

Manager Commentary Q3 2026

BNY MELLON DYNAMIC VALUE ETF (BKDV)

Market Review

Global equities rose in the third quarter, driven by strong earnings growth. However, renewed conflict between the U.S. and Iran pushed oil prices higher, which in turn lifted inflationary pressures and bond yields. Bonds also took a hit from mounting government debt across developed markets, while corporate bonds faced additional pressure as large technology companies issued debt to fund their artificial intelligence (AI) ambitions. Concerns about excessive AI spending weighed on equities in July, though confidence returned as the quarter progressed. Nevertheless, value stocks outpaced their growth counterparts over the quarter. U.S. equities outperformed other developed markets, with the S&P 500® Index returning 2.30%. The MSCI EAFE Index, which tracks developed markets outside the U.S. and Canada, gained 0.81%, while the MSCI Emerging Markets Index returned -0.37%.

Quarterly Performance

BNY Mellon Dynamic Value ETF (NAV) returned 0.57% during the third quarter of 2026. In comparison, the fund's benchmark, the Russell 1000 Value Index (the "Index"), returned 2.61% for the same time period.

Average Annual Total Returns (9/30/26)

Ticker	3 Month (%)	YTD (%)	1 Year (%)	Since Inception 11/1/24 (%)
BKDV Market Price	0.63	16.13	21.96	17.44
BKDV NAV	0.57	16.22	21.87	17.37
Russell 1000® Value Index	2.61	19.27	23.81	

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. Performance for periods less than 1 year is not annualized. Go to bny.com/investments/etf for the fund's most recent month-end returns. Returns assume the reinvestment of dividends and capital gains, if any. A fund's NAV is the sum of all its assets less any liabilities, divided by the number of shares outstanding. Market Price performance is calculated using the most recent NYSE Arca Official Closing Price. Market Price returns do not represent investors' returns had they traded shares at other times.

Total Expenses (9/30/26)

	Gross ¹	Net ²
BKDV	0.60%	0.60%

¹Gross expenses is the total annual operating expense ratio for the fund, before any fee waivers or expense reimbursements.

²Net Expenses is the total annual operating expense ratio for the fund, after any applicable fee waivers or expense reimbursements. The Net Expense ratio is the actual fund expense ratio applicable to investors.

Market Review (continued)

U.S. equities delivered mixed results. The S&P 500 led the way, while the NASDAQ 100 Index® gained 0.58% and the Dow Jones Industrial Average® fell 2.34%. Within the S&P 500, just four of the 11 Global Industry Classification Standard (GICS) sectors rose, led by energy and information technology.

The U.S. economy remained resilient. Gross domestic product (GDP) growth for the second quarter came in at 2.2%, beating expectations, though down from the first quarter's 2.5%. Job growth disappointed in June and July, but August payrolls came in well ahead of expectations. Inflation, which peaked at 4.2% in May, cooled to 3.5% in June and 3.4% in July and August, still above the Federal Reserve's target. As expected, the central bank raised rates by 25 basis points (bps) to 3.75%-4.00% in September and signaled further tightening this year. U.S. Treasuries sold off sharply, as higher oil prices lifted inflation expectations and worries about rising government debt deepened. The U.S. dollar edged higher against a basket of currencies over the quarter.

Across other developed markets, the European Central Bank raised rates by 25 bps in September, its second hike of 2026, as eurozone inflation remained above target and economic activity stayed relatively resilient. The eurozone's GDP grew 0.6% in the second quarter from the prior quarter, its fastest pace since the second quarter of 2022. In the U.K., political uncertainty eased after Andy Burnham succeeded Keir Starmer as prime minister in July. Burnham had previously backed higher government spending, which had rattled government bonds, but he pledged to stick to existing borrowing limits, reassuring investors. The Bank of England held rates steady throughout the quarter, though rising oil prices boosted expectations of a rate hike later in the year. Meanwhile, the Bank of Japan raised rates to 1.25% in September, the highest in more than three decades, to stabilize inflation. Even so, the yen still weakened against the U.S. dollar, given the wide gap between the two countries' interest rates.

Emerging-market equities slipped modestly, lagging their developed-market peers. South Korea fared worst, hit hard by a sell-off in AI-related stocks in July, while India felt the squeeze from higher oil prices. However, rising oil prices supported Brazil, an energy exporter, while cooling inflation further lifted sentiment, prompting the central bank to cut rates twice during the quarter. Taiwan and China also gained. Taiwan, like Korea, sold off sharply in July as chip stocks weakened, before rebounding strongly as investors regained confidence in the AI theme. China's gains came despite persistent concerns about weak domestic demand and some disappointing data: second-quarter GDP growth missed expectations, and retail sales growth slowed in July and August.

Commodities delivered strong gains, with the Bloomberg Commodity Index Total Return returning 16.19% over the quarter. Oil prices surged as conflict flared again in the Middle East, with Brent crude climbing above \$100 a barrel. Geopolitical uncertainty and rising inflation expectations also supported precious metals, with both gold and silver rising modestly, though gains were capped by rising bond yields and the prospect of higher interest rates.

Performance Review

The fund underperformed its benchmark, the Russell 1000 Value Index, during the third quarter of 2026. Stock selection in the consumer staples sector was a large contributor to relative returns, and an underweight position in the utilities sector was also beneficial. Conversely, stock selection in both the information technology and financials sectors detracted.

Top 10 Holdings (9/30/26)

	%		%
Amazon.com	5.94	Berkshire Hathaway	2.56
Microsoft	5.64	Thermo Fisher Scientific	2.37
JPMorgan Chase & Co.	3.98	SLB	2.32
Apple	3.34	UnitedHealth Group	2.30
Johnson & Johnson	2.77	Assurant	2.25

The holdings listed should not be considered recommendations to buy or sell a security. Large concentrations can increase share price volatility.

Sector Review¹

Positive Impacts

Consumer Staples: Stock selection in the consumer staples sector contributed to relative performance, as a large retailer outperformed. Additionally, not owning several underperforming benchmark holdings in the consumer staples distribution and retail segment contributed to relative returns.

Utilities: An underweight position in the utilities sector benefited relative returns, notably among electric utilities names.

Negative Impacts

Information Technology: Stock selection detracted from relative returns during the third quarter. IT services names weighed on performance, notably the position in International Business Machines Corporation. In the technology hardware, storage, and peripherals segment, the underweight position in Apple Inc. detracted, while Applied Materials declined in the semiconductors and semiconductor equipment segment.

Financials: Stock selection in the financials sector, particularly among insurance names, also weighed on relative returns.

Stock Review¹

Key Contributors

Thermo Fisher Scientific: The leading provider of scientific instrumentation, reagents, software, and consumables for life sciences and health care gained after announcing solid earnings, buoyed by its Laboratory Products and Biopharma Services unit. Shares received a further boost in September after management stated that it saw improving demand across several of its business lines.

Marathon Petroleum Corporation: Shares of the energy company rallied early in the quarter, as crude oil prices rose amid escalating geopolitical tensions in the Middle East. The company also benefitted from widening crack spreads (the price difference between crude oil and its refined products like gasoline and heating oil), as refining capacity remained tight across the globe.

Phillips 66: Shares of the energy company rallied early in the quarter, as crude oil prices rose amid escalating geopolitical tensions in the Middle East. The company also benefitted from widening crack spreads as tightened refining capacity persisted across the globe.

Key Detractors

Apple: Apple was added to the Russell 1000 Value benchmark at the end of the second quarter. Not owning Apple at the beginning of the period, followed by an underweight allocation for the second half of the quarter, weighed on relative results as shares moved higher ahead of their new iPhone launch.

International Business Machines Corporation: Shares of IBM fell after the company issued an unexpected preliminary earnings warning as clients redirected their technology budgets away from the company's software offerings.

Applied Materials: Shares of semiconductor companies declined early in the quarter following intense investor skepticism about the massive capital expenditure (capex) required for AI infrastructure without immediate, proportional revenue returns.

¹Performance of individual stock evaluated is based on total effect. Total effect represents the opportunity cost of an investment manager's investment decisions relative to an overall benchmark, which can include holdings that are not held by the portfolio but contribute to relative portfolio performance.

Market Outlook

Over the past few years, we believe investors should consider a “balanced” approach in their portfolios given the volatility in the market as well as the wide dispersion of potential outcomes from major macro events and thematic drivers. We believe that so far in 2026, achieving “balance” has served investors well given the multiple changes in market leadership. Shifts in investor sentiment around AI winners and losers, followed by geopolitical tensions spiking and then easing, and more recently, uncertainty about monetary policy, especially in the U.S., have led to some dramatic shifts in market direction and desired exposures.

In the coming weeks, companies will begin reporting earnings for the third quarter. We will be particularly focused on how they have been dealing with higher energy and input prices and whether they are being absorbed by the companies or being passed along the supply chain to the consumer. Also of particular interest are companies’ outlooks for 2027 to identify which companies are gaining, or losing, earnings momentum.

In addition to corporate earnings season, we will also be following the U.S. mid-term elections, where “affordability” is the key debate. While we do not have any predictions on the outcome, we do note that a divided government has historically been good for the markets. One risk we will be watching is how a potential significant power shift could impact some of the market tailwinds we have experienced over the past year, including fiscal policy and stimulus programs as well as financial deregulation initiatives. For us, we believe “balance” remains an optimal strategy going forward.

Within the strategy, we continue to take advantage of the shorter-term cyclical opportunities presented by the market while also focusing on some of the longer-term structural and secular tailwinds. In the short term, that includes adding and trimming around existing positions in energy and technology. Longer term, we continue to look for the most attractive opportunities that we believe will benefit from fiscal policy and stimulus, financial deregulation, and the broadening of AI adoption.

We continue to believe that the current market environment favors an active management approach. Equity markets are forward-looking and can move quickly to price in, or price out, risk and opportunity. It is our view that active managers with extensive resources are well positioned to identify potential winners and losers, regardless of the market driver. Above all, we believe that investing in companies with strong and improving fundamentals, attractive valuations, and catalyst-driven business momentum has the potential to provide attractive long-term investment outcomes for our clients.

DISCLOSURES

Investors should consider the investment objectives, risks, charges and expenses of an ETF carefully before investing. To obtain a prospectus, or a summary prospectus, if available, that contains this and other information about a fund, contact your financial professional. For more information, call 1-800-373-9387 or visit bny.com/investments/etf. Read the prospectus carefully before investing.

Past performance is no guarantee of future results.

Risks

ETFs trade like stocks, are subject to investment risk, including possible loss of principal. The risks of investing in ETFs typically reflect the risks associated with the types of instruments in which the ETF invests.

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 the payment of brokerage commissions. Any applicable brokerage commissions will reduce returns.

The fund will issue (or redeem) fund shares to certain institutional investors known as “Authorized Participants” (typically market makers or other broker-dealers) only in large blocks of fund shares known as “Creation Units.” BNY Mellon Securities Corporation (“BNYSC”), a subsidiary of BNY, serves as distributor of the fund. BNYSC does not distribute fund shares in less than Creation Units, nor does it maintain a secondary market in fund shares. BNYSC may enter into selected dealer agreements with Authorized Participants for the sale of Creation Units of fund shares.

Equities are subject to market, market sector, market liquidity, issuer, and investment style risks, to varying degrees. Investing in **foreign denominated and/or domiciled securities** involves special risks, including changes in currency exchange rates, political, economic, and social instability, limited company information, differing auditing and legal standards, and less market liquidity. These risks generally are greater with emerging market countries.

As of 9/30/26, the companies mentioned represented 7.87% of the fund's portfolio in the aggregate. The holdings listed should not be considered recommendations to buy or sell a particular security. Other holdings may not have performed as well as some of those listed herein. Portfolio composition is subject to change at any time.

Q is quarter. **US** is United States. **FDIC** is Federal Deposit Insurance Corporation. **AI** is Artificial intelligence and refers to computer systems that can perform tasks typically requiring human intelligence, such as visual perception, speech recognition, decision-making, and language translation.

Index Definitions

The **Russell 1000® Value Index** is an unmanaged index which measures the performance of those Russell 1000® companies with lower price-to-book ratios and lower forecasted growth values. The **S&P 500® Index** is widely regarded as the best single gauge of large-cap U.S. equities. The index includes 500 leading companies and captures approximately 80% coverage of available market capitalization. This is not a benchmark for the fund. The **Morgan Stanley Capital International Europe, Australasia, Far East (MSCI EAFE®) Index** is a free float-adjusted, market capitalization-weighted index that is designed to measure equity performance in developed markets, excluding the United States and Canada. The index consists of select designated MSCI national developed market indices. The **MSCI Emerging Markets Index** is a free float-adjusted, market capitalization-weighted index that is designed to measure the equity performance in global emerging markets. The index consists of 22 MSCI emerging-market national indices. This is not a benchmark for the fund. The **Bloomberg Commodity Index** is a broadly diversified financial benchmark that tracks the price movements of exchange-traded futures contracts on physical commodities. An investor cannot invest directly in any index. GICS stands for the **Global Industry Classification Standard**, a system developed by S&P Dow Jones Indices and MSCI to categorize companies into sectors and industries based on their principal business activities.

The fund's investment adviser is BNY Mellon ETF Investment Adviser, LLC. BNY Mellon ETF Investment Adviser, LLC has engaged its affiliate, Newton Investment Management North America, LLC (NIMNA), to serve as the fund's sub-adviser.

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