BNY Mellon ETF Trust

BNY Mellon Sustainable International Equity ETF

ANNUAL REPORT October 31, 2023

BNY MELLON
INVESTMENT MANAGEMENT

Contents

THE FUND

Save time. Save paper. View your next shareholder report online as soon as it's available. Log into www.im.bnymellon.com 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.

For the period from November 1, 2022, through October 31, 2023, as provided by Julianne D. McHugh and Nick Pope, Portfolio Managers employed by the fund's sub-adviser, Newton Investment Management Limited.

Market and Fund Performance Overview

For the 12-month period ended October 31, 2023, the BNY Mellon Sustainable International Equity ETF (the "fund") produced a total return of 9.26% at net asset value.[1] In comparison, the fund's benchmark, the MSCI EAFE® Index (the "Index"), produced a total return of 14.40% for the same period.[2]

International markets gained ground during the reporting period as central bank rate hikes showed progress in slowing inflation rates; the Chinese economy reopened after the government rescinded its "zero-COVID-19" policy; and the U.S. dollar weakened relative to most international currencies. The fund underperformed the Index largely due to disappointing stock selections in several sectors, as well as overweight exposure to the lagging health care sector.

The Fund's Investment Approach

The fund seeks long-term capital appreciation. To pursue its goal, the fund normally invests at least 80% of its net assets (plus the amount of any borrowings for investment purposes) in equity securities of foreign companies that demonstrate attractive investment attributes and sustainable business practices. The fund considers a foreign company to be a company organized or with its principal place of business in, or that has a majority of its assets or business in, or whose securities are primarily listed or traded on exchanges in, a country outside the United States. The fund's sub-adviser, Newton Investment Management Limited ("NIM"), an affiliate of the BNY Mellon ETF Investment Adviser, LLC, considers a company to be engaged in "sustainable business practices" if the company engages in business practices that are, in NIM's view, sustainable in an economic sense (i.e., the company's strategy, operations and finances are stable and durable) and takes appropriate measures to manage any material consequences or impact of its policies and operations in relation to environmental, social and governance (ESG) matters (e.g., the company's environmental footprint, labor standards, board structure, etc.). Companies engaged in sustainable business practices also may include companies that have committed explicitly to improving their environmental and/or social impacts that will lead to a transformation of their business models.

Equities Gain Ground as Inflation Eases

International equities climbed during the reporting period as interest-rate hikes implemented by central banks gained traction in the fight against rampant inflation. In October 2022, just prior to the start of the reporting period, inflation in the 20-member eurozone averaged 10.60%, its highest level since the eurozone group was established in 1999. The European Central Bank raised its fixed benchmark rate from 0.75% to

1.50% on November 2, 2022, followed by seven additional increases to a range of 4.00% to 4.50% as of September 20, 2023. Inflation appeared to respond, declining to 4.30% as of September 2023. Eurozone economic growth rates declined as well, dipping into slightly negative territory near the end of the period, but remained positive on average for the period as a whole. Similar trends in the United States and elsewhere encouraged hopes that inflation might be tamed without prompting a major global recession. International markets were further buoyed by the Chinese government's decision in December 2022 to end its "zero-COVID-19" strategy, which had resulted in lockdowns that slowed Chinese economic growth and disrupted global supply chains, with negative effects felt throughout the world's economies. Although Chinese economic growth remained sluggish in the aftermath of the lockdowns, exacerbated by restrictive government and regulatory policies, investors continued to anticipate an eventual return to the more rapid pre-pandemic growth patterns. International equities, particularly those denominated in U.S. dollars, also benefited from a weakening U.S. dollar relative to most international currencies. The U.S. dollar weakened during the first half of the period as U.S. inflation moderated, and the U.S. Federal Reserve (the "Fed") appeared to near the end of its current rate-hike cycle.

Markets lost ground during the final three months of the period in the face of several developments, including renewed oil price increases and technical dynamics, such as substantial government bond issuance meeting reduced interest from several major international buyers. Arguably more significant was the growing realization that U.S. interest rates would stay 'higher for longer,' as the Fed had been suggesting for some time, given the continuing resilience of the U.S. economy. In stark contrast to the United States, China announced a stream of stimulus initiatives designed to stabilize its economy. Geopolitical risk also undermined sentiment toward the end of the period as armed conflict erupted in the Middle East.

Stock Selections Detract from Relative Returns

Stock selection weighed heavily on performance relative to the Index in the health care and utilities sectors and, to a lesser degree, financials and materials. Overweight exposure to the lagging health care sector further undermined relative returns. Among significant individual detractors, shares in Denmark-based renewable energy utility Orsted A/S declined, as investors reacted negatively to the cost-related suspension of a UK offshore wind project by a Swedish peer. Shares subsequently fell sharply after the company announced that it may have to write down the value of its U.S. portfolio, with management pointing to the impact of supplier delays in offshore wind projects. Shares in Switzerland-based health care products provider Lonza Group AG lost ground on the surprise announcement that the company's CEO would be stepping down at the end of September 2023. Further share-price weakness ensued as the business introduced new mid-term targets, and management issued underwhelming guidance for 2024 margins following the termination of an agreement with Moderna. The fund continued to hold its position given our view of the attractive opportunity in outsourced drug manufacturing represented by the company.

Conversely, stock selections bolstered the fund's relative performance in communication services, consumer discretionary and industrials. From an allocation perspective, the fund benefited from lack of exposure to real estate against a backdrop of rising interest rates. Several holdings benefited from Artificial Intelligence ("AI")-driven momentum in the semiconductor space, amid strengthening demand related to generative AI and large language models. Taiwan Semiconductor Manufacturing Co. Ltd., which manufactures semiconductors for AI industry leaders, contributed positively to the fund's performance. In other areas, shares in Spain-based fashion retailer Industria de Diseño Textil SA ("Inditex") rose on the company's robust performance across brands and geographies. Investors took additional encouragement from the Inditex's differentiated business model and strong trading momentum.

Maintaining Conviction Despite Macroeconomic Challenges

If prevailing expectations of interest rates remaining higher for longer than previously expected are borne out, we expect the associated higher cost of capital to negatively affect valuations across asset classes. However, structural demand trends remain in place as several global transitions continue, supported in some cases by government stimulus and support. Against this backdrop, we continue to seek out businesses with attractive sustainability credentials, durable returns and quality characteristics leveraged to emerging needs and demands.

As of October 31, 2023, the fund holds its largest overweight position relative to the Index in information technology. We see strong potential given the sector's exposure to rapid developments in AI and the potential for our "internet of things" and "smart everything" investment themes. The fund also emphasizes the health care sector, targeting companies offering best-in-class and innovative products, services and solutions to serve the needs and tastes of an aging global population. Conversely, the fund holds relatively underweight exposure to the consumer discretionary sector, with zero exposure to the automobiles & components subsector, reflecting our caution regarding the health of a consumer strained by higher interest rates, particularly with regard to big-ticket spending. The fund also maintains underweight exposure to financials, driven by the fund's positioning in banks where we find few compelling sustainable stories. Indeed, the Fund's bank holdings are limited to India's HDFC Bank Ltd. and Indonesia's Bank Rakyat Indonesia (Persero) Tbk PT, businesses where we see significant social benefit from the provision of financial access and security. The fund also holds zero exposure to energy, given the lack of business characteristics in the sector consistent with the portfolio's sustainable mandate.

November 15, 2023

[1] *Total return includes reinvestment of dividends and any capital gains paid. A fund's net asset value (NAV) is the sum of all its assets less any liabilities, divided by the number of shares outstanding. Exchange-Traded Funds ("ETFs") are bought and sold at market prices, not NAV, therefore an investor's return at market price may differ from NAV. Past performance is no guarantee of future results. Share price, yield and investment return fluctuate such that upon redemption, fund shares may be worth more or less than their original cost.*

[2] *Source: Lipper Inc. — The MSCI EAFE® Index (Europe, Australasia, Far East) is a free float-adjusted, market capitalization-weighted index that is designed to measure the equity market performance of developed markets, excluding the U.S. and Canada. It reflects reinvestment of net dividends and, where applicable, capital gain distributions. Investors cannot invest directly in any index.*

ETF shares are listed on an exchange, and shares are generally purchased and sold in the secondary market at market price. At times, the market price may be at a premium or discount to the ETF's per share NAV. In addition, ETFs are subject to the risk that an active trading market for an ETF's shares may not develop or be maintained. Buying or selling ETF shares on an exchange may require payment of brokerage commissions.

The fund may, but is not required to, use derivative instruments. A small investment in derivatives could have a potentially large impact on the fund's performance. The use of derivatives involves risks different from, or possibly greater than, the risks associated with investing directly in the underlying assets.

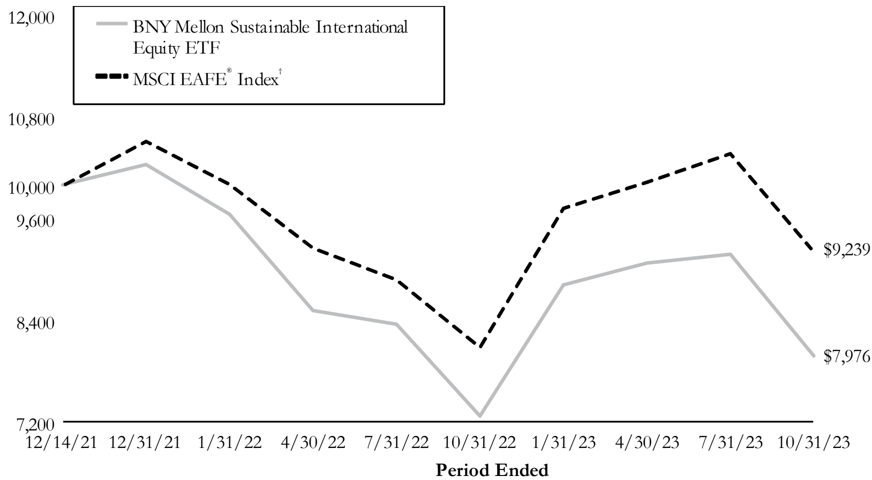
Equities are subject generally to market, market sector, market liquidity, issuer and investment style risks, among other factors, to varying degrees, all of which are more fully described in the fund's prospectus.

Investing internationally involves special risks, including changes in currency exchange rates, political, economic and social instability, a lack of comprehensive company information, differing auditing and legal standards and less market liquidity. These risks generally are greater with emerging-markets countries than with more economically and politically established foreign countries.

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.

Environmental, social and governance (ESG) managers may take into consideration factors beyond traditional financial information to select securities, which could result in relative investment performance deviating from other strategies or broad market benchmarks, depending on whether such sectors or investments are in or out of favor in the market. Further, ESG strategies may rely on certain values-based criteria to eliminate exposures found in similar strategies or broad market benchmarks, which could also result in relative investment performance deviating.

FUND PERFORMANCE (Unaudited)



Comparison of change in value of a $10,000 investment in BNY Mellon Sustainable International Equity ETF with a hypothetical investment of $10,000 in the MSCI EAFE® Index (the "Index").

Average Annual Total Returns as of October 31, 2023

	Inception Date††	1 Year	From Inception
BNY Mellon Sustainable International Equity ETF			
Net Asset Value Return	12/14/21	9.26%	(20.86)%
Market Price Return	12/14/21	9.78%	(20.26)%
MSCI EAFE® Index	12/14/21	14.40%	(7.61)%

† *Source: Lipper Inc.*

†† *The inception date is the first date the fund was available on NYSE Arca, Inc.*

Past performance is not predictive of future performance.

The above graph compares a hypothetical $10,000 investment made in BNY Mellon Sustainable International Equity ETF on 12/14/21 to a hypothetical investment of $10,000 made in the Index on that date using closing market price return. All dividends and capital gain distributions are reinvested.

The fund's performance shown in the line graph above takes into account all applicable fees and expenses. The Index (Europe, Australasia, Far East) is a free float-adjusted, market capitalization-weighted index that is designed to measure the equity market performance of developed markets, excluding the U.S. and Canada. It reflects reinvestment of net dividends and, where applicable, capital gain distributions. Investors cannot invest directly in any index.

Further information relating to fund performance, including expense reimbursements, if applicable, is contained in the Financial Highlight section of the prospectus and elsewhere in this report.

The performance data quoted represents past performance, which is no guarantee of future results. Share price and investment return fluctuate and an investor's shares may be worth more or less than original cost upon redemption. Current performance may be lower or higher than the performance quoted. Go to www.im.bnymellon.com for the fund's most recent month-end returns.

The fund's performance shown in the graph and table does not reflect the deduction of taxes that a shareholder would pay on fund distributions or the redemption of fund shares.

As a shareholder of the fund, you pay ongoing expenses, such as management fees and other expenses. Using the information below, you can estimate how these expenses affect your investment and compare them with the expenses of other funds. For more information, see your fund's prospectus or talk to your financial adviser.

Actual Expenses

The table below shows the expenses you would have paid on a $1,000 investment in the fund from May 1, 2023 to October 31, 2023. The information under each column in the table below entitled "Actual" provides information about on how much a $1,000 investment would be worth at the close of the period, assuming net asset value total returns and actual expenses. You may use the information in these columns, together with the amount you invested, to estimate the expenses that you paid over the period. Simply divide your account value by $1,000 (for example, an $8,600 account value divided by $1,000 = 8.6), then multiply the result by the number for the fund under the heading entitled "Expenses paid for the period" to estimate the expenses you paid on your account during this period.

Hypothetical Example For Comparison Purposes

The Securities and Exchange Commission ("SEC") has established guidelines to help investors assess fund expenses. The information under each column in the table entitled "Hypothetical" provides information about hypothetical account values and hypothetical expenses based on the fund's actual expense ratio and assuming a hypothetical 5% annualized return, which is not the fund's actual return. The hypothetical account values and expenses may not be used to estimate the actual ending account balance or expenses you paid for the period. You may use this information to compare the ongoing expenses (but not transaction expenses or total cost) of investing in the fund with those of other funds. To do so, compare this 5% hypothetical example with the 5% hypothetical examples that appear in the shareholder reports of the other funds.

Please note that the expenses shown in the table are meant to highlight your ongoing costs only and do not reflect any transactional costs, such as brokerage commissions paid on purchases and sales of fund shares. Therefore, the ending account values and expenses paid for the period in the table are useful in comparing ongoing expenses (but not transaction expenses or total cost) of investing in the fund with those of other funds. In addition, if these transactional costs were included, your costs would have been higher.

For the six months ended October 31, 2023

Beginning account value ($)		Ending account value($)		Expense paid for the period ($)		Annualized expense ratios for the period (%)
Actual	Hypothetical	Actual	Hypothetical	Actual[(a)]	Hypothetical[(a)]	
1,000.00	1,000.00	877.50	1,021.68	3.31	3.57	0.70

(a) *Expenses are calculated using the annualized expense ratio, which represents the ongoing expenses as a percentage of net assets for the six-month period ended October 31, 2023. Expenses are calculated by multiplying the fund's annualized expense ratio by the average account value for the period, then multiplying the result by 184/365 (to reflect the one-half period).*

STATEMENT OF INVESTMENTS
October 31, 2023

Description	Shares	Value ($)
Common Stocks – 97.7%		
Australia – 1.7%		
CSL Ltd.	920	**135,600**
China – 1.5%		
Ping An Insurance Group Co. of China Ltd., Class H	23,000	**117,862**
Denmark – 6.4%		
CHR Hansen Holding A/S	3,193	217,506
Novo Nordisk A/S, Class B	1,708	163,929
Orsted A/S[(a)]	2,467	118,843
		500,278
Finland – 1.1%		
Neste OYJ	2,476	**83,076**
France – 13.6%		
Capgemini SE	708	124,731
Cie de Saint-Gobain SA	2,212	120,303
Hermes International SCA	63	117,295
Legrand SA	2,293	197,689
L'Oreal SA	720	301,800
Sanofi SA	2,278	206,567
		1,068,385
Germany – 7.6%		
Infineon Technologies AG	6,313	183,527
RWE AG	2,827	108,074
SAP SE	2,240	300,392
		591,993
Hong Kong – 5.1%		
AIA Group Ltd.	27,804	241,079
Prudential PLC	15,052	156,934
		398,013
India – 2.8%		
HDFC Bank Ltd.	12,502	**221,709**
Indonesia – 2.2%		
Bank Rakyat Indonesia (Persero) Tbk PT	549,200	**171,485**
Ireland – 3.9%		
ICON PLC[(b)]	741	180,775
Smurfit Kappa Group PLC	3,845	125,434
		306,209
Japan – 9.3%		
Seven & i Holdings Co. Ltd.	2,100	76,103
Sony Group Corp.	2,900	237,720
Suntory Beverage & Food Ltd.	4,500	132,944

Description	Shares	Value ($)
Common Stocks – 97.7% (continued)		
Japan – 9.3% (continued)		
Topcon Corp.	12,200	109,585
Toyota Industries Corp.	2,400	175,042
		731,394
Netherlands – 9.4%		
ASML Holding NV	494	295,483
Universal Music Group NV	7,221	176,497
Wolters Kluwer NV	2,099	268,957
		740,937
South Korea – 1.1%		
Samsung SDI Co. Ltd.	271	**85,380**
Spain – 3.6%		
Industria de Diseno Textil SA	8,109	**279,283**
Switzerland – 7.5%		
Lonza Group AG	386	134,431
Roche Holding AG	929	238,824
Zurich Insurance Group AG	456	215,856
		589,111
Taiwan – 3.3%		
Taiwan Semiconductor Manufacturing Co. Ltd.	16,004	**261,018**
United Kingdom – 17.6%		
Ashtead Group PLC	3,781	216,178
AstraZeneca PLC	2,568	319,931
Bunzl PLC	4,479	159,618
Croda International PLC	1,837	97,751
Genus PLC	2,932	76,192
Informa PLC	24,488	211,801
RELX PLC	8,459	294,560
		1,376,031
Total Investments (cost $9,038,362)	**97.7%**	**7,657,764**
Cash and Receivables (Net)	**2.3%**	**182,646**
Net Assets	**100.0%**	**7,840,410**

(a) *Security exempt from registration pursuant to Rule 144A under the Securities Act of 1933. These securities may be resold in transactions exempt from registration, normally to qualified institutional buyers. At October 31, 2023, these securities were valued at $118,843 or 1.52% of net assets.*

(b) *Non-income producing security.*

Portfolio Summary (Unaudited)†	Value (%)
Health Care	18.5
Industrials	18.2
Information Technology	17.4
Financials	14.4
Consumer Discretionary	8.1
Consumer Staples	6.6
Materials	5.6
Communication Services	4.9
Utilities	2.9
Energy	1.1
	97.7

† *Based on net assets.*

See Notes to Financial Statements

STATEMENT OF ASSETS AND LIABILITIES
October 31, 2023

	Cost	Value
Assets ($):		
Investments in securities—See Statement of Investments:		
Unaffiliated issuers	9,038,362	7,657,764
Cash		154,605
Cash denominated in foreign currency	6,381	6,371
Tax reclaim receivable—Note 2(b)		18,223
Dividends receivable		8,185
		7,845,148
Liabilities ($):		
Due to BNY Mellon ETF Investment Adviser, LLC—Note 3(b)		4,738
		4,738
Net Assets ($)		**7,840,410**
Composition of Net Assets ($):		
Paid-in capital		10,002,050
Total distributable earnings (loss)		(2,161,640)
Net Assets ($)		**7,840,410**
Shares outstanding no par value (unlimited shares authorized):		200,001
Net asset value per share		39.20
Market price per share		39.50

See Notes to Financial Statements

STATEMENT OF OPERATIONS
Year Ended October 31, 2023

Investment Income ($):	
Income:	
Cash dividends (net of $22,521 foreign taxes withheld at source):	
Unaffiliated issuers	158,478
Total Income	**158,478**
Expenses:	
Management fee—Note 3(a)	59,516
Total Expenses	**59,516**
Net Investment Income	**98,962**
Realized and Unrealized Gain (Loss) on Investments—Note 4 ($):	
Net realized gain (loss) on investments and foreign currency transactions	(421,011)
Net change in unrealized appreciation (depreciation) on investments and foreign currency transactions	993,457
Net Realized and Unrealized Gain (Loss) on Investments	**572,446**
Net Increase (Decrease) in Net Assets Resulting from Operations	**671,408**

See Notes to Financial Statements

	Year Ended October 31, 2023	For the Period from December 15, 2021[a] to October 31, 2022
Operations ($):		
Net investment income	98,962	82,414
Net realized gain (loss) on investments	(421,011)	(465,494)
Net change in unrealized appreciation (depreciation) on investments	993,457	(2,374,154)
Net Increase (Decrease) in Net Assets Resulting from Operations	**671,408**	**(2,757,234)**
Distributions ($):		
Distributions to shareholders	(70,462)	(5,352)
Beneficial Interest Transactions ($):		
Proceeds from shares sold	—	10,000,050
Transaction fees—Note 5	—	2,000
Increase (Decrease) in Net Assets from Beneficial Interest Transactions	**—**	**10,002,050**
Total Increase (Decrease) in Net Assets	**600,946**	**7,239,464**
Net Assets ($):		
Beginning of Period	7,239,464	—
End of Period	**7,840,410**	**7,239,464**
Changes in Shares Outstanding:		
Shares sold	—	200,001
Net Increase (Decrease) in Shares Outstanding	**—**	**200,001**

[a] Commencement of operations.

See Notes to Financial Statements

The following table describes the performance for the fiscal periods indicated and these figures have been derived from the fund's financial statements.

	Year Ended October 31, 2023	For the Period from December 15, 2021[a] to October 31, 2022
Per Share Data ($):		
Net asset value, beginning of period	36.20	50.00
Investment Operations:		
Net investment income[b]	0.49	0.41
Net realized and unrealized gain (loss) on investments	2.86	(14.19)
Total from Investment Operations	3.35	(13.78)
Distributions:		
Dividends from net investment income	(0.35)	(0.03)
Transaction fees[b]	—	0.01
Net asset value, end of period	39.20	36.20
Market price, end of period	39.50	36.30
Net Asset Value Total Return (%)[c]	9.26	(27.57)[d]
Market Price Total Return (%)[c]	9.78	(27.36)[d]
Ratios/Supplemental Data (%):		
Ratio of total expenses to average net assets	0.70	0.70[e]
Ratio of net investment income to average net assets	1.16	1.10[e]
Portfolio Turnover Rate[f]	13.19	27.08
Net Assets, end of period ($ x 1,000)	7,840	7,239

(a) Commencement of operations.

(b) Based on average shares outstanding.

(c) 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.

(d) 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.

(e) Annualized.

(f) 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

NOTE 1—Organization:

BNY Mellon Sustainable International Equity 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 sixteen series, including the fund. The investment objective of the fund is to seek long-term capital appreciation. BNY Mellon ETF Investment Adviser, LLC (the "Adviser"), a wholly-owned subsidiary of The Bank of New York Mellon Corporation ("BNY Mellon"), serves as the fund's investment adviser. Newton Investment Management Limited (the "Sub-Adviser" or "NIM"), an indirect wholly-owned subsidiary of BNY Mellon and an affiliate of the Adviser, serves as the fund's sub-adviser. The Bank of New York Mellon, a subsidiary of BNY Mellon 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.

Effective May 31, 2023, the Sub-Adviser entered into a sub-sub-investment advisory agreement with its affiliate, Newton Investment Management North America, LLC ("NIMNA"), to enable NIMNA to provide certain advisory services to the Sub-Adviser for the benefit of the fund, including, but not limited to, portfolio management services. NIMNA is subject to the supervision of the Sub-Adviser and the Adviser. NIMNA is also an affiliate of the Adviser. NIMNA's principal office is located at BNY Mellon Center, 201 Washington Street, Boston, MA 02108. NIMNA is an indirect subsidiary of BNY Mellon.

The shares of the fund are referred to herein as "Shares" or "Fund's Shares." The Fund's 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 accounts separately for the assets, liabilities and operations of each series. Expenses directly attributable to each series are charged to that series' operations; expenses which are applicable to all series are allocated among them on a pro rata basis.

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 October 31, 2023 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	7,657,764	—	—	**7,657,764**

† *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 October 31, 2023, 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.

Sustainable Investment Approach Risk: The fund's sustainable investment approach may cause it to make different investments than funds that invest principally in equity securities of U.S. companies that do not incorporate sustainable investment criteria when selecting investments. Under certain economic conditions, this could cause the fund to underperform funds that do not incorporate similar criteria. For example, the incorporation of sustainable investment criteria may result in the fund forgoing opportunities to buy certain securities when it might otherwise be advantageous to do so or selling securities when it might otherwise be disadvantageous for the fund to do so. The incorporation of sustainable investment criteria may also affect the fund's exposure to certain sectors and/or types of investments, and may adversely impact the fund's performance depending on whether such sectors or investments are in or out of favor in the market. NIM's security selection process incorporates ESG data provided by third parties, which may be limited for certain companies and/or only take into account one or a few ESG related components. In addition, ESG data may include qualitative and/or quantitative measures, and consideration of this data may be subjective. Different methodologies may be used by the various data sources that provide ESG data. ESG data from third parties used by NIM as part of its sustainable investment process often lacks standardization, consistency and transparency, and for certain companies such data may not be available, complete or accurate. NIM's evaluation of ESG factors relevant to a particular company may be adversely affected in such instances. As a result, the fund's investments may differ from, and potentially underperform, funds that incorporate ESG data from other sources or utilize other methodologies.

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 October 31, 2023, 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 October 31, 2023, the fund did not incur any interest or penalties.

Each tax year in the two-year period ended October 31, 2023 remains subject to examination by the Internal Revenue Service and state taxing authorities.

At October 31, 2023, the components of accumulated earnings on a tax basis were as follows: undistributed ordinary income $100,171, accumulated capital losses $881,114, and unrealized depreciation $1,380,697.

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 accumulated capital loss carryover is available for federal income tax purposes to be applied against future net realized capital gains, if any, realized subsequent to October 31, 2023. The fund has $646,231 of short-term capital losses and $234,883 of long-term capital losses which can be carried forward for an unlimited period.

The tax character of distributions paid to shareholders during the fiscal years ended October 31, 2023 and October 31, 2022 were as follows: ordinary income $70,462 and $5,352, respectively.

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 0.70% 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 October 31, 2023, there was no reduction in expenses pursuant to the undertaking.

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 Mellon 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 0.35% 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 Mellon 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 $4,738.

(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 fee paid to the Adviser by the fund. The quarterly fees are paid by the Adviser from 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, during the period ended October 31, 2023, amounted to $1,201,309 and $1,088,271, respectively.

At October 31, 2023, the cost of investments for federal income tax purposes was $9,038,461; accordingly, accumulated net unrealized depreciation on investments for federal income tax purposes was $1,380,697, consisting of gross appreciation of $343,790 and gross depreciation of $1,724,487.

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.

Seed Capital: As of October 31, 2023, MBC Investments Corporation, an indirect subsidiary of BNY Mellon, held 188,894 shares of the fund.

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 year ended October 31, 2023, the fund had no in-kind transactions.

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Shareholders and the Board of Trustees of BNY Mellon Sustainable International Equity ETF

Opinion on the Financial Statements

We have audited the accompanying statement of assets and liabilities of BNY Mellon Sustainable International Equity ETF (the "Fund") (one of the funds constituting BNY Mellon ETF Trust (the "Trust")), including the statement of investments, as of October 31, 2023, and the related statement of operations for the year then ended, the statements of changes in net assets and the financial highlights for the year ended October 31, 2023 and the period from December 15, 2021 (commencement of operations) through October 31, 2022 and the related notes (collectively referred to as the "financial statements"). In our opinion, the financial statements present fairly, in all material respects, the financial position of the Fund (one of the funds constituting BNY Mellon ETF Trust) at October 31, 2023, the results of its operations for the year then ended, and the changes in its net assets and its financial highlights for the year ended October 31, 2023 and the period from December 15, 2021 (commencement of operations) through October 31, 2022, in conformity with U.S. generally accepted accounting principles.

Basis for Opinion

These financial statements are the responsibility of the Trust's management. Our responsibility is to express an opinion on the Fund's financial statements based on our audits. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) ("PCAOB") and are required to be independent with respect to the Trust in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audits in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement, whether due to error or fraud. The Trust is not required to have, nor were we engaged to perform, an audit of the Trust's internal control over financial reporting. As part of our audits, we are required to obtain an understanding of internal control over financial reporting but not for the purpose of expressing an opinion on the effectiveness of the Trust's internal control over financial reporting. Accordingly, we express no such opinion.

Our audits included performing procedures to assess the risks of material misstatement of the financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. Our procedures included confirmation of securities owned as of October 31, 2023, by correspondence with the custodian, brokers and others; when replies were not received from brokers and others, we performed other auditing procedures. Our audits also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audits provide a reasonable basis for our opinion.

Ernst + Young LLP

We have served as the auditor of one or more investment companies in the BNY Mellon Family of Funds since at least 1957, but we are unable to determine the specific year.

New York, New York
December 20, 2023

Form 1099-DIV, Form 1042-S and other year–end tax information provide shareholders with actual calendar year amounts that should be included in their tax returns. Shareholders should consult their tax advisers.

The following distribution information is being provided as required by the Internal Revenue Code or to meet a specific state's requirement.

The fund designates the following amounts or, if subsequently determined to be different, the maximum amount allowable for its fiscal year ended October 31, 2023:

For federal tax purposes the fund hereby reports 100.00% of ordinary income dividends paid during the fiscal year ended October 31, 2023 as qualified dividend income.

The fund intends to elect to pass through to shareholders the credit for taxes paid to foreign countries. The fund received foreign source income of $181,122 and paid foreign taxes of $22,521.

INFORMATION ABOUT THE APPROVAL OF THE FUND'S SUB-SUB-INVESTMENT ADVISORY AGREEMENT (Unaudited)

At a meeting held May 9, 2023 (the "May Meeting"), the Board of Trustees of the Trust (the "Board"), all the members of which are not "interested persons" of the Trust as defined in the Investment Company Act of 1940, as amended (the "1940 Act"), considered the approval of a delegation arrangement between Newton Investment Management Limited ("NIM" or the "Sub-Adviser") and its affiliate, Newton Investment Management North America, LLC ("NIMNA"), which permits NIM, as the Sub-Adviser to BNY Mellon Sustainable International Equity ETF (the "fund"), to use the investment advisory personnel, resources and capabilities ("Investment Advisory Services") available at its sister company, NIMNA, in providing the day-to-day management of the fund's investments. In connection therewith, the Board considered the approval of a sub-sub-investment advisory agreement (the "SSIA Agreement") between NIM and NIMNA, with respect to the fund. The Trustees were advised by legal counsel throughout the process. The Trustees also met separately from management to consider the SSIA Agreement. NIM and NIMNA are affiliates of the fund's investment adviser, BNY Mellon ETF Investment Adviser, LLC (the "Adviser").

At the May Meeting, the Adviser recommended the approval of the SSIA Agreement to enable NIMNA to provide Investment Advisory Services to the Sub-Adviser for the benefit of the fund, including, but not limited to, portfolio management services, subject to the supervision of the Sub-Adviser and the Adviser. The recommendation for the approval of the SSIA Agreement was based on the following considerations, among others: (i) approval of the SSIA Agreement would permit the Sub-Adviser to use investment personnel employed primarily by NIMNA as primary portfolio managers of the fund and to use the investment research services of NIMNA in the day-to-day management of the fund's investments; and (ii) there would be no material changes to the fund's investment objective, strategies or policies, no reduction in the nature or level of services provided to the fund, and no increases in the management fee payable by the fund or the sub-advisory fee payable by the Adviser to the Sub-Adviser as a result of the delegation arrangement. The Board noted NIMNA currently serves as the sub-adviser for certain other series of the Trust, and had presented to the Board at a meeting held on February 8, 2023 (the "February Meeting") and a meeting held on August 11, 2022 (the "August Meeting") with respect to the initial approval of the NIMNA sub-advisory agreement with respect to those series. The Board further noted NIMNA had represented there had been no material changes to the information it had provided at the February Meeting and August Meeting.

In approving the SSIA Agreement, the Board considered the materials prepared by the Adviser, Sub-Adviser and NIMNA, and other information received in advance of the May Meeting, which included: (i) a form of the SSIA Agreement and related documents; (ii) information regarding the delegation arrangement and how it is expected to enhance investment capabilities for the benefit of the fund; (iii) information regarding NIMNA; and (iv) an opinion of counsel that the proposed delegation arrangement would not result in an "assignment" of the Sub-Investment

Advisory Agreement under the 1940 Act and the Investment Advisers Act of 1940, as amended, and, therefore, did not require the approval of fund shareholders. The Board also considered materials provided by the Adviser, Sub-Adviser and NIMNA received in advance of: (i) the February Meeting, in connection with the Board's re-approval of the Management Agreement between the Trust and the Adviser, pursuant to which the Adviser provides the fund with investment advisory and administrative services, and the Sub-Investment Advisory Agreement between the Adviser and Sub-Adviser, pursuant to which the Sub-Adviser provides day-to-day management of the fund's investments; and (ii) the February Meeting and August Meeting, in connection with the Board's initial approval of the NIMNA sub-investment advisory agreement with respect to the other series of the Trust for which NIMNA serves as a sub-adviser. The Board also took into consideration the substance of discussions with representatives of the Adviser, Sub-Adviser and NIMNA at the May Meeting, February Meeting and August Meeting.

J. Charles Cardona (67)
Chairman of the Board (2020)

Principal Occupation During Past 5 Years:

- BNY Mellon Family of Funds, *Interested Director* (2014-2018), *Independent Director* (2019-Present)
- BNY Mellon Liquidity Funds, *Director* (2004-Present) and *Chairman* (2019-2021)

No. of Portfolios for which Board Member Serves: 38, including 22 managed by an affiliate of the Adviser

Kristen M. Dickey (63)
Board Member (2020)

Principal Occupation During Past 5 Years:

- Independent board director of Marstone, Inc., a financial technology company (since 2018); Lead non-executive director for Aperture Investors, LLC, an investment management firm (since 2018); Managing Director—Global Head of Index Strategy at BlackRock, Inc. (until 2017).

No. of Portfolios for which Board Member Serves: 16

F. Jack Liebau, Jr. (60)
Board Member (2020)

Principal Occupation During Past 5 Years:

- Managing Director at Beach Investment Counsel, a financial advisory firm (since 2020)
- Corporate director (since 2015)

Other Public Company Board Memberships During Past 5 Years:

- Myers Industries, an industrial company, *Director* (2015 – Present; *Chairman of Board* 2016 – Present)

No. of Portfolios for which Board Member Serves: 16

Jill I. Mavro (51)
Board Member (2020)

Principal Occupation During Past 5 Years:

- Managing director at CapWGlobal, LLC, a financial technology consulting company (since 2020)
- Founder and Principal of Spoondrift Advisory, LLC (since 2018); Senior Managing Director, Head of Strategic Relationships and Member of SPDR Executive Committee at State Street Global Advisors (until 2018)

No. of Portfolios for which Board Member Serves: 16

Kevin W. Quinn (64)
Board Member (2020)

Principal Occupation During Past 5 Years:

- Partner at PricewaterhouseCoopers, LLC (until 2019)

No. of Portfolios for which Board Member Serves: 16

Stacy L. Schaus (63)
Board Member (2020)

Principal Occupation During Past 5 Years:

- Chief Executive Officer of the Schaus Group LLC, a consulting firm (since 2019); Advisory board member of A&P Capital, a consulting firm (from 2019-2021); Executive Vice President—Defined Contribution Practice Founder at PIMCO Investment Management (until 2018).

No. of Portfolios for which Board Member Serves: 16

The address of the Board Members and Officers is c/o BNY Mellon ETF Investment Adviser, LLC, 240 Greenwich Street, New York, New York 10286. Additional information about each Board Member is available in the fund's Statement of Additional Information which can be obtained from the Adviser free of charge by calling this toll free number: 1-833-383-2696.

DAVID DIPETRILLO, President since February 2020.

Vice President and Director of BNY Mellon Investment Adviser, Inc. since February 2021; Head of North America Distribution, BNY Mellon Investment Management since February 2023; Head of North America Product, BNY Mellon Investment Management from January 2018 to February 2023. He is an officer of 53 investment companies (comprised of 102 portfolios) managed by the Adviser or an affiliate of the Adviser. He is 45 years old and has been an employee of BNY Mellon since 2005.

PETER M. SULLIVAN, Chief Legal Officer since July 2021, Vice President and Assistant Secretary since February 2020.

Chief Legal Officer of BNY Mellon Investment Adviser, Inc. and Associate General Counsel of BNY Mellon since July 2021; Senior Managing Counsel of BNY Mellon from December 2020 to July 2021; and Managing Counsel of BNY Mellon from March 2009 to December 2020. He is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. He is 55 years old and has been an employee of BNY Mellon since April 2004.

JAMES WINDELS, Treasurer since February 2020.

Director of BNY Mellon Investment Adviser, Inc. since February 2023; Vice President of BNY Mellon Investment Adviser, Inc. since September 2020; and Director – BNY Mellon Fund Administration. He is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. He is 65 years old and has been an employee of BNY Mellon Investment Adviser, Inc., an affiliate of the Adviser, since April 1985.

SARAH S. KELLEHER, Vice President and Secretary since February 2020.

Vice President of BNY Mellon ETF Investment Adviser, LLC since February 2020; Senior Managing Counsel of BNY Mellon since September 2021; and Managing Counsel of BNY Mellon from December 2017 to September 2021. She is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. She is 48 years old and has been an employee of BNY Mellon since March 2013.

JAMES BITETTO, Vice President and Assistant Secretary since February 2020.

Senior Managing Counsel of BNY Mellon since December 2019; Managing Counsel of BNY Mellon from April 2014 to December 2019; and Secretary of BNY Mellon Investment Adviser, Inc. He is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. He is 57 years old and has been an employee of BNY Mellon Investment Adviser, Inc., an affiliate of the Adviser, since December 1996.

DEIRDRE CUNNANE, Vice President and Assistant Secretary since February 2020.

Managing Counsel of BNY Mellon since December 2021; and Counsel of BNY Mellon from August 2018 to December 2021. She is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. She is 32 years old and has been an employee of BNY Mellon Investment Adviser, Inc., an affiliate of the Adviser, since August 2018.

JEFF PRUSNOFSKY, Vice President and Assistant Secretary since February 2020.

Senior Managing Counsel of BNY Mellon. He is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. He is 58 years old and has been an employee of BNY Mellon Investment Adviser, Inc., an affiliate of the Adviser, since October 1990.

AMANDA QUINN, Vice President and Assistant Secretary since February 2020.

Counsel of BNY Mellon since June 2019; and Regulatory Administration Manager at BNY Mellon Investment Management Services from September 2018 to May 2019. She is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. She is 38 years old and has been an employee of BNY Mellon since June 2012.

JOANNE SKERRETT, Vice President and Assistant Secretary since March 2023.

Managing Counsel of BNY Mellon since June 2022; and Senior Counsel with the Mutual

Fund Directors Forum, a leading funds industry organization, from 2016 to June 2022. She is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. She is 51 years old and has been an employee of BNY Mellon Investment Adviser, Inc., an affiliate of the Adviser, since June 2022.

DANIEL GOLDSTEIN, Vice President since March 2022

Head of Product Development of North America Distribution, BNY Mellon Investment Management since January 2018; Executive Vice President of North America Product, BNY Mellon Investment Management since April 2023; and Senior Vice President, Development & Oversight of North America Product, BNY Mellon Investment Management from 2010 to March 2023. He is an officer of 53 investment companies (comprised of 102 portfolios) managed by the Adviser or an affiliate of the Adviser. He is 54 years old and has been an employee of the Distributor since 1991.

JOSEPH MARTELLA, Vice President since March 2022

Vice President of BNY Mellon Investment Adviser, Inc. since December 2022; Head of Product Management of North America Distribution, BNY Mellon Investment Management since January 2018; Executive Vice President of North America Product, BNY Mellon Investment Management since April 2023, and Senior Vice President of North America Product, BNY Mellon Investment Management from 2010 to March 2023. He is an officer of 53 investment companies (comprised of 102 portfolios) managed by the Adviser or an affiliate of the Adviser. He is 47 years old and has been an employee of the Distributor since 1999.

GAVIN C. REILLY, Assistant Treasurer since February 2020.

Tax Manager-BNY Mellon Fund Administration. He is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. He is 55 years old and has been an employee of BNY Mellon Investment Adviser, Inc., an affiliate of the Adviser, since April 1991.

ROBERT SALVIOLO, Assistant Treasurer since February 2020.

Senior Accounting Manager – BNY Mellon Fund Administration. He is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. He is 56 years old and has been an employee of BNY Mellon Investment Adviser, Inc., an affiliate of the Adviser, since June 1989.

ROBERT SVAGNA, Assistant Treasurer since February 2020.

Senior Accounting Manager – BNY Mellon Fund Administration. He is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. He is 56 years old and has been an employee of BNY Mellon Investment Adviser, Inc., an affiliate of the Adviser, since November 1990.

NATALYA ZELENSKY, Vice President and Assistant Secretary since February 2020 and Chief Compliance Officer since August 2021.

Chief Compliance Officer since August 2021 and Vice President since February 2020 of BNY Mellon ETF Investment Adviser, LLC; Managing Counsel of BNY Mellon from December 2019 to August 2021; Counsel of BNY Mellon from May 2016 to December 2019; and Assistant Secretary of BNY Mellon Investment Adviser, Inc. from April 2018 to August 2021. She is an officer of 54 investment companies (comprised of 121 portfolios) managed by the Adviser or an affiliate of the Adviser. She is 38 years old and has been an employee of BNY Mellon since May 2016.

CARIDAD M. CAROSELLA, Anti-Money Laundering Compliance Officer since February 2020.

Anti-Money Laundering Compliance Officer of the BNY Mellon Family of Funds and BNY Mellon Funds Trust. She is an officer of 47 investment companies (comprised of 114 portfolios) managed by the Adviser or an affiliate of the Adviser. She is 55 years old and has been an employee of the Distributor since 1997.

This page is intentionally left blank.

This page is intentionally left blank.

For More Information

BNY Mellon ETF Trust
BNY Mellon ETF Investment Adviser, LLC
240 Greenwich Street
New York, NY 10286

Adviser
BNY Mellon ETF Investment Adviser, LLC
201 Washington Street
Boston, MA 02108

Sub-Adviser
Newton Investment Management Limited
160 Queen Victoria Street
London, EC4V, 4LA, UK

Custodian
The Bank of New York Mellon
240 Greenwich Street
New York, NY 10286

Transfer Agent & Dividend Disbursing Agent
The Bank of New York Mellon
240 Greenwich Street
New York, NY 10286

Distributor
BNY Mellon Securities Corporation
240 Greenwich Street
New York, NY 10286

Ticker Symbol:	
BNY Mellon Sustainable International Equity ETF	BKIS

Telephone Call your financial representative or 1-833-ETF-BNYM (383-2696) (inside the U.S. only)
Mail BNY Mellon ETF Trust, 240 Greenwich Street, New York, New York 10286
E-Mail Send your request to info@bnymellon.com
Internet Information can be viewed online or downloaded at www.im.bnymellon.com

BNY Mellon ETF Trust discloses, at www.im.bnymellon.com, the identities and quantities of the securities held by the fund daily. The fund files its complete schedule of portfolio holdings with the Securities and Exchange Commission ("SEC") for the first and third quarters of the fiscal year on Form N-PORT. The fund's Forms N-PORT are available on the SEC's website at www.sec.gov. Additionally, the fund makes its portfolio holdings for the first and third quarters of the most recent fiscal year available at https://im.bnymellon.com/etfliterature. The fund's complete schedule of portfolio holdings, as filed on Form N-PORT, can also be obtained without charge, upon request, by calling 1-833-383-2696.

A description of the policies and procedures that the fund uses to determine how to vote proxies relating to portfolio securities, and information regarding how the fund voted these proxies for the most recent 12-month period ended June 30 is available at www.im.bnymellon.com and on the SEC's website at www.sec.gov. The description of the policies and procedures is also available without charge, upon request, by calling 1-833-383-2696.

Printed on recycled paper.
50% post-consumer.
Process chlorine free.
Vegetable-based ink.