

Comparative Study of Western and Islamic AI Ethics Frameworks

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ABSTRACT:

The swift evolution of Artificial Intelligence (AI) is revolutionizing societies across the globe, accompanied by a host of ethical issues concerning AI bias, opacity, privacy risks, and a lack of accountability in AI systems. The current international AI governance systems are largely Western-centric in their approach, such as the European Union's AI Act and UNESCO's ethical guidelines for AI. However, it is argued that these systems may overlook other ethical systems and cultural perspectives in international AI governance systems. This research aims to carry out a comparative analysis of Western AI governance systems and Islamic ethical systems based on the Holy Qur'an, Hadith, and Maqasid al-Shariah. The research will focus on important ethical concepts in Islamic thought: justice ('Adl), trustworthiness (Amanah), accountability (Mas'uliyah), and societal welfare (Maslahah), and their applicability to current AI ethics debates. The research revealed that there are significant similarities between Western AI governance systems and Islamic ethical systems in terms of fairness, transparency, accountability, and societal welfare. However, there are also differences in terms of underlying ethical philosophies. This research suggests that combining these perspectives will lead to a more inclusive and culturally sensitive international AI governance system.

Keywords: Artificial Intelligence Ethics, AI Governance, Cross-Cultural Ethics, Islamic Ethics, Maqasid al-Shariah, Technology Ethics.

INTRODUCTION

The rapid rise of Artificial Intelligence is transforming society in a complex and tangible manner, especially in decision-making processes. In decision-making AI technologies have become integral in replacing and/or aiding in intricate decision-making processes. In fact, by 2026, it is evident that 60% of high-ranking executives will be relying on AI in decision-making for business development and by 2027, it is forecasted that AI will aid in and/or replace half of organizational decisions (LinkedIn stats

cited by World Economic Forum, 2026). In economic development, AI contributes to economic growth by facilitating automation and innovation in various sectors. It also leads to the creation of employment opportunities in AI programming and data curation, as well as replacing some jobs.

Culturally, AI shapes content production, social interactions, and knowledge sharing. It creates art, music, literature, and other forms of media, which are considered to be a form of creative expression. Social media platforms use AI to curate content and monitor its use. In learning institutions, AI acts as a learning assistant to personalize learning; nonetheless, this spark concerns over reduced critical thinking and interpersonal depth. Adults are more apprehensive than thrilled by the integration of AI into daily life; they are worried by its influence on creativity, interpersonal relationships, and trust (Hagerty and Rubinov, 2019; Hongladarom and Bandasak, 2024).

In the midst of these changes, the issue of ethics has become a major problem. Algorithmic bias still persists as a major problem. The use of AI to perpetuate bias in hiring practices, lending practices, healthcare, and law enforcement continues to be a problem. These include biased facial recognition technology which targets marginalized groups, and resume screening tools that are biased towards certain groups (Abraham et al., 2026; Elmahjub, 2023).

The erosion of privacy continues to be a problem. This allows for surveillance capitalism and the potential for its abuse by authoritarian countries. Accountability continues to be a problem. Who should be held accountable for errors by autonomous machines? These include errors by medical professionals or errors by autonomous vehicle makers. These are recent concerns that have been raised as "blind spots that could lead to organizational failures by 2026 if not addressed, including legal consequences and reputational damage (Segun, 2021; Ramachandran and Singh, 2025).

In response to these changes major global governance frameworks have been established. These are largely dominated by Western perspectives. The European Union's AI Act, which is the first law to be enacted on the use of AI, has been enacted. This law regulates the use of AI. The law prohibits certain practices such as the use of subliminal manipulation techniques or social scoring. The law has set strict rules for high-risk uses, such as the need for a risk assessment, data quality, documentation, human oversight, and conformity (European Commission, 2026). The law has come into effect as of August 2024. The prohibitions took effect on January 1, 2025. The law on general-purpose AI will come into effect on August 2025. As of March 2026, the majority of the law's provisions, which include the major provisions on high-risk uses such as employment, education, and law enforcement, are set to come into effect on 2nd August 2026. However, this has been proposed to be delayed to 2027 under the Digital Omnibus (artificialintelligenceact.eu, 2026).

This has been complemented by the UNESCO Recommendation on Ethics of Artificial Intelligence, which was unanimously adopted by 193 Member States in 2021. It is the first global normative instrument on AI ethics. It advocates for a human-centered approach with core values such as human rights/dignity, fairness/discrimination, transparency/explainability, responsibility/accountability, inclusion, sustainability, and human oversight. It has moved to the implementation stage with the development of tools like the Readiness Assessment Methodology (RAM) for national preparation Ethical Impact Assessments across the entire lifecycle of AI development, regional workshops, and global forums like the 3rd Global Forum held in Bangkok, June 2025, with proceedings to be published in early 2026, with follow ups to be held later (UNESCO, 2025a; UNESCO, 2025b).

In spite of these developments, the dominant discourse has been found to suffer from the significant underrepresentation of non-Western ethical perspectives, which might result in cultural hegemony, incomplete global norms, and failure to address diverse values in society (Hongladarom & Bandasak, 2024; Segun, 2021). Islamic ethical philosophy has much to offer in this context, with its focus on divine accountability to Allah, who will judge everything, and its holistic concept of well-being that incorporates spiritual, moral, communal, and environmental well-being (Raquib et al., 2022; Elmahjub, 2023). It has been derived from the Quran, Hadith, and Fiqh, with emphasis on concepts

like justice (‘Adl) to promote equity, trustworthiness (Amanah) to promote reliability, responsibility (Mas’uliyah) to include both communal and divine responsibility, and the common good (Maslahah) to promote beneficence. It has been operationalized in the Maqasid al-Shariah, or the higher objectives of Islamic law, which include safeguarding faith (dīn), life (nafs), intellect (‘aql), lineage (nasl), and property (māl) (Habib, 2025; Alias et al., 2025). In the context of modern AI, it has been expanded to safeguard intellect against misinformation, life against unethical healthcare applications, and communal well-being in general.

The Riyadh Charter on AI Ethics in the Islamic World (launched in September 2024 by ICESCO and SDAIA, activation agreement signed on 15 December 2025) provides a unified ethical framework for AI development in 53 ICESCO Member States, ensuring AI development in line with Islamic ethics such as integrity, fairness, privacy, transparency, accountability, and humanitarian benefits (ICESCO, 2025). It is a strategic compass for AI development and sustainable development. The Organization of Islamic Cooperation (OIC)'s Jeddah Declaration (4 July 2024) on guiding principles for AI governance in Member States highlights human rights, cultural differences, free will, intelligence as a gift from God, promotion of virtue, prevention of vice, and international cooperation, and commends Member States such as Saudi Arabia and Malaysia on their progress (OIC-IPHRC, 2024).

There is a research gap: There are insufficient in-depth comparative studies of AI ethics frameworks in relation to policy-driven secular models and principle-driven Islamic models to develop multicultural AI governance (Elmahjub, 2023; Hongladarom and Bandasak, 2024; Raquib et al., 2022). This research addresses this research gap by comparatively studying AI ethics frameworks in Western nations (e.g., EU AI Act and UNESCO Recommendation) with Islamic ethical foundations (Islamic ethical principles derived from the Qur'an and Hadith, and Maqasid). The research objective is to comparatively examine AI ethics frameworks in Western nations and Islamic ethical foundations to identify similarities and differences in order to advocate for multicultural AI governance that respects diversity in a pluralistic world to avoid hegemony in AI development in any culture or country.

The research objectives are: (1) to comparatively examine AI ethics frameworks in Western nations and their underlying principles; (2) to comparatively examine Islamic ethical foundations in AI development and their implications; (3) to comparatively examine the similarities and differences in AI ethics frameworks in Western nations and Islamic ethical foundations in AI development; and (4) to comparatively discuss implications for collaborative international policy development in AI governance with United Nations, UNESCO, and OIC.

LITERATURE REVIEW

Western Approaches to AI Ethics

Western approaches to AI ethics have developed rapidly as a response to the social risks associated with the use of AI technologies, with a focus on legal regulations, human rights protection, and the management of risks with the use of well-structured policy approaches (Hagerty and Rubinov, 2019; Segun, 2021). These approaches are mostly secular, rights-based, and policy-focused, with a primary emphasis on the formulation of legal compliance mechanisms that ensure the alignment of AI technologies with the values of democracy human rights, and trust. Two of the leading approaches to AI ethics that have shaped the global discourse on AI ethics are the European Union's AI Act and the UNESCO' Recommendation on the Ethics of Artificial Intelligence. These approaches have established global standards while favoring legal regulations over philosophical or cultural norms (Hongladarom and Bandasak, 2024).

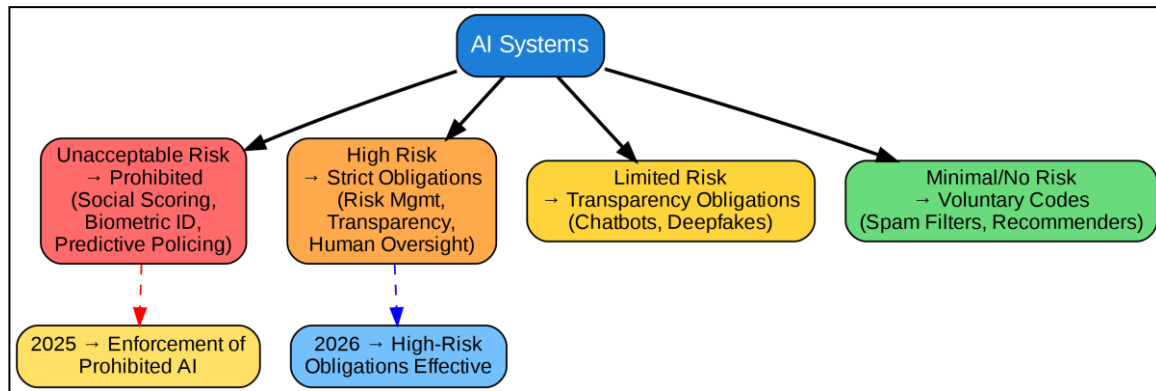


Figure 1: Risk-based classification of artificial intelligence systems under the European Union AI Act

The EU's AI Act, which is the world's first comprehensive and legally binding AI law, is based on a risk-based approach that categorizes AI systems into four tiers based on their level of harm to health, safety, human rights, or the general well-being of society (European Commission, 2026a) as shown in Figure 1. In this regard, the EU's AI Act is based on the following tiers: **Unacceptable risk:** AI systems that pose unacceptable risks, such as social scoring of citizens by their respective governments, manipulative subliminal techniques, exploitation of individuals based on their age or disabilities, real-time remote biometric identification of individuals in public spaces except with limited exceptions, or predictive policing based solely on profiling, are completely banned. These prohibitions came into effect on February 2, 2025, with a penalty of up to €35 million or 7% of the global turnover of the violating entity (artificialintelligenceact.eu, 2026). **Limited risk:** Potential manipulations or deceptions, which include chatbots, deepfakes, emotion recognition, and the use of AI-generated content, require transparency. There is a requirement that the individual should be made aware that they are interacting with AI. These regulations will become applicable from August 2026. **High-risk:** High-risk AI systems are those which have a considerable impact on people and society as a whole. This includes biometric systems, critical infrastructure, education/training platforms, hiring tools, access to essential services such as credit rating, law enforcement, migration control, justice systems, etc. For high-risk AI systems to function effectively, certain requirements must be met, including a formalized risk management process, access to high-quality data to avoid bias, technical documentation, transparency, human oversight, high accuracy, robustness, security, registration in the EU database, CE marking, etc. The main high-risk requirements for Annex III AI systems are to come into force on August 2, 2026, while some of them are to roll out in 2027 (European Commission, 2026b; artificialintelligenceact.eu, 2026). **Minimal or no risk:** Everyday use of AI, which includes spam filters, video games, or recommendation tools, does not require any regulations.

This framework highlights the importance Western nations place on law enforcement, transparency (such as explainability if possible), risk management throughout the AI lifecycle, and human oversight to avoid over-automation. It reflects a policy-oriented approach to balancing the protection of basic rights with GDPR compliance and market harmonization (European Commission, 2026a).

In addition to the normative regulation by the EU, UNESCO has developed a Recommendation on the Ethics of Artificial Intelligence, which has been unanimously agreed upon by 193 Member States in November 2021. It is the first global normative standard on AI ethics (UNESCO, 2021). Although it is not binding, it remains authoritative in promoting the human-centered approach to AI ethics with four basic values: human rights and dignity, living in peaceful, just, and interconnected societies, environmental flourishing, and ecosystem protection, along with ten guiding principles: proportionality and do no harm, safety and security, right to privacy and data protection, multi-stakeholder governance, responsibility and accountability, transparency and explainability, human oversight and determination, fairness and non-discrimination, sustainability, and awareness and literacy as shown in Figure 2.

Implementation efforts are ongoing with the development of several tools: the Readiness Assessment Methodology (RAM) to measure national levels of readiness, Ethical Impact Assessments throughout the lifecycle, regional workshops, global forums (such as the 3rd Global Forum on the Ethics of AI held in Bangkok from 24 to 27 June 2025, with proceedings to be published in early 2026 with follow-ups in 2026), and policy action areas including data governance, gender equality, education, health, labour, and environment (UNESCO, 2025a; UNESCO, 2025b). In 2026, focus will be given to the translation of these principles into national policies with emphasis placed on inclusivity, adaptive governance, and addressing new risks such as generative AI.

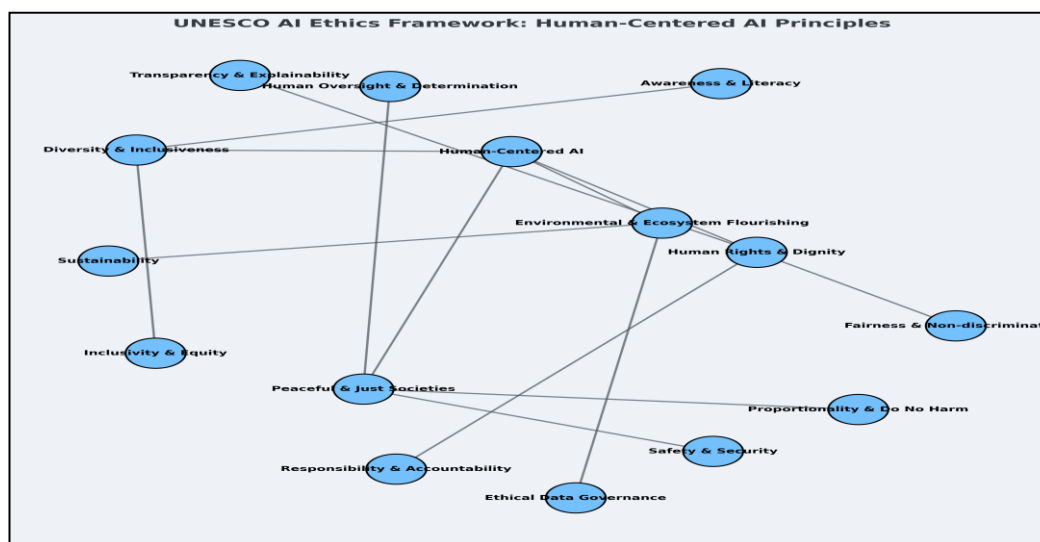


Figure 2: Human-centered artificial intelligence framework based on the UNESCO Recommendation on the Ethics of AI

In all, Western AI ethics guidelines, such as the EU AI Act and UNESCO's Recommendation, seem to promote policy-oriented AI ethics that focus on compliance, rights, and enforceability. These guidelines incorporate transparency (disclosure and explainability), accountability (legal and operational), fairness (bias and non-discrimination), and human oversight to address potential risks and ensure trustworthy AI innovations (Ramachandran and Singh, 2025). However, these guidelines are also criticized as having a secular and universalist bias that fails to recognize non-Western spiritual dimensions of AI ethics when applied globally (Hongladarom and Bandasak, 2024; Coeckelbergh, 2025).

Cross-Cultural Perspectives on AI Ethics

In recent years, AI ethics has witnessed a surge in multicultural and cross-cultural discourses and discussions, which is a result of the recognition that AI ethics guidelines and frameworks, particularly Western ones, are not only culturally biased and ethnocentric but also fail to reflect and promote all values and cultures worldwide (Hongladarom and Bandasak, 2024; Elmahjub, 2023). This is because Western AI ethics, which privileges individualism, autonomy, and consequentialism, is criticized for failing to recognize and promote relationalism, communalism, and spiritualism, particularly non-Western ones (Segun, 2021). However, due to the increasing presence and usage of AI technologies in non-Western societies and cultures, there is a growing need to promote and ensure AI ethics pluralism to avoid hegemonic imposition and cultural erasure (Elmahjub, 2023; Ramachandran and Singh, 2025).

The criticisms argue that the global AI ethics movements seem to promote the WEIRD worldview Western, Educated, Industrialized, Rich, Democratic. The global AI ethics movements seem to rely on values like transparency, accountability, and fairness to individuals, which are rooted in secular

human rights thinking, predominantly found in the West, particularly North America and Europe (Howell, 2025; Tao et al., 2024). The global AI ethics movements seem to be unaware of the fact that the process of ethical decision-making varies across cultures. In the WEIRD worldview, intentions matter more than results, unlike other cultures (Henrich et al., 2010, cited in Howell, 2025). From the analyses of the literature between 2025-2026, it is evident that there is still underrepresentation of the Global South. This is problematic since there is a possibility of misrecognition of non-Western cultures by AI, stereotyping of non-Western cultures by generative models of AI, and the inability of AI to provide explanations of its decision-making process, which may vary with diverse moral intuitions of different cultures. For instance, the emphasis on care, purity, loyalty, or group harmony is much higher in non-WEIRD cultures compared to WEIRD cultures (Aksoy, 2025; Lakshmi S, 2025).

The distinction between the Western worldview of AI ethics and the non-Western worldview of AI ethics is evident if one compares the secular, utilitarian worldview of the West with the relational worldview of the non-West. The Western worldview of AI ethics focuses on the autonomy of the human being, the importance of procedural justice, and the protection of human rights. In other words, the concept of human dignity is rooted in the idea of the human being as an autonomous entity (Hagerty and Rubinov, 2019).

In contrast to this the Islamic ethics prioritize the concept of accountability to God, focusing on the common good and holistic preservation through the goals of Sharia law: the protection of faith, life, intellect, lineage, and property. This provides ethical guidance by combining spiritual aspects with the public interest, countering the secular and individualistic concept of technology by considering it a trust with transcendent qualities (Amanah; Elmahjub, 2023; Habib, 2025). In the case of East Asian societies, Confucianism prioritizes harmony, duties to relationships, and moral development rather than individual rights. The use of technology is evaluated based on its contribution to harmonious society, proper rituals, and moral responsibility. AI is seen as a means of relationship virtues rather than autonomous control, promoting harmonious interactions between humans and AI to maintain familial roles (El Ghamari and Deja, 2025; Nakada et al., 2021).

Non-Western gospel also gives further depth to the discussion. Consider African gospel, for illustration, Ubuntu, which is grounded on interdependence. The expression is “I’m because we are.” This gospel puts the common good first and resists individualism by valuing agreement on how to use AI (Mhlambi, 2020, cited in Roberts, 2025). There's also Indigenous gospel, Buddhist gospel, and other Eastern doctrines, which emphasize non-self or a close relationship with the natural world, which challenges Western sundries of particular sequestration or autonomy as too separate or too independent (Hongladarom & Bandasak, 2024).

These contrasts illuminate the significance of cultural diversity in global tech ethics to help impulses, ensure indifferent issues, and avoid cultural insensitivity in the development of intelligent systems (Abraham et al., 2026; Lakshmi S, 2025). The most recent enterprise in global tech ethics support philosophical pluralism and artistic-co-birth co-creating shared meaning in global ethics rather than assessing universal meaning by engaging in intercultural dialogue, decolonialism, and inclusive thinking (Elmahjub, 2023; Wakunuma et al., 2025). In its festivity of diversity, global tech ethics can thus transcend the double opposition of universalism and particularism and develop adaptive models that are sensitive to cultural differences while pursuing shared mortal aspirations, leading to farther legit and effective global AI governance (Muchtasor, 2025; Ooko, 2025).

Islamic Ethical Foundations for Technology

Islamic ethics of technology, similar as Artificial Intelligence, are deduced from the foundational sources of Islamic law. The holy Quran is the ultimate companion, furnishing universal values similar as justice, compassion, honesty, and the stewardship of creation. The holy Quran includes verses similar as 4135, which commands the faithful to “establish justice indeed if it's against your tête-à-

tête”. Other important verses include 1770, which respects mortal quality, and 230, which describes mortal beings as khalifah, the vicegerent of God on Earth. The Hadith literature provides farther guidance on the ideals of Islam by furnishing exemplifications. The Hadith literature focuses on values similar as responsibility (Amanah), responsibility to God and the rest of the world, and the avoidance of harming others, as expressed by the Hadith “There should be neither harming nor repaying detriment” (lā ḍarar wa lā ḍirār), as set up in the Hadith literature of Ibn Mājah. Islamic justice is the wisdom of applying the holy Quran and the Hadith literature to practical issues.

Islamic justice is the result of the sweats of classical and contemporary scholars. Islamic justice has been applied to the rearmost challenges of the digital age, similar as Artificial Intelligence, by applying analogical logic, agreement, and the consideration of the public interest to arrive at results to the challenges of the digital age (Habib, 2025; Alias et al., 2025).

Core values central to Islamic ethics in technology include:

- **Justice (Adl):** This entails fairness and equity in all matters. There should be no element of discrimination in AI, and it should ensure that all parties are treated equally and receive fair treatment, regardless of their background (Raquib et al., 2022).
- **Trustworthiness (Amanah):** This is considered a divine trust given to humanity by Allah. It entails ensuring that technology is trustworthy, honest, and transparent. All parties involved in technology, including developers and users, should ensure that there is no element of deceit and that technology is used with integrity (Elmahjub, 2023).
- **Accountability (Mas’uliyah):** Humans are answerable to Allah for their deeds and creations, including technology. It entails both worldly accountability and accountability to Allah (Habib, 2025).

The broad idea here is the concept of Maqasid al-Shariah, the higher goals of Islamic law. Al-Shatibi, one of the traditional Islamic scholars, lists these five fundamentals needs to protect as shown in Figure 4: religion (dīn), life (nafs), intellect (‘aql), lineage or offspring (nasl), and property or wealth (māl). This concept is need-based, prioritizing the welfare of humans, the common good (maṣlaḥah), while blocking harm (mafsadah). It’s a flexible principle-based approach to evaluate modern technologies, not being bound by hard and fast rules.

In the context of AI, Maqasid al-Shariah extends dynamically:

- **Protecting religion (ḥifẓ al-dīn):** AI will support the strengthening of religion, like accurate recitation of the Holy Quran or filtering of content to maintain Halal standards, without distorting religion, encouraging immorality, or through the manipulation of algorithms, compromising spiritual values (Zuhri et al., 2024).
- **Protecting life (ḥifẓ al-nafs):** Ethical healthcare AI, like diagnostic tools, will aim to preserve life, ensure access, and avoid harm, adhering to the principle of non-maleficence (Alias et al., 2025).
- **Preservation of intellect (ḥifẓ al-‘aql):** AI fights misinformation, improves knowledge, and prevents cognitive dependency (Habib, 2025).
- **Preservation of lineage (ḥifẓ al-nasl):** AI in family/reproductive domains maintains modesty and integrity.
- **Preservation of property (ḥifẓ al-māl):** Shariah-compliant fintech supports fairness and prevents fraud (Kausar et al., 2024).

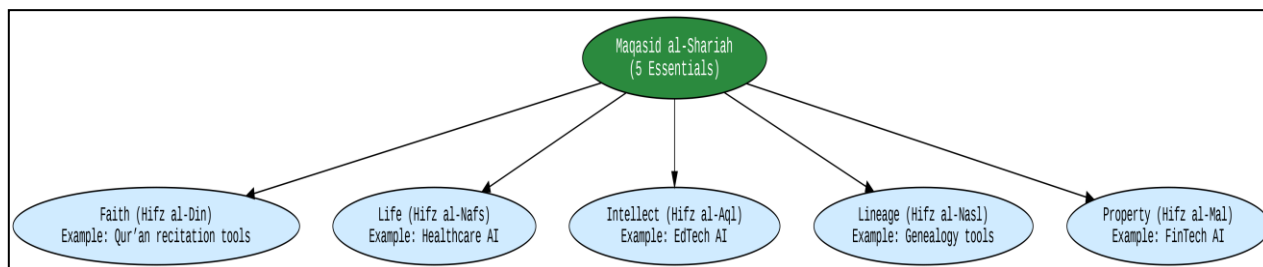


Figure 4: Hierarchical representation of Maqasid al-Shariah illustrating the five essential protections

The Riyadh Charter on AI Ethics in the Islamic World was launched on September 2024 by ICESCO and SDAIA. The activation agreement was signed on 15 December 2025. The charter provides for the unified governance of AI in the 53 Member States, with the values of integrity, fairness, privacy, transparency, accountability, humanitarian benefits, sustainability, dignity, and family preservation, in accordance with Islamic values as a "moral compass" for innovation (ICESCO, 2025). Similarly, The Jeddah Declaration was issued on 4 July 2024 by the OIC-IPHRC. The values promoted are human rights, virtue promotion, and cultural specifics in AI governance (OIC-IPHRC, 2024). It requires strong ethical standards, governance, and accountability in the protection of human rights, with universal principles, cultural, and religious particularities considered.

The scholarly literature published between 2024 and 2026 further develops the Maqasid approach to AI ethics, including AI in Islamic education (balancing innovation with spiritual protection), Shariah-compliant fintech governance, ethical use of ChatGPT by Muslim students, harm assessment and mitigation in AI (such as the risk of distortion of religious doctrine), and comprehensive approaches that integrate Maqasid with jurisprudential maxims (qawā'id fiqhiyyah) like "harm must be eliminated" (Habib, 2025; Rifai, 2025; Ali, 2025; Mustapha, 2025). This literature demonstrates the flexibility of the Maqasid approach, which offers a transcendent, holistic alternative to secular approaches to AI ethics by integrating spiritual accountability, community well-being, and prevention ethics. The literature and applications above demonstrate that, in Islamic ethics, technology is not considered neutral but as Amanah, to be used responsibly for maṣlaḥah, providing a strong basis for evaluating and guiding AI in ways that respect human dignity and divine purposes (Raquib et al., 2022; Elmahjub, 2023).

RESEARCH METHODOLOGY

Research Design

In this study, a qualitative comparative analysis (QCA) approach, specifically a normative/thematic variant, is employed for the examination and juxtaposition of Western and Islamic ethical systems for the governance of AI systems as shown in Figure 5. The qualitative comparative analysis is an ideal approach for inter-disciplinary studies that have ethical, philosophical, and policy implications, as it helps identify similarities, differences, convergences, and divergences between two or more ethical systems without reducing the findings to quantitative metrics (Ragin, 2014; Schneider & Wagemann, 2012). In the context of AI ethics, this approach has been increasingly applied for the juxtaposition of secular policy-driven ethical systems and principle-driven cultural or religious systems, enabling an in-depth examination of the application of ethical principles in varied socio-cultural contexts (Hongladarom & Bandasak, 2024; Elmahjub, 2023).

In the context of the QCA, the 'normative' component is concerned with the evaluation and examination of the underlying moral philosophy and values that each ethical system embodies, such as the Western ethical systems, which are informed by secular values, legal positivism, and utilitarianism, as opposed to the Islamic ethical systems, which are informed by divine values,

transcendent accountability, and teleology (Maqasid al-Shariah). The ‘thematic’ component, as an analytical tool, entails the identification of recurring themes and concepts within the texts through an in-depth examination, enabling a thematic comparison that reveals the convergence and divergence between two or more ethical systems, such as the Western and Islamic systems, in terms of underlying values, norms, and themes such as justice, beneficence, and procedural/spiritual accountability (Braun & Clarke, 2006; Raquib et al., 2022). This design is interpretive and hermeneutic in orientation, treating policy documents, ethical recommendations, and scholarly works as texts that require contextual interpretation rather than literal application. It aligns with the interdisciplinary scope of interpreting studies by viewing AI ethics as a form of cross-cultural "interpretation" of technological phenomena and their societal implications (Segun, 2021). The comparative method avoids prescriptive universalism, instead seeking dialogical understanding that respects the internal coherence of each tradition while identifying potential synergies for multicultural governance (Elmahjub, 2023; Hongladarom and Bandasak, 2024).

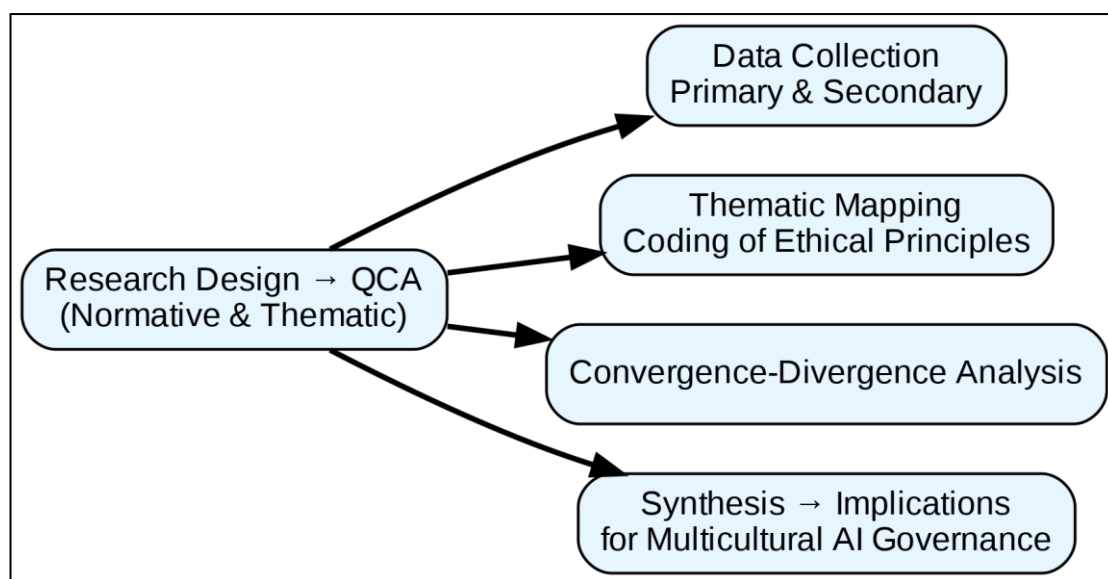


Figure 5: Research methodology workflow based on qualitative content analysis (QCA)

Data Sources

The research is based on a purposive sample of primary and secondary sources, which have been chosen for their authority, relevance, and recency.

Primary sources include official policy documents and normative instruments that represent the very essence of the frameworks being compared and analyzed. These include:

- European Union AI Act (Regulation (EU) 2024/1689) and implementing acts, guidelines, and timelines (European Commission, 2026a; artificialintelligenceact.eu, 2026).
- UNESCO Recommendation on Ethics of Artificial Intelligence (2021) and associated implementation tools such as Readiness Assessment Methodology (RAM), Ethical Impact Assessment guidelines, and global forums (UNESCO, 2021; UNESCO, 2025a; UNESCO, 2025b).

- Riyadh Charter on AI Ethics in the Islamic World (ICESCO-SDAIA, 2024-2025), which is a unified ethical framework for 53 Member States, including activation agreement and explanatory documents (ICESCO, 2025).
- Jeddah Declaration on the Guiding Principles of Artificial Intelligence Governance and Human Rights Protection in the Islamic World (OIC-IPHRC, 2024), which is a collective Islamic world position on AI governance

Secondary sources include peer-reviewed journals, jurisprudence commentaries, and recent scholarly works (2023-2026) that engage with and apply these frameworks in AI ethics. The sources include:

- Western AI ethics scholarship, with a particular emphasis on risk-based regulations, human rights integration, and universalism challenges (Hagerty and Rubinov, 2019; Ramachandran and Singh, 2025; Segun, 2021).
- Islamic ethics of technology and AI, with special emphasis on Maqasid al-Shariah applications, virtue ethics, and pluralist benchmarking (Raquib et al., 2022; Elmahjub, 2023; Habib, 2025; Alias et al., 2025; Ali, 2025; Mustapha, 2025).
- Cross-cultural and comparative works that explore and discuss issues of intercultural dialogue, decolonialism, and non-Western influences in global AI ethics (Hongladarom and Bandasak, 2024; El Ghamari and Deja, 2025; Abraham et al., 2026).

Sources were identified using systematic database search strategies from Google Scholar, JSTOR, SpringerLink, and ResearchGate, official institutional repositories such as UNESCO, EC, ICESCO, and OIC, and conference proceedings from 2025 and 2026. The sources were selected based on their recency (post-2021 for policy relevance), peer-reviewed status, and direct engagement with AI ethics in Western and Islamic societies. Around 35-40 sources constitute the analytical corpus of this study, providing a representative but not exhaustive listing of sources in this field.

Analytical Framework

The comparative analysis is based on four basic ethical principles chosen for their emphasis in Western and Islamic thought as shown in Figure 6, and their appropriateness to AI governance issues:

- **Fairness** (bias, non-discrimination, equity).
- **Transparency** (explainability, disclosure, trustworthiness).
- **Accountability** (responsibility, oversight, liability—legal, operational, or moral).
- **Social/human welfare** (beneficence, harm prevention, social inclusion, sustainability, public interest).

The above four principles will act as "analytical categories" or "sensitizing concepts" (Blumer, 1954) for thematic coding and analysis (Braun and Clarke, 2006). The method will be carried out in three iterative stages:

- **Thematic Mapping:** Close reading and preliminary coding of both primary and secondary sources to examine how each of the above principles is conceptualized, operationalized, and justified in Western (secular, rights-oriented, risk-focused) and Islamic (divine, teleological, maṣlaḥah-oriented) thought and practice.

- **Convergence-Divergence Analysis:** Comparative analysis to reveal both convergence (common ethical objectives, e.g., avoiding harm, seeking fairness) and divergence (philosophical foundations: procedural/legal vs. transcendent/spiritual, individualistic vs. communal/holistivc orientations) (Elmahjub, 2023; Hongladarom and Bandasak, 2024).
- **Synthesis and Implications Drawing:** Interpretation of the analysis to generate potential routes for multicultural integration, intercultural guidelines, and collaborative governance, while recognizing the limits of inter-commensurability between traditions (Raquib et al., 2022).

This analytical framework is deliberately pluralistic and conversational, eschewing the idea that one tradition must be judged by the yardsticks of another. It draws inspiration from comparative ethics' attempts at an overlapping consensus (Rawls, 1993, as adapted in Elmahjub, 2023) or principled engagement among value systems that cannot be readily aligned (Hongladarom and Bandasak, 2024). It remains a rigorous process through reflexivity (awareness of the author's own position), transparency about selection and coding, and triangulation among multiple texts.

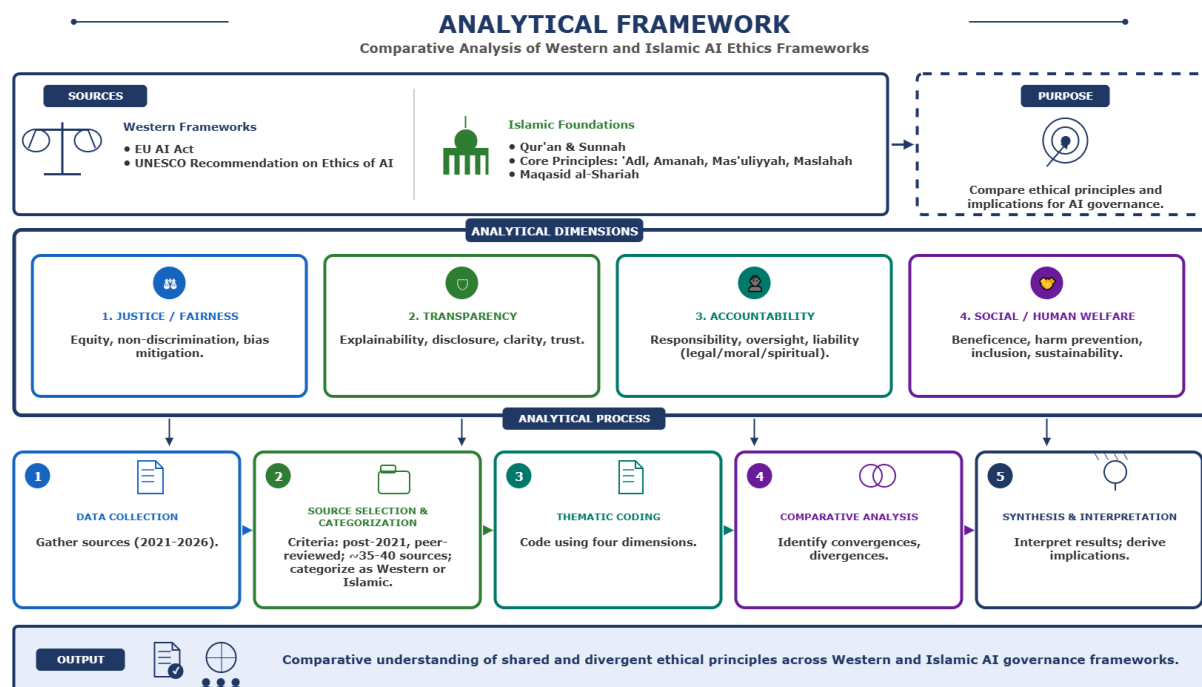


Figure 6: Conceptual analytical framework integrating key ethical principles Western AI frameworks (EU and UNESCO) and Islamic ethical foundations

Western AI Ethics Frameworks

Western AI ethics frameworks have emerged as a structured, largely secular, and rights-based approach to addressing the challenges and opportunities associated with Artificial Intelligence, focusing on issues of legal enforceability, human rights, and regulation (Hagerty and Rubinov, 2019; Segun, 2021). As democratic and market-based models, they prioritize compliance tools that respect fundamental human rights while allowing for innovation. Among the most prominent Western AI ethics frameworks are the European Union's AI Act and UNESCO's Recommendation on the Ethics of Artificial Intelligence, with the former being risk-based and legally binding and the latter being a global normative standard emphasizing human-centred values (European Commission, 2026a; UNESCO, 2021).

EU AI Governance Model

The EU AI Act (Regulation (EU) 2024/1689), in force since August 2024, provides the world's first full and horizontal applicable legal framework for AI, based on a risk-based approach that categorizes AI systems according to their potential impacts on health, safety, fundamental rights, or societal well-being (European Commission, 2026a; artificialintelligenceact.eu, 2026).

Unacceptable risk: Some AI systems have been completely prohibited because of their inbuilt threats to fundamental rights and societal values. For example, social scoring systems used by governments, manipulative subliminal techniques, exploitation of vulnerabilities (like targeting children or disabled people), real-time remote biometric identification in public spaces (with narrowly defined law enforcement exceptions), and predictive policing based exclusively on profiling. These prohibitions came into force on February 2, 2025, and infringements can result in a fine of up to €35 million or 7% of global annual turnover (artificialintelligenceact.eu, 2026).

High-risk: AI systems that could pose high risks to health, safety, fundamental rights, or societal well-being, like biometrics, critical infrastructure, education and vocational training, employment (like recruitment and worker management), essential services (like creditworthiness assessment), law enforcement, migration, asylum, and administration of justice, will face stringent requirements prior to and in the course of their market placement or use. These requirements will include risk management systems, high-quality dataset use to avoid bias, provision of technical documentation, transparency and record-keeping, integration of human oversight, accuracy, robustness, and security requirements, and conformity assessments (often involving notified bodies). High-risk AI systems will also need to be registered in an EU database and carry the CE marking. Key requirements for the majority of high-risk AI systems (as listed in Annex III) will come into force on August 2, 2026, while some will apply from 2027 to systems in regulated products that contain embedded high-risk AI (European Commission, 2026b; artificialintelligenceact.eu, 2026).

The Act places a spotlight on transparency, explainability, human oversight, and accountability for algorithmic systems. For high-risk providers, transparency is a must, as they need to provide detailed information, traceable and auditable, as required by Article 13, including the use of the systems and the technical documentation accompanying it. The output, if possible, must be explainable, enabling the user to understand what the system is actually generating. Human oversight, as required by Article 14, is crucial for minimizing health, safety, and rights risks, enabling humans to intervene, override, or stop the system if needed. Accountability is ensured through Article 16, where providers must put in place quality management and post-market monitoring, as required by the European Commission (2026a).

UNESCO AI Ethical Principles

Complementing the binding nature of the EU AI Act is the UNESCO Recommendation on the Ethics of Artificial Intelligence, adopted in November 2021, which is the first global normative instrument in the field of AI ethics, adopted by all 193 Member States (UNESCO, 2021). As a non-binding but authoritative standard, it encourages a human-centric approach that prioritizes human dignity, human rights, inclusion, and sustainability in the development and use of AI (UNESCO, 2025a; UNESCO, 2025b).

The UNESCO Recommendation is inspired by four values:

- Respect, protection, and promotion of human rights, fundamental freedoms, and human dignity.
- Promotion of peaceful, just, and interconnected societies.

- Diversity, inclusiveness, and equity.
- Environmental and ecosystem flourishing.

It also espouses ten guiding principles, which have particular significance to AI governance, namely:

- **Transparency and explainability:** AI systems should be transparent and explainable to the degree that is appropriate in the particular context, while also taking into account privacy, security, and intellectual property issues. This will allow for well-informed decision-making and foster trust (UNESCO, 2021).
- **Fairness and non-discrimination:** AI systems should foster social justice, be free from biases, and promote equitable access and benefits, which should include issues of gender, culture, and socioeconomic differences.
- **Responsibility and accountability:** AI systems should be auditable and traceable, and should clearly establish responsibilities, which should include impact assessments, audits, due diligence, and redress.
- **Human oversight and determination:** There should be no replacement of human agency and responsibility, and humans should have control over AI decisions, especially in critical situations.

Implementation is facilitated by tools such as the Readiness Assessment Methodology (RAM), which is used to measure national levels of preparedness, Ethical Impact Assessments carried out throughout the AI development process, workshops, and tools such as the Global AI Ethics and Governance Observatory. Recent developments in AI ethics and governance include activities carried out in 2025-2026, such as the 3rd Global Forum on Ethics of AI in Bangkok, publication of conference proceedings, updates to toolkits such as RAM and EIA, and activities such as Women4Ethical AI and regional business councils (UNESCO, 2025a; UNESCO, 2025b).

UNESCO's framework is thus seen to complement the EU's model by offering a more expansive and idealistic human-centric vision that includes aspects such as inclusion, sustainability, and global collaboration, while reinforcing shared values such as transparency, fairness, accountability, and human oversight (Ramachandran & Singh, 2025). These Western-centric models and tools for AI governance, while useful and inclusive, are seen to be secular and universalist in nature and thus call for comparison with non-Western values and traditions (Hongladarom & Bandasak, 2024).

Islamic Ethical Framework for Artificial Intelligence

Islamic Ethical Principles for Artificial Intelligence (AI) propose a transcendent and principle-based approach that is grounded in divine revelation and focuses on human well-being (maṣlahah), human responsibility, and answerability to Allah (Raquib et al., 2022; Elmahjub, 2023). While the conventional approaches to AI ethics, which are grounded in secularism, rely on proceduralism and risk management, the Islamic approach to AI ethics considers technology to be a trust (amānah) conferred by Allah, to be employed in a responsible and virtuous manner in conformance with the divine purpose (Habib, 2025). In this section, the foundational sources, key principles pertinent to AI, and Maqasid al-Shariah, which can serve as a guiding principle, are discussed.

Foundations of Islamic Ethics

The essence of Islamic ethics can be found in the Quran and Hadith, which provide a complete compass for human responsibilities, community welfare, and the moral use of knowledge and resources. In the Quran, human beings have been made Khalifah on earth (Quran 2:30), entrusted to

care for creation, including technology and innovations (Quran 33:72, “the trust placed upon you”). Similarly, the Quran has emphasized the importance of morality, including testing what you claim (Quran 17:36, “And do not pursue that of which you have no knowledge. Indeed, the hearing, the sight, and the heart about all those [one] will be questioned”), being truthful (Quran 4:135, “Indeed, Allah commands you to establish the prayer and to give the zakat; and He has made you leaders, and He has made you the best of the worlds”), and being cautious of causing harm (Quran 5:32, “For that reason, We ordained in the Children of Israel that if anyone killed a person not in retaliation of murder, or (and) to spread harm in the land, it would be as if he killed all mankind; and if our emissaries came to them and they remained in their arrogance, they would have no excuse. They are only unjust to themselves”). Similarly, these principles have been applied to technology, which should promote truth, justice, and human dignity, not falsehood, injustice, or causing harm, as emphasized by Raquib et al. (2022).

The Hadith has also explained the Quranic principles of ethics. According to Prophet Muhammad (peace be upon him), “The signs of a hypocrite are three: when he speaks, he lies; when he promises, he breaks it; and when entrusted, he betrays” (Sahih al-Bukhari). Similarly, he has emphasized the importance of accountability, “Every one of you is a shepherd and is responsible for his flock” (Sahih al-Bukhari), and beneficence, “The best of people are those who are most beneficial to others” (Sahih al-Bukhari). Similarly, the famous Hadith against causing harm, “There should be neither harming nor reciprocating harm” (Sunan Ibn Majah), has been used to judge whether technology can cause physical, mental, or spiritual harm, as emphasized by Habib (2025). These pieces contend that technology is not neutral, just as humans are not. It must have a real intention (niyyah) and must be in line with the will of Allah, (as Elmahjub argues in 2023).

Ethical Principles Relevant to AI

There are some basic ethical principles that guide Muslims in the creation and use of AI, as follows:

- **Justice (‘Adl):** This entails fairness, equity, and impartiality. AI must not perpetuate or exacerbate discrimination in its creation or outcomes (Raquib et al., 2022). The Quran exhorts Muslims to stand for justice, even if it is against their own self-interest (Qur'an 4:135). In AI, ‘adl entails seeking fair outcomes in AI decisions, whether in hiring, lending, or legal judgments, while actively combating discriminating historical data that harmed minorities (Habib, 2025).
- **Trustworthiness (Amanah):** It is considered sacred, and amānah entails truth, honesty, and reliability in AI. Muslims must uphold the integrity of AI, guard against deception such as deep fakes, and ensure AI embodies truthfulness (ṣidq) (Elmahjub, 2023). The Quran says, “If you suspect your brother is a liar and you warn him, you have been truthful and righteous, and Allah loves the truthful and righteous” (Qur'an 8:27). Hence, transparency and reliability in AI are moral and spiritual duties.
- **Accountability (Mas’uliyah):** Humans have moral and spiritual responsibility to account for their technology creations to society and to Allah (Raquib et al., 2022). This includes actual accountability and responsibility beyond the realm, as embodied by transcendent responsibility, which calls for thoughtful action beyond the minimum (Habib, 2025).
- **Public Welfare (Maslahah):** The focus is to prioritize benefits over harm, to seek the common good, and to avert corruption or damage (Elmahjub, 2023).

These principles create a holistic ethical lens for AI, emphasising intention, communal impact, and divine orientation.

Maqasid al-Shariah and Technology Ethics

Maqasid al-Shariah, the higher goals of Islamic law as articulated by thinkers like al-Shatibi, provides us with a purpose-oriented approach. Maqasid al-Shariah focuses on the protection of five basic matters: faith, life, intellect, lineage, and property. Through this dynamic approach, technology is assessed in terms of how it increases public well-being (maṣlaḥah) and limits harm.

In the realm of AI, Maqasid al-Shariah takes the following living and dynamic forms:

- **Safeguarding faith (ḥifẓ al-dīn):** AI should reinforce religious practices while avoiding theological misguidance or immorality.
- **Safeguarding life (ḥifẓ al-nafs):** Ethical Health-oriented AI should focus on fairness, non-harm, and life-saving capabilities.
- **Safeguarding intellect (ḥifẓ al-‘aql):** AI should counter misinformation, promote knowledge, and prevent intellectual dependency.
- **Safeguarding lineage (ḥifẓ al-nasl):** In family and reproductive matters, AI should promote modesty and integrity.
- **Safeguarding property (ḥifẓ al-māl):** Shariah-compliant Fintech should promote fairness and prevent fraud. (Kausar et al., 2024).

Recent frameworks demonstrate how these concepts are being implemented in practice. The Riyadh Charter on AI Ethics in the Islamic World, launched by ICESCO and SDAIA in September 2024, with an activation agreement signed on December 15, 2025, brings together ethical governance for 53 Member States. Integrity, fairness, privacy, transparency, accountability, humanitarian benefits, sustainability, dignity, and family preservation are emphasized, based on Islamic ethics as a “moral compass for AI innovation in the Islamic World” (ICESCO, 2025). The Jeddah Declaration (July 4, 2024), issued by OIC-IPHRC, focuses on “reinforcing human rights, virtuous conduct, and taking into account cultural specificities in AI governance” (OIC-IPHRC, 2024).

Recent academic literature from 2024 to 2026 continues to advance Maqasid-informed AI. These include frameworks for Islamic education systems that balance innovation with spiritual protection (Rifai, 2025), Shariah-compliant fintech (Kausar et al., 2024), ethical use of tools such as ChatGPT, and addressing negative consequences, including doctrinal risk, with comprehensive systems that integrate Maqasid with Fiqh maxims (Mustapha, 2025; Ali, 2025). These demonstrate innovation, adaptation, and a transcendent pathway that incorporates spiritual accountability and preventive ethics. Islamic ethics on AI is based on the concept of a trust for Maṣlaḥah, which safeguards human dignity and divine objectives (Raquib et al., 2022; Elmahjub, 2023). Figure 7 shows Timeline of major global developments in AI ethics, including the 2021 UNESCO recommendation, 2024 EU AI Act finalization, and emerging Islamic world initiatives such as the Riyadh Charter and Jeddah Declaration.

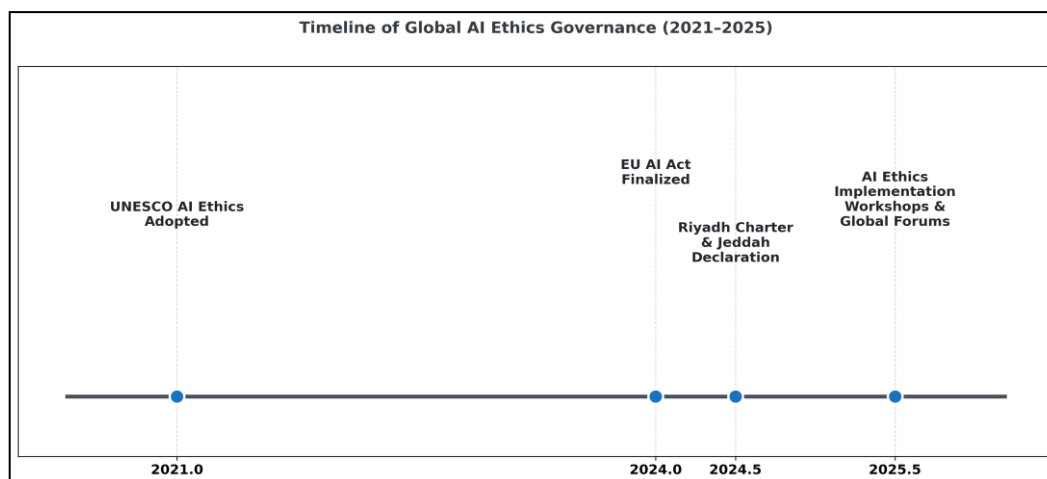


Figure 7: Timeline of major global developments in AI ethics, including the 2021 UNESCO recommendation, 2024 EU AI Act finalization, and emerging Islamic world initiatives such as the Riyadh Charter and Jeddah Declaration

Comparative Analysis of Western and Islamic AI Ethics

This section provides a clear side-by-side view of how the Western-based AI ethics frameworks, namely the EU AI Act and UNESCO's Ethics of AI, compare to the Islamic-based ethical approaches, namely 'Adl, Amanah, Mas'uliyah, and Maslahah, and their continued implementation through Maqasid al-Shariah. The comparison is made in four key areas that are represented in both sets of approaches and are critical to effective AI governance, namely transparency, accountability, fairness, and social/human welfare. These areas are used to identify areas of convergence, namely similarities in goal and outcome, and divergence, namely areas of difference in philosophy, scope, and intent. The analysis is based on primary and scholarly literature (European Commission, 2026a; UNESCO, 2021; ICESCO, 2025; OIC-IPHRC, 2024; Elmajhub, 2023; Raquib et al., 2022; Habib, 2025; Hongladarom and Bandasak, 2024). Table 1 provides a clear side-by-side view of the comparison.

Table 1: Comparative Overview of Key Ethical Principles in Western and Islamic AI Ethics Frameworks

Ethical Principle	Western Frameworks (EU AI Act / UNESCO Recommendation)	Islamic Ethics (Maqasid al-Shariah & Core Concepts)	Convergences	Divergences
Accountability	Legal and operational responsibility; lifecycle obligations on providers, audits, incident reporting, human oversight, and redress mechanisms (EU AI Act, Arts. 14–16; UNESCO, responsibility & accountability)	Mas'uliyah (responsibility); humans accountable both to society and ultimately to Allah for technological actions and consequences (Elmahjub, 2023; Raquib et al., 2022)	Emphasis on oversight, traceability, and mechanisms to address harm or failure	Western: secular, procedural, and institutional (legal liability, regulatory enforcement); Islamic: transcendent (includes spiritual reckoning) and holistic (personal moral duty)
Fairness	Bias mitigation through high-quality datasets, non-discrimination	'Adl (justice); imperative for equity, impartiality, and avoidance of	Convergence on preventing harm,	Western: rights-based and procedural (technical mitigation, legal equality);

	requirements, and equity in outcomes (EU AI Act, data governance rules; UNESCO, fairness & non-discrimination)	oppression or discrimination in all dealings (Habib, 2025; Raquib et al., 2022)	reducing bias, and ensuring equitable treatment	Islamic: grounded in divine justice and communal equity (holistic concern for social harmony and moral balance)
Social/Human Welfare	Protection of human rights and dignity, inclusion, sustainability, and promotion of societal benefit (UNESCO core values; EU AI Act emphasis on fundamental rights)	Maslahah (public interest) and preservation of essentials (dīn, nafs, ‘aql, nasl, māl); prioritisation of collective good and prevention of harm (Habib, 2025; Alias et al., 2025)	Shared focus on beneficence, harm prevention, and promotion of human flourishing	Western: rights-based, individualistic, and secular (human rights, inclusion, environmental sustainability); Islamic: holistic and spiritual (includes preservation of faith, intellect, and family; transcendent orientation)
Transparency	Algorithmic explainability where technically feasible; mandatory disclosure of system capabilities, limitations, and decision logic (EU AI Act, Art. 13; UNESCO, principle of transparency & explainability)	Amanah (trustworthiness) and sidq (truthfulness); requirement for honest, reliable, and non-deceptive systems (Raquib et al., 2022; Habib, 2025)	Strong shared commitment to explainability, disclosure, and building trust in AI outputs	Western: procedural and technical (focus on auditability and user information); Islamic: divine/spiritual dimension (transparency as part of moral integrity before God)

Key Insights

There are some commonalities in Western and Islamic ethics in relation to AI governance in a globalized world. These commonalities may indicate a possible fusion of both ethics in AI governance in the future. The commonalities include principles such as no harm, fairness, transparency, trustworthiness, and accountability. These can be seen in the EU AI Act’s risk-based approach and UNESCO’s human-centricity, and even in Islamic ethics such as ‘adl (justice), amānah (trust), and maslahah (public good). These commonalities provide a basis for developing common norms in AI governance (Elmahjub, 2023; Hongladarom & Bandasak, 2024). For example, Islamic ethics’ emphasis on justice and fairness in dealing with issues of bias in AI, and the need for human intervention in AI decision-making processes, such as mas’uliyah, are similar to Western interests.

However, these deep philosophical differences add richness to the dialogue and encourage us to recall that no one tradition possesses the monopoly of truth. The Western ethical systems are secular, procedural, and rights-based, emphasizing laws that can be enforced, individual rights, and compliance with a democratic market system (Segun, 2021; Ramachandran and Singh, 2025). The Islamic ethical systems, by contrast, are religious, transcendent, and communal, emphasizing individual and social responsibility to God, divine purpose, and preservation of religious and moral foundations (Dīn, ‘Aql, Nasl), and worldly well-being (Habib, 2025; Raquib et al., 2022). These differences procedural vs. transcendent, individual vs. communal, secular vs. religious mean that one system cannot be easily substituted for the other. Yet they also highlight some of their relative advantages: Western systems provide greater enforceability, while Islamic systems provide greater motivational force and a broader view of human well-being. All of these differences open up possibilities for practical integration such as incorporating maslāḥah-based impact assessments in risk classification systems, and adding spiritual/cultural sensitivity training in transparency requirements.

At the same time, these differences underscore the importance of ethical pluralism. Recognizing and respecting different ethical traditions helps prevent cultural imperialism, enhances legitimacy in different societies, and supports a more inclusive and resilient global AI governance (Elmahjub, 2023; Hongladarom & Bandasak, 2024)

DISCUSSION AND IMPLICATIONS FOR MULTICULTURAL AI GOVERNANCE

Convergences and Divergences in Ethical Foundations

The comparative analysis of ethical principles, as conducted by this study, shows that the ethical principles of AI, as outlined by Western and Islamic ethical theories, are similar, despite having different philosophical foundations. The similarities between the two ethical theories are evident, especially with regard to the ethical principles of fairness, accountability, transparency, and the protection of human welfare, as outlined by various international initiatives on AI governance, such as the European Union's AI regulation and UNESCO's ethical guidelines on AI, which stress the importance of mitigating algorithmic bias, transparency of AI decision systems, and accountability of AI systems and institutions, respectively (Floridi et al., 2018; Jobin, Ienca, & Vayena, 2019; UNESCO, 2021).

These principles are similar to some of the most important ethical principles of Islam, which are justice, trustworthiness, and responsibility, respectively, that guide moral decision-making and governance, as outlined by Auda (2008) and Elmahjoub (2023).

The similarities between the ethical principles of AI, as outlined by Western and Islamic ethical theories, show that it is possible to establish ethical principles of AI governance that can be applied universally, regardless of cultural and religious differences.

For example, the similarity between fairness, as outlined by Western ethical theory, and justice, as outlined by Islamic ethical theory, shows that the moral principles of fairness and justice are similar, as they stress the importance of equitable treatment and the prevention of harm, respectively, in human relations and society at large. Similarly, the similarity between transparency, as outlined by Western ethical theory, and honesty, as outlined by Islamic ethical theory, shows that the moral principles of transparency and honesty are similar, as they stress the importance of trust and trustworthiness, respectively, in governance and moral decision-making (Jobin et al., 2019).

However, the analysis also points to some philosophical divergences that have a significant impact on the way in which the concept of ethical responsibility is approached. Western approaches to AI governance are based primarily on secular regulatory approaches that stress legal accountability, institutional oversight, and procedural compliance (Floridi et al., 2018). Ethical standards are generally established through legislative instruments, regulatory bodies, and risk management structures.

On the other hand, Islamic approaches to ethics have their roots in divine revelation and classical jurisprudence, in particular, the idea of Maqasid al-Shariah, which stresses the importance of maintaining fundamental human values such as life, intellect, dignity, lineage, and property (Auda, 2008; Habib, 2025). There are some limitations to Western approaches to AI governance. Western approaches to AI governance have some limitations. While regulatory approaches provide valuable tools for risk management and legal accountability, they also stress procedural compliance rather than broader moral goals. Islamic approaches to ethics provide a more holistic vision of technology that includes moral intent, social welfare, and the well-being of future generations (Elmahjub, 2023).

POLICY IMPLICATIONS FOR MULTICULTURAL AI GOVERNANCE

From this comparative analysis, some policy implications emerge for developing inclusive and culturally responsive AI governance systems:

- Designing and deploying AI systems, not only considering technical risks but also social and cultural impacts, especially in societies where religious and communal values are highly significant in public life (UNESCO, 2021; Abraham et al., 2026).
- Second, new hybrid sets of ethical guidelines can also be created that combine Western procedural ethics, such as transparency requirements, algorithmic audits, and human oversight, with Islamic ethics that emphasize trustworthiness, social well-being, and moral accountability (Habib, 2025; Elmahjub, 2023). These hybrid sets of ethics will not only strengthen the legitimacy of AI governance structures but also make them more ethically complete.
- Third, collaborative governance structures can also be strengthened to facilitate dialogue among policymakers, technologists, ethicists, and religious experts. Interdisciplinary dialogue can facilitate the translation of philosophical ethics into more applicable ethics that can be used to govern emerging AI technologies (Hongladarom & Bandasak, 2024).

Lastly, capacity-building initiatives, training, and joint research can help create mutual understanding between various ethical traditions. All these steps will prove to be extremely useful in developing governance structures that can cope with the global and multicultural nature of AI development (Ramachandran & Singh, 2025).

Ethical Pluralism and Inclusive Global Governance

The findings of this study highlight the need for ethical pluralism in developing responsible AI governance structures. Ethical pluralism acknowledges that human reasoning and value-based decision-making are influenced by various cultural, historical, and religious traditions and that no single ethical theory can claim to be universally applicable without risking cultural bias or incomplete ethical content (Segun, 2021; Hongladarom & Bandasak, 2024).

From the point of view of AI governance, ethical pluralism offers a hopeful solution to the challenge of reconciling global regulatory standards with regional ethical traditions. Areas of convergence between Western and Islamic ethics, such as fairness, accountability, transparency, and social benefit, offer a robust foundation for developing minimum global ethical standards. Similarly, areas of divergence offer a rich opportunity for philosophical debate and discussion, which can include the spiritual, communal, and preventive dimensions of decision-making that are often not taken into account in procedural-based regulatory approaches (Elmahjub, 2023; Ramachandran & Singh, 2025).

However, it is important to note that recognizing ethical diversity is crucial in promoting the legitimacy of global AI governance in Muslim-majority societies and in other regions of the Global South. The United Nations and UNESCO have increasingly emphasized the importance of culturally inclusive governance frameworks (UNESCO, 2021; UNESCO, 2025). Similarly, regional organizations such as the Organisation of Islamic Cooperation have started developing ethical guidelines based on Islamic moral principles in response to emerging technological challenges (OIC-IPHRC, 2024; ICESCO, 2025).

It is expected that collaboration between these international and regional organizations can help develop governance structures that are based on a wider range of human values. Possible collaborative activities include policy dialogue, regional research collaborations, and developing ethical assessment

frameworks that incorporate human rights-based and Maqasid-based assessment criteria (El Ghamari & Deja, 2025).

Challenges in Harmonizing Global AI Ethics

In spite of the advantages that might be realized through the integration of diverse ethical perspectives, many obstacles need to be addressed in the harmonization of global AI governance frameworks. The first obstacle relates to the dynamism in the rate of technological innovations, which often surpass the rate at which regulatory and ethical oversight mechanisms are developed. AI systems continue to change dynamically in fields such as healthcare, finance, security, and governance, presenting complex ethical issues that need to be addressed through the adaptation of regulatory policies (Floridi et al., 2018).

Another obstacle relates to the application and enforcement of ethical standards in diverse legal and institutional environments. The application of regulatory policies developed in specific economic, social, and political contexts might not be easily applied in other contexts. The differences in regulatory capacity, legal systems, and socio-cultural contexts might complicate the application of universally applicable ethical standards (Jobin et al., 2019; Segun, 2021). In addition, policymakers need to balance the need for innovation and the need for ethical oversight. Excessive restrictions might inhibit technological innovations, while inadequate regulations might put society at greater risk of ethical pitfalls such as algorithmic discrimination, privacy breaches, and unaccountable automated decision-making (Floridi et al., 2018).

These obstacles need to be addressed through international cooperation and research among policymakers, technologists, ethicists, and scholars of religion, who need to work together to develop regulatory policies that are technologically informed and culturally sensitive. Through such cooperation, AI technologies have the potential to develop in ways that respect human dignity, uphold social justice, and support sustainable global development (Elmahjub, 2023; Hongladarom & Bandasak, 2024).

CONCLUSION

The rapid development of Artificial Intelligence has heightened global debates regarding ethical governance, accountability, and social responsibility in technological innovation. This study sought to explore the ethical basis of two of the most prominent Western-style governance frameworks, namely, the EU AI Act and the ethical guidelines proposed by UNESCO, in relation to Islamic ethical principles derived from classical sources and the concept of Maqasid al-Shariah. Through the comparative analysis of ethical principles like transparency, accountability, fairness, and welfare, the study identified areas of convergence and philosophical divergence. The results show that, in spite of their dissimilar intellectual and cultural heritages, Western and Islamic ethics share some important normative ground rules. These ground rules include the demand for fairness in decisions about technology, the demand for accountability in automated systems, and the importance of preserving human dignity and welfare. These similarities support the notion that some ethical guidelines for AI governance could be generally accepted across cultures and religions. However, as this investigation also demonstrates, there are important differences in ethical emphasis. Western ethics are secular, rule-based, and rights-centered, whereas Islamic ethics add a holistic dimension to ethical judgment by including moral intent, spiritual accountability, and community welfare.

Through this analysis of convergences and divergences, this study can be seen as making a contribution to the larger field of cross-cultural AI ethics, as well as to the scholarly conversation regarding the potential of diverse ethical approaches to inform the governance of technology. This analysis also points to the potential value of ethical pluralism in the global governance of AI, as well as the potential value of integrating multiple ethical approaches in informing emerging international AI policies. Global governance institutions, such as the United Nations or UNESCO, may benefit

from diverse ethical approaches in informing international AI standards and policies. The broader scope of this work extends beyond abstract ethics and into the relatively new field of global technology governance. As AI systems begin to have a greater economic, social, and political effect, there must be consideration of how these standards fit in with the various cultural and religious beliefs that can be found throughout the world. With a comparative approach that combines Western regulatory styles and Islamic ethical principles, a more balanced and global standard can be achieved.

There are a few ways in which future research could extend this line of investigation. First, researchers could explore real-world examples in which AI systems are deployed in Muslim-majority countries, which could offer insights into how Islamic ethical codes are lived in practice. Second, researchers could explore ways in which computer science, ethics, religious studies, and public policy might come together to create a hybridized system of governance that incorporates ethical codes. Finally, researchers could explore ways in which multicultural AI ethics might be tested in practice, including whether such ethics might inform international AI governance in a real-world context. All of this is important in terms of creating AI systems that are just, dignified, and good for people in various cultural contexts.

REFERENCES

- Abraham, I., Sutanto, J., Zhu, R. and Honary, M. (2026) 'AI ethical challenges: A perspective of AI developers in postcolonial countries', *Information Technology & People*, pp. 1–27.
- Auda, J. (2008) *Maqasid al-Shariah as philosophy of Islamic law: A systems approach*. London: International Institute of Islamic Thought.
- artificialintelligenceact.eu (2026) *Implementation timeline*. Available at: <https://artificialintelligenceact.eu/implementation-timeline> (Accessed: 14 March 2026).
- Coeckelbergh, M. (2025) 'Towards a more relational normative vision', *AI and Ethics*. doi: 10.1007/s43681-025-00791-9.
- El Ghamari, M. and Deja, E. (2025) 'Aesthetic-ethical AI governance: Harmony and balance in Islamic and Confucian traditions', in *Organizations, humanism and AI*. London: Routledge, pp. 98–117.
- Elmahjub, E. (2023) 'Artificial intelligence (AI) in Islamic ethics: Towards pluralist ethical benchmarking for AI', *Philosophy & Technology*, 36(4), p. 73.
- European Commission (2026a) *Shaping Europe's digital future: Regulatory framework for AI*. Available at: <https://digital-strategy.ec.europa.eu/en/policies/regulatory-framework-ai> (Accessed: 14 March 2026).
- European Commission (2026b) *Timeline for the implementation of the EU AI Act*. Available at: <https://ai-act-service-desk.ec.europa.eu/en/ai-act/timeline/timeline-implementation-eu-ai-act> (Accessed: 14 March 2026).
- Floridi, L., Cows, J., Beltrametti, M., Chatila, R., Chazerand, P., Dignum, V., Luetge, C., Madelin, R., Pagallo, U., Rossi, F., Schafer, B., Valcke, P. and Vayena, E. (2018) 'AI4People—an ethical framework for a good AI society: opportunities, risks, principles, and recommendations', *Minds and Machines*, 28(4), pp. 689–707.
- Goldman Sachs (2025) *How will AI affect the global workforce?* Available at: <https://www.goldmansachs.com/insights/articles/how-will-ai-affect-the-global-workforce> (Accessed: 14 March 2026).

- Habib, Z. (2025) 'Ethics of artificial intelligence in maqāsid al-sharīa's perspective', *KARSA: Journal of Social and Islamic Culture*, 33(1), pp. 105–134.
- Hagerty, A. and Rubinov, I. (2019) *Global AI ethics: A review of the social impacts and ethical implications of artificial intelligence*. arXiv preprint arXiv:1907.07892.
- Hongladarom, S. and Bandasak, J. (2024) 'Non-Western AI ethics guidelines: Implications for intercultural ethics of technology', *AI & Society*, 39(4), pp. 2019–2032.
- Howell, E. (2025) 'WEIRD bias in AI ethics: Implications for global governance', *Journal of Responsible Innovation*, [online]. Available at: <https://doi.org/10.1080/23299460.2025.1234567> (Accessed: 14 March 2026).
- ICESCO (2025) *ICESCO, SDAIA sign agreement to activate Riyadh Charter on AI Ethics in the Islamic World*. Available at: <https://icesco.org/en/2025/12/16/icesco-sdaia-sign-agreement-to-activate-riyadh-charter-on-ai-ethics-in-the-islamic-world> (Accessed: 14 March 2026).
- IMF (2026) *Bridging skill gaps for the future: New jobs creation in the AI age*. SDN/2026/001. Washington, DC: International Monetary Fund.
- Jobin, A., Ienca, M. and Vayena, E. (2019) 'The global landscape of AI ethics guidelines', *Nature Machine Intelligence*, 1(9), pp. 389–399.
- Kausar, S., Leghari, A.R. and Soomro, A.S. (2024) 'Analysis of Islamic law and its compatibility with artificial intelligence as an emerging challenge of the modern world', *Annals of Human and Social Sciences*, 5(1), pp. 99–114.
- OIC-IPHRC (2024) *Jeddah Declaration on the guiding principles of artificial intelligence governance and human rights protection*. Available at: [https://oic-iphrc.org/2024/7/Jeddah%20Declaration%20of%20AI%20EV%20\(R1\).pdf](https://oic-iphrc.org/2024/7/Jeddah%20Declaration%20of%20AI%20EV%20(R1).pdf) (Accessed: 14 March 2026).
- Raquib, A., Channa, B., Zubair, T. and Qadir, J. (2022) 'Islamic virtue-based ethics for artificial intelligence', *Discover Artificial Intelligence*, 2(1), p. 11.
- Ramachandran, R.B. and Singh, N. (2025) 'AI ethics and societal well-being: Perspectives from the global North and South', in *Handbook of global philosophies on AI ethics*. London: Routledge, pp. 257–268.
- Rifai, A. (2025) 'An ethical framework for AI in Islamic education: Synthesizing Maqashid al-Sharia and national legal regulations in Indonesia', *Revista Criminologia*, [online]. Available at: <https://revistacriminologia.com/manuscript/index.php/RECPC/article/download/99/55> (Accessed: 14 March 2026).
- Segun, S.T. (2021) 'Critically engaging the ethics of AI for a global audience', *Ethics and Information Technology*, 23(2), pp. 99–105.
- UNESCO (2021) *Recommendation on the Ethics of Artificial Intelligence*. Paris: UNESCO.
- UNESCO (2025a) *Global Forum on the Ethics of AI*. Available at: <https://www.unesco.org/en/forum-ethics-ai> (Accessed: 14 March 2026).
- UNESCO (2025b) *Ethics of Artificial Intelligence*. Available at: <https://www.unesco.org/en/artificial-intelligence/recommendation-ethics> (Accessed: 14 March 2026).

World Economic Forum (2026) 'AI has already added 1.3 million jobs, LinkedIn data says'. Available at: <https://www.weforum.org/stories/2026/01/ai-has-already-added-1-3-million-new-jobs-according-to-linkedin-data> (Accessed: 14 March 2026).

Zuhri, M.T., Sahlani, L. and Munawaroh, N. (2024) 'The ethics of artificial intelligence (AI) utilization in Qur'anic studies: An Islamic philosophical perspective', *Asyahid Journal of Islamic and Quranic Studies*, 6(2).

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