



Towards a Responsible AI Framework in ASEAN: An Islamic Ethical Approach

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Abstract

The development and deployment of Artificial Intelligence (AI) systems present complex ethical, social and regulatory challenges worldwide. While regions like the European Union (EU), the United Kingdom (UK) and the United States (US) have developed clear regulatory strategies, the ASEAN region remains in the early stages of policy implementation, characterised mainly by voluntary guidelines and non-binding principles. This paper critically analyses existing AI policies across ASEAN member states, with a focus on Malaysia, Indonesia, and Brunei, and compares them to global regulatory frameworks. It introduces an original scoring system to assess the strength of enforcement and policy maturity. Furthermore, it proposes the integration of Maqasid al-Shariah, a classical Islamic ethical framework, as a culturally resonant foundation for AI governance in Muslim-majority ASEAN countries. Drawing on recent policy documents, academic literature, and contemporary debates in AI ethics, the paper identifies key gaps and presents a faith-aligned model for responsible AI. Findings indicate that Islamic principles, such as *adl* (justice), *amanah* (trust), and *maslahah* (public good), offer both universal and context-specific tools for developing a regionally relevant, responsible AI framework. The study concludes with policy recommendations and outlines a strategic pathway towards an ASEAN-wide AI governance model that harmonises ethical accountability with technological innovation.

Keywords: Responsible AI, ASEAN, AI Policy, Governance, Maqasid al-Shariah.

1. Introduction

Artificial Intelligence (AI) is redefining global technological landscapes, reshaping industries, governance systems, and societal interactions (Samsudin et al. 2021). While the European Union has codified a tiered, legally binding regulatory structure through the AI Act (European Commission 2024), and the United Kingdom (UK) continues to promote innovation via flexible, sectoral frameworks (UK Department for Science, Innovation & Technology 2023), the United States has just released America's AI Action Plan in July 2025, marking a significant policy shift toward deregulation and global AI leadership (The White House 2025). In Southeast Asia, ASEAN's regional approach remains nascent, characterised by non-binding, principle-based frameworks (ASEAN Secretariat 2024, 2025). Member states such as Malaysia, Indonesia, and Brunei are gradually rolling out national strategies. Malaysia released the National Artificial Intelligence Roadmap 2021–2025, launched on 1 December 2021, supported by AI Governance & Ethics Guidelines (AIGE) (Ministry of Science, Technology and Innovation 2021), released in September 2024. Indonesia introduced its national AI strategy, Strategi Nasional Kecerdasan Artifisial 2020–2045 (Indonesian Ministry of Research and Technology 2020), released on 10 August 2020 and currently in its first implementation phase, with an anticipated release in August 2025. Brunei developed the AI Governance Guidelines (Brunei Ministry of Transport and InfoComm 2025), a voluntary ethics-based framework. Despite this progress, ASEAN frameworks primarily rely on aspiration rather than enforcement, in contrast to the legally binding and regulated regimes of the EU and the strategic leadership vision of the US (European Commission 2024; The White House 2025).

ASEAN, especially its Muslim-majority member states, holds significant potential to establish a distinctive AI policy identity by integrating Islamic ethical principles, rooted in Maqasid al-Shariah, alongside global governance norms (Auda 2008; Nikmah 2025). Islamic values, such as *adl* (justice), *amanah* (trust), and *maslahah* (public welfare), can shape AI governance to reflect both local cultural integrity and universal ethical expectations (Auda 2008; Nikmah 2025).



2. Literature review

Global AI Governance

The EU's AI Act represents the first binding attempt to regulate AI technologies through a tiered risk classification (Auda 2008; Nikmah 2025). It specifies prohibited uses (e.g., social scoring), high-risk applications (e.g., biometric identification), and strict compliance requirements, including audits and penalties. The UK adopts a "pro-innovation" approach, issuing non-binding white papers and encouraging sectoral regulators to develop their own AI guidelines (UK Department for Science, Innovation & Technology 2023). The US, while lacking a central AI law, has issued Executive Orders emphasising risk mitigation, equity, and national security, as well as the AI Bill of Rights, which promotes algorithmic fairness and transparency (The White House 2025).

ASEAN AI Governance

The ASEAN Guide on AI Governance and Ethics (2024) and its Expanded Guide for Generative AI (2025) outline foundational principles, including transparency, robustness, security, and accountability (ASEAN Secretariat 2024, 2025). However, the guidelines remain non-binding, and ASEAN member states demonstrate varying levels of commitment and capacity. Malaysia launched the National AI Roadmap 2021–2025 and the AI Governance & Ethics Guidelines (AIGE) (Ministry of Science, Technology and Innovation 2021). Brunei introduced voluntary AI Governance Guidelines in 2025 (Brunei Ministry of Transport and InfoComm 2025), while Indonesia is finalising its National Strategy for AI 2020–2045 (Indonesian Ministry of Research and Technology 2020). These frameworks remain largely aspirational, without precise enforcement mechanisms.

Islamic Ethics and Governance

Islamic ethical frameworks, particularly Maqasid al-Shariah, provide a structured understanding of public interest, moral accountability, and justice. Classical scholars such as Al-Ghazali emphasised foundational values (Harjoni et al. 2024) while contemporary scholars such as Jasser Auda have expanded its application to modern governance (Auda 2008). Recent studies, such as Maqasid al-Shariah and the Ethics of Artificial Intelligence (Thalgi 2025; Ali et al. 2025), demonstrate its applicability to the regulation of digital technologies. These works highlight how Islamic ethics can complement modern frameworks and provide culturally grounded approaches to emerging challenges.....

3. Research Methodology

This study employs a comparative qualitative policy analysis framework to evaluate responsible AI strategies and governance models in ASEAN, as well as key global benchmarks, including the EU, UK, and US. The aim is to analyse both the content and enforceability of AI governance mechanisms and how they align with Islamic ethical principles (European Commission 2024; UK Department for Science, Innovation & Technology 2023; The White House 2025; ASEAN Secretariat 2024, 2025; Ministry of Science, Technology and Innovation 2021; Indonesian Ministry of Research and Technology 2020; Brunei Ministry of Transport and InfoComm 2025).

Document Selection

Primary sources include national AI strategies, white papers, and AI ethics frameworks published between 2020 and 2025 by ASEAN, Malaysia, Indonesia, Brunei, the EU, UK, and the US. Policy documents were retrieved from official government portals and intergovernmental organisations, such as ASEAN.org, the European Commission and WhiteHouse.gov. Academic literature on Maqasid al-Shariah, Islamic ethics in digital governance and recent publications on AI ethics provided the ethical foundation for analysis (Auda 2008; Thalgi 2025). The paper focuses on three ASEAN member states, Malaysia, Indonesia and Brunei, due to their shared Islamic cultural context and their public release of AI-related governance documents. The inclusion of the EU, UK, and US provides a cross-regional benchmark to assess ASEAN's regulatory maturity.

Analytical Approach

The comparative analysis consisted of two interrelated components:

(a) Enforcement Strength Assessment



A five-point scoring rubric was developed to evaluate the relative enforcement strength of each AI governance framework. The rubric, inspired by regulatory maturity models in public policy literature, evaluated five key criteria:

1. Legal Bindingness – whether the AI framework is enforceable by law.
2. Oversight Mechanisms – the presence of independent audit or supervisory institutions.
3. Penalty Structures – presence of legal, financial, or reputational consequences for non-compliance.
4. Policy Maturity – how long and consistently the policy has been implemented.
5. Institutional Support – existence of national AI bodies or cross-ministerial governance structures.

Each country or region was scored based on the highest level of implementation across these categories. This scoring was triangulated with expert commentary and secondary reports, such as from KPMG, UNESCO, and policy journals (Thalgi 2025).

(b) Ethical Value Mapping

The second component involved mapping Islamic ethical values, primarily drawn from Maqasid al-Shariah, against AI principles identified in each country's framework. These include transparency, fairness and non-discrimination, privacy, accountability and public interest. This ethical mapping was guided by prior frameworks in Islamic finance and governance (Auda 2008) and more recent works focused on AI (Thalgi 2025). The goal was to assess both alignment and potential value gaps in ASEAN's responsible development of AI.

4. Results and Discussion

Enforcement Strength of AI Governance Frameworks

The enforcement scoring revealed significant variation between Western models and ASEAN frameworks. The EU AI Act achieved the highest score, 5/5, due to its comprehensive legal structure, mandatory risk classification, and robust audit systems (European Commission 2024). The US followed with a score of 4, supported by its executive-led action plan and strong institutional capacity (The White House 2025), while the UK scored 3 owing to its sector-based, non-binding framework (UK Department for Science, Innovation & Technology 2023). In ASEAN, Malaysia and Brunei each scored 2, reflecting their national strategies and soft-law guidelines, but lacking legal enforcement or penalties (Ministry of Science, Technology and Innovation 2021; Brunei Ministry of Transport and InfoComm 2025). Indonesia and the broader ASEAN region scored 1, indicating an aspirational or early-stage stance (Indonesian Ministry of Research and Technology 2020; ASEAN Secretariat 2024, 2025). This disparity reflects differences in regulatory philosophy and institutional readiness. Western models prioritise formal legal compliance, whereas ASEAN adopts a more principle-based and culturally sensitive approach. However, the absence of binding authority poses risks of regulatory fragmentation and dependence on foreign AI systems and ethical norms (ASEAN Secretariat 2024, 2025; Mohadi & Tarshany 2023). As visualised in Fig. 1, which shows these scores, there is a clear gap between ASEAN and global leaders.

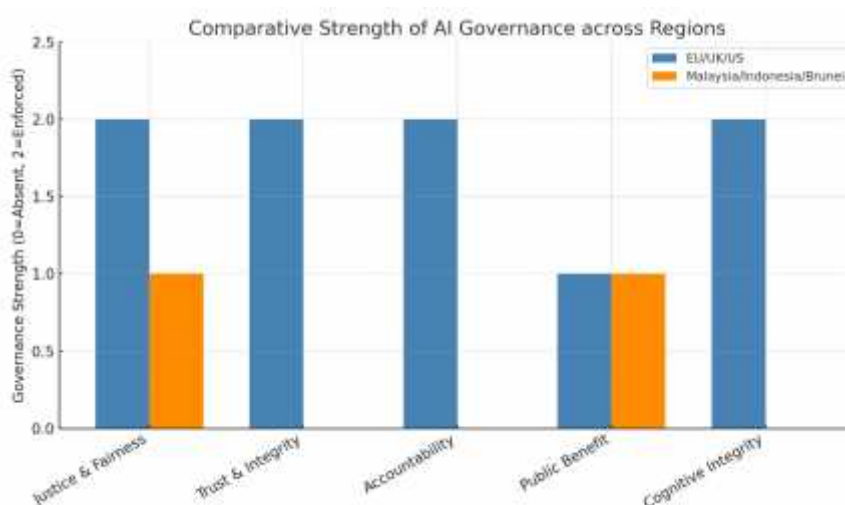


Figure 1: Comparative Enforcement Strength of AI Governance Frameworks



Policy Structure vs. Ethical Coverage

The comparison of governance documents showed that while ASEAN frameworks outline key principles such as transparency, fairness, and human-centricity, they often lack mechanisms to safeguard these values, evaluate compliance through audits or disclosures, and penalise violations and non-compliance. The EU AI Act mandates transparency and third-party audits for high-risk systems (European Commission 2024). The US AI Action Plan emphasises accountability and technical safety but delegates implementation to federal agencies (The White House 2025). The UK's White Paper is still consultative in nature prioritising innovation over restrictions (UK Department for Science, Innovation & Technology 2023). By contrast, Malaysia's AIGE (2024) outlines 11 ethical principles but lacks clear compliance procedures (Ministry of Science, Technology, and Innovation 2021). Brunei's guidelines are voluntary and remain at an early stage (Brunei Ministry of Transport and InfoComm 2025), whereas Indonesia's strategy emphasises innovation and economic potential over ethical safeguards (Indonesian Ministry of Research and Technology 2020).

Value Mapping: Islamic Ethics as Reinforcement

While ASEAN frameworks outline broad principles, they often lack substance in areas such as accountability and public interest. Islamic ethics can help address these shortcomings. Table 1 below presents the value mapping between the governance area, standard policy terms, Islamic ethical parallel and the strength of the ASEAN AI policy.

TABLE 1. Value Mapping: Islamic Ethics as Reinforcement

Governance Area	Common Policy Terms	Islamic Ethical Parallel	ASEAN Strength
Justice & Fairness	Bias, equity	Adl, Maslahah	Moderate
Trust & Integrity	Transparency	Amanah, Hisbah	Weak
Accountability	Audit, explainability	Hisbah, Shura	Weak
Public Interest	Sustainability	Maslahah mursalah	Implicit
Protection of Reason	Disinformation, AI safety	Hifz al-'Aql	Absent

For instance, adl (justice) and maslahah (public welfare) reflect global concerns for fairness and equity (Auda 2008). Amanah (trust) and hisbah (accountability) offer guidance for transparency and auditability (Nikmah 2025). Additionally, hifz al-'aql (protection of reason) addresses the risks of disinformation and AI misuse, a value that is largely lacking in ASEAN documents (Saad & Rajamanickam 2023; Ali et al. 2025). Islamic ethics not only support global AI norms but also enhance governance in areas that are currently underrepresented, especially accountability, integrity, harm prevention and public trust.

Strategic Implications for ASEAN

ASEAN frameworks could benefit from a tiered enforcement model that provides flexibility while moving toward regulatory convergence. Islamic ethics provide a shared moral framework for Muslim-majority states in guiding AI governance in ways that align with their cultural and legal traditions (Auda 2008; Mohadi & Tarshany 2023). Developing Shariah-informed AI compliance tools, such as Shariah-compliant AI audits or maqasid-based ethical checklists, would enhance legitimacy and foster public trust (Nikmah 2025). These approaches may help bridge gaps separating global norms and local ethical and cultural expectations.

5. Conclusion

Responsible AI in ASEAN must transcend ethical declarations and adopt enforceable mechanisms (Nawi et al. 2021). The EU, UK, and US have demonstrated that enforceability through binding legislation, strong oversight, and institutional support underpins policy maturity (European Commission 2024; UK Department for Science, Innovation & Technology 2023; The White House 2025). For ASEAN, particularly Malaysia, Indonesia, and Brunei, the challenge is balancing global best practices with regional realities. While their strategies and guidelines provide an essential



starting point (Ministry of Science, Technology and Innovation 2021; Indonesian Ministry of Research and Technology 2020; Brunei Ministry of Transport and InfoComm 2025; ASEAN Secretariat 2024, 2025), they lack binding authority and strong enforcement mechanisms. Islamic ethics, especially Maqasid al-Shariah, provide practical insights and cultural legitimacy (Ahmad & Wan Abdullah 2022) in establishing a responsible AI framework. ASEAN nations, notably Malaysia, Indonesia, and Brunei, can lead the way with an Islamic-informed AI governance model that strikes a balance between innovation and accountability. Future work should explore how AI risk classifications and ethical checklists can be aligned with maqasid-based goals. Regional cooperation through ASEAN, Islamic finance boards, and digital ministries can harmonise policies and foster a sustainable AI governance ecosystem. This study provides a roadmap toward culturally grounded, globally respected, responsible AI governance in the region. By incorporating faith-aligned ethical considerations into global best practices, ASEAN can establish a responsible AI governance model that resonates locally while gaining international recognition (Mohadi & Tarshany 2023).

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