 3 — Unobservable inputs for the asset or liability, to the extent relevant observable inputs are not available, representing the Funds’ own assumptions about the assumptions a market participant would use in valuing the asset or liability, and would be based on the best information available.

The inputs or methodology used to value securities are not necessarily an indication of the risk associated with investing in those securities.

Portfolio securities listed or traded on securities exchanges, including ADRs, are valued at the closing price on the exchange or system where the security is principally traded or at the NASDAQ Official Closing Price. If there have been no sales for that day on the exchange or system, a security is valued at the mean of the highest closing bid and lowest asked prices on the exchange or system where the security is principally traded. These valuations are typically categorized as Level 1 in the fair value hierarchy.

In accordance with procedures adopted by the Board, fair value pricing may be used if events materially affecting the value of foreign securities occur between the times the exchange on which they are traded closes and the time the Portfolios' net asset values are calculated. These valuations are categorized as Level 2 in the fair value hierarchy.

The following is a summary categorization, as of September 30, 20120, of each Portfolio's investments based on the level of inputs utilized in determining the value of such investments:

	LEVEL 1 - Quoted Prices ⁽¹⁾		
	NGF	NAGF	NSCGF
Assets			
Common Stocks ⁽²⁾	\$ 113,887,760	\$ 60,671,120	\$ 178,879,454
Closed-End Funds	-	-	-
Short-Term Investments	1,347,198	137,625	1,501,201
Liabilities			
Securities Sold Short ⁽²⁾	(124,350)	(74,352)	-
Total	\$ 115,110,608	\$ 60,734,393	\$ 180,380,655

⁽¹⁾ As of September 30, 2020, the Portfolios did not hold Level 2 or Level 3 investments.

⁽²⁾ Please refer to the Schedule of Investments and Schedule of Securities Sold Short to view segregation by industry.

3. Transactions with Affiliates

NAGF owned 5% or more of the voting securities of the following company during the nine months ended September 30, 2020. As a result, this company is deemed to be an affiliate of NAGF as defined by the 1940 Act. Transactions during the period in this affiliated company were as follows:

<u>Security Name</u>	<u>Value At Dec. 31, 2019</u>	<u>Value of Purchases</u>	<u>Value of Sales</u>	<u>Net Change in Unrealized Appreciation (Depreciation)</u>	<u>Net Realized Gain (Losses)</u>	<u>Dividend Income</u>	<u>Value Sept. 30, 2020</u>	<u>Share Balance Sept. 30, 2020</u>
GSE Systems, Inc.	\$1,736,831	\$ —	\$ —	(642,101)	\$ —	\$ —	\$1,094,730	1,052,625