

BNY Mellon ETF Trust

BNY Mellon Ultra Short Income ETF

IMPORTANT NOTICE – UPCOMING CHANGES TO ANNUAL AND SEMI-ANNUAL REPORTS

The Securities and Exchange Commission (the “SEC”) has adopted rule and form amendments that will result in changes to the design and delivery of annual and semi-annual fund reports (“Reports”). Beginning in July 2024, Reports will be streamlined to highlight key information. Certain information currently included in Reports, including financial statements, will no longer appear in the Reports but will be available online, delivered free of charge to shareholders upon request, and filed with the SEC.

If you previously elected to receive the fund’s Reports electronically, you will continue to do so. Otherwise, you will receive paper copies of the fund’s re-designed Reports by USPS mail in the future. If you would like to receive the fund’s Reports (and/or other communications) electronically instead of by mail, please contact your financial advisor.

SEMI-ANNUAL REPORT December 31, 2023



BNY MELLON

INVESTMENT MANAGEMENT

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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

DISCUSSION OF FUND PERFORMANCE (Unaudited)

For the period from July 1, 2023, through December 31, 2023, as provided by Stephen Murphy, CFA, and Anthony Honko, portfolio managers employed by the fund's sub-adviser, Dreyfus, a division of Mellon Investments Corporation.

Market and Fund Performance Overview

For the six-month period ended December 31, 2023, BNY Mellon Ultra Short Income ETF (the “fund”) produced a net asset value total return of 3.28%.¹ In comparison, the ICE BofA 3-Month U.S. Treasury Bill Index (the “Index”), the fund's benchmark, returned 2.70% for the same period.²

Short-term interest rates fell sharply during the reporting period, lifting fixed-income prices. The fund outperformed the Index, largely as a result of its relatively long duration and credit positioning.

The Fund's Investment Approach

The fund seeks high current income consistent with the maintenance of liquidity and low volatility of principal. To pursue its goal, the fund normally invests at least 80% of its net assets in investment-grade, U.S. dollar-denominated, fixed, variable, and floating-rate debt or cash equivalents. The fund typically seeks to maintain an effective duration of one year or less, although, under certain market conditions, such as in periods of significant volatility in interest rates and spreads, the fund's duration may be longer than one year. The fund's portfolio, under normal market conditions, will have an average credit rating of at least A or the equivalent.

The fund's sub-adviser seeks to achieve what they believe provides the optimal portfolio for the fund in terms of preservation of principal, liquidity and high current income. To do so, the sub-adviser uses a top-down and bottom-up investment process, and leverages the breadth and depth of Dreyfus' research resources. The sub-adviser focuses on preservation of principal and downside protection, by proactively monitoring issuer and counterparty risk, and ensures appropriate portfolio liquidity through a combination of overnight investments and short-term, highly liquid securities.

Yields Decline, Driving Bond Prices Higher

After a final rate increase in July 2023, the U.S. Federal Reserve (the “Fed”) paused its aggressive program of interest-rate hikes in recognition of easing inflation levels, leaving the federal funds rate in a range of 5.25%–5.50% for the remainder of the reporting period. While short-term U.S. Treasury yields rose mildly during the first half of the period, they fell sharply in the second half, driven lower by the prospect of eventual rate cuts. Yield declines accelerated and spreads tightened further in December, after the Fed indicated a likelihood of multiple rate cuts in 2024. From early October through the end of 2023, the 1-year Treasury yield decreased from a high of just over 5.5% to approximately 4.7% as of year-end. The 2-year Treasury experienced an even

steeper drop in yields during that same period, from approximately 5.2% to just over 4.2%. As yields fell, bond prices increased, reflecting the inverse relationship between bond prices and yields. At the same time, short-term yields continued to provide an attractive income stream. As the 1-year and 2-year Treasury examples above illustrate, longer-duration bonds experienced steeper yield declines, and correspondingly greater price increases, than shorter-duration bonds.

Favorable Duration Positioning Bolsters Returns

The fund benefited from the environment favoring longer-duration instruments. By maintaining a duration of approximately eight-to-nine months during the reporting period (versus the Index duration of three months), we positioned the fund to capture the price advantage of longer-duration holdings. These positions were largely made up of fixed corporate (representing approximately 25% of the portfolio) and Treasury holdings. The fund also invested approximately 40% of assets in commercial paper with durations of six months to a year, which further bolstered relative returns as a result of duration and the extra yield carry from the credit. No fund positions materially detracted from returns relative to the Index.

Positioned for Moderate Rate Cuts

As of December 31, 2023, we believe the market is pricing in more aggressive Fed rate cuts than are likely to occur in 2024, although some cuts appear likely. Credit spreads appear unlikely to tighten further and may widen somewhat, leading us to position the fund with a bias in favor of higher-quality credit, although the actual direction of the economy over time will determine the course we set for the fund. Current trends toward moderating inflation and somewhat slowing economic growth appear likely to remain in place, barring unexpected developments, with potential challenges for the market implicit in high levels of consumer debt and elevated equity prices in the wake of 2023's stock market boom. While we are keeping a close eye on these and other developments that could affect the fund's performance, for now, we are maintaining the duration and credit positioning described above.

January 16, 2024

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. 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: FactSet - The ICE BofA 3-Month U.S. Treasury Bill Index is an unmanaged market index of U.S. Treasury securities maturing in 90 days that assumes reinvestment of all income. Investors cannot invest directly in any index.

ETFs trade like stocks, are subject to investment risk, including possible loss of principal. 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.

Bonds are subject generally to interest-rate, credit, liquidity and market risks, to varying degrees, all of which are more fully described in the fund's prospectus. Generally, all other factors being equal, bond prices are inversely related to interest-rate changes, and rate increases can cause price decline.

UNDERSTANDING YOUR FUND'S EXPENSES (Unaudited)

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 July 1, 2023 to December 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 an assumed rate of return of 5% per year before expenses, 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 December 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	1,032.80	1,024.53	0.61	0.61	0.12

^(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 December 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 184/366 (to reflect the one-half period).

STATEMENT OF INVESTMENTS

December 31, 2023 (Unaudited)

Description	Principal Amount (\$)	Value (\$)
Asset-Backed Securities – 1.7%		
Ford Credit Floorplan Master Owner Trust, Series 2019-2, Class A, 3.06%, 4/15/2026	300,000	297,695
Honda Auto Receivables Owner Trust, Series 2021-3, Class A3, 0.41%, 11/18/2025	180,333	175,824
Hyundai Auto Lease Securitization Trust, Series 2021-C, Class A4, 0.48%, 9/15/2025 ^(a)	350,000	348,536
Oscar US Funding XII LLC, Series 2021-1A, Class A3, 0.70%, 4/10/2025 ^(a)	55,830	55,542
World Omni Automobile Lease Securitization Trust, Series 2022-A, Class A3, 3.21%, 2/18/2025	250,151	248,600
Total Asset-Backed Securities (cost \$1,155,720)		1,126,197
Commercial Paper – 35.2%		
Antalis SA, 5.60%, 3/21/2024 ^{(a)(b)}	1,500,000	1,481,055
Atlantic Asset Securitization LLC, 5.58%, 4/01/2024 ^{(a)(b)}	450,000	443,577
Bank of Montreal, 5.48%, 9/04/2024 ^{(a)(b)}	1,400,000	1,350,705
CAFCO LLC, 5.69%, 4/30/2024 ^{(a)(b)}	1,250,000	1,227,131
Credit Industriel et Commercial, 5.84%, 3/06/2024 ^{(a)(b)}	900,000	890,840
DNB ASA, 5.47%, 6/20/2024 ^{(a)(b)}	2,000,000	1,949,961
Gotham Funding Corp., 5.56%, 4/01/2024 ^{(a)(b)}	1,200,000	1,182,934
HSBC Bank PLC, 6.05% (1 Month SOFR + 0.66%), 6/21/2024 ^{(a)(c)}	460,000	460,724
ING (U.S.) Funding LLC, 5.63%, 6/03/2024 ^{(a)(b)}	1,250,000	1,221,320
John Deere Capital Corp., 5.52%, 3/20/2024 ^{(a)(b)}	1,750,000	1,728,705
Lloyds Bank PLC, 5.51%, 3/05/2024 ^(b)	2,000,000	1,979,601
LMA SA/LMA-Americas LLC		
5.84%, 1/22/2024 ^{(a)(b)}	250,000	249,098
5.89%, 4/11/2024 ^{(a)(b)}	800,000	787,393
MUFG Bank, Ltd., 5.79%, 5/20/2024 ^(b)	500,000	489,284
Old Line Funding, LLC, 5.89% (1 Month SOFR + 0.50%), 3/04/2024 ^{(a)(c)}	275,000	275,058
Sheffield Receivables Corp., 5.58%, 3/20/2024 ^{(a)(b)}	2,000,000	1,975,122
Skandinaviska Enskilda Banken, 5.77% (1 Month SOFR + 0.38%), 3/04/2024 ^{(a)(c)}	500,000	500,249
Societe Generale SA, 5.89%, 3/13/2024 ^{(a)(b)}	675,000	667,472
Starbird Funding Corp., 5.56%, 6/18/2024 ^{(a)(b)}	2,000,000	1,949,676
Svenska Handelsbanken AB		
5.45%, 6/03/2024 ^{(a)(b)}	1,500,000	1,465,411
6.02%, 9/18/2024 ^{(a)(b)}	425,000	409,249
Toronto-Dominion Bank (The), 5.95% (3 Month SOFR + 0.56%), 10/28/2024 ^{(a)(c)}	350,000	350,516
Westpac Banking Corp., 5.79%, 11/14/2024 ^(b)	500,000	477,933
Total Commercial Paper (cost \$23,511,624)		23,513,014
Corporate Bonds – 42.2%		
Auto Manufacturers – 3.5%		
American Honda Finance Corp.		
2.90%, 2/16/2024	300,000	298,895
1.30%, 9/09/2026	300,000	275,727

STATEMENT OF INVESTMENTS (continued)

Description	Principal Amount (\$)	Value (\$)
Corporate Bonds - 42.2% (continued)		
Auto Manufacturers - 3.5% (continued)		
BMW US Capital LLC, 5.78% (3 Month SOFRX + 0.38%), 8/12/2024 ^{(a)(c)}	300,000	300,303
General Motors Financial Co., Inc., 5.40%, 4/06/2026	250,000	251,667
Mercedes-Benz Finance North America LLC		
5.20%, 8/03/2026 ^(a)	325,000	329,494
3.45%, 1/06/2027 ^(a)	325,000	314,138
PACCAR Financial Corp., 3.55%, 8/11/2025	300,000	295,154
Toyota Motor Credit Corp., 5.69% (3 Month SOFR + 0.32%), 1/13/2025 ^(c)	300,000	299,346
		2,364,724
Banks - 23.2%		
ANZ New Zealand Int'l Ltd., 6.00% (3 Month SOFR + 0.60%), 2/18/2025 ^{(a)(c)}	300,000	299,993
ASB Bank Ltd., 3.13%, 5/23/2024 ^(a)	350,000	347,134
Banco Santander SA, 6.64% (3 Month SOFR + 1.24%), 5/24/2024 ^(c)	350,000	351,128
Bank of America NA, 5.53%, 8/18/2026	300,000	305,641
Bank of Montreal		
6.48% (3 Month SOFRX + 1.06%), 6/07/2025 ^(c)	350,000	350,900
5.27%, 12/11/2026	325,000	329,618
Bank of Nova Scotia (The)		
5.83% (3 Month SOFR + 0.46%), 1/10/2025 ^(c)	300,000	299,267
5.35%, 12/07/2026	750,000	762,876
Canadian Imperial Bank of Commerce		
3.95%, 8/04/2025	275,000	270,750
6.66% (3 Month SOFR + 1.22%), 10/02/2026 ^(c)	375,000	376,124
Chariot Funding LLC, 5.67%, 7/01/2024	750,000	750,052
Citigroup, Inc.		
6.06% (3 Month SOFR + 0.67%), 5/01/2025 ^(c)	300,000	299,296
6.96% (3 Month SOFR + 1.53%), 3/17/2026 ^(c)	300,000	302,128
Commonwealth Bank of Australia, 6.17% (3 Month SOFR + 0.75%), 3/13/2026 ^{(a)(c)}	350,000	350,882
Goldman Sachs Group, Inc. (The)		
6.08% (3 Month SOFR + 0.70%), 1/24/2025 ^(c)	200,000	199,925
6.21% (3 Month SOFR + 0.79%), 12/09/2026 ^(c)	725,000	718,158
JPMorgan Chase & Co., 6.70% (3 Month SOFR + 1.32%), 4/26/2026 ^(c)	300,000	301,527
JPMorgan Chase Bank NA, 5.11%, 12/08/2026	325,000	328,044
KeyBank NA, 4.70%, 1/26/2026	300,000	293,106
Manufacturers & Traders Trust Co., 4.65%, 1/27/2026	300,000	293,881
Mitsubishi UFJ Financial Group, Inc., 6.80% (3 Month SOFR + 1.39%), 9/12/2025 ^(c)	350,000	351,138
Morgan Stanley, 6.01% (3 Month SOFR + 0.63%), 1/24/2025 ^(c)	300,000	299,603
Morgan Stanley Bank NA, 6.55% (3 Month SOFR + 1.17%), 10/30/2026 ^(c)	500,000	504,490
National Australia Bank Ltd.		
5.75% (3 Month SOFR + 0.38%), 1/12/2025 ^{(a)(c)}	300,000	299,491

Description	Principal Amount (\$)	Value (\$)
Corporate Bonds – 42.2% (continued)		
Banks – 23.2% (continued)		
National Australia Bank Ltd. (continued)		
1.89%, 1/12/2027 ^(a)	375,000	345,969
National Bank of Canada, 5.25%, 1/17/2025	300,000	300,048
NatWest Markets PLC		
5.93% (3 Month SOFR + 0.53%), 8/12/2024 ^{(a)(c)}	350,000	349,971
1.60%, 9/29/2026 ^(a)	225,000	205,462
Nordea Bank Abp, 0.63%, 5/24/2024 ^(a)	300,000	294,434
PNC Financial Services Group, Inc. (The), 2.60%, 7/23/2026	325,000	307,904
Royal Bank of Canada, Series G, 5.82% (3 Month SOFR + 0.44%), 1/21/2025 ^(c)	300,000	299,243
Standard Chartered PLC, 7.18% (3 Month SOFR + 1.74%), 3/30/2026 ^{(a)(c)}	350,000	351,698
State Street Corp.		
3.55%, 8/18/2025	98,000	96,215
5.27%, 8/03/2026	225,000	228,356
6.23% (3 Month SOFR + 0.85%), 8/03/2026 ^(c)	350,000	349,889
Sumitomo Mitsui Financial Group, Inc., 1.40%, 9/17/2026	300,000	273,347
Sumitomo Mitsui Trust Bank Ltd.		
5.86% (3 Month SOFR + 0.44%), 9/16/2024 ^{(a)(c)}	300,000	299,783
6.54% (3 Month SOFR + 1.12%), 3/09/2026 ^{(a)(c)}	300,000	301,646
5.65%, 9/14/2026 ^(a)	325,000	330,418
Toronto-Dominion Bank (The)		
5.77% (3 Month SOFR + 0.35%), 9/10/2024 ^(c)	300,000	300,192
5.53%, 7/17/2026	200,000	203,896
Truist Bank, 3.20%, 4/01/2024	300,000	298,078
Truist Financial Corp., 5.82% (3 Month SOFR + 0.40%), 6/09/2025 ^(c)	200,000	197,065
UBS AG, 0.45%, 2/09/2024 ^(a)	300,000	298,392
US Bancorp, Series V, 2.38%, 7/22/2026	325,000	305,232
Wells Fargo & Co., 3.00%, 2/19/2025	300,000	293,447
Westpac Banking Corp., 5.70% (3 Month SOFR + 0.30%), 11/18/2024 ^(c)	300,000	299,537
		15,515,374
Computers – 0.5%		
International Business Machines Corp., 4.00%, 7/27/2025	300,000	296,831
		296,831
Diversified Financial Services – 2.3%		
American Express Co.		
3.40%, 2/22/2024	300,000	299,672
6.16% (3 Month SOFR + 0.76%), 2/13/2026 ^(c)	250,000	249,555
Charles Schwab Corp. (The)		
5.92% (3 Month SOFR + 0.50%), 3/18/2024 ^(c)	350,000	349,942
5.92% (3 Month SOFR + 0.52%), 5/13/2026 ^(c)	300,000	295,227
5.88%, 8/24/2026	350,000	359,100
		1,553,496

STATEMENT OF INVESTMENTS (continued)

Description	Principal Amount (\$)	Value (\$)
Corporate Bonds - 42.2% (continued)		
Food - 0.5%		
Mondelez International, Inc., 2.13%, 3/17/2024	300,000	297,680
		297,680
Healthcare-Services - 1.0%		
Roche Holdings, Inc., 6.14% (3 Month SOFR + 0.74%), 11/13/2026 ^{(a)(c)}	650,000	651,651
		651,651
Insurance - 0.4%		
Prudential Financial, Inc., 1.50%, 3/10/2026	300,000	279,840
		279,840
Machinery-Diversified - 0.9%		
John Deere Capital Corp. 4.80%, 1/09/2026	300,000	301,683
1.70%, 1/11/2027	350,000	323,295
		624,978
Media - 1.1%		
Comcast Corp., 2.35%, 1/15/2027	750,000	704,357
		704,357
Oil & Gas - 0.4%		
BP Capital Markets America, Inc., 3.41%, 2/11/2026	300,000	293,076
		293,076
Pharmaceuticals - 3.6%		
AbbVie, Inc., 2.95%, 11/21/2026	350,000	335,721
AstraZeneca Finance LLC, 0.70%, 5/28/2024	300,000	294,266
Cigna Group (The), 5.69%, 3/15/2026	650,000	650,529
CVS Health Corp., 3.00%, 8/15/2026	300,000	286,781
GlaxoSmithKline Capital PLC, 3.00%, 6/01/2024	300,000	297,000
Pfizer Investment Enterprises Pte Ltd., 4.45%, 5/19/2026	250,000	249,358
Shire Acquisitions Investments Ireland DAC, 3.20%, 9/23/2026	300,000	288,717
		2,402,372
Real Estate - 1.0%		
Simon Property Group LP, 1.38%, 1/15/2027	725,000	662,499
		662,499
Retail - 1.4%		
Target Corp., 1.95%, 1/15/2027	700,000	653,469
Walmart, Inc., 3.90%, 9/09/2025	300,000	297,152
		950,621
Semiconductors - 0.5%		
Intel Corp., 3.70%, 7/29/2025	300,000	295,348
		295,348
Software - 0.9%		
Oracle Corp., 2.65%, 7/15/2026	300,000	284,584
Salesforce, Inc., 0.63%, 7/15/2024	300,000	292,545
		577,129

Description	Principal Amount (\$)	Value (\$)
Corporate Bonds – 42.2% (continued)		
Telecommunications – 1.0%		
AT&T, Inc., 4.25%, 3/01/2027	700,000	692,543
		692,543
Total Corporate Bonds (cost \$28,145,840)		28,162,519
U.S. Treasury Government Securities – 7.5%		
U.S. Treasury Notes		
3.13%, 8/15/2025	2,500,000	2,450,586
4.88%, 11/30/2025	2,500,000	2,526,074
Total U.S. Treasury Government Securities (cost \$4,971,408)		4,976,660
	Shares	
Investment Companies – 13.2%		
Registered Investment Companies – 13.2%		
Dreyfus Institutional Preferred Government Money Market Fund, Institutional Shares, 5.32% ^{(d)(e)} (cost \$8,834,231)		
	8,834,231	8,834,231
Total Investments (cost \$66,618,823)	99.8%	66,612,621
Cash and Receivables (Net)	0.2%	151,820
Net Assets	100.0%	66,764,441

SOFR—Secured Overnight Financing Rate

SOFRIX—Secured Overnight Financing Rate Index

^(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 December 31, 2023, these securities were valued at \$26,641,133 or 39.90% of net assets.

^(b) Security is a discount security. Income is recognized through the accretion of discount.

^(c) Variable rate security - rate shown is the interest rate in effect at period end. Security description also includes the reference rate and spread if published and available.

^(d) Investment in affiliated issuer. The investment objective of this investment company is publicly available and can be found within the investment company's prospectus.

^(e) The rate shown is the 1-day yield as of December 31, 2023.

Portfolio Summary (Unaudited) [†]	Value (%)
Financial	63.8
Registered Investment Companies	13.2
Government	7.5
Consumer, Non-cyclical	5.1
Consumer, Cyclical	4.9
Communications	2.1
Technology	1.9
Industrial	0.9
Energy	0.4
	99.8

[†] Based on net assets.

STATEMENT OF INVESTMENTS (continued)

Holdings and transactions in these affiliated companies during the period ended December 31, 2023 are as follows:

<u>Description</u>	<u>Value (\$)</u> <u>6/30/23</u>	<u>Purchases (\$)¹</u>	<u>Sales (\$)</u>	<u>Value (\$)</u> <u>12/31/23</u>	<u>Dividends/ Distributions (\$)</u>
Investment Companies - 13.2%					
Dreyfus Institutional Preferred Government Money Market Fund,					
Institutional Shares	39,339	44,330,981	(35,536,089)	8,834,231	32,233
Total - 13.2%	39,339	44,330,981	(35,536,089)	8,834,231	32,233

¹ Includes reinvested dividends/distributions.

See Notes to Financial Statements

STATEMENT OF ASSETS AND LIABILITIES

December 31, 2023 (Unaudited)

	Cost	Value
Assets (\$):		
Investments in securities—See Statement of Investments:		
Unaffiliated issuers	57,784,592	57,778,390
Affiliated issuers	8,834,231	8,834,231
Interest receivable		321,039
Dividends receivable		25,853
		<u>66,959,513</u>
Liabilities (\$):		
Due to BNY Mellon ETF Investment Adviser, LLC—Note 3(b)		4,627
Distributions payable—Note 2(e)		190,445
		<u>195,072</u>
Net Assets (\$)		<u>66,764,441</u>
Composition of Net Assets (\$):		
Paid-in capital		67,056,483
Total distributable earnings (loss)		(292,042)
Net Assets (\$)		<u>66,764,441</u>
Shares outstanding no par value (unlimited shares authorized):		<u>1,350,001</u>
Net asset value per share		<u>49.46</u>
Market price per share		<u>49.46</u>

See Notes to Financial Statements

STATEMENT OF OPERATIONS

Six Months Ended December 31, 2023 (Unaudited)

Investment Income (\$):

Income:

Cash dividends:

Affiliated issuers

32,233

Interest

730,965

Total Income

763,198

Expenses:

Management fee—Note 3(a)

19,498

Total Expenses

19,498

Net Investment Income

743,700

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

Net realized gain (loss) on investments

770

Net change in unrealized appreciation (depreciation) on investments

320,449

Net Realized and Unrealized Gain (Loss) on Investments

321,219

Net Increase (Decrease) in Net Assets Resulting from Operations

1,064,919

See Notes to Financial Statements

STATEMENT OF CHANGES IN NET ASSETS

	Six Months Ended December 31, 2023 (Unaudited)	Year Ended June 30, 2023
Operations (\$):		
Net investment income	743,700	887,148
Net realized gain (loss) on investments	770	(9,700)
Net change in unrealized appreciation (depreciation) on investments	320,449	117,584
Net Increase (Decrease) in Net Assets Resulting from Operations	1,064,919	995,032
Distributions (\$):		
Distributions to shareholders	(893,904)	(878,254)
Beneficial Interest Transactions (\$):		
Proceeds from shares sold	39,564,596	4,886,067
Cost of shares redeemed	(2,473,521)	(2,436,261)
Transaction fees—Note 5	4,204	732
Increase (Decrease) in Net Assets from Beneficial Interest Transactions	37,095,279	2,450,538
Total Increase (Decrease) in Net Assets	37,266,294	2,567,316
Net Assets (\$):		
Beginning of Period	29,498,147	26,930,831
End of Period	66,764,441	29,498,147
Changes in Shares Outstanding:		
Shares sold	800,000	100,000
Shares redeemed	(50,000)	(50,000)
Net Increase (Decrease) in Shares Outstanding	750,000	50,000

See Notes to Financial Statements

FINANCIAL HIGHLIGHTS

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

	Six Months Ended December 31, 2023 (Unaudited)	Year Ended June 30, 2023	For the Period from August 11, 2021 ^(a) to June 30, 2022
Per Share Data (\$):			
Net asset value, beginning of period	49.16	48.97	50.00
Investment Operations:			
Net investment income ^(b)	1.13	1.56	0.17
Net realized and unrealized gain (loss) on investments	0.46	0.18	(0.94)
Total from Investment Operations	1.59	1.74	(0.77)
Distributions:			
Dividends from net investment income	(1.30)	(1.55)	(0.27)
Transaction fees ^(b)	0.01	0.00 ^(c)	0.01
Net asset value, end of period	49.46	49.16	48.97
Market price, end of period	49.46	49.15	48.96
Net Asset Value Total Return (%)^(d)	3.28	3.64	(1.54) ^(e)
Market Price Total Return (%)^(d)	3.32	3.62	(1.55) ^(e)
Ratios/Supplemental Data (%):			
Ratio of total expenses to average net assets	0.12 ^(f)	0.12	0.12 ^(f)
Ratio of net investment income to average net assets	4.58 ^(f)	3.19	0.39 ^(f)
Portfolio Turnover Rate ^(g)	21.05	20.55	43.10
Net Assets, end of period (\$ x 1,000)	66,764	29,498	26,931

^(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) Annualized.

^(g) 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 Ultra Short Income ETF (the “fund”) is a separate 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 high current income consistent with the maintenance of liquidity and low volatility of principal. 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. Dreyfus, a division of Mellon Investments Corporation (the “Sub-Adviser”), 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.

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:

Registered investment companies that are not traded on an exchange are valued at their net asset value and are generally categorized within Level 1 of the fair value hierarchy.

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 debt securities excluding short-term investments (other than U.S. Treasury Bills) are valued each business day by one or more independent pricing services (each, a "Service") approved by the Board. Investments for which quoted bid prices are readily available and are representative of the bid side of the market in the judgment of a Service are valued at the mean between the quoted bid prices (as obtained by a Service from dealers in such securities) and asked prices (as calculated by a Service based upon its evaluation of the market for such securities). Securities are valued as determined by a Service, based on methods which include consideration of the following: yields or prices of securities of comparable quality, coupon, maturity and type; indications as to values from dealers; and general market conditions. Each Service and independent valuation firm is engaged under the general oversight of the Board. Overnight and certain other short-term debt instruments (excluding U.S. Treasury Bills) will be valued by the amortized cost method, which approximates value, unless a Service provides a valuation for such security or, in the opinion of the Board or a committee or other persons designated by the Board, the amortized cost method would not represent fair value. These securities are generally categorized within Level 2 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.

The table below summarizes the inputs used as of December 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: [†]				
Asset-Backed Securities	—	1,126,197	—	1,126,197
Commercial Paper	—	23,513,014	—	23,513,014
Corporate Bonds	—	28,162,519	—	28,162,519
U.S. Treasury Government Securities	—	4,976,660	—	4,976,660
Investment Companies	8,834,231	—	—	8,834,231

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

(b) 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.

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

(d) 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.

Fixed-Income Market Risk: The market value of a fixed-income security may decline due to general market conditions that are not specifically related to a particular company, such as real or perceived adverse economic conditions, changes in the outlook for corporate earnings, changes in interest or currency rates or adverse investor sentiment generally. The fixed-income securities market can be susceptible to increases in volatility and decreases in liquidity. Liquidity can decline unpredictably in response to overall economic conditions or credit tightening. Increases in volatility and decreases in liquidity may be caused by a rise in interest rates (or the expectation of a rise in interest rates). An unexpected increase in redemption requests, including

requests from Authorized Participants who may own a significant percentage of the fund's shares, which may be triggered by market turmoil or an increase in interest rates, could cause the fund to sell its holdings at a loss or at undesirable prices and adversely affect the fund's share price and increase the fund's liquidity risk, fund expenses and/or taxable distributions. Federal Reserve policy in response to market conditions, including with respect to interest rates, may adversely affect the value, volatility and liquidity of dividend and interest paying securities. Policy and legislative changes worldwide are affecting many aspects of financial regulation. The impact of these changes on the markets and the practical implications for market participants may not be fully known for some time.

Commercial Paper Risk: Commercial paper is a short-term obligation with a maturity generally ranging from one to 270 days and is issued by U.S. or foreign companies or other entities in order to finance their current operations. Such investments are unsecured and usually discounted from their value at maturity. The value of commercial paper may be affected by changes in the credit rating or financial condition of the issuing entities and will tend to fall when interest rates rise and rise when interest rates fall.

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.

(e) Dividends and distributions to shareholders: Dividends and distributions are recorded on the ex-dividend date. Dividends from net investment income are normally declared and paid on a monthly basis. 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.

On December 26, 2023, the Board declared a cash dividend of \$0.14 per share from net investment income, payable on January 3, 2024 to shareholders of record as of the close of business on December 28, 2023. The ex-dividend date was December 27, 2023.

(f) 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 December 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 December 31, 2023, the fund did not incur any interest or penalties.

Each tax year in the two-year period ended June 30, 2023 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 \$156,066 available for federal income tax purposes to be applied against future net realized capital gains, if any, realized subsequent to June 30, 2023. The fund had \$105,384 of short-term capital losses and \$50,682 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 year ended June 30, 2023 were as follows: ordinary income \$878,254. The tax character of current year distributions will be determined at the end of the current fiscal year.

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 0.12% 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 December 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 0.06% 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 \$4,627.

(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 (including paydowns, if any) of investment securities, excluding short-term securities and in-kind transactions, during the period ended December 31, 2023, amounted to \$18,638,014 and \$4,305,795, respectively.

At December 31, 2023, accumulated net unrealized depreciation on investments was \$6,202, consisting of gross appreciation of \$187,002 and gross depreciation of \$193,204.

At December 31, 2023, 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.

Seed Capital: As of December 31, 2023, MBC Investments Corporation, a wholly-owned subsidiary of BNY Mellon, held 499,001 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 period ended December 31, 2023, the fund had no in-kind transactions.

LIQUIDITY RISK MANAGEMENT PROGRAM (Unaudited)

The funds of the Trust have adopted a liquidity risk management program (the “Program”) pursuant to the requirements of Rule 22e-4 under the Investment Company Act of 1940, as amended. Rule 22e-4 requires registered open-end funds, including exchange-traded funds, to establish liquidity risk management programs in order to effectively manage fund liquidity and shareholder redemptions. The rule is designed to mitigate the risk that a fund could not meet redemption requests without significantly diluting the interests of remaining investors. The Board has appointed BNY Mellon ETF Investment Adviser, LLC, the investment adviser to the funds, as the Program Administrator.

The rule requires each fund to assess, manage and review its liquidity risk at least annually, considering applicable factors such as investment strategy and liquidity during normal and reasonably foreseeable stressed conditions, including whether the strategy is appropriate for an open-end fund and whether the fund has a relatively concentrated portfolio or large positions in particular issuers. Each fund must also assess its use of borrowings and derivatives, short-term and long-term cash flow projections in normal and reasonably foreseeable stressed conditions, holdings of cash and cash equivalents, and borrowing arrangements and other funding sources. In addition, with respect to an exchange-traded fund, a fund must assess the relationship between the fund’s portfolio liquidity and the way in which, and the prices and spreads at which, the fund’s shares trade, and the effect of the composition of baskets on the overall liquidity of the fund’s portfolio.

The rule also generally requires funds to classify each of their investments as highly liquid, moderately liquid, less liquid or illiquid based on the number of days the fund expects it would take to liquidate the investment, and to review these classifications at least monthly or more often under certain conditions. Illiquid investments are those a fund does not expect to be able to sell or dispose of within seven calendar days without the sale or disposition significantly changing the market value of the investment. A fund is prohibited from acquiring an investment if, after the acquisition, its holdings of illiquid assets will exceed 15% of its net assets. In addition, if a fund permits redemptions in-kind, the rule requires the fund to establish redemption in-kind policies and procedures governing how and when it will engage in such redemptions.

Pursuant to the rule’s requirements, the Program has been reviewed and approved by the Board. Furthermore, at its November 2023 meeting, the Board received a written report prepared by the Program Administrator, for the period October 1, 2022 to September 30, 2023, addressing the operation of the Program, assessing the Program’s adequacy and effectiveness and describing any material changes made to the Program.

Assessment of Program

In the opinion of the Program Administrator, the Program approved by the Board continues to be adequate for the funds and the Program has been implemented effectively. The Program Administrator has monitored each fund's liquidity risk and the liquidity classification of the securities held by the funds and has determined that the Program is operating effectively.

During the period from October 1, 2022 to September 30, 2023, there were no material changes to the Program and no material liquidity events that impacted the funds. During the period, each fund held sufficient highly liquid assets to meet fund redemptions.

Under normal expected foreseeable fund redemption forecasts and foreseeable stressed fund redemption forecasts, the Program Administrator believes that each fund maintains sufficient highly liquid assets to meet expected fund redemptions.

For More Information

BNY Mellon ETF Trust

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240 Greenwich Street
New York, NY 10286

Adviser

BNY Mellon ETF Investment Adviser, LLC
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Sub-Adviser

Dreyfus
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Custodian

The Bank of New York Mellon
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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 Ultra Short Income ETF

BKUI

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/etf/literature>. 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.