

BNY Mellon ETF Trust

SEMI-ANNUAL FINANCIALS AND OTHER INFORMATION

April 30, 2025

BNY Mellon Concentrated International ETF: BKCI

Principal U.S. Listing Exchange: NYSE Arca, Inc.

Contents

THE FUND

Please note the Semi-Annual Financials and Other Information only contains Items 7-11 required in Form N-CSR. All other required items will be filed with the Securities and Exchange Commission (the “SEC”).

Item 7. Financial Statements and Financial Highlights for Open-end Management	
Investment Companies	3
Statement of Investments	3
Statement of Assets and Liabilities	5
Statement of Operations	6
Statement of Changes in Net Assets	7
Financial Highlights	8
Notes to Financial Statements	9
Item 8. Changes in and Disagreements with Accountants for Open-End Management	
Open-End Management Investment Companies	14
Item 9. Proxy Disclosures for Open-End Management	
Investment Companies	15
Item 10. Remuneration Paid to Directors, Officers, and Others of Open-End	
Investment Companies	16
Item 11. Statement Regarding Basis for Approval of Investment	
Advisory Contract	17

Save time. Save paper. View your next shareholder report online as soon as it's available. Log into www.bny.com/investments and sign up for eCommunications. It's simple and only takes a few minutes.

The views expressed herein are current to the date of this report. These views and the composition of the fund's portfolio is subject to change at any time based on market and other conditions.

Not FDIC-Insured • Not Bank-Guaranteed • May Lose Value

Item 7. Financial Statements and Financial Highlights for Open-End Management Investment Companies

BNY Mellon Concentrated International ETF
Statement of Investments
April 30, 2025 (Unaudited)

Description	Shares	Value (\$)
Common Stocks – 96.9%		
Australia – 2.6%		
CSL Ltd.	26,465	<u>4,257,191</u>
Canada – 7.6%		
Alimentation Couche-Tard, Inc.	139,273	7,269,755
Canadian National Railway Co.	52,887	<u>5,121,822</u>
		12,391,577
Denmark – 6.5%		
Coloplast A/S, Class B	53,677	6,044,670
Novo Nordisk A/S, Class B	68,646	<u>4,532,991</u>
		10,577,661
Finland – 3.2%		
Kone OYJ, Class B	85,420	<u>5,273,855</u>
France – 14.7%		
Air Liquide SA	34,636	7,084,699
L'Oréal SA	13,990	6,133,393
LVMH Moët Hennessy Louis Vuitton SE	9,109	5,034,700
TotalEnergies SE	100,292	<u>5,812,580</u>
		24,065,372
Germany – 11.3%		
adidas AG	20,100	4,592,764
Merck KGaA	35,625	4,919,610
SAP SE	30,743	<u>8,891,380</u>
		18,403,754
Hong Kong – 3.9%		
AIA Group Ltd.	858,514	<u>6,431,438</u>
Ireland – 3.9%		
Experian PLC	129,886	<u>6,430,600</u>
Japan – 11.8%		
Daikin Industries Ltd.	26,800	3,054,315
Hoya Corp.	40,200	4,717,835
Keyence Corp.	12,800	5,357,057
Shin-Etsu Chemical Co. Ltd.	132,800	4,021,710
SMC Corp.	6,700	<u>2,177,570</u>
		19,328,487
Netherlands – 7.0%		
ASML Holding NV	8,796	5,804,346
Universal Music Group NV	191,434	<u>5,605,982</u>
		11,410,328
Singapore – 3.3%		
CapitaLand Ascendas REIT	2,680,000	<u>5,458,081</u>
Spain – 5.7%		
Amadeus IT Group SA	119,245	<u>9,345,291</u>
Switzerland – 6.1%		
Roche Holding AG	14,941	4,875,037
SGS SA	52,860	<u>5,169,757</u>
		10,044,794
Taiwan – 4.2%		
Taiwan Semiconductor Manufacturing Co. Ltd., ADR	40,996	<u>6,833,623</u>

STATEMENT OF INVESTMENTS (continued)

Description	Shares	Value (\$)
Common Stocks – 96.9% (continued)		
United Kingdom – 5.1%		
Compass Group PLC	247,267	<u>8,297,595</u>
Total Common Stocks (cost \$163,319,931)		158,549,647
Investment Companies – 2.8%		
Registered Investment Companies – 2.8%		
Dreyfus Institutional Preferred Government Money Market Fund, Institutional Shares, 4.31% ^{(a)(b)} (cost \$4,610,916)	4,610,916	<u>4,610,916</u>
Total Investments (cost \$167,930,847)	99.7%	163,160,563
Cash and Receivables (Net)	0.3%	<u>549,757</u>
Net Assets	100.0%	<u>163,710,320</u>

ADR—American Depositary Receipt

REIT—Real Estate Investment Trust

^(a) Investment in affiliated issuer. The investment objective of this investment company is publicly available and can be found within the investment company's prospectus.^(b) The rate shown is the 1-day yield as of April 30, 2025.

Holdings and transactions in these affiliated companies during the period ended April 30, 2025 are as follows:

Description	Value (\$) 10/31/24	Purchases (\$) ¹	Sales (\$)	Value (\$) 4/30/25	Dividends/ Distributions (\$)
Investment Companies – 2.8%					
Dreyfus Institutional Preferred Government Money Market Fund, Institutional Shares	4,040,537	10,202,230	(9,631,851)	4,610,916	50,611
Total – 2.8%	4,040,537	10,202,230	(9,631,851)	4,610,916	50,611

¹ Includes reinvested dividends/ distributions.

See Notes to Financial Statements

STATEMENT OF ASSETS AND LIABILITIES

April 30, 2025 (Unaudited)

	Cost	Value
Assets (\$):		
Investments in securities—See Statement of Investments:		
Unaffiliated issuers	163,319,931	158,549,647
Affiliated issuers	4,610,916	4,610,916
Cash denominated in foreign currency	123,784	123,499
Tax reclaim receivable—Note 2(b)		368,068
Dividends receivable		141,445
Receivable for investment securities sold		58,405
		<u>163,851,980</u>
Liabilities (\$):		
Due to BNY Mellon ETF Investment Adviser, LLC—Note 3(b)		83,615
Payable for investment securities purchased		58,045
		<u>141,660</u>
Net Assets (\$)		<u>163,710,320</u>
Composition of Net Assets (\$):		
Paid-in capital		168,154,117
Total distributable earnings (loss)		(4,443,797)
Net Assets (\$)		<u>163,710,320</u>
Shares outstanding no par value (unlimited shares authorized):		<u>3,350,001</u>
Net asset value per share		<u>48.87</u>
Market price per share		<u>48.92</u>

See Notes to Financial Statements

STATEMENT OF OPERATIONS
Six Months Ended April 30, 2025 (Unaudited)

Investment Income (\$):

Income:

Cash dividends (net of \$191,784 foreign taxes withheld at source):

Unaffiliated issuers

1,586,842

Affiliated issuers

50,611

Total Income

1,637,453

Expenses:

Management fee—Note 3(a)

572,497

Total Expenses

572,497

Less—reduction in fees due pursuant to undertaking—Note 3(a)

(76,332)

Net Expenses

496,165

Net Investment Income

1,141,288

Realized and Unrealized Gain (Loss) on Investments—Note 4 (\$):

Net realized gain (loss) on investments and foreign currency transactions

(1,094,914)

Net realized gain (loss) on in-kind redemptions

1,110,953

Net realized gain (loss)

16,039

Net change in unrealized appreciation (depreciation) on investments and foreign currency transactions

(5,507,556)

Net Realized and Unrealized Gain (Loss) on Investments

(5,491,517)

Net Increase (Decrease) in Net Assets Resulting from Operations

(4,350,229)

See Notes to Financial Statements

STATEMENT OF CHANGES IN NET ASSETS

	Six Months Ended	
	April 30, 2025	Year Ended
	(Unaudited)	October 31, 2024
Operations (\$):		
Net investment income	1,141,288	1,119,793
Net realized gain (loss) on investments	16,039	6,540,678
Net change in unrealized appreciation (depreciation) on investments	(5,507,556)	2,336,390
Net Increase (Decrease) in Net Assets Resulting from Operations	(4,350,229)	9,996,861
Distributions (\$):		
Distributions to shareholders	(1,162,130)	(826,298)
Beneficial Interest Transactions (\$):		
Proceeds from shares sold	22,002,917	118,958,611
Cost of shares redeemed	(7,388,057)	(42,337,709)
Transaction fees—Note 5	1,619	981
Increase (Decrease) in Net Assets from Beneficial Interest Transactions	14,616,479	76,621,883
Total Increase (Decrease) in Net Assets	9,104,120	85,792,446
Net Assets (\$):		
Beginning of Period	154,606,200	68,813,754
End of Period	163,710,320	154,606,200
Changes in Shares Outstanding:		
Shares sold	450,000	2,300,000
Shares redeemed	(150,000)	(850,000)
Net Increase (Decrease) in Shares Outstanding	300,000	1,450,000

See Notes to Financial Statements

FINANCIAL HIGHLIGHTS

	Six Months Ended April 30, 2025 (Unaudited)	Year Ended October 31,		For the Period from December 8, 2021 ^(a) to October 31, 2022
		2024	2023	
Per Share Data (\$):				
Net asset value, beginning of period	50.69	43.01	37.52	50.00
Investment Operations:				
Net investment income ^(b)	0.36	0.57	0.56	0.30
Net realized and unrealized gain (loss) on investments	(1.81)	7.47	5.12	(12.78)
Total from Investment Operations	(1.45)	8.04	5.68	(12.48)
Distributions:				
Dividends from net investment income	(0.37)	(0.36)	(0.19)	—
Transaction fees ^(b)	0.00 ^(c)	0.00 ^(c)	—	0.00 ^(c)
Net asset value, end of period	48.87	50.69	43.01	37.52
Market price, end of period	48.92	50.65	43.32	37.12
Net Asset Value Total Return (%)^(d)	(2.85)	18.73	15.14	(24.96) ^(e)
Market Price Total Return (%)^(d)	(2.67)	17.78	17.23	(25.76) ^(e)
Ratios/Supplemental Data (%):				
Ratio of total expenses to average net assets ^(f)	0.75 ^(g)	0.79	0.80	0.80 ^(g)
Ratio of net expenses to average net assets ^(f)	0.65 ^{(g),(h)}	0.76 ^(h)	0.80	0.80 ^(g)
Ratio of net investment income to average net assets	1.50 ^{(g),(h)}	1.14 ^(h)	1.23	0.82 ^(g)
Portfolio Turnover Rate ⁽ⁱ⁾	9.04	7.83	2.37	—
Net Assets, end of period (\$ x 1,000)	163,710	154,606	68,814	56,281

^(a) Commencement of operations.

^(b) Based on average shares outstanding.

^(c) Amount represents less than \$0.01 per share.

^(d) Net asset value total return is calculated assuming an initial investment made at the net asset value at the beginning of the period, reinvestment of all dividends and distributions at net asset value during the period, and redemption at net asset value on the last day of the period. Net asset value total return includes adjustments in accordance with accounting principles generally accepted in the United States of America and as such, the net asset value for financial reporting purposes and the returns based upon those net asset values may differ from the net asset value and returns for shareholder transactions. Market price total return is calculated assuming an initial investment made at the market price at the beginning of the period, reinvestment of all dividends and distributions at market price during the period, and sale at the market price on the last day of the period. Total investment returns calculated for a period of less than one year are not annualized.

^(e) The net asset value total return and the market price total return is calculated from fund inception. The inception date is the first date the fund was available on NYSE Arca, Inc.

^(f) Amounts do not include the expenses of the underlying fund.

^(g) Annualized.

^(h) Amount inclusive of reduction in expenses pursuant to undertaking.

⁽ⁱ⁾ Portfolio turnover rate is not annualized for periods less than one year, if applicable, and does not include securities received or delivered from processing creations or redemptions.

See Notes to Financial Statements

NOTES TO FINANCIAL STATEMENTS (Unaudited)

NOTE 1—Organization:

BNY Mellon Concentrated International ETF (the “fund”) is a separate non-diversified series of BNY Mellon ETF Trust (the “Trust”), which is registered as a Massachusetts business trust under the Investment Company Act of 1940, as amended (the “Act”), as an open-ended management investment company. The Trust operates as a series company currently consisting of twelve series, including the fund. The investment objective of the fund is to seek long-term total return. BNY Mellon ETF Investment Adviser, LLC (the “Adviser”), a wholly-owned subsidiary of The Bank of New York Mellon Corporation (“BNY”), serves as the fund’s investment adviser. Walter Scott & Partners Limited (the “Sub-Adviser”), an indirect wholly-owned subsidiary of BNY and an affiliate of the Adviser, serves as the fund’s sub-adviser. The Bank of New York Mellon, a subsidiary of BNY and an affiliate of the Adviser, serves as administrator, custodian and transfer agent with the Trust. BNY Mellon Securities Corporation (the “Distributor”), a wholly-owned subsidiary of the Adviser, is the distributor of the fund’s shares.

The shares of the fund are referred to herein as “Shares” or “Fund Shares.” Fund Shares are listed and traded on NYSE Arca, Inc.. The market price of each Share may differ to some degree from the fund’s net asset value (“NAV”). Unlike conventional mutual funds, the fund issues and redeems Shares on a continuous basis, at NAV, only in a large specified number of Shares, each called a “Creation Unit”. Creation Units are issued and redeemed principally in exchange for the deposit or delivery of a basket of securities. Except when aggregated in Creation Units by Authorized Participants, the Shares are not individually redeemable securities of the fund. Individual Fund Shares may only be purchased and sold on the NYSE Arca, Inc., other national securities exchanges, electronic crossing networks and other alternative trading systems through your broker-dealer at market prices. Because Fund Shares trade at market prices rather than at NAV, Fund Shares may trade at a price greater than NAV (premium) or less than NAV (discount). When buying or selling Shares in the secondary market, you may incur costs attributable to the difference between the highest price a buyer is willing to pay to purchase Shares of the fund (bid) and the lowest price a seller is willing to accept for Shares of the fund (ask).

NOTE 2—Significant Accounting Policies:

The Financial Accounting Standards Board (“FASB”) Accounting Standards Codification (“ASC”) is the exclusive reference of authoritative U.S. generally accepted accounting principles (“GAAP”) recognized by the FASB to be applied by nongovernmental entities. Rules and interpretive releases of the SEC under authority of federal laws are also sources of authoritative GAAP for SEC registrants. The fund is an investment company and applies the accounting and reporting guidance of the FASB ASC Topic 946 Financial Services-Investment Companies. The fund’s financial statements are prepared in accordance with GAAP, which may require the use of management estimates and assumptions. Actual results could differ from those estimates.

The Trust enters into contracts that contain a variety of indemnifications. The fund’s maximum exposure under these arrangements is unknown. The fund does not anticipate recognizing any loss related to these arrangements.

(a) Portfolio valuation: The fair value of a financial instrument is the amount that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date (i.e., the exit price). GAAP establishes a fair value hierarchy that prioritizes the inputs of valuation techniques used to measure fair value. This hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets or liabilities (Level 1 measurements) and the lowest priority to unobservable inputs (Level 3 measurements).

Additionally, GAAP provides guidance on determining whether the volume and activity in a market has decreased significantly and whether such a decrease in activity results in transactions that are not orderly. GAAP requires enhanced disclosures around valuation inputs and techniques used during annual and interim periods.

Various inputs are used in determining the value of the fund’s investments relating to fair value measurements. These inputs are summarized in the three broad levels listed below:

Level 1—unadjusted quoted prices in active markets for identical investments.

Level 2—other significant observable inputs (including quoted prices for similar investments, interest rates, prepayment speeds, credit risk, etc.).

Level 3—significant unobservable inputs (including the fund’s own assumptions in determining the fair value of investments).

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

Changes in valuation techniques may result in transfers in or out of an assigned level within the disclosure hierarchy. Valuation techniques used to value the fund’s investments are as follows:

The Trust’s Board of Trustees (the “Board”) has designated the Adviser as the fund’s valuation designee to make all fair value determinations with respect to the fund’s portfolio of investments, subject to the Board’s oversight and pursuant to Rule 2a-5 under the Act.

Investments in equity securities, including ETFs (but not including investments in other open-end registered investment companies), generally are valued at the last sales price on the day of valuation on the securities exchange or national securities market on which such securities primarily are traded. Securities listed on the National Association of Securities Dealers Automated Quotation System (“NASDAQ”) for which market quotations are available will be valued at the official closing price. If there are no transactions in a security, or no official closing prices for a NASDAQ market-listed security on that day, the security will be valued at the average of the most recent bid and asked prices. Bid price is used when no asked price is available. Open short positions for which there is no sale price on a given day are valued at the lowest asked price. Registered investment companies that are not traded on an exchange are valued at their net asset value. All of the preceding securities are generally categorized within Level 1 of the fair value hierarchy.

When market quotations or official closing prices are not readily available, or are determined not to reflect fair value accurately, they are valued at fair value as determined in good faith based on procedures approved by the Board. Fair value of investments may be determined by valuation designee using such information as it deems appropriate under the circumstances. Certain factors may be considered when fair valuing investments such as: fundamental analytical data, the nature and duration of restrictions on disposition, an evaluation of the forces that influence the market in which the securities are purchased and sold, and public trading in similar securities of the issuer or comparable issuers. These securities are either categorized within Level 2 or 3 of the fair value hierarchy depending on the relevant inputs used.

For securities where observable inputs are limited, assumptions about market activity and risk are used and are generally categorized within Level 3 of the fair value hierarchy.

Investments denominated in foreign currencies are translated to U.S. dollars at the prevailing rates of exchange.

The table below summarizes the inputs used as of April 30, 2025 in valuing the fund’s investments:

Fair Value Measurements

	Level 1 - Unadjusted Quoted Prices	Level 2 - Other Significant Observable Inputs	Level 3 - Significant Unobservable Inputs	Total
Assets (\$)				
Investments In Securities: [†]				
Common Stocks	158,549,647	—	—	158,549,647
Investment Companies	4,610,916	—	—	4,610,916
	163,160,563	—	—	163,160,563

[†] See Statement of Investments for additional detailed categorizations, if any.

(b) Foreign currency transactions: The fund does not isolate that portion of the results of operations resulting from changes in foreign exchange rates on investments from the fluctuations arising from changes in the market prices of securities held. Such fluctuations are included with the net realized and unrealized gain or loss on investments.

Net realized foreign exchange gains or losses arise from sales of foreign currencies, currency gains or losses realized on securities transactions between trade and settlement date, and the difference between the amounts of dividends, interest and foreign withholding taxes recorded on the fund’s books and the U.S. dollar equivalent of the amounts actually received or paid. Net unrealized foreign exchange gains and losses arise from changes in the value of assets and liabilities other than investments resulting from changes in exchange rates. Foreign currency gains and losses on foreign currency transactions are also included with net realized and unrealized gain or loss on investments.

Foreign Taxes: The fund may be subject to foreign taxes (a portion of which may be reclaimable) on income, stock dividends, realized and unrealized capital gains on investments or certain foreign currency transactions. Foreign taxes are recorded in accordance with the applicable foreign tax regulations and rates that exist in the foreign jurisdictions in which the fund invests. These foreign taxes, if any, are paid by the fund and are reflected in the Statement of Operations, if applicable. Foreign taxes payable or deferred or those subject to reclaims as of April 30, 2025, if any, are disclosed in the fund’s Statement of Assets and Liabilities.

(c) Securities transactions and investment income: Securities transactions are recorded on a trade date basis. Realized gains and losses from securities transactions are recorded on the identified cost basis. Dividend income is recognized on the ex-dividend date and interest income, including, where applicable, accretion of discount and amortization of premium on investments, is recognized on the accrual basis.

(d) Affiliated issuers: Investments in other investment companies advised by the Adviser or its affiliates are defined as “affiliated” under the Act.

(e) Market Risk: The value of the securities in which the fund invests may be affected by political, regulatory, economic and social developments, and developments that impact specific economic sectors, industries or segments of the market. In addition, turbulence in financial markets and reduced liquidity in equity, credit and/or fixed income markets may negatively affect many issuers, which could adversely affect the fund. Global economies and financial markets are becoming increasingly interconnected, and conditions and events in one country, region or financial market may adversely impact issuers in a different country, region or financial market. These risks may be magnified if certain events or developments adversely interrupt the global supply chain; in these and other circumstances, such risks might affect companies world-wide.

Foreign Investment Risk: Because the fund invests in foreign securities, the fund's performance will be influenced by political, social and economic factors affecting investments in foreign issuers. Special risks associated with investments in foreign issuers include exposure to currency fluctuations, less liquidity, less developed or less efficient trading markets, lack of comprehensive company information, political and economic instability and differing auditing and legal standards. The imposition of sanctions, confiscations, trade restrictions (including tariffs) and other government restrictions by the United States and other governments, or problems in share registration, settlement or custody, may result in losses for the fund. Investments denominated in foreign currencies are subject to the risk that such currencies will decline in value relative to the U.S. dollar and affect the value of these investments held by the fund. To the extent securities held by the fund trade in a market that is closed when the exchange on which the fund's shares trade is open, there may be deviations between the current price of a security and the last quoted price for the security in the closed foreign market. These deviations could result in the fund experiencing premiums or discounts greater than those of ETFs that invest in domestic securities. To the extent the fund's investments are focused in a limited number of foreign countries, the fund's performance could be more volatile than that of more geographically diversified funds.

Non-Diversification Risk: The fund is non-diversified, which means that the fund may invest a relatively high percentage of its assets in a limited number of issuers. Therefore, the fund's performance may be more vulnerable to changes in the market value of a single issuer or group of issuers and more susceptible to risks associated with a single economic, political or regulatory occurrence than a diversified fund.

Authorized Participants, Market Makers and Liquidity Providers Risk: The fund has a limited number of financial institutions that may act as Authorized Participants, which are responsible for the creation and redemption activity for the fund. In addition, there may be a limited number of market makers and/or liquidity providers in the marketplace. To the extent either of the following events occur, fund shares may trade at a material discount to net asset value and possibly face delisting: (i) Authorized Participants exit the business or otherwise become unable to process creation and/or redemption orders and no other Authorized Participants step forward to perform these services, or (ii) market makers and/or liquidity providers exit the business or significantly reduce their business activities and no other entities step forward to perform their functions.

(f) Dividends and distributions to shareholders: Dividends and distributions are recorded on the ex-dividend date. Dividends from net investment income and dividends from net realized capital gains, if any, are normally declared and paid annually, but the fund may make distributions on a more frequent basis to comply with the distribution requirements of the Internal Revenue Code of 1986, as amended (the "Code"). To the extent that net realized capital gains can be offset by capital loss carryovers of a fund, it is the policy of the fund not to distribute such gains. Income and capital gain distributions are determined in accordance with income tax regulations, which may differ from GAAP.

(g) Federal income taxes: It is the policy of the fund to continue to qualify as a regulated investment company, if such qualification is in the best interests of its shareholders, by complying with the applicable provisions of the Code, and to make distributions of taxable income and net realized capital gain sufficient to relieve it from substantially all federal income and excise taxes.

As of and during the period ended April 30, 2025, the fund did not have any liabilities for any uncertain tax positions. The fund recognizes interest and penalties, if any, related to uncertain tax positions as income tax expense in the Statement of Operations. During the period ended April 30, 2025, the fund did not incur any interest or penalties.

Each tax year in the three-year period ended October 31, 2024 remains subject to examination by the Internal Revenue Service and state taxing authorities.

The fund is permitted to carry forward capital losses for an unlimited period. Furthermore, capital loss carryovers retain their character as either short-term or long-term capital losses.

The fund has an unused capital loss carryover of \$753,390 available for federal income tax purposes to be applied against future net realized capital gains, if any, realized subsequent to October 31, 2024. These long-term capital losses can be carried forward for an unlimited period.

The tax character of distributions paid to shareholders during the fiscal year ended October 31, 2024 were as follows: ordinary income \$826,298. The tax character of current year distributions will be determined at the end of the current fiscal year.

(g) Operating Segment Reporting: In this reporting period, the fund adopted FASB Accounting Standards Update 2023-07, Segment Reporting (Topic 280) - Improvements to Reportable Segment Disclosures (“ASU 2023-07”). Adoption of the new standard impacted financial statement disclosures only and did not affect the fund’s financial position or the results of its operations. The ASU 2023-07 is effective for public entities for fiscal years beginning after December 15, 2023, and requires retrospective application for all prior periods presented within the financial statements.

Since its commencement, the fund operates and is managed as a single reportable segment deriving returns in the form of dividends, interest and/or gains from the investments made in pursuit of its single stated investment objective as outlined in the fund’s prospectus. The accounting policies of the fund are consistent with those described in these Notes to the Financial Statements. The chief operating decision maker (“CODM”) is represented by BNY Investments, the management of the fund’s adviser, comprising of Senior management and Directors. The CODM considers net increase in net assets resulting from operations in deciding whether to purchase additional investments or to make distributions to its shareholders. Detailed financial information for the fund is disclosed within these financial statements with total assets and liabilities disclosed on the statement of assets and liabilities, investments held on the statement of Investments, results of operations and significant segment expenses on the statement of operations and other information about the fund’s performance, including total return, portfolio turnover and ratios within the financial highlights.

NOTE 3—Management Fee, Sub-Advisory Fee and Other Transactions with Affiliates:

(a) Pursuant to a management agreement with the Adviser, the management fee is computed at an annual rate of 0.75% of the value of the fund’s average daily net assets and is payable monthly. The fund’s management agreement provides that the Adviser pays substantially all expenses of the fund, except for the management fees, payments under the fund’s 12b-1 plan (if any), interest expenses, taxes, acquired fund fees and expenses, brokerage commissions, costs of holding shareholder meetings, fees and expenses associated with the fund’s securities lending program, and litigation and potential litigation and other extraordinary expenses not incurred in the ordinary course of the fund’s business.

The Adviser may from time to time voluntarily waive and/or reimburse fees or expenses in order to limit total annual fund operating expenses. Any such voluntary waiver or reimbursement may be eliminated by the Adviser at any time. During the period ended April 30, 2025, there was no reduction in expenses pursuant to the undertaking.

In addition, the Adviser has contractually agreed, from November 1, 2024 through March 1, 2026, to assume the direct expenses of the fund so that the fund’s total annual operating expenses (including acquired fund fees and expenses (if any)) (excluding payments under the fund’s 12b-1 plan (if any), taxes, brokerage commissions, costs of holding shareholder meetings, fees and expenses associated with any securities lending program adopted by the fund, and litigation and potential litigation and other extraordinary expenses not incurred in the ordinary course of the fund’s business) do not exceed 0.65% of the fund’s average daily net assets. Prior to March 1, 2026, this expense limitation agreement may only be terminated by the fund’s Board. On or after March 1, 2026, the Adviser terminate this expense limitation agreement at any time. The reduction in expenses pursuant to the undertaking amounted to \$76,332 during the period ended April 30, 2025.

Pursuant to a sub-investment advisory agreement between the Adviser and the Sub-Adviser, the Sub-Adviser serves as the fund’s sub-adviser responsible for the day-to-day management of the fund’s portfolio. The Adviser pays the Sub-Adviser a monthly fee at an annual percentage of the value of the fund’s average daily net assets. The Adviser has obtained an exemptive order from the SEC (the “Order”), upon which the fund may rely, to use a manager of managers approach that permits the Adviser, subject to certain conditions and approval by the Board, to enter into and materially amend sub-investment advisory agreements with one or more sub-advisers who are either unaffiliated or affiliated with the Adviser without obtaining shareholder approval. The Order also relieves the fund from disclosing the sub-advisory fee paid by the Adviser to a Sub-Adviser in documents filed with the SEC and provided to shareholders. In addition, pursuant to the Order, it is not necessary to disclose the sub-advisory fee payable by the Adviser separately to a Sub-Adviser that is a wholly-owned subsidiary (as defined in the 1940 Act) of BNY in documents filed with the SEC and provided to shareholders; such fees are to be aggregated with fees payable to the Adviser. The Adviser has ultimate responsibility (subject to oversight by the Board) to supervise any Sub-Adviser and recommend the hiring, termination, and replacement of any Sub-Adviser to the Board.

Pursuant to a sub-investment advisory agreement between the Adviser and the Sub-Adviser, the Adviser pays the Sub-Adviser a monthly fee at an annual rate of 0.375% of the value of the fund’s average daily net assets. The Adviser, and not the fund, pays the Sub-Adviser fee rate.

(b) The fund has an arrangement with The Bank of New York Mellon (the “Custodian”), a subsidiary of BNY and an affiliate of the Adviser, whereby the fund will receive interest income or be charged overdraft fees when cash balances are maintained. For financial reporting purposes, the fund includes this interest income and overdraft fees, if any, as interest income in the Statement of Operations.

The components of “Due to BNY Mellon ETF Investment Adviser, LLC” in the Statement of Assets and Liabilities consist of: Management fee of \$83,615.

(c) Each Board member serves as a Board member of each fund within the Trust. The Board members are not compensated directly by the fund. The Board members are paid by the Adviser from the unitary management fees paid to the Adviser by the funds within the Trust, including the fund.

NOTE 4—Securities Transactions:

The aggregate amount of purchases and sales of investment securities, excluding short-term securities and in-kind transactions, if any, during the period ended April 30, 2025, amounted to \$13,821,120 and \$13,852,991, respectively.

At April 30, 2025, accumulated net unrealized depreciation on investments was \$4,770,284, consisting of gross appreciation of \$10,105,774 and gross depreciation of \$14,876,058.

At April 30, 2025, the cost of investments for federal income tax purposes was substantially the same as the cost for financial reporting purposes (see the Statement of Investments).

NOTE 5—Shareholder Transactions:

The fund issues and redeems its shares on a continuous basis, at NAV, to certain institutional investors known as “Authorized Participants” (typically market makers or other broker-dealers) only in a large specified number of shares called a Creation Unit. Except when aggregated in Creation Units, shares of the fund are not redeemable. The value of the fund is determined once each business day. The Creation Unit size for the fund may change. Authorized Participants will be notified of such change. Creation Unit transactions may be made in-kind, for cash, or for a combination of securities and cash. The principal consideration for creations and redemptions for the fund is in-kind, although this may be revised at any time without notice. The Trust issues and sells shares of the fund only: in Creation Units on a continuous basis through the Distributor, without a sales load, at their NAV per share determined after receipt of an order, on any Business Day, in proper form pursuant to the terms of the Authorized Participant Agreement. Transactions in capital shares for the fund are disclosed in detail in the Statement of Changes in Net Assets. The consideration for the purchase of Creation Units of the fund may consist of the in-kind deposit of a designated portfolio of securities and a specified amount of cash. Investors purchasing and redeeming Creation Units may pay a purchase transaction fee and a redemption transaction fee directly to the Trust and/or custodian to offset transfer and other transaction costs associated with the issuance and redemption of Creation Units, including Creation Units for cash. The Adviser or its affiliates (the “Selling Shareholder”) may purchase Creation Units through a broker-dealer to “seed” (in whole or in part) funds as they are launched or may purchase shares from broker-dealers or other investors that have previously provided “seed” for funds when they were launched or otherwise in secondary market transactions. Because the Selling Shareholder may be deemed an affiliate of such funds, the fund shares are being registered to permit the resale of these shares from time to time after purchase. The fund will not receive any of the proceeds from resale by the Selling Shareholders of these fund shares. An additional variable fee may be charged for certain transactions. Such variable charges, if any, are included in “Transaction fees” on the Statement of Changes in Net Assets.

In-kind Redemptions: For financial reporting purposes, in-kind redemptions are treated as sales of securities resulting in realized capital gains or losses to the fund. Because such gains or losses are not taxable to the fund and are not distributed to existing fund shareholders, the gains or losses are reclassified from accumulated net realized gain (loss) to paid-in capital at the end of the fund’s tax year. These reclassifications have no effect on net assets or net asset value per share. During the period ended April 30, 2025, the fund had in-kind transactions associated with creations of \$21,136,740 and redemptions of \$7,339,289.

Item 8. Changes in and Disagreements with Accountants for Open-End Management Investment Companies (Unaudited)

N/A

Item 9. Proxy Disclosures for Open-End Management Investment Companies (Unaudited)

N/A

Item 10. Remuneration Paid to Directors, Officers, and Others of Open-End Investment Companies (Unaudited)

Each board member serves as a Board member of each fund within the Trust and BNY Mellon ETF Trust II. The Board members are not compensated directly by the fund. The Board members are paid by the Adviser from the unitary management fees paid to the Adviser by the funds within the Trust and BNY Mellon ETF Trust II, including the fund.

Item 11. Statement Regarding Basis for Approval of Investment Advisory Contract (Unaudited)

N/A

This page is intentionally left blank.

This page is intentionally left blank.

