

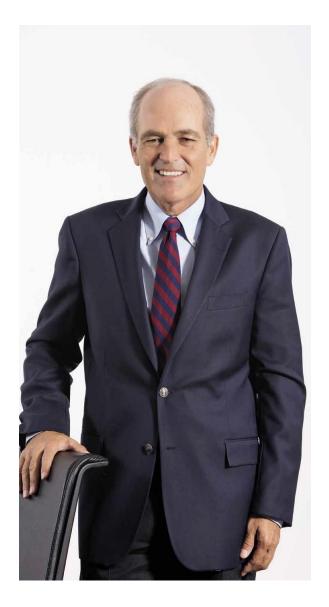
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Message from the Chairman of the Board



The reputation of Buenaventura is the result of the mission, passion, work and commitment of its founders and who we collaborate with in achieving what we are today: one of the most important mining groups in Peru. Our reputation is not only based on the success we may have as a company, but also on who we are and how we differ as a human group.

It is our values, actions and decisions that define us and that is precisely where the importance of committing ourselves to the compliance with our Code of Ethics and Good Conduct arises in order to achieve the objectives we set year after year.

In this sense, the success of Buenaventura lies in a series of values that constitute the basis for our thinking and acting, as well as the principles on which our Code of Ethics and Good Conduct is developed:

- Respect: treat people well and with courtesy, valuing their culture, opinions and rights.
- **Diligence:** give your best at work, acting safely and responsibly.
- Loyalty: sincere commitment to the vision, objectives and values of the organization.
- Honesty: that consolidates us as outstanding professionals with an impeccable career.
- Transparency: report and communicate clear, reliable and timely information on the facts, events and results of the organization.

People are our most valuable asset and each of you occupies an important role within our organization, representing Buenaventura before the shareholders, clients, suppliers, public entities and communities.

To achieve this, we are confident that you will always maintain the highest behavior standards in the performance of your duties and ensure that your acts continuously enhance the excellent

reputation of Buenaventura and its subsidiaries.

While this document addresses a number of situations that any of us might face at any given time, it is impossible to cover all the situations that may arise.

Consequently, if you are unsure about the right course of action, consult with your direct supervisor, the Ethics Officer or use the confidential communication lines to report any problem that arises.

We thank you for taking the time to read and understand our Code of Ethics and Good Conduct. Our values define who we are and must remain unchanged.

We are sure that we have all your support, enthusiasm and commitment to continue building the future of Buenaventura as one company.

Warm regards,

Roque BenavidesChairman of the Board



1. General

1.1 Objectives

The Code of Ethics and Good Conduct (hereinafter the "Code") of Buenaventura (hereinafter "Group", "Buenaventura Group", "Buenaventura" or "Company") describes the manner in which we must work and contains the principles and guidelines of conduct that must be followed by all those within its scope. This code and its annexes are designed to help us evaluate and deal with different situations we may encounter.

1.2 Scope

The Code of Ethics and Good Conduct applies to all collaborators of the Buenaventura Group, Adherent and Third-Party Collaborators from all locations, who must adhere to its principles and requirements.

1.3 Basic Definitions

- Collaborators of the Buenaventura Group: All those people (Employees and Workers, Permanent or Temporary, Interns, Officers, Executives, Managers and Directors) who work for the Buenaventura Groups or for any of its subsidiaries or affiliates adherent to compliance with this Code, regardless of the position, geographical location, level of responsibility or subsidiary to which they belong.
- Adherent Partners: All those natural or legal persons contractually bound to the terms and commitments of compliance with this Code. In the case of legal entities, their Employees, Workers, Executives and Directors.
- Third Parties: Persons or businesses that supply the Company with goods or services, including: port and customs agents, contractors, lawyers, tax advisors, consultants, expediters, funding organizations and other people who act on behalf of, in representation of or in the interest of the Company, as well as those third parties who are subject by contract to this Policy. "Sensitive" Third Parties are

those that imply for the Company a greater risk for the control of Corruption and Bribery.

- Due Diligence: Obligation to act with prudence, opportunity and good faith in the best interests of the Company and not of individual interests.
- BVN Ethics Channel: (also called Ethics Line) Anonymous and independent means at the disposal of the Group's collaborators, for reporting unusual situations or non-compliance with the Code of Ethics and Good Conduct, with the Anti-Corruption Policy, or with the Company's policies or procedures. The telephone number and Web Portal are provided in section 4 of this Code, and is at the disposal of all collaborators 24 hours a day, 7 days a week and 365 days a year.
- Stakeholders: All those groups that are directly or indirectly affected by the development of the business activity of Buenaventura (e.g. employees, clients, suppliers, communities, authorities, civil society, among others).

2. Relationship with our stakeholders

2.1 Commitment to our collaborators

Working relationship with our collaborators	We are committed to treating people with respect and justice, caring of their safety and investing in their development. Likewise, they are expected to act with integrity, performing their duties in an honest and transparent manner without seeking undue personal advantage.
Respect for others (prevention of	We are committed to maintaining a working environment free from harassment, intimidation and bullying, with mutual respect being the basis of relations between collaborators.
harassment and bullying)	Examples of harassment and bullying include, but are not limited to, sexual, workplace and psychological harassment.
Working relationship with our collaborators	We are committed to providing our employees and people with a safe and healthy work environment. There is no justification for putting their physical integrity at risk. We are responsible for sharing and requiring visitors, clients, employees and contractors to comply with safety measures.
	(For more details refer to: Occupational Health and Safety Policy, Environment, Quality and Community Relations / Internal Regulations for Safety and Health at Work)
Violence-free environment	We are committed to treating our visitors, clients, employees, contractors and people in general with respect, dignity, justice and courtesy, expecting them to reject and report any violent acts they observe.

2.2 Commitment to our shareholders

Alteration of reports or records:

Our reports and records must fully, accurately, timely and truthfully reflect the situation of the Company. This is the most important measure to preserve the trust of shareholders and stakeholders.

We are committed to responsibly disclose the Company information. To not altering Company reports or records, to not providing false information and not violate established regulations or procedures.

Furthermore, we are committed to not exerting influence or pressure on our employees to alter reports, records or apply improper financial or accounting practices.

(For more details refer to: Anti-Fraud and Anti-Corruption Policy).

Avoid conflicts of interest:

Persons subject to this Code must act with loyalty to the vision of Buenaventura, avoiding conflicts of interest (real or apparent) between our interests and those of the Group.

A conflict of interest exists when an employee is in a position of having to choose between two incompatible interests, a personal one versus the company's, or when a personal matter prevents them from taking decisions in the best interests of the Group.

We are committed to not abusing our position in order to gain undue advantage, accept, agree to or offer, directly or indirectly, any type of reward for our own benefit or that of third parties other than those of the Group, such as:

- Participate in personal business involving the operations of the Company, representing, directly or indirectly, our own interests, those of our family or related third parties.
- Be a consultant, director, executive or employee of, or have an interest in, a supplier, contractor or subcontractor, client or competitor of the Company

without prior written consent of the latter.

- Offer any kind of product or service directly or indirectly to Buenaventura (through contractors or subcontractors).
- Receive improper personal benefits as a result of unlawful use or appropriation of assets or services owned by the Company.
- Accept money, gifts, discounts or loans from suppliers, clients or competitors of the Company without the knowledge or approval of the respective Management and/or the Company's Ethics Officer.

In accordance with the Company's Policy, all persons subject to this Code must declare annually whether or not we have a conflict of interest and must also report any modification to the declaration made immediately upon its occurrence.

(For more details refer to: Anti-Corruption Policy and Conflict of Interest Management Policy).

Responsible use of delegated authority – commitment to internal regulations of Buenaventura:

We are committed to always comply with the policies, procedures and controls implemented by Buenaventura, including those applying to negotiation and approval processes for acquisitions and contracts.

This implies to follow the consultation procedures, thus avoiding exceeding the authority invested upon us.

Fraud prevention:

Fraud is a crime and shall not be tolerated by the Buenaventura Group. It affects our reputation, market value and culture. Fraud is any act of intentional deception to gain an undue advantage.

This type of event is related to:

- Misappropriation of assets: including appropriation or theft of assets, misuse, cash theft, checks or deposits, payment to fictitious employees, theft of company information, among others.
- Acts of corruption: this includes bribes to public officials and between individuals (bribery), illegal payments, extortion, conflicts of interest.
- Fraudulent financial and non-financial reports: which includes acts of manipulation of financial and non-financial reports, overvaluation of assets, tax fraud, among others.

We are committed to timely report any concerns or suspicions related to potential fraud, bribery or irregularities.

(For more details refer to: Anti-Fraud Policy)

Gifts, entertainment and improper courtesies:

We shall not give, offer, promise, accept nor solicit any financial compensation or anything of value, directly or through an intermediary, as an improper inducement or reward for obtaining any business, benefit or advantage, whether involving the public or private sector.

Nor shall we receive or deliver, directly or indirectly, any favours, gifts and/or courtesies that might compromise or give the impression of compromising our impartiality or that might, in any way, limit our ability to act with integrity in the best interests of the Company. This policy includes members of our immediate family.

(For more details refer to: Anti-Corruption Policy / Policy on Donations and/or Charitable Contributions).

Responsible use of travels:

We are committed to a responsible use of the budgets and other resources allocated by Buenaventura for trips inside the country and abroad.

Responsible use of information technology and company assets:

We are committed to using responsibly and for work purposes only, all the technological resources and assets of the Company assigned to us.

We understand that our personal data, information or electronic communication created or stored in computers or other electronic means provided by Buenaventura, such as portable devices belonging to the company, are not considered private.

We follow the policies of Buenaventura regarding the use of information technology and Company assets, understanding that our electronic communications may be stored and may be subject to monitoring or audits at any time without notice.

Appropriate use of confidential or privileged information:

Our objective is to protect confidential or privileged information of the Buenaventura Group (such belonging to the Group or third parties, which is not publicly available or is not known), in accordance with professional standards, applicable laws, internal policies and good professional judgment. Therefore, we are required to:

- Establish mechanisms for complying with Personal Data Protection of employees, clients, suppliers or other persons or entities, as stipulated by the respective Personal Data Protection Act.
- Take measures to protect records, documents, computers, and other data sources containing confidential information.
- Not use confidential information for personal advantage.
- Not share information that could have an impact on business without the express written consent of the Company.
- Not to trade, directly or indirectly, Company shares by making use of privileged information, in compliance with the provisions set forth in the Single Consolidated Text of the Securities Market Law, approved by Supreme Decree No. 093-2002-EF and to the provisions of its amendments, annulments and/or

replacements.

(For more details refer to: General Information Security Policy).

2.3 Commitment to our Clients and Suppliers

Relationship with our suppliers and the market:

We are committed to building relationships based on fair and ethical professional practices with our suppliers and third parties, operating in a truthful, fair and corruption-free manner, in compliance with the applicable laws and regulations.

Fair and ethical agreements:

We are committed to negotiating fair agreements with our partners, suppliers and competitors.

2.4 Commitment to our communities and the environment

Corporate Social Responsibility:

In compliance with our social commitments, we are committed to promoting the sustainable development of the communities with which we interact, as well as to fighting poverty and protecting the environment under the direction of the General Management.

(For more details refer to: Community Handbook / Gifts and/or Charitable Contribution Policy).

Relationship with the communities:

We are committed to creating and maintaining respectful relationships with the communities with which we interact, to deal in a timely manner with those aspects that may affect them and to periodically evaluate the impact of our activities on local environmental, social and economic development.

Relationship with the environment:

We are committed to achieving the efficient use of natural resources, including the reduction and prevention of pollution and major protection of biodiversity by assessing ecological values and land use in the development of our activities.

2.5 Commitment to our authorities, the State and the society

Compliance with laws and regulations:

In all locations where Buenaventura operates it has the obligation and commitment to comply with all applicable laws and regulations. In addition, as a publicly traded company on the New York Stock Exchange, Buenaventura is committed to complying with the laws and regulations of the United States of America.

To this end, we, the persons subject to this Code, are committed to reporting any suspected illegal acts or breaches by employees or third parties.

Corruption and bribery:

We are against any act of corruption and bribery, and any illegal or improper payment in order to obtain personal benefits for the company or third parties is prohibited.

We must not promise, offer, solicit, receive or give undue advantage or anything of value to a person or entity, directly or through an intermediary, so that person or entity performs or refrains from performing any act involving a breach of their corporate or public duties.

(For more details refer to: Anti-Corruption Policy).

Improper interactions with public officials:

We have a responsibility not to engage in improper interactions with Public Officials, and are prohibited from offering, promising, accepting or soliciting any financial compensation or anything of value, directly or through an intermediary, such as improper inducement or reward to obtain businesses, any other benefit or improper advantage in order to influence their decisions (directly or indirectly).

(For more details refer to: Anti-Corruption Policy).

Money laundering / financing of terrorism:

We are committed to not:

- Concealing money or assets derived from illicit activities.
- Acquiring, using or retaining money or other assets derived from illicit activities.
- Participating, directly or indirectly, in commercial, financial or other relationships involving assets derived from criminal or illicit activities.
- Forging, concealing or destroying documents for the purpose of impeding an investigation on Money Laundering and/or Terrorist Financing.
- Bring to the attention of any person, entity or body, by any means or modality, the fact that any information has been requested and/or provided to the Financial Intelligence Unit (UIF-Peru for its acronym in Spanish).

(For more details refer to: Money Laundering and Financing of Terrorism Prevention System Manual)

Political contributions:

As a general rule, we do not make political donations, either in cash or in kind. If any contribution is made, it must be approved in advance by the General Manager, be permitted under local laws, be made without any promise or expectation of favour in return and be duly recorded in the books.

(For more details refer to: Anti-Corruption Policy and Policy on Donations and/or Charitable Contributions).

3. Non-compliance with the Code of Ethics and Good Conduct

If any violation of this Code by an Employee of the Buenaventura Group is determined, the Employee shall be sanctioned depending on the seriousness of the case. The sanctions may be as follows:

TYPE OF OFFENCE	SANCTION	DESCRIPTION OF THE SANCTION
Minor	Verbal or written warning	Breaches classified as minor shall result in a warning (verbal or written in the event of a repeated offence), including a warning that the breach may be classified as serious if the unwanted conduct persists. If the decision is made to issue a written warning, it will be recorded in the collaborator's personal file.
Moderate	Temporary suspension of employment and salary	Breaches classified as moderate shall result in the temporary suspension of employment and salary of the employee who committed the breach. The number of days shall be determined by the Ethics Committee, as provided by law.
Serious	Layoff	Breaches classified as serious shall result in the employee's layoff.

(For more details refer to the Section on: Complaints Mechanisms and Complaints Handling Procedure).

If necessary or if there is a legal obligation on the matter, the Company shall refer such cases of non-compliance to the appropriate authorities.

The Code of Ethics and Good Conduct of the Buenaventura Group establishes guidelines on how we should work; however, not all situations were able to be

expressly included thereto. Notwithstanding, it is expressly established herein that any situation that has not been expressly included in the Code shall also be sanctioned if the guidelines established in the Code are infringed.

4. Reporting Mechanisms

What should I report?

Any situation that gives rise to doubt or suspicion of non-compliance with this Code of Ethics and Good Conduct or with the policies and procedures of the Buenaventura Group.

Who should do it?

All employees of the Buenaventura Group are compelled to report when a potential non-compliance is identified. Notwithstanding, any person can make a report through the channels established by this Code.

What are the channels available for reporting a complaint?

Situations should be reported through the following mechanisms:

1. Local, national and international toll-free **telephone line**:

0800-00626

2. Entering the portal: www.bdolineaetica.com/buenaventura

What information should I provide?

- Who is responsible / involved?
- What are their responsibilities and positions?
- What did they do? (specific situation)

- What happened?
- Where did it happen?
- How long did it happen?
- When?
- Is it still happening?
- Where is there evidence or support that can be validated by the company?
- Who else knows about this situation?

It is important to provide details so that the report can be considered as valid to initiate an investigation process.

Buenaventura is committed to promoting a work environment in which employees can communicate their concerns without fear of reprisals, as well as maintaining anonymity to avoid any unfair treatment of those communicating their concerns, or any irregularities detected.

5. Annexes

5.1 Examples of non-compliance with the Code of Ethics and Good Conduct

We remind you that these are just a few examples of situations we might face at some point. Accordingly, if you are unsure about the correct course of action in similar or other cases, please consult with your direct supervisor or use the confidential reporting lines to inform Management or Ethics Officer of any problem you may face. If you observe such situations, you should report them by using the reporting channels or mechanisms made available by the Company.

Alteration of reports or documents of Buenaventura:

Q: An employee, concerned about the nonattendance of a colleague whose child is sick, forges his signature on the Attendance Register of a training session he did not attend. Is it okay to do this?

A: No. This is not telling the truth. Forging information and records is considered fraud and may result in administrative or criminal penalties for both the employee and the Company. If you observe this type of situation, you should report it using the reporting mechanisms made available by the company.

Responsible use of information technology and company assets:

Q: The Company has vehicles destined to business trips. An employee uses the one provided by the Company to make a family trip during his holidays. Is this allowed?

A: No. The Company provides vehicles for the exclusive use of the duties assigned to the position. Personal activities, unrelated to those of Buenaventura, are prohibited.

Gifts, entertainment and improper courtesies:

Q: A supplier participating in the bidding process offers an international trip to people in the Company involved in the selection process. Is there any problem if any accept the trip?

A: Yes. The Company's personnel involved in the selection process work in the best interest of Buenaventura and, thus, must be independent and objective. Unauthorized travels are assumed to be economic benefits and, therefore, may influence the bidding decision.

Conflict of interest:

Q: A collaborator knows that the service provider ABC S.A. proposed for hiring or has already been hired, is related to the brother of the Supervisor of the contract. Is this information important to the Company? Is there a conflict of interest if the Company hires the supplier ABC S.A.?

A: Yes. It is part of the duty of truthfulness to report this situation immediately to Director of Contracts of Buenaventura. The Supervisor, as well as each of us, has the duty to declare any real or apparent conflict of interests during the performance of our duties.

Inappropriate use of confidential information:

Q: A collaborator knows internally that the company is going to start an expansion plan and that with this he will double its annual production from the following year. Can the employee disclose this information to his or her friends and family?

A: No. In doing so, he would be failing in keeping this information confidential. Internal company information must be kept private until the company authorizes its disclosure. If you suspect that someone has disclosed confidential information, you should immediately report this through the reporting mechanisms made available by the Company (such as the Ethics Line, detailed in section 4 of this Code "Reporting Mechanisms").

Corruption:

Q: An employee made payments to a government auditor so that he would not report findings that would compromise the Company. Do I have a responsibility to do anything about this?

A: Yes. It is part of the integrity conduct to immediately report the non-compliance through the channels or mechanisms of complaint made available by the Company (such as the BVN Ethics Line). You must bear in mind that it is forbidden to make or accept this type of payments to inspectors and auditors because this would be a breach of the Buenaventura Values and the principles of this Code.

Bribery:

Q: A third party has offered to get a Unit's operating license in half the regular time in exchange of a payment. What should I do?

A: You should **reject** this proposal and report this situation immediately through the channels or mechanisms of complaint made available by the Company (such as the BNV Ethics Line). Any offer or execution of "facilitation payments" to any third party is prohibited under the "Anti-Corruption Policy" of Buenaventura.

Improper interactions with public officials:

Q: A collaborator hires the services of a contractor of the President of the Region where the Mining Unit operates. Should I report it?

A: Yes. You should report this situation immediately through the channels or mechanisms of complaint made available by the Company (such as the BNV Ethics Line), since this type of procurement is of economic benefit to an Authority and could influence, or give the impression of influencing, the decisions taken by that Authority.

Money laundering / financing of terrorism:

Q: A member of the Marketing Department of Buenaventura negotiates with a client who wants to buy mineral at a significantly higher price than his competitors. Is this ethical?

A: No. If you identify a transaction that seems to be unusual, you should immediately report it to your direct Supervisor, who can provide you with timely advice on how to conduct a transaction in a correct, ethical and transparent manner.

Improper political contributions:

Q: A candidate for mayor in a community near the Mining Unit demands a payment through donations to finance his campaign, threatening to incite the people to act and block access routes if the payment is not made. What should I do?

A: You should **immediately report** it through the complaint channels or mechanisms made available by the Company (such as the BVN Ethics Line), in order to act in accordance with the guidelines of this Code, the Anti-Corruption Policy and the Policy on Donations and/or Charitable Contributions.

Compliance Statements 5.2

DECLARATION OF KNOWLEDGE AND COMPLIANCE WITH THE CODE OF ETHICS AND GOOD CONDUCT OF BUENAVENTURA

TO: ADMINISTRATION AND HUMAN RESOURCES MANAGEMENT FROM:				
Paternal surname, maternal surname, name (s):				
Unit:				
Work area:				
DATE:				
I hereby declare to have read and fully Conduct of Compañía de Minas Buenav	understood the Code of Ethics and Good ventura S.A.A.			
contrary to the Code of Ethics and Goo	the provisions and declare that any action d Conduct is subject to sanctions and layoff, within the legal framework in force.			
any non-compliance with the provision	he obligation to report the identification of its of the Code of Ethics and Good Conduct, thics Officer, through the means authorized and website).			
Name and signature of direct supervisor	Signature of worker as a sign of acknowledgement			

CONFIDENTIALITY AND NON-DISCLOSURE AGREEMENT

	D: ADMINISTRATION AND HUMAN RESOURCES MANAGEMENT ROM:	
	aternal surname, maternal surname, name (s):	
Wo	nit: 'ork area: ATE:	
l, Em	identified with ID Card No, in my capacity as nployee of COMPAÑÍA DE MINAS BUENAVENTURA S.A.A. hereby freely and voluntarily represent and accept the llowing:	;
con	I will not disclose or make public or authorize the disclosure or publication of any confidential information incerning to COMPAÑÍA DE MINAS BUENAVENTURA S.A.A. or its related companies without the express written insent of the legal representatives thereof.	
info tha em	The confidential information referred to in this document includes, but is not limited to, written, oral or electroformation property of COMPAÑÍA DE MINAS BUENAVENTURA S.A.A. or its related companies to which I have acce at is expressly or tacitly was provided to me by COMPAÑÍA DE MINAS BUENAVENTURA S.A.A., its officers, and/or apployees for the performance of my duties (hereinafter "the Confidential Information") whether or not the word confidential" is noted therein.	
	I shall not use the confidential information for matters that do not correspond to my functions as a collaborato DMPAÑÍA DE MINAS BUENAVENTURA S.A.A.	r of
4.	I shall not use or make unauthorized copies of the Confidential Information.	
5.	The Confidential Information does not include:	
a.	Public information.	
b. BUI	Information than I can prove was of my property prior to the employment start date with COMPAÑÍA DE MINA JENAVENTURA S.A.A.	.S
c.	Any information provided to me by an external source, which is not subject to this confidentiality agreement.	
res	No later than the last day of the employment relationship, I must return all the Confidential Information in my assession to COMPAÑÍA DE MINAS BUENAVENTURA S.A.A., as well as the information that I would have generated sult of the access to the Confidential Information, which includes such that could be contained in equipment and/agnetic media not owned by COMPAÑÍA DE MINAS BUENAVENTURA S.A.A.	
	The obligations that I assume by virtue of this document enter into force at the beginning of the employment lationship and will expire 5 years after its completion.	
8.	Under no circumstances shall I be deemed to have acquired any rights with respect to the Confidential Informa	tion
	leclare that I shall personally assume any responsibility for the damages I may cause to COMPAÑÍA DE MINAS JENAVENTURA S.A.A. by breaching of the obligations and declarations that I assume hereby.	
	Name and signature of direct supervisor Signature of worker as a sign of acknowledgement	-

DECLARATION OF CONFLICT OF INTEREST

TO: ADMINISTRATION AND HUMAN RESOURCES MANAGEMENT					
Paternal surname, maternal surname, name (s):					
					Unit:
Work area:					
	ne Conflict of Interest Management Policy of S.A.A. and further represent that I am aware of it icts of Interest.				
performed any acts that may be contrary Furthermore, I hereby declare my commi	of my family has or has had any interest in or has to this Code of Ethics and Good Conduct. itment not to perform or permit any action or n a conflict with the interests of COMPAÑÍA DE				
Otherwise, if I have any doubts about a particular situation where my personal interests may be in apparent conflict with the interests of Buenaventura, I will notify it herein below:					
Name and signature of direct	Signature of worker as a sign of				
supervisor	acknowledgement				

ACKNOWLEDGEMENT AND COMPLIANCE STATEMENT OF ANTI-CORRUPTION POLICY OF BUENAVENTURA

TO: ADMINISTRATION AND HUMAN RESOURCES MANAGEMENT FROM:		
Paternal surname, maternal surname, name (s):		
Unit:		
Work area: DATE:		
I hereby declare to have read and fully understood BUENAVENTURA S.A.A.	the Anti-Corruption Policy of COMPAÑÍA DE MINAS	
Therefore, I undertake to comply with the provision that is against this policy is subject to sanctions and the current legal framework.	ns, and I further declare that any attitude or action disciplinary measures that may include layoff, within	
-	ation to report the identification of any breach of the ed to the Ethics Officer through the means authorized by telephone, email and website).	
•	•	
Name and signature of direct supervisor	Signature of worker as a sign of acknowledgement	

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Calle Las Begonias 415, Floor 19, San Isidro, Lima 27, Peru

Telephone: 419 2500 Fax: 440 2959

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BUENAVENTURA