

Needham Small Cap Growth Fund

Schedule of Investments

March 31, 2020 (Unaudited)

	<i>Shares</i>	<i>Value</i>
Common Stocks (88.6%)		
Airlines (0.4%)		
Hawaiian Holdings, Inc.	40,000	\$ 417,600
Biotechnology (1.7%)		
CRISPR Therapeutics AG (Switzerland) (a)	5,500	233,255
Moderna, Inc. (a)	30,000	898,500
Voyager Therapeutics, Inc. (a)	90,000	823,500
		<u>1,955,255</u>
Building Products (0.0%)		
DIRTT Environmental Solutions (Canada) (a)	40,000	39,232
Communications Equipment (8.3%)		
Cambium Networks Corp. (a)	620,000	3,472,000
EMCORE Corp. (a)	750,000	1,680,000
KVH Industries, Inc. (a)(b)	285,000	2,687,550
ViaSat, Inc. (a)	45,000	1,616,400
		<u>9,455,950</u>
Consumer Finance (3.2%)		
LendingTree, Inc. (a)	20,000	3,667,800
Diversified Telecommunication Services (0.3%)		
Vonage Holdings Corp. (a)	50,000	361,500
Electrical Equipment (2.5%)		
Vicor Corp. (a)(b)	63,350	2,821,609
Electronic Equipment, Instruments & Components (14.7%)		
Akoustis Technologies, Inc. (a)	600,000	3,222,000
Coherent, Inc. (a)	7,500	798,075
Frequency Electronics, Inc. (a)	85,000	776,900
II-VI, Inc. (a)	190,000	5,415,000
National Instruments Corp.	20,000	661,600
nLight, Inc. (a)	200,000	2,098,000
Sanmina Corp. (a)	20,000	545,600
TTM Technologies, Inc. (a)	90,000	930,600
Vishay Precision Group, Inc. (a)	120,000	2,409,600
		<u>16,857,375</u>
Energy Equipment & Services (2.8%)		
Aspen Aerogels, Inc. (a)	526,550	3,233,017
Entertainment (0.2%)		
Roku, Inc., Class A (a)	3,000	262,440
Health Care Equipment & Supplies (8.3%)		
GenMark Diagnostics, Inc. (a)	1,000,000	4,120,000
Inogen, Inc. (a)	52,000	2,686,320
ViewRay, Inc. (a)	1,100,000	2,750,000
		<u>9,556,320</u>
IT Services (3.4%)		
Fastly, Inc. (a)	40,000	759,200
Limelight Networks, Inc. (a)	520,000	2,964,000
Twilio, Inc., Class A (a)	2,000	178,980
		<u>3,902,180</u>
Machinery (0.3%)		
Westinghouse Air Brake Technologies Corp.	6,000	288,780
Oil, Gas & Consumable Fuels (0.7%)		
Navigator Holdings, Ltd. (a)	180,000	802,800

Semiconductors & Semiconductor Equipment (16.8%)		
Advanced Energy Industries, Inc. (a)	30,000	1,454,700
AXT, Inc. (a)	900,000	2,889,000
Brooks Automation, Inc.	10,000	305,000
Cohu, Inc.	100,000	1,238,000
Ichor Holdings, Ltd. (a)	40,000	766,400
MACOM Technology Solutions Holdings, Inc. (a)	10,000	189,300
MaxLinear, Inc. (a)	475,000	5,543,250
MKS Instruments, Inc.	10,000	814,500
PDF Solutions, Inc. (a)(b)	232,000	2,719,040
Photronics, Inc. (a)	219,500	2,252,070
SiTime Corp. (a)	50,000	1,088,500
		<u>19,259,760</u>
Software (18.4%)		
8x8, Inc. (a)	90,000	1,247,400
Appian Corp. (a)	40,000	1,609,200
Bottomline Technologies DE, Inc. (a)	30,000	1,099,500
ChannelAdvisor Corp. (a)	410,000	2,976,600
Cornerstone OnDemand, Inc. (a)	5,000	158,750
FireEye, Inc. (a)	390,000	4,126,200
GSE Systems, Inc. (a)	24,029	22,347
Mimecast, Ltd. (a)	72,500	2,559,250
Pluralsight, Inc. (a)	250,000	2,745,000
SPS Commerce, Inc. (a)	50,000	2,325,500
Zendesk, Inc. (a)	3,000	192,030
Zuora, Inc. (a)	250,000	2,012,500
		<u>21,074,277</u>
Specialty Retail (0.6%)		
Floor & Decor Holdings, Inc. (a)	20,000	641,800
Technology Hardware, Storage & Peripherals (5.5%)		
Intevac, Inc. (a)	500,000	2,045,000
Pure Storage, Inc., Class A (a)	200,000	2,460,000
Super Micro Computer, Inc. (a)(b)	85,000	1,808,800
		<u>6,313,800</u>
Trading Companies & Distributors (0.5%)		
Air Lease Corp.	27,500	608,850
Total Common Stocks		
(Cost \$121,578,064)		<u>\$ 101,520,345</u>
Short-Term Investments (12.2%)		
Money Market Fund (12.2%)		
Dreyfus Treasury Securities Cash Management - Institutional Class 0.51% (a) (Cost \$13,940,284)	13,940,284	<u>13,940,284</u>
Total Investments (100.8%)		
(Cost \$135,518,348)		<u>115,460,629</u>
Liabilities in Excess of Other Assets (-0.8%)		<u>(896,863)</u>
Net Assets (100.0%)		<u><u>\$ 114,563,766</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 \$1,568,200.
- (c) Rate shown is the seven day yield as of March 31, 2020.

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>
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United States^	99.8%
Canada	0.0%
Switzerland	0.2%
Total	<u>100.0%</u>

^ United States allocation includes Short-Term Investment-Money Market Fund of 12.20%

Notes to Schedule of Investments (Unaudited)

March 31, 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

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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 March 31, 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⁾	\$ 89,986,304	\$ 41,957,917	\$ 101,520,345
Closed-End Funds	-	-	-
Short-Term Investments	2,607,855	506,609	13,940,284
Liabilities			
Securities Sold Short ⁽²⁾	(122,675)	(53,384)	-
Total	\$ 92,471,484	\$ 42,411,142	\$ 115,460,629

⁽¹⁾ As of March 31, 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 three months ended March 31, 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:

Security Name	Value at Dec 31, 2019	Value of Purchases	Value of Sales	Net Change in Unrealized Appreciation (Depreciation)	Net Realized Gains (Losses)	Dividend Income	Value Mar. 31, 20120	Share Balance Mar. 31, 2020
GSE Systems, Inc.	\$1,936,830	—	—	(957,889)	\$ —	—	\$978,941	1,052,625

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GSE Systems, Inc.	\$1,936,830	—	—	(957,889)	\$ —	—	\$978,941	1,052,625
