

Your reference : *Please advise*  
Our Reference : FWZ/CORP/1099/WFI/10/2025(SM)  
Date : 14.11.2025

**Wecopy Fintech Inc. / WeMasterTrade LTD**

**By Email only**

(Incorporation No.: BC1333534)  
420-744 West Hastings Street,  
Vancouver BC V6C 1A5  
Canada

Dear Sirs,

**Re: Legal Opinion on the Wecopy Fintech Inc / WeMasterTrade LTD Business Model and Compliance with the Law and Legal Regulation in Malaysia**

We refer to the above matter, wherein we have been instructed by your good self to provide legal advise in relation to the regulatory treatment of your trading simulation platform under the laws of Malaysia.

This legal advise will include the assessment whether your business model triggers regulatory licensing obligations or falls within the ambit of prohibited activities under applicable Malaysian statutes, including but not limited to the Capital Markets and Services Act 2007 (“**CMSA**”), the Companies Act 2016 (“**CA 2016**”) and the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (“**AMLA**”).

This legal advise will be segregated into the following sections for the ease of your perusal/reference:-

1. Corporate and Business Model Overview
2. Technology Infrastructure Overview
3. Applicable Law and Regulation
4. Conclusion and Summary
5. Disclaimer

**1. Corporate and Business Model Overview**

Based on your instructions, we have been made to understand that the following is your corporate and business model. Your good firm is an incorporation incorporated under the laws of Canada with a business address at 420-744 West Hastings Street, Vancouver BC V6C 1A5, Canada. Your good firm has no employees, agents, officers or bank accounts in Malaysia nor do you maintain any office or establishment in Malaysia

Your good firm is a trading simulation platform designed to provide users with a realistic and risk-free trading experience. The business model is exclusively an educational platform and operates exclusively in a virtual, simulated environment, and does not involve connection to financial brokers, or exchanges involving actual funds or assets. Essentially, the platform allows the users to participate in a simulated trading environment using virtual funds, enabling them to practice investment strategies and strengthen risk management skills without any financial exposure. Users can place orders, track results, and evaluate their performance as if they were trading in the market, however no real money, actual funds, or live trading accounts are involved.

Users are required to pay for the platform usage and evaluation access fee, which is solely for access to the simulation platform. This fee does not constitute trading capital and is not used for any form of live trading activity. Your good firm does not allow access to any third-party brokers, real trading accounts, trading platforms, or fund allocation within or outside Malaysia. All payout returns are governed under contract law and are not considered investment returns or wages. Users are not employees of the firm.

## **2. Technology Infrastructure Overview**

We have been informed that the following are the technology infrastructure utilized by your good firm for the purposes of the abovementioned business model:-

- Technology Provider: Match Trader, MetaTrader 5 (MT5), and CTrader
- Leverage and Margin: All trading occurs on simulated accounts and simulated trading platform using demo funds exclusively. There is no involvement of real capital.
- Transactions: The only payment accepted from users is a one-time access fee. These payments are strictly for evaluation access and platform usage. No funds are held, managed, transmitted, or safeguarded on behalf of any user.

## **3. Applicable Law and Regulation**

Upon your instructions, we have conducted our due diligence and researched on the relevant statutes and their application to your good firm. The following is our findings and legal advise.

An important statute that we have conducted deep research on is the CMSA. This statute governs securities, bonds and other financial activities in the capital market. In other words, any corporations that conduct “regulated activities” must comply with the CMSA.

Under the CMSA, “regulated activities” include “dealings with securities”, “investment advise”, “fund management”, amongst other. Meanwhile, “dealing with securities” is broadly defined as “acquiring, disposing of, subscribing for or underwriting securities; or making or offering an agreement to do so.”

Furthermore, the CMSA emphasizes that regulated activities revolved around the notion of “profit from yield of securities” or “by reference to fluctuations in value”. In other words, if the activities involve trading which can yield profits, and not earnings, by means of increases or decreases in the value, the CMSA would apply.

It should be noted that the CMSA makes it mandatory for any individuals or incorporations to acquire a Capital Markets Services Licence in order to carry out the said “regulated activities”.

Based on our legal analysis, CMSA applies to incorporations that conduct activities related to securities, bonds and/or other monetary items in the capital markets. Under the CMSA, it is stated that the purpose of the statute is “to regulate and to provide for matters relating to the activities, markets and intermediaries in the capital markets, and for matters consequential and incidental thereto.”

As we are informed of your good firm’s business model, given that no monetary funds are involved and only virtual funds are used and there is no notion that any investment could possibly yield “profits”, the CMSA would not apply to your good firm. It is our legal advise that so long there is no real-monetary trading/investment/management involved in your good firm’s business model, the CMSA would not be applicable to your good firm. Accordingly, the platform does not fall under the regulatory supervision of the Securities Commission Malaysia (SC).

With respect to the CA 2016, the usual duties/obligations of directors are applicable to your good firm. Generally speaking, directors of any incorporations have reasonable duties of care, skill and diligence and have to exercise their powers for proper purposes. Directors cannot commit deceit towards the corporation, ie. your good firm, or towards your customers. The CA 2016 exists for the purposes of corporate governance. It does not generally govern your good firm’s business model, per se.

We have also reviewed the AMLA in detail. The AMLA is relevant to bodies that handle funds or are receiving any funds as stakeholders. Based on our understanding, since your good firm receive fees for platform usage and evaluation access, it does not handle funds as intermediary. As such, your good firm falls outside the AMLA and its reporting entity scope.

In summary, based on our research analysis, the business model appears largely compatible with Malaysian law, because of the following reasons:

- Your good firm uses exclusively virtual funds only, whereby there are no real investor funds and no investment capital from users.
- The users will be entitled to payouts which constitutes contractual rewards. The users do not received returns because there are no invested funds or profit-sharing from any market trades.
- Your good firm does not act as broker, intermediary, fund manager and does not operate real-money trading for the clients.

- 
- Your good firm has to maintain corporate governance and regulatory in compliance under CA 2016.

#### **4. Conclusion and Summary**

Based on your good firm's instructions as well as documents provided, your good firm's business model constitutes an educational and skills assessment simulation platform and does not fall within the regulatory scope of the CMSA, nor does it require a Capital Markets Services Licence at present. Our legal advise is your good firm does not engage in activities that require any licencing under CMSA in order to operate. No actual monetary trading, brokerage, securities, bonds, financial management or profit yields that occurs.

It is our opinion that the current model is compliant with relevant Malaysian laws, subject to ongoing compliance with corporate governance, accurate disclosure practices, and avoidance of representations implying real investment returns or real brokerage access.

#### **5. Disclaimer**

This legal advise is strictly limited to the facts and documents provided by your good firm and the laws in force at the date of this legal advise. Any change in the platform model, including the introduction of real trading, handling of client funds, or financial investment programs, will require fresh legal assessment and may trigger licensing obligations.

We, Messrs Fawwaz & Co, accept no liability whatsoever for any direct, indirect, consequential, or other loss, or any other damage, that may arise from any use/reliance on this document, the information contained herein, or any further communication relating to this document. This legal advise is valid until there is any change to the laws, regulations and other bylaws abovementioned

We hope that the legal advise proffered above will serve you well. Thank you.

Yours faithfully,

*Fawwaz & Co*

.....  
**Mr HUI CHUN SAN**  
**MESSRS FAWWAZ & CO**