

**ACETO CORPORATION**  
**DISCLOSURE COMMITTEE CHARTER**  
**September 2003**

This disclosure committee (the "Committee") charter (the "Charter") has been established by Aceto Corporation (the "Company") and ratified by the Company's board of directors to assist the Company's chief executive officer and chief financial officer (the "Certifying Officers").

**I. Objective**

The Committee has been formed to help ensure that disclosures made by the Company in its United States Securities and Exchange Commission (the "SEC") filings and to the investment community comply with applicable laws and stock exchange rules.

The Committee shall have full access to the Company's books, records and facilities, and the Company's officers and employees, regarding any matter within the scope of the Committee's responsibilities. The Committee shall confer with the Company's independent auditors and outside legal counsel in order to verify the accuracy and completeness of the Company's disclosures.

The Committee will, under the supervision and oversight of the Certifying Officers, facilitate these objectives by:

A. Creating a process (this process shall be referred to as the Company's "Disclosure Controls and Procedures") designed to ensure that information required by the Company to be disclosed in filings with the SEC and other information that the Company discloses to the investment community is recorded, processed, summarized and reported accurately and timely.

B. Supervising the preparation of the Company's: (i) annual report on Form 10-K and each quarterly report on Form 10-Q (collectively, the "periodic reports"), and current reports, proxy statements, information statements, registration statements and other filings with the SEC; (ii) press releases containing financial and other information material to the marketplace for the Company's securities; (iii) presentations to shareholders, analysts and the investment community; and (iv) presentations to rating agencies and lenders (collectively, the "Disclosure Statements"); and (v) the Company's web site.

C. Evaluating the integrity and effectiveness of the Company's Disclosure Controls and Procedures within 90 days before the Company files its periodic reports with the SEC and any amendments to those reports.

D. Reviewing with the Certifying Officers, outside counsel and the public auditors all relevant information with respect to the Committee's proceedings, the preparation of the Disclosure Statements and the Committee's evaluation of the effectiveness of the

Company's Disclosure Controls and Procedures.

E. Certifying to the Certifying Officers before filing each periodic report as to: (i) the Committee's compliance with this charter and the Disclosure Controls and Procedures; and (ii) the Committee's conclusions resulting from its evaluation of the effectiveness of the Disclosure Controls and Procedures.

## **II. Membership, Process**

A. Committee members shall include the Company's chief financial officer, controller, vice president of administration, vice president of international, and other appropriate Aceto employees as determined by the Certifying Officers.

B. The Certifying Officers (acting with such members of the Committee as they shall determine) may, at any time, assume any or all of the duties of the Committee identified in this Charter, including, for example, approving the Disclosure Statements when time or other factors do not permit the full Committee to review the Disclosure Statement.

C. The chief financial officer shall serve as the Committee Chair. The Committee Chair shall schedule and preside over meetings and prepare agendas. Any interpretation of the Charter or the Committee's procedures shall be made by the Committee Chair.

D. As soon as practicable, the Committee shall prepare and submit for the approval of the Certifying Officers and the Company's Board of Directors, a set of Disclosure Controls and Procedures, including policies and procedures of the Committee and policies and procedures to test the effectiveness of the Disclosure Controls and Procedures.

E. The Committee shall meet as necessary to: (i) ensure the accuracy and completeness of the Disclosure Statements; and (ii) evaluate the Disclosure Controls and Procedures.

## **III. Periodic Evaluation**

The Committee shall review and reassess this Charter and the performance of the Committee annually and recommend any proposed changes to the Certifying Officers and the Board of Directors for approval.

## **IV. Other Responsibilities, Delegation**

The Certifying Officers may assign other responsibilities, consistent with this Charter, to the Committee, and may delegate as they consider appropriate.