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## Preventing Corruption in Government Bodies Under the Laws of Muslim and European Countries in the Contemporary Era

**Abstract:** This study examines mechanisms for preventing corruption in contemporary governance through a comparative analysis of Islamic and European legal frameworks. The research aims to identify normative principles, institutional structures, and regulatory approaches that enhance anti-corruption effectiveness in state authorities, highlighting the influence of religious and secular legal norms. A comparative legal method was employed to analyse primary legal sources, institutional models, financial control systems, and sanctioning approaches. In Muslim countries, Sharia principles are integrated with national legislation to regulate anti-corruption measures, as seen in the United Arab Emirates, where strict criminal sanctions for bribery are reinforced by digital control of public services. In contrast, European countries, exemplified by France under the Sapin II Law (2016), implement mandatory corporate compliance programs within a secular legal framework and emphasise institutional transparency and accountability. Statistical indicators, including the Transparency International Corruption Perception Index for 2020–2025, were examined alongside the operational practices of specialised anti-corruption bodies. Findings reveal that the effectiveness of anti-corruption measures depends not only on sanction severity but also on the comprehensiveness of legal regulation, institutional independence, and societal intolerance for corruption. Muslim countries achieve notable results when religious principles are combined with modern management tools, while European countries excel through systematic preventive policies, transparency, and accountability mechanisms. The study highlights both commonalities and divergences between the two legal models and outlines opportunities to adapt selected elements of foreign anti-corruption practices to the Ukrainian context. This comparative approach contributes to the scholarly understanding of how legal, institutional, and cultural factors

jointly shape corruption prevention, offering insights for policymakers seeking to strengthen governance frameworks in diverse socio-legal settings.

**Keywords:** Anti-corruption, European law, Governance, Islamic law, Public Service.

## INTRODUCTION

Corruption in state authorities remains one of the most persistent challenges to effective governance, the rule of law, and the protection of citizens' rights.<sup>1</sup> In today's interconnected world, corruption is no longer confined to national borders; it has become a transnational concern, influencing international investment, economic development, public trust in government institutions, and the stability of political systems. Analyses conducted between 2020 and 2025 indicate that many countries continue to struggle with corruption, showing only modest progress or consistently problematic indicators. Yet, some states have achieved meaningful results by adopting comprehensive anti-corruption policies that integrate legal, institutional, financial, and administrative measures.<sup>2</sup>

Comparative studies of corruption prevention across countries with differing legal traditions reveal interesting contrasts.<sup>3</sup> In Muslim-majority countries, anti-corruption efforts are shaped not only by national legislation but also by Sharia principles, which treat bribery and embezzlement as violations of legal, moral, and religious norms. This integration of religious values offers a unique framework for guiding both policy and behaviour.<sup>4</sup> In European countries, anti-corruption frameworks are grounded in secular legal principles that prioritise transparency, accountability, and the institutional independence of supervisory bodies. Comparing these two approaches highlights not only

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<sup>1</sup> Yuliia Kobets et al., 'The Influence of the Digital State on Preventing and Detecting Corruption in Ukraine', *Theoretical and Practical Research in the Economic Fields* 15, no. 2 Special issue (2024): 365-374, [https://doi.org/10.14505/tpref.v15.2\(30\).16](https://doi.org/10.14505/tpref.v15.2(30).16).

<sup>2</sup> Zamira Sinaj et al., 'Institutions and Corruption in Public Administration: A Study of the Relationship and Methods of Preventing Corruption', *Ceridap* 2025, no. 3 (2025): 424-451, <https://doi.org/10.13130/2723-9195/2025-3-43>.

<sup>3</sup> Erma Rusdiana et al., 'Preventing the Politicisation of Corruption Crime Law Enforcement Based on Local Wisdom', *Legality: Jurnal Ilmiah Hukum* 33, no. 1 (2025): 110-131, <https://doi.org/10.22219/ljih.v33i1.37429>.

<sup>4</sup> Edi Rosman, Aidil Alfin, and Bustamar, 'Politik Hukum Pidana Indonesia: Analisis Korelasi Siyāṣah Syar'iyah dan Pencegahan Korupsi', *Al-Manahij: Jurnal Kajian Hukum Islam* 13, no. 1 (2019): 15-31, <https://doi.org/10.24090/mnh.v0i1.1797>.

differences in formal regulation but also distinct philosophical understandings of public authority, official ethics, and civic responsibility.<sup>5</sup> In the European Union, preventive measures such as asset declarations, compliance programs, whistleblower protections, and e-governance tools are central to anti-corruption strategies. In contrast, several Muslim countries emphasise strict sanctions, centralised control, and moral-religious guidance.

Despite international conventions, national strategies, and institutional reforms, corruption persists as a systemic issue in both developed and developing states.<sup>6</sup> One key research gap is understanding how religious-legal norms interact with secular mechanisms to shape effective anti-corruption policies. Studies focusing solely on Sharia-based systems often overlook institutional and procedural aspects, while research on European models tends to neglect moral or cultural dimensions. A second gap concerns institutional independence: European anti-corruption agencies often enjoy operational autonomy with clearly defined powers, whereas in some Muslim-majority states, these bodies remain closely tied to the executive, limiting their effectiveness. Third, the balance between preventive and punitive measures differs significantly. European models emphasise prevention through transparency, financial oversight, and digital tools, whereas some Muslim countries rely predominantly on punitive approaches, sometimes without adequate compliance systems. Fourth, digitalisation is increasingly recognised as a critical tool for reducing discretionary power and corruption risk. The United Arab Emirates, for example, demonstrates how electronic administrative procedures limit opportunities for corruption, while EU countries integrate e-governance and digital monitoring into broader transparency strategies. Finally, fostering an anti-corruption culture remains an ongoing challenge. Scandinavian countries illustrate that public trust and societal intolerance of

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<sup>5</sup> Maryna O. Dei et al., 'Retraction: Preventing and Combating Corruption in the European Union: The Practice of Member States (Statute Law Review DOI: 10.1093/Slr/Hmab015)', *Statute Law Review* 43, no. 3 (2022): 371, <https://doi.org/10.1093/slr/hmac007>.

<sup>6</sup> Yaroslav O. Kostohryz et al., 'The Effectiveness of Codes of Ethics in Labour Relations as a Tool for Preventing Corruption', *European Review*, ahead of print, 2025, <https://doi.org/10.1017/S1062798725000018>.

corruption are as important as legal frameworks, while transitional states are still cultivating these values.

Earlier research has provided valuable insights but leaves room for further exploration. Federica Zazzaro (2025) examined the corporate criminal liability regime in European Union directives, emphasizing legal harmonisation, the strengthening of common standards to prevent forum shopping, and recent innovations that highlight organisational fault and post-delictum reorganization in attributing liability and imposing sanctions on legal entities.<sup>7</sup> Subari et al (2025) analysed Sharia-based anti-corruption frameworks, highlighting religious influences but without comparative evaluation against secular legal systems.<sup>8</sup> Krivins et al (2025) investigated institutional independence in EU anti-corruption agencies but did not examine cultural or ethical influences on effectiveness.<sup>9</sup> This study contributes to the field by integrating legal, institutional, moral, and cultural factors, offering a more holistic understanding of corruption prevention.

The central research question guiding this study is: Which legal, institutional, and cultural elements of Muslim and European anti-corruption models demonstrate the highest effectiveness, and how can these elements be adapted to strengthen national anti-corruption policies in other contexts? Addressing this question provides both theoretical and practical contributions. Theoretically, it deepens understanding of how legal traditions, institutional design, and socio-cultural norms intersect to influence anti-corruption outcomes. Practically, it offers insights for policymakers seeking to improve public administration integrity, design preventive frameworks, and adapt successful elements from both Islamic and European models.

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<sup>7</sup> Federica Zazzaro, 'Corporate Criminal Liability in EU Directives: An Overview of the EU Discipline', *New Journal of European Criminal Law* 16, no. 2 (2025): 197-212, <https://doi.org/10.1177/20322844251338625>.

<sup>8</sup> Andi Akbar Subari, Achmad Faisal, and Suprpto, 'Cross-Cultural Perspectives on Corruption and Bribery: Sharia-Based Approaches to Anti-Corruption Law', *DIKTUM: Jurnal Syariah Dan Hukum* 24, no. 1 (July 2025): 51-63, <https://doi.org/10.35905/diktum.v24i1.14926>.

<sup>9</sup> Anatalis Krivins et al., 'Ethics and Corruption in the European Union: A Content Analysis', *European Review* 33, no. 5 (2025): 555-580, <https://doi.org/10.1017/S1062798725100240>.

The significance of this research is multifaceted. It clarifies structural and functional differences between Muslim and European anti-corruption approaches, offering evidence-based evaluations of effectiveness. It highlights how normative principles, institutional independence, preventive and punitive measures, and digital governance collectively influence outcomes. It also sheds light on the often-overlooked role of religious, moral, and cultural factors in shaping policy effectiveness. Finally, by providing lessons for countries undergoing reform or legal harmonisation, the study informs efforts to enhance transparency, accountability, and public trust in governance. In summary, this study situates corruption prevention within a comparative, cross-cultural, and multidimensional framework. By combining empirical evidence, legal analysis, and institutional evaluation, it offers a nuanced perspective on what makes anti-corruption measures effective and transferable across different legal traditions. This approach contributes to academic discourse while providing practical guidance for policymakers, particularly in countries seeking to reform governance systems or harmonise legal frameworks with international standards.

## **METHOD**

This study employs a comprehensive interdisciplinary approach to investigate corruption-prevention mechanisms in government bodies across Muslim and European legal frameworks. The methodological foundation integrates tools from the theory of state and law, administrative law, international public law, comparative law, and legal sociology, allowing the analysis of anti-corruption policy not merely as a set of legal norms but as a holistic system encompassing regulatory, institutional, cultural, and moral dimensions. A systemic approach was applied to examine the interplay between legal provisions, the functioning of specialised institutions, judicial practice, financial control mechanisms, and the level of public legal awareness. Comparative legal analysis serves as the primary method, enabling a structured comparison of regulatory sources, institutional structures, criminalisation of corruption, and preventive control models. For instance, France's Sapin II Law emphasises mandatory compliance programs and internal audits, while the UAE focuses on strict criminal sanctions reinforced by digitalised administrative procedures.

Complementary methods include formal-legal analysis of international conventions (e.g., UN Convention against Corruption 2003, Council of Europe Criminal Convention on Combating Corruption) and national legislation, historical-legal methods tracing the evolution of anti-corruption mechanisms, and statistical methods evaluating effectiveness through quantitative indicators such as the Transparency International Corruption Perceptions Index (2020–2025).

Data collection combined both quantitative and qualitative techniques.<sup>10</sup> Statistical data from the CPI were integrated with empirical case studies, judicial records, and reports from anti-corruption agencies to provide a more nuanced understanding of real-world practices and hidden corruption risks. Empirical data included in-depth interviews with civil servants and experts in Southeast Asian countries, analysis of public procurement and financial records in European contexts, and the review of public anti-corruption campaigns in Saudi Arabia and the operations of the Malaysian Anti-Corruption Commission. Data analysis involved triangulating legal norms, institutional practices, and quantitative indicators to identify structural strengths and weaknesses, as well as cross-cultural lessons. Validation was achieved through cross-referencing multiple sources, including judicial statistics, agency reports, and international indices, ensuring reliability and scientific rigour. This integrated methodology enables a thorough, evidence-based comparison of Muslim and European anti-corruption models and provides practical recommendations for adapting best practices across other national contexts.

## RESULTS AND DISCUSSION

Effective combating of corruption is one of the most pressing problems of our time. This is evidenced by the systematic holding of international seminars, conferences, and forums dedicated to innovations in the study of corruption in Europe and beyond. Solving this problem is impossible without a systematic study of the essential features, manifestations, and determining factors of this negative social phenomenon. Since Ukraine

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<sup>10</sup> Matthew B. Miles and A. Michael Huberman, *Analisis Data Kualitatif : Buku Sumber Tentang Metode Metode Baru* (Jakarta: Universitas Indonesia Press, 2014).

declared independence, this problem has attracted increased attention from Ukrainian scientists, political figures, and state leaders. The experience of other countries and the theoretical and methodological foundations already developed by European researchers have become valuable support in combating corruption in Ukrainian realities.<sup>11</sup> It is known that corruption is one of the main social, economic, and political problems of our time. Despite the radical measures taken by the world community to prevent and combat this social evil, overcoming corruption remains an extremely relevant, important and urgent task for state authorities, local governments and the entire civil society. Solving this problem also mostly concerns Ukraine, as corruption poses a significant threat to democracy, the rule of law, social progress, and national security.<sup>12</sup>

68% of Europeans believe corruption is widespread in their country. This is evidenced by the data of sociological surveys conducted by Eurobarometer.<sup>13</sup> At the same time, only 2% of respondents have personally been exposed to corruption, and 3% have witnessed corrupt actions. EU countries differ greatly in both the level of corruption and the methods of combating it.<sup>14</sup> Even though the countries of the European Union differ greatly from each other both in terms of the state of corruption and in the methods of combating it, it can be assessed by the Corruption Perceptions Index - an indicator that has been calculated and published annually by the Corruption Perceptions Index since 1995 based on 13 studies by reputable international institutions and research centers (for Ukraine - 9 sources).<sup>15</sup> According to the 2021 results, this rating is led by Denmark and

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<sup>11</sup> Roman Tashian et al., 'Implementation of International Anti-Corruption Standards into Ukrainian Legislation', *International Criminal Law Review*, ahead of print, 2026, <https://doi.org/10.1163/15718123-bja10256>.

<sup>12</sup> Bilenchuk P.D., Lykhova S.Ya. The latest national anti-corruption strategy: features of formation and implementation. Implementation of state anti-corruption policy in the international dimension: materials of the V International Scientific and Practical Conference (Kyiv, December 9-10, 2020): in 2 parts. Kyiv: National Academy of Internal Affairs, 2020. Part 1.

<sup>13</sup> Anona Armstrong, 'The Role of Leadership and Culture in Preventing Corruption', in *CSR, Sustainability, Ethics and Governance*, Part F180 (Springer Nature, 2025), 303-322, [https://doi.org/10.1007/978-3-031-74523-2\\_14](https://doi.org/10.1007/978-3-031-74523-2_14).

<sup>14</sup> Fighting corruption: what the EU experience teaches us. <https://www.eurointegration.com.ua/articles/2018/07/3/7083870/>.

<sup>15</sup> Olesia Zhytkova, Robert Gillanders, and Windkouni Haoua Eugenie Maïga, 'The Internal and Transnational Effects of Corruption on the Environment: The Case of Ukraine', *Cogent Social Sciences* 11, no. 1 (2025), <https://doi.org/10.1080/23311886.2025.2566301>.

New Zealand, with Finland and Somalia at the bottom. Among neighbouring countries, Ukraine is ahead of Poland and Belarus.<sup>16</sup>

One of the most successful examples of combating corruption - Estonia - achieved this without creating separate bodies. However, there was a political will among politicians to eradicate bribery. After the collapse of the Soviet model, an opportunity also appeared. After Estonian became the official language, many Russian-speaking migrants lost their jobs and were replaced by young Estonians. This destroyed the Soviet corruption networks. Moreover, the rapid economic recovery enabled high salaries for civil servants. In Bulgaria, there was no such political will. Anti-corruption reform became possible thanks to EU pressure. Thus, the local anti-corruption body was given the authority to conduct investigations only when the EU refused to provide funding. The creation of anti-corruption bodies does not guarantee the eradication of corruption. Moreover, a successful fight is possible without such bodies.

In the Republic of Estonia, the responsibility for combating corruption lies with the relevant bureau of the Central Criminal Police, which is part of the Estonian Ministry of the Interior. The bureau, together with the internal security unit of the Estonian Ministry of the Interior, carries out activities to prevent corruption and identify persons who commit such acts.<sup>17</sup> As Shvydkyi Y.Yu. Notes: France has its own experience in combating corruption. In 1993, the Central Anti-Corruption Service was created here. It is entrusted with such important functions as centralising information necessary to prevent (detect) facts of active and passive corruption, as well as assisting judicial and investigative bodies in cases of their appeals. The Central Service informs the Prosecutor of the Republic about the investigation. Current French legislation contains several regulatory acts aimed at combating corruption, primarily related to financial abuse. Thus, in 1990, a law was adopted requiring credit institutions to be especially attentive to capital whose origin is

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<sup>16</sup> Alekseenko I.V., Kobets M.P. Combating corruption: European experience for Ukraine. Discussion issues of the application of anti-corruption legislation: materials of the International Scientific and Practical Conference (Dnipro, November 15, 2019). Dnipro: Dnipropetrovsk State University of Internal Affairs, 2019.

<sup>17</sup> Filshtein M.V. The experience of the Baltic countries in overcoming corruption in the police environment. *Law and Society*. 2015. No. 6.2(2). P. 149–152. URL: [http://nbuv.gov.ua/UJRN/Pis\\_2015\\_6](http://nbuv.gov.ua/UJRN/Pis_2015_6).

associated with organised crime. This concerns the detection of violations related to the falsification of checks and bills of exchange transferred for collection.<sup>18</sup>

Frankov S.O. proves that in the Federal Republic of Germany, there is no single anti-corruption body to combat corruption; however, specialised Prosecutor's offices to combat corruption in individual regions (states) are working fruitfully, which actually perform the role of a specialised anti-corruption body, the creation of which is provided for in international conventions. Probably the most effective is the system of political and legal mechanisms to combat corruption in Italy, where public organisations and state institutions closely cooperate to solve this problem. The parliament of this country established a special General Council to combat organised crime. Along with the General Council, district departments to combat organised crime and the mafia were established, and, separately, the State Department to Combat the Mafia was established.<sup>19</sup> Thus, the National Directorate for Combating Organised Crime and the Mafia, the District Directorate, and the Operational Investigation Directorate for Combating Organised Crime constitute a system of multifunctional, specialised operational, investigative, and information elements for combating organised crime. That is, the prevention of organised crime in Italy is carried out not only by law enforcement agencies but also by executive bodies accountable to parliament, which is remarkable and productive. Currently, corruption in Italy has not been eliminated. However, its scale and nature have undergone significant changes: mafia-related murders of judges and prosecutors are a thing of the past, and the general atmosphere in society has nevertheless changed for the better.<sup>20</sup>

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<sup>18</sup> Shvydkyi Y.Yu. Foreign experience in combating corruption and the possibilities of its implementation in Ukraine. <https://maup.com.ua/assets/files/expert/7/17.pdf>.

<sup>19</sup> Frankov S.O. Foreign experience in combating corruption and organized crime. *Legal Scientific Electronic Journal*. 2021. No. 7. P. 215–219. [http://lsej.org.ua/7\\_2021/56.pdf](http://lsej.org.ua/7_2021/56.pdf)

<sup>20</sup> Krotiyuk O.M. Foreign experience of public participation in the prevention of corruption crimes. *Legal Journal of the National Academy of Internal Affairs*. 2021. No. 1(21). 98–105

## The essence of preventing corruption in government bodies under the legislation of Muslim countries

The essence of preventing corruption in government bodies under the legislation of Muslim countries is to establish a comprehensive system of legal, religious, and organisational mechanisms to prevent the abuse of power, illicit enrichment, and violations of the principle of justice in public administration.<sup>21</sup> A feature of this model is the close combination of Sharia norms with the provisions of modern secular legislation, which creates a double – legal and moral-ethical – level of responsibility of officials.<sup>22</sup>

In the Muslim legal tradition, corruption is considered not only as an illegal act, but also as a sin and a violation of the divine order. Bribery (bribe), embezzlement of state property (gulul), abuse of trust and unfair use of official authority are directly prohibited by Islamic law. Thus, the prevention of corruption is based on the fundamental principles of Islam – justice (adl), trust (amanah), responsibility and integrity. An official is perceived as a bearer of the power entrusted to him by society, and his activities must comply not only with the requirements of the law but also with religious prescriptions.<sup>23</sup> At the regulatory level, modern Muslim states combine Sharia provisions with codified anti-corruption laws. Criminal legislation provides for liability for bribery, conflict of interest, abuse of office, and illicit enrichment. In several countries, specialised anti-corruption bodies have been created, authorised to conduct controls, inspections, and investigations. At the same time, this model is characterised by centralised control and a significant role for the executive branch in coordinating anti-corruption policy.

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<sup>21</sup> Muh Sutri Mansyah and La Ode Bunga Ali, 'Penafsiran Keterangan Palsu Dalam Persidangan Tindak Pidana Korupsi Dengan Kaitannya Kasus Obstruction of Justice', *Justicia Islamica* 16, no. 1 (June 2019): 61–78, <https://doi.org/10.21154/justicia.v16i1.1499>.

<sup>22</sup> Yevhen Leheza, Larysa Yerofieienko, and Volodymyr Komashko, 'Peculiarities of Legal Regulation of Intellectual Property Protection in Ukraine under Martial Law: Administrative and Civil Aspects', *Revista Justiça Do Direito* 37, no. 3 (December 2023): 157–172, <https://doi.org/10.5335/rjd.v37i3.15233>.

<sup>23</sup> Yuliia Volkova et al., 'Crypto Market Experience: Navigating Regulatory Challenges in Modern Conditions', *Al-Risalah: Forum Kajian Hukum Dan Sosial Kemasyarakatan* 24, no. 2 (December 2024): 178–194, <https://doi.org/10.30631/alrisalah.v24i2.1625>.

A significant feature is the combination of punitive and preventive measures. The legislation provides for severe sanctions - significant fines, confiscation of property, imprisonment, and in some cases, increased liability for official misconduct. However, the preventive component is no less important. Within the framework of Islamic legal doctrine, there is a principle of preventing conditions that can lead to an offence, that is, eliminating the prerequisites for corrupt behaviour. This is manifested in the limitation of discretionary powers, internal control in government bodies, requirements for the integrity of civil servants and increased attention to ethical education. In modern conditions, the Muslim model of corruption prevention is being modernised. Considerable attention is paid to digitalisation of public administration, automation of administrative procedures, and the introduction of electronic services that minimise direct contact between officials and citizens. This indicates the integration of traditional religious and legal principles with modern management tools.<sup>24</sup>

Thus, the essence of preventing corruption in government bodies in Muslim countries lies in the complex combination of religious prescriptions that form the moral basis of public service and secular legal mechanisms of control and accountability. This model is based on the concepts of delegated authority, the severity of punishment, centralised control, and the gradual introduction of modern management technologies, all of which aim to ensure justice and integrity in public administration.

Table 1: Criteria for preventing corruption in government bodies under the legislation of Muslim and European countries

| <b>Comparison criterion</b> | <b>Muslim countries</b>                         | <b>European countries</b>            |
|-----------------------------|---|--------------------------------------|
| Legal basis                 | A combination of Sharia and secular laws        | Secular law based on the rule of law |
| Understanding corruption    | Breach of law and religious sin (bribe, ghulul) | Criminal and administrative offenses |

<sup>24</sup> Leheza, Ye. Shablysty, V. Aristova, I. Kravchenko, I. Korniakova, T. 'Foreign Experience in Legal Regulation of Combating Crime in the Sphere of Trafficking of Narcotic Drugs, Psychotropic Substances, their Analogues and Precursors: Administrative and Criminal Aspect', *Journal of Drug and Alcohol Research*. 12 (4) (2023), 1-8 <http://doi.org/10.4303/JDAR/236240>.

|                                     |  |  |
|-------------------------------------|--|--|
| Sources of legal regulation         | Constitutions, criminal codes, special anti-corruption laws, and Sharia norms                | Constitutions, criminal codes, anti-corruption laws, international conventions (UN, Council of Europe, EU) |
| Institutional model                 | Mostly centralised; anti-corruption agencies are often under the executive branch's control. | Decentralised or autonomous; independent anti-corruption bodies  |
| Specialized bodies                  | National anti-corruption agencies (Nazaha, MACC, etc.)                                       | Anti-corruption agencies, prosecutors' offices, financial inspectorates, and audit bodies                  |
| Preventive mechanisms               | Moral and religious control, official ethics, and internal administrative control            | Asset declaration, financial monitoring, compliance programs, whistleblower protection                     |
| Punitive policy                     | Strict sanctions, confiscation of property, and significant fines                            | Proportionate sanctions, judicial control, and human rights guarantees                                     |
| Role of religion                    | Determinative or substantial (formation of ethical standards)                                | None; secular nature of regulation   |
| Digitalisation of administration    | Actively implemented (especially in the Gulf countries)                                      | Systematic digitalisation, open registries, e-procurement  |
| Public control                      | Limited in some states   | Developed a mechanism of public and parliamentary control  |
| Level of institutional independence | It may depend on the political will of the leadership  | High level of autonomy of anti-corruption structures   |
| Value basis                         | Justice (adl), trust (amanah), religious responsibility                                      | Transparency, accountability, integrity, rule of law   |

Source: author's interpretation

The study found that the effectiveness of preventing corruption in government depends directly on the combination of three key elements: regulatory clarity, institutional independence, and the implementation of anti-corruption mechanisms. A comparative analysis of Muslim and European countries revealed both common structural features and conceptual differences in legal models. First, both legal systems criminalise the main corruption offences: bribery, abuse of office, illicit enrichment, and conflict of interest.

This indicates the universal nature of anti-corruption standards enshrined in international instruments (the UN Convention against Corruption).<sup>25</sup>

Secondly, a difference like preventive mechanisms was identified. In the countries of the European Union (Denmark, Finland, Germany, France), a systemic preventive approach prevails: mandatory asset declaration, financial monitoring, internal compliance, whistleblower protection mechanisms, open registers, and digitalisation of public services. In Muslim countries (Saudi Arabia, UAE, Qatar, Malaysia), prevention is combined with strict sanctions and centralised control, as well as with the moral and religious influence of Sharia norms.

Thirdly, statistical analysis (based on data from 2020–2025) shows that countries with a developed system of institutional independence and transparent governance have consistently higher Corruption Perceptions Index scores. Thus, the Scandinavian countries maintain their leading positions (about 88–90 points), while most Muslim countries demonstrate an average level (about 50–70 points). At the same time, the experience of the UAE shows that active digitalisation and the minimisation of personal contact between citizens and officials significantly reduce corruption risks.<sup>26</sup> The results obtained confirm the hypothesis that the effectiveness of anti-corruption policy is determined not only by the severity of punishment, but also by the quality of the institutional environment.<sup>27</sup> Strict criminal sanctions, typical of some Muslim states, do not guarantee consistently high indicators in the event of insufficient autonomy of control bodies or limited transparency of public administration.<sup>28</sup> At the same time, the moral and religious component inherent

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<sup>25</sup> Voloshanivska, Tetiana, Inna Pozihun, Serhii Losych, Olha Merdova and Yevhen Leheza. 'Administrative and Criminal Law Aspects of Preventing Offenses Committed by Minors in the Sphere of Illegal Circulation of Narcotic Drugs, Psychotropic Substances and Precursors'. *Journal of Drug and Alcohol Research*, 12(10) (2023). <https://doi.org/10.4303/JDAR/236269>

<sup>26</sup> Davydenko, V., Korniienko, M., Radchuk, A., Babiak, A., & Leheza, Y. (2025). International cooperation in operational and search activities: A comparative analysis of foreign experience. *Cadernos de Dereito Actual*, 2025(28). <http://www.cadernosdedereitoactual.es/index.php/cadernos/article/view/1362>

<sup>27</sup> Jawade Hafidz et al., 'Contemporary Legal Accountability Reform in Public Procurement: A Framework Integrating Ethical Norms and Anti-Corruption Mechanisms', *MILRev: Metro Islamic Law Review* 4, no. 1 (June 2025): 517–538, <https://doi.org/10.32332/milrev.v4i1.10664>.

<sup>28</sup> K. M. S. Herman and K. Johnson Rajagukguk, 'Recovery of State Financial Losses as a Strategy for Combating Corruption Crimes: A Reform of Criminal Law', *Jurnal Ilmiah Mizani: Wacana Hukum, Ekonomi Dan Keagamaan* 12, no. 1 (April 2025): 114–127, <https://doi.org/10.29300/mzn.v12i1.6940>.

in Muslim legal systems performs an important preventive function, forming public intolerance to corrupt behavior. This indicates the importance of the value factor in legal regulation. However, without proper institutional support, religious and ethical prescriptions cannot fully replace effective mechanisms of financial control and transparency.<sup>29</sup>

The European model demonstrates greater stability due to the balance between prevention and responsibility. Protection of whistleblowers, independence of anti-corruption agencies, parliamentary and public control, openness of budget information and e-government create a comprehensive barrier against corruption. The high indicators for Denmark and Finland are explained not only by legislative norms but also by a high level of trust in state institutions and a well-developed legal culture. An important result of the study is the establishment of a direct link between the digitalisation of public services and the reduction of corruption risks.<sup>30</sup> The experience of the UAE and EU countries confirms that automating procedures, implementing electronic tender systems, and establishing open registers reduce officials' discretionary powers and minimise the risk of abuse. At the same time, in some of the countries studied, there is a problem of selective application of anti-corruption legislation, associated with the political dependence of law enforcement agencies or limited transparency in judicial procedures. This reduces trust in anti-corruption policy even in the presence of formally strict legislation.<sup>31</sup>

The study formulated the following generalisations: an effective anti-corruption model should combine regulatory clarity, institutional independence and transparency of management. Religious and legal norms can perform an additional preventive function, but do not replace institutional guarantees. Preventive mechanisms (compliance, financial

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<sup>29</sup> Wolfgang Hetzer, 'Corruption and Integration - Does the Expansion of the European Union Represent a Risk Factor?', *European Journal of Crime, Criminal Law and Criminal Justice* 12, no. 4 (2004): 301-320, <https://doi.org/10.1163/1571817042523103>.

<sup>30</sup> Peter W. Schroth and Ana Daniela Bostan, 'International Constitutional Law and Anti-Corruption Measures in the European Union's Accession Negotiations: Romania in Comparative Perspective', *American Journal of Comparative Law* 52, no. 3 (2004): 625-712, <https://doi.org/10.2307/4144480>.

<sup>31</sup> Jan Delhey, 'Corruption in candidate countries of the European Union. A cross-national comparison of institutional quality and corruption', *Soziale Welt* 53, no. 3 (2002): 345-366+260.

monitoring, digitalisation) are more stable in the long term than an exclusively punitive approach.<sup>32</sup> A high level of legal culture and public intolerance to corruption is a critically important factor in the effectiveness of anti-corruption policy.<sup>33</sup> Thus, the results of the study show that the most effective is a mixed model that combines strict legal responsibility, systemic prevention, digitalisation of public administration and the formation of an anti-corruption culture. It is such a comprehensive approach that can yield a sustainable impact in preventing corruption in government bodies, regardless of a state's legal tradition.<sup>34</sup>

In many studies, the normative interpretation of Sharia prevails over practical analysis, creating a gap in understanding the real challenges in corruption prevention.<sup>35</sup> At the same time, some examples allow for partial inclusion of the practical context.<sup>36</sup> For example, in Saudi Arabia, the system of anti-corruption bodies (Anti-Corruption Commission) operates under the strict control of religious norms, but at the same time applies modern legal procedures, including investigations and bringing high-ranking officials to justice. Similarly, in Malaysia, the Anti-Corruption Commission (MACC) combines religious principles with civil law, enabling effective responses to specific cases of abuse. Regarding the contradictions between religious norms and modern legal systems, an example is Indonesia, where provinces with Sharia law (e.g., Aceh) are required to align

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<sup>32</sup> Rafael A. Benitez, 'The Pan-European Approach in the Fight against Corruption: The Council of Europe', *Science and Engineering Ethics* 4, no. 3 (1998): 269–280, <https://doi.org/10.1007/s11948-998-0018-x>.

<sup>33</sup> Yevhen Leheza et al., 'Interpretation of Regulatory and Legal Acts in Contemporary Contexts: Foreign Experience, Comparative Perspectives, and Pathways for Regulatory Reform', *NUSANTARA: Journal Of Law Studies* 5, no. 1 (February 2026): 102–22, <https://doi.org/10.5281/zenodo.18727992>.

<sup>34</sup> J. A. E. Vervaele, 'Towards an Independent European Agency to Fight Fraud and Corruption in the EU?', *European Journal of Crime, Criminal Law and Criminal Justice* 7, no. 3 (1999): 331–346, <https://doi.org/10.1163/15718179920518907>.

<sup>35</sup> Nameer Hashim Qasim et al., 'Examining Legislation and Enforcement Mechanisms to Combat International Human Trafficking from an Islamic Criminal Law Perspective', *Al-Istinbath: Jurnal Hukum Islam* 10, no. 1 (April 2025): 251–279, <https://doi.org/10.29240/jhi.v10i1.12544>.

<sup>36</sup> Asmawi Asmawi, 'Relevansi Teori Maslahat Dengan UU Pemberantasan Korupsi', *De Jure: Jurnal Hukum Dan Syar'iah* 1, no. 2 (December 2009), <https://doi.org/10.18860/j-fsh.v1i2.330>.

religious provisions with the national criminal code<sup>37</sup>, often leading to compromises between religious doctrine and secular law.

As for policy recommendations for Ukraine, the proposals' general nature could indeed limit their practical value. To increase operational efficiency, specific steps can be proposed: the establishment of an independent anti-corruption body with clear monitoring procedures and transparent reporting, aligned with European standards (e.g., OLAF in the EU). Development of specialised training programs for civil servants on the interaction between religious and secular norms in ethics and anti-corruption behaviour. Use of digital tools to prevent conflicts of interest, control public procurement and reduce corruption risks, focusing on the experience of EU countries (e.g., e-procurement systems in Estonia or Lithuania). Thus, the work can be supplemented with practical examples of implementing anti-corruption norms across various legal contexts and more specific recommendations for Ukraine, thereby increasing its applied value.

## CONCLUSION

This study demonstrates that both universal international standards and the specific legal, institutional, and cultural contexts of each country shape corruption prevention in government bodies. While Muslim and European legal systems share a common basis in conventions such as the UN Convention against Corruption, their implementation mechanisms differ significantly. The Muslim model combines secular legislation with Sharia norms, giving anti-corruption policy a moral and ethical dimension that reinforces public trust and serves as an additional barrier against abuse of power. Its effectiveness, however, depends heavily on the independence of institutions and the political will of state leadership. In contrast, the European model relies on systematic, institutionally balanced frameworks that emphasise the rule of law, transparency, accountability, and preventive mechanisms such as asset declarations, internal compliance, financial monitoring, and whistleblower protection. Analysis of statistical indicators for 2020–2025 shows that

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<sup>37</sup> Putri Rahmah Nur Hakim et al., 'Contesting Sharia and Human Rights in the Digital Sphere: Media Representations of the Caning Controversy under the Qanun Jinayat in Aceh', *Journal of Islamic Law* 6, no. 2 (July 2025): 206–235, <https://doi.org/10.24260/jil.v6i2.3600>.

countries with high institutional independence, transparency, and public oversight consistently achieve lower levels of perceived corruption. Furthermore, digitalisation of public administration emerges as a universal tool, reducing opportunities for abuse through automation, e-procurement, and minimal direct contact between officials and citizens.

The findings suggest that neither punitive measures alone nor preventive tools in isolation are sufficient to ensure sustainable anti-corruption outcomes. Effective policy requires a balance between sanctions, institutional integrity, and a culture of public accountability. Public intolerance of corruption, media freedom, and active parliamentary oversight play decisive roles in strengthening governance. For future research, it is recommended to conduct in-depth empirical studies using qualitative methods, such as interviews, case studies, and analyses of judicial practice, to uncover hidden mechanisms of corruption and assess the interplay between religious and secular norms, particularly in countries like Malaysia, Indonesia, and the UAE. Additionally, further exploration of digital anti-corruption tools and their potential adaptation to reforming states, such as Ukraine, would provide practical guidance for enhancing transparency and institutional effectiveness. Expanding research in these directions will strengthen the scientific validity of comparative analyses and contribute to more effective, context-sensitive anti-corruption strategies worldwide.

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## **AUTHOR CONTRIBUTIONS STATEMENT**

Tetiana Kolomoiets conceived and developed the overall structure of the study, formulated the main arguments, and guided the preparation and writing of the manuscript. Denys Chyzhov and Andriy Osaulenko made significant contributions to the theoretical analysis and interpretation of the results, offering critical conclusions that strengthened the legal and methodological aspects of the study. Meanwhile, Serhii Kushnir and Vyacheslav Krahlevych played a key role in conducting the literature review, collecting relevant data, and refining the discussion to ensure coherence between the regulatory framework and the current realities of legislative development. All authors actively participated in the review and final approval of the manuscript, ensuring its academic accuracy and integrity.

## **CONFLICT OF INTEREST**

The author declares that there is no potential conflict of interest, whether financial, professional, or personal, that could have influenced the research findings, data interpretation, or conclusions presented in this article. The research was conducted independently and objectively to ensure academic integrity and transparency.

## **AI USAGE STATEMENT**

This section is a statement from the author that the use of Artificial Intelligence (AI) tools in this work is strictly limited to supportive functions, and authors are only permitted to use AI for language editing, grammar checking, and improving clarity and readability. AI was not used to generate core ideas, conduct substantive analysis, interpret data, or draw scholarly conclusions. The author retains full responsibility for the originality, accuracy, and academic integrity of the content, and AI tools are not credited as authors or contributors, in accordance with ethical standards in academic publishing.

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