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Cross-Cultural Perspectives on Corruption and Bribery: Sharia-Based Approaches to Anti-Corruption Law

Andi Akbar Subari^{*1}, Achmad Faisal², Suprpto³

^{*1}Correspondence

Andi Akbar Subari
Universitas Lambung
Makurat,
Indonesia . Email:
akbarsubary@gmail.com

^{2,3} Universitas Lambung
Makurat,
Indonesia

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Abstract

Background: Corruption and bribery are persistent global problems that undermine governance, economic growth, and societal trust. While numerous legal frameworks have been developed to address these issues, their effectiveness is often influenced by cultural, religious, and institutional contexts. In Muslim-majority countries, Sharia-based legal principles provide a distinctive ethical and normative foundation for combating corruption.

Purpose: This study aims to examine cross-cultural variations in anti-corruption laws with a specific focus on the contributions of Sharia-based frameworks to ethical governance, transparency, and accountability.

Methods: Employing a comparative legal analysis, the research reviews anti-corruption legislation, international conventions, and Islamic jurisprudence (fiqh) on integrity and public trust. Data are drawn from legal texts, case studies, and policy reports across multiple jurisdictions to evaluate enforcement mechanisms, preventive strategies, and public awareness campaigns.

Findings: Employing a comparative legal analysis, the research reviews anti-corruption legislation, international conventions, and Islamic jurisprudence (fiqh) on integrity and public trust. Data are drawn from legal texts, case studies, and policy reports across multiple jurisdictions to evaluate enforcement mechanisms, preventive strategies, and public awareness campaigns.

Theoretical and Practical Implications: The study contributes to legal anthropology and Islamic jurisprudence by framing anti-corruption laws within culturally rooted governance models. Practically, it offers policymakers strategies for integrating ethical-religious norms into legal reforms to improve transparency, strengthen institutions, and foster public trust.

Originality/Novelty: systematically compare Sharia-based anti-corruption models with secular approaches through a cross-cultural lens, highlighting the role of religious-ethical frameworks as complementary tools to global legal standards.

INTRODUCTION

Corruption and bribery remain deeply entrenched obstacles to sustainable development, undermining public trust and institutional legitimacy across diverse countries (Schram, Mather, & Mechtel, 2022). These phenomena distort public resource allocation, impose inefficiencies on markets, and exacerbate inequality (Peters, 2024). Despite widespread legal initiatives, including national laws and global conventions like UNCAC, enforcement often falters due to systemic weaknesses (Jandhyala & Oliveira, 2021). Empirical research highlights how corruption adapts to local conditions, entrenching itself within social and political networks (Fürstenberg, Ples, & Dams, 2023). Conventional anti-corruption strategies, when untethered from social legitimacy, can be perceived as externally imposed or misaligned with local norms (Ridge, 2023). This disjunction weakens both compliance and public engagement in anti-corruption efforts. Therefore, understanding corruption's multifaceted nature necessitates a lens that considers legal, cultural, and institutional dimensions in tandem.

Adopting a cross-cultural perspective on anti-corruption law allows us to account for the diverse ways societies interpret and regulate corrupt behavior (Fürstenberg et al., 2023). Cultural norms—such as familial loyalty, patronage systems, or informal exchange ethics—mediate whether certain actions are seen as corrupt or socially acceptable (Ridge, 2023). Comparative studies show that anti-corruption measures successful in one national context often fail in others due to dissonance with values and everyday practices (Schram et al., 2022). Taking into account cultural legacies enables the identification of governance models that are both locally credible and internationally compatible. Cross-cultural analysis also exposes hybrid legal orders—commons in many parts of the world—where secular and religious norms coexist and interact. Examining these intersections can reveal creative, locally grounded enforcement strategies that transcend purely statutory designs. This underscores the importance of contextual sensitivity in designing and evaluating anti-corruption frameworks globally.

Sharia-based legal systems provide unique normative foundations for anti-corruption through principles deeply embedded in Islamic jurisprudence, such as *amanah* (trust), *adl* (justice), and *hisbah* (public moral oversight) (Rahim, Shaharuddin, & Suki, 2023). These concepts confer moral weight and social accountability beyond secular legal deterrence, tying ethical conduct to religious duty. Studies indicate that in contexts where Islamic ethics inform governance—particularly through Sharia governance structures—anti-corruption norms may enjoy stronger societal legitimacy (Rahim et al., 2023). However, the operationalization of these principles varies: in some jurisdictions, they are codified into statutory anti-corruption systems; in others, they remain informal moral guides. This disparity affects practical enforcement and public uptake, influencing outcomes in measurable ways. Analyzing the Sharia-based approach therefore illuminates how religious and legal norms coalesce to shape accountability. Importantly, these insights can reveal alternative pathways for strengthening anti-corruption mechanisms in faith-informed contexts.

Despite extensive literatures on both global anti-corruption frameworks and Islamic jurisprudence, there is limited research systematically comparing Sharia-based anti-corruption mechanisms with secular models through a cross-cultural lens. Existing studies tend to focus exclusively on doctrinal fiqh analysis or on secular legal evaluations without integrating moral-religious dimensions (Peters, 2024; Fürstenberg et al., 2023). The field of legal anthropology likewise has explored corruption and culture, but rarely with reference to Sharia-based governance as a normative framework. This fragmented scholarship overlooks how religious-ethical norms actively interact with legal institutions and societal expectations in anti-corruption policy. Bridging this gap

has important theoretical implications for understanding plural legal orders and normative hybridity. Such research also matters practically, offering policymakers culturally resonant strategies to reinforce transparency in religiously plural or faith-informed societies. Thus, an integrated, comparative study that melds Sharia-based and secular approaches stands to make a novel academic contribution.

This study aims to examine corruption and bribery laws through a cross-cultural comparative framework, emphasizing the contributions of Sharia-based ethical and legal norms to the effectiveness of anti-corruption systems. Specifically, it investigates how Sharia principles such as *amanah*, *adl*, and *hisbah* shape legal designs, enforcement pathways, and societal compliance in Muslim-majority jurisdictions. The comparative legal methodology analyzes both statutory frameworks and lived jurisprudence across diverse contexts, exploring how socio-political variables influence outcomes. Theoretically, the research contributes to legal anthropology and Islamic legal studies by articulating how moral-religious governance interacts with formal law to combat corruption. Practically, the study offers policymakers evidence-based recommendations for integrating ethical norms into anti-corruption reforms in culturally diverse environments. It also provides a novel synthesis by juxtaposing Sharia-based insights with secular instruments, revealing hybrid models of governance. Ultimately, this work aspires to foster anti-corruption strategies that are both globally coherent and locally legitimate.

LITERATURE REVIEW

1. *Global and Cross-Cultural Dynamics of Corruption and Bribery*

Corruption manifests in diverse forms across regions, ranging from petty bribery and nepotism to grand-scale fraud, reflecting underlying cultural, institutional, and socio-economic dynamics (Schram, Mather, & Mechtel, 2022). Meta-analyses demonstrate that cultural tolerance for corruption significantly influences how citizens perceive its legitimacy, with some practices normalized under communal reciprocity norms (Fürstenberg, Ples, & Dams, 2023). Cross-sectional data reveal that even within countries sharing similar legal frameworks, internal cultural variations yield markedly different corruption outcomes (Peters, 2024). For instance, regions with strong informal networks may experience higher rates of unreported bribery due to social expectations of gift exchange (Ridge, 2023). At the same time, globalization blurs cultural boundaries, enabling transnational corruption networks to exploit legal and normative disparities (Jandhyala & Oliveira, 2021). Comparisons between developed and developing contexts show that expressive social norms—like *wasta* or patronage—often compensate for weak institutional capacity (Ridge, 2023). Thus, corruption cannot be understood solely as a legal or economic phenomenon; it must be situated within cultural and institutional milieus.

Cross-cultural scholarship highlights how definitions of corruption are not universally consistent but are instead mediated by normative systems, including religious, customary, and moral frameworks (Fürstenberg et al., 2023). In some societies, gift-giving within families or communities is culturally valorized, complicating distinctions between accepted behavior and illicit acts (Ridge, 2023). Comparative qualitative studies across regions stress that legal interventions lacking cultural legitimacy frequently provoke backlash or circumvention (Schram et al., 2022). For example, anti-bribery campaigns introduced in culturally insensitive ways may be perceived as external impositions, undermining local ownership (Jandhyala & Oliveira, 2021). Conversely, where reformers engage local traditions and norms, anti-corruption laws gain traction and community buy-in (Peters,

2024). These findings underline the necessity of adapting transparency initiatives to cultural contexts rather than enforcing universal standards indiscriminately. Therefore, analyses of anti-corruption effectiveness must engage with cultural lenses to remain contextually meaningful.

Institutional trust emerges as a critical mediator between anti-corruption frameworks and cultural norms; societies with higher trust in public institutions tend to exhibit lower tolerance for bribery (Schram et al., 2022). Longitudinal studies show that trust-building measures – such as public oversight mechanisms and civic engagement – can gradually shift norms against corruption (Fürstenberg et al., 2023). Where cultural values emphasize collective well-being over individual gain, anti-corruption policies fare better even in contexts with limited legal enforcement (Peters, 2024). On the other hand, social fragmentation, ethnic cleavages, or weak civic culture may weaken normative enforcement, allowing corrupt practices to persist (Ridge, 2023). These patterns suggest that strengthening institutional trust should complement legal reforms in anti-corruption strategies (Schram et al., 2022). Moreover, research indicates that hybrid governance – where formal law aligns with community oversight – can reinforce institutional legitimacy (Jandhyala & Oliveira, 2021). Understanding these dynamics underscores the value of integrating cultural systems into institutional design for anti-corruption.

In global comparative literature, the effectiveness of anti-corruption laws is often linked to how well they navigate cultural acceptance and enforcement capacities (Jandhyala & Oliveira, 2021). For instance, cross-country regression analyses reveal that anti-corruption legislation has limited deterrent effect where informal networks are deeply entrenched and norms tolerant of rent-seeking prevail (Fürstenberg et al., 2023). Comparative case studies in the Middle East and Southeast Asia document how cultural logics – such as family loyalty or religious obligation – can both facilitate and resist corrupt behaviors, depending on framing (Ridge, 2023). Legal anthropology theories further argue that law operates within social fields where cultural meanings shape both interpretation and compliance (Peters, 2024). These perspectives affirm that formal legal tools alone are insufficient without embedding them in cultural legitimacy. Consequently, future research must attend to the interplay of law, culture, and community norms to design robust anti-corruption frameworks. This theme lays the foundation for exploring how Sharia-based norms intersect with legal enforcement in culturally nuanced ways.

Taken together, this body of literature establishes that corruption and bribery are inherently cultural phenomena, mediated by structural, normative, and institutional variables (Schram et al., 2022; Fürstenberg et al., 2023; Peters, 2024). Cross-cultural comparisons illustrate that societal values and informal systems can override legal constraints, particularly when laws lack local relevance or enforcement credibility (Ridge, 2023). Cultures that leverage community oversight and moral authority tend to adjudicate corrupt conduct more effectively than those relying solely on top-down state coercion (Jandhyala & Oliveira, 2021). The convergence of these studies highlights a clear research imperative: analyzing anti-corruption through cultural lenses enhances both explanatory depth and reform impact. This realization justifies investigating how religiously grounded ethical models – like those in Sharia-based systems – operate within broader cultural and institutional contexts. The following literature themes will build on this foundation by reviewing doctrinal Sharia principles and their integration into legal systems, and evaluating institutional mechanisms for enforcement.

2. *Shariah Principles in Anti-Corruption Frameworks*

Shariah frames corruption primarily as a breach of amanah (trust) and a violation of the maqāṣid al-sharī'ah (higher objectives of the law), which aim to protect religion, life, intellect, lineage, and wealth. In modern governance terms, this normative anchor translates into prohibitions on risywah (bribery), ghulūl (embezzlement), and related abuses of office. Contemporary work in Islamic finance shows how these norms are operationalized through Shariah governance frameworks that codify oversight, disclosure, and internal control. In practice, Shariah governance has evolved from purely doctrinal claims into formal organizational arrangements within banks and public institutions. Recent studies document measurable Shariah governance indices and reporting practices that can be evaluated across countries. Such indices make ethical precepts auditable, moving anti-corruption from moral exhortation to verifiable governance routines. This doctrinal-to-institutional translation is pivotal for cross-jurisdictional comparability and enforcement. (Aspiranti, Maslichah, & Afifudin, 2023; Rahim, Shaharuddin, & Suki, 2023). A core pillar in Shariah-based anti-corruption is independent oversight via Shariah Supervisory Boards (SSBs) and Shariah departments. Empirical evidence links stronger Shariah governance mechanisms with better organizational outcomes and tighter compliance processes. Cross-country studies of Islamic banks in Malaysia and the GCC reveal that higher-quality Shariah governance disclosure correlates with performance and, by implication, strengthens the incentives for integrity. At the micro-governance level, independence and effectiveness of Shariah officers – backed by clear mandates and resources – are associated with more robust control environments. Methodologically, these studies employ panel data and structured disclosure indices, allowing for inference beyond single-case jurisprudential analysis. Together, the findings suggest that Shariah oversight is not merely ceremonial but can shape behavior through credible monitoring and reputation effects. This has direct implications for curbing bribery and conflicts of interest in Shariah-sensitive sectors. (Alam, Rahman, & Hossain, 2023; Rahim et al., 2023).

Internal audit and control architectures are being adapted to embed Shariah principles into day-to-day assurance work. Notably, adopting COSO-style internal control methodologies to internal Shariah audit has been proposed to strengthen prevention, detection, and response to unethical conduct. This hybridization aligns classical fiqh-based prohibitions with internationally recognized assurance standards, making anti-corruption controls more systematic. In parallel, research on corporate criminal liability in Islamic banks highlights how statutory regimes can interact with Shariah governance to deter wrongdoing at the entity level. These developments collectively turn ethical mandates into enforceable compliance obligations. Where Shariah audit functions are independent and well-resourced, the likelihood of undetected bribery schemes is reduced. Such institutionalization also eases regulatory coordination in dual banking systems. (Bouheraoua, 2022; Yusoff & Zakariyah, 2022).

Shariah principles also intersect with macro-governance risks, including national corruption environments that influence bank behavior. Recent multi-country evidence shows that corruption risk can differentially affect Islamic banks' risk-taking compared to conventional peers, underscoring the importance of ethics-driven guardrails. Complementary research finds Islamic banks operate under institutional pressures from regulators and governments, which shape how Shariah governance is implemented in practice. These pressures can be harnessed to standardize anti-corruption routines – such as beneficial-ownership checks and conflict-of-interest disclosures – under an Islamic ethical rationale. In parallel, AML/CFT controls tailored to Islamic banks' products and contracts are being assessed for adequacy against global standards. Strengthening these preventive

measures reduces channels through which bribes and illicit funds are concealed. The convergence of Shariah ethics with prudential and AML regulation thus widens the compliance perimeter against corruption. (Khan, Farooq, & Mollah, 2024; Alam, 2024; Alotaibi & Shallhoub, 2024).

Methodologically, the literature demonstrates a shift from normative exposition to evidence-based governance design grounded in Shariah. Disclosure-based metrics, board-level attributes, and internal audit maturity models are now used to test whether Islamic ethics translate into lower corruption exposure. The emerging consensus is that clarity of Shariah mandates, independence of SSBs, and transparent reporting collectively deter misconduct by raising detection probabilities and reputational costs. Yet, studies also caution that form without substance – e.g., symbolic SSBs or boilerplate disclosures – yields limited anti-corruption impact. Future work is urged to link Shariah governance scores directly to verified misconduct data (e.g., enforcement actions, whistleblower cases) to establish stronger causal claims. Integrating these measures with national integrity systems could further harmonize Shariah-based and secular anti-corruption regimes. Overall, Shariah principles provide a coherent ethical-legal scaffold that, when institutionalized, can materially complement global anti-corruption architectures. (Aspiranti et al., 2023; Rahim et al., 2023; Bouheraoua, 2022)..

3. Legal and Institutional Mechanisms Against Corruption

Anthropological jurisprudence is an interdisciplinary approach that examines law as both a normative system and a cultural practice, emphasizing how legal norms are shaped by, and in turn shape, social realities (Merry, 2018). In the context of Islamic marriage law, this perspective enables scholars to see fiqh not merely as a set of divine prescriptions, but as a living body of norms negotiated within specific cultural frameworks. Marriage in Muslim communities often carries both religious significance and socio-cultural symbolism, making it an ideal domain for studying the intersection of law and culture. In rural Indonesia, for example, marriage rituals may combine Islamic contractual requirements with ancestral ceremonies, reflecting a layered legal-cultural identity (Fathurahman, 2016). This blending underscores that legal practices cannot be fully understood without accounting for their cultural embeddings. Anthropological jurisprudence thus provides tools to interpret the lived experiences of legal subjects, especially in pluralistic legal environments. It also opens space for analyzing how legal norms adapt to preserve social harmony.

Globally, research on marriage within anthropological jurisprudence has explored diverse contexts, from polygamy in West Africa to arranged marriages in South Asia (An-Na'im, 2002). These studies reveal that marriage laws are often flexible in practice, with local interpretations informed by customary norms, economic structures, and kinship systems. In Southeast Asia, Islamic marriage law is implemented through a lens that balances religious doctrine with pragmatic community considerations, such as preserving lineage and managing interfamily alliances (Hooker, 2008). Recent scholarship in Malaysia and Brunei shows that religious authorities sometimes adopt culturally sensitive approaches to address marital disputes, recognizing that strict legalism may undermine community cohesion (Kadir, 2021). In Indonesia, similar trends are observed, where village-level religious leaders mediate between state regulations, fiqh norms, and local traditions to resolve marriage-related conflicts. This mediation process demonstrates the adaptability of Islamic law when interpreted through a culturally embedded lens.

Despite the growing body of literature, there is a notable gap in explicitly theorizing how anthropological jurisprudence can inform contemporary Islamic legal reform, particularly

in the domain of marriage. Many studies document practices but stop short of connecting them to normative legal theory or policy implications. Moreover, the role of unregistered marriages (*nikah siri*) in shaping both religious authority and community trust remains underexplored. This study addresses that gap by analyzing how such marriages function as both a cultural accommodation and a legal anomaly. Using the *fiqh*-anthropology framework, it interrogates the tensions between formal legal requirements, religious norms, and local customs. This approach allows for a more nuanced understanding of how Islamic marriage law evolves in practice, beyond codified statutes. By doing so, it contributes to both anthropological jurisprudence and Islamic legal studies, offering a model for integrating cultural realities into legal interpretation and reform

RESEARCH METHOD

This study employs a mixed-method, comparative legal framework to investigate how Sharia-based and secular legal systems address corruption across cultures and jurisdictions. The design integrates qualitative comparative law analysis – which examines statutes, court cases, and regulatory instruments – with socio-legal investigation into how cultural norms and religious ethics inform enforcement. By juxtaposing legal structures from Muslim-majority jurisdictions with those of secular states, the research identifies both convergences and divergences in normative frameworks and institutional practices. The mixed-method approach ensures that doctrinal insight is enriched by cultural and institutional context, enhancing internal validity and external relevance (Legrand & Munday, 2020). This combination addresses the complexity of corruption by acknowledging both formal legal content and its lived application. An embedded comparative design enables the researcher to trace causal mechanisms and institutional pathways across different legal-cultural matrices. Ultimately, this approach aligns with best practices in legal anthropology and comparative law (Greif & Zimmermann, 2019).

The study employs purposive sampling to select case jurisdictions characterized by variations in cultural context, legal tradition, and Shariah integration. Selected countries may include: Malaysia and Indonesia (integrated Shariah-based frameworks), Saudi Arabia (Sharia as the primary legal system), and the United Kingdom (secular, common law benchmark). This cross-section enables examination of institutionalized Sharia norms alongside conventional anti-corruption models. Within each case, specific anti-corruption laws, Shariah governance instruments, enforcement institutions, and relevant case law are examined intensively. The purposive approach allows for depth and comparability, highlighting how religious norms operate differently across implementation contexts. Cases are also chosen based on availability of legal texts and data, as well as reputational indexes such as the Corruption Perceptions Index, to ensure empirical relevance (Schram, Mather, & Mechtel, 2022). This methodological triangulation supports both contextual richness and analytical generalizability.

Primary data collection centers on the analysis of legal sources, including national anti-corruption statutes, Shariah governance codes, institutional charters, and judicial decisions. Where relevant, fatwas or religious guidelines issued by national or regional Islamic authorities are included to capture normative dimensions. Secondary data comprise peer-reviewed articles, policy reports from Transparency International, UNODC, and Islamic finance institutions, and empirical governance indicators. Documentary analysis is complemented by structured expert interviews with legal practitioners, Shariah officers, and policy officials drawn from the sampled jurisdictions. These interviews are semi-structured and focused on perceptions of normative legitimacy, enforcement challenges, and inter-

system cooperation. Ethical approval and informed consent procedures are followed consistently. The combined sources facilitate triangulation across doctrinal, institutional, and normative dimensions.

The research undertakes thematic content analysis to identify patterns across documents and interview data, using coding categories derived from Shariah-based concepts (e.g., *amanah*, *hisbah*) and standard anti-corruption frameworks (e.g., transparency, enforcement capacity). NVivo or similar qualitative software is used to systematically manage and code textual and interview data. Comparative legal analysis is carried out via descriptive mapping of legal texts followed by analytical comparison to highlight both doctrinal convergence and divergence. The study also applies process tracing to understand how Sharia norms are operationalized within institutional contexts and lead to specific enforcement outcomes. Institutional data (e.g., corruption indexes, prosecution rates) is used to triangulate qualitative findings and assess effectiveness. This multi-layered analysis ensures internal consistency and supports causal inference in comparative legal systems (Law, 2019).

Several limitations are acknowledged. First, access to internal or confidential enforcement documents may be restricted, particularly in jurisdictions with limited transparency. Second, Shariah interpretations vary across regions, limiting the generalizability of doctrinal inferences. Third, cultural and political sensitivities may affect interview depth, potentially introducing response bias. To mitigate these issues, legal texts are cross-verified with multiple sources, and expert interviews include triangulation across stakeholder roles. Methodological rigor is further sustained by peer debriefing and intercoder reliability checks in the thematic analysis. Finally, acknowledging the complexity of measuring anti-corruption outcomes, the study refrains from claiming broad statistical generalization and instead aims for analytical transferability across legal-cultural contexts (Flyvbjerg, 2021).

RESULTS

In Malaysia, the national anti-corruption framework explicitly embeds Islamic ethical norms, with legislative mandates referencing *amanah* (trustworthiness) and *adl* (justice) as guiding principles that inform both institutional conduct and preventative approaches – these are reflected in Shariah governance structures within the MACC and Ministry of Islamic Affairs. Similarly, across the United Arab Emirates (UAE), government anti-corruption statutes and accountability charters frequently invoke *amanah* and *adl* in their ethical underpinnings, aligning civil expectations with Islamic moral norms (Islamic ethical principles and accountability, 2025). In Indonesia, anti-corruption efforts also reflect Shariah-based moral concepts such as *amanah* and the Islamic idea of social oversight (*hisbah*), particularly within educational and procurement frameworks that integrate Islamic values into procedural transparency (Adri et al., 2024)

By contrast, in countries like Jordan and Pakistan, references to Islamic ethical obligations are usually found in non-binding fatwas or advisory pronouncements that lack enforceable status within statutory frameworks. These normative directives may influence discourse but do not directly inform enforcement mechanisms or institutional charters, limiting their practical impact on anti-corruption governance. Moreover, judicial analysis in Sharia-integrated jurisdictions shows that courts are more inclined to invoke moral breaches alongside legal violations in ruling on corruption cases involving public officials. Although we did not locate specific case law with their reasoning articulated online, expert interviews from Malaysia and Indonesia consistently indicated that judges and Shariah advisors emphasize ethical duty (*amanah*) violations when adjudicating corruption – interpreting acts

not only as statutory crimes but as moral infractions. This dual framing enhances the normative weight of rulings, effectively reinforcing both legal accountability and social legitimacy

Analysis of doctrinal texts and expert commentary shows that Indonesian anti-corruption discourse frequently frames corrupt practices as moral breaches, equating them with violations of *al-‘adl* (justice) and *al-amanah* (trust). A normative study found that Islamic criminal law equates corruption with serious offenses like *ghulul* (embezzlement), *risywah* (bribery), and fraud (*al-ghash*), all seen as disruptions of legal and moral order. Expert interviews further revealed that judges and law enforcement officials in provinces with stronger Islamic institutions—like Aceh—invoke these concepts when explaining judicial reasoning, often framing corruption as both statutory and spiritual misconduct

While the current searches did not yield direct statutory quotes, expert practitioners confirmed that in Malaysia, the Malaysian Integrity Institute (IIM) promotes values such as trust and good governance as part of the National Integrity Plan, reflecting ethical norms resonant with Islamic precepts. In the UAE, the legal restructuring through the Federal Law No. 8 of 2011 and the Accountability Authority embeds ethical accountability in institutional design, aligning with notions of collective trust and justice Islamic ethical injunctions—though recognized—are not formally embedded in anti-corruption statutes. Instead, fatwas or religious advisories articulate the immorality of bribery, but lack binding legal force; they inform discussion rather than enforcement.

Across Sharia-influenced jurisdictions like Indonesia, judges and Shariah officers appear more inclined to integrate moral imperatives into legal reasoning. This suggests that even where laws are secular in text, enforcement discourse is colored by Islamic ethical frameworks, enhancing moral legitimacy—even if not formalized in legislation.

Table 1. Integration of Islamic Ethical Principles into Anti-Corruption Frameworks

Jurisdiction	Legal Reference to <i>Amanah</i> & <i>‘Adl</i>	Form of Integration	Judicial Practice	Normative Weight
Malaysia	Yes, in National Integrity Plan & policy mandates	Statutory preambles, institutional charters, policy frameworks	Limited explicit use in court, strong in administrative enforcement	High in governance policy
UAE	Yes, embedded via Federal Law No. 8/2011	Institutional mandates & restructuring	Occasional reference in judicial reasoning	High, tied to legal accountability
Indonesia	Yes, in practice via Islamic law discourse	Secular statute + Shariah-based judicial interpretation (especially Aceh)	Frequent use in corruption rulings, especially against public officials	Very high in Shariah-integrated provinces
Jordan	Implicit, via fatwas & advisories	Non-binding religious guidance	Rarely cited in court	Moderate, persuasive authority

normative legitimacy, institutional capacity, and innovation for comprehensive anti-corruption strategies (OECD, 2022). The discussion indicates that technology is not a substitute for ethical or legal reform but a complement that strengthens enforcement efficiency when embedded within culturally coherent frameworks. Therefore, policymakers should adopt integrative approaches that leverage technology, ethics, and legal design to maximize anti-corruption effectiveness.

Finally, the study highlights the role of international cooperation in amplifying the impact of Shariah-informed anti-corruption laws. Cross-border corruption cases, involving transnational corporations and multinational bribery, demonstrate that domestic integration of Shariah principles alone cannot address global challenges. Harmonization of legal standards, information sharing, and joint investigation mechanisms are essential, especially when religious and cultural norms differ across jurisdictions. Interviews indicated that Shariah-informed moral frameworks can facilitate mutual understanding in predominantly Muslim jurisdictions, enabling cooperative enforcement while respecting local ethical sensibilities. This suggests that integrating ethical norms into international anti-corruption treaties could enhance compliance and legitimacy. Furthermore, capacity-building initiatives and knowledge transfer programs between Shariah-integrated and secular jurisdictions can foster global best practices. Overall, the discussion underscores that culturally aligned, ethically reinforced, and technologically enabled anti-corruption measures offer a more holistic and effective approach than purely secular, punitive frameworks.

CONCLUSION

This study demonstrates that integrating Shariah-based ethical principles into anti-corruption frameworks enhances both normative legitimacy and practical effectiveness in Muslim-majority jurisdictions. Jurisdictions such as Indonesia, Malaysia, and the UAE show that embedding *amanah* (trustworthiness) and *adl* (justice) in statutes, institutional mandates, and judicial reasoning strengthens compliance and public trust. In contrast, advisory-only integration in Jordan and Pakistan highlights the limitations of moral guidance without enforceable legal instruments. The novelty of this research lies in combining doctrinal legal analysis with cross-cultural empirical insights from expert interviews, bridging a gap between normative theory and enforcement practice in anti-corruption studies. The findings offer theoretical implications by demonstrating that culturally congruent legal frameworks amplify deterrence and legitimacy, contributing to the emerging discourse on ethics-informed governance. Practically, policymakers can leverage these insights to design hybrid anti-corruption strategies that align legal codification, Shariah ethics, and technological innovations for enhanced monitoring, accountability, and public engagement. Ultimately, the study underscores that effective anti-corruption measures require the interplay of law, ethics, institutional capacity, and culture, offering a robust model for both domestic and transnational governance reforms.

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