

The Enforcement of Arbitral Awards in Commercial Disputes: Challenges of Aligning UAE Law with the Necessity of Adherence to Islamic Rules

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DOI Link: <http://dx.doi.org/10.6007/IJARBSS/v16-i6/28418>

Published Date: 18 June 2026

Abstract

This research examines the enforcement of arbitral awards in commercial disputes under United Arab Emirates (UAE) legislation, focusing on the problem of reconciling the requirements of international commercial arbitration with adherence to Islamic rules as an integral component of public policy (*ordre public*). The study originates from the hypothesis that the efficacy of arbitration is not realized merely by the issuance of an award; rather, it materializes during the enforcement stage, which constitutes the true litmus test for the viability of this system. Utilizing an analytical methodology, this study reviews the regulatory legal framework governing the enforcement of arbitral awards pursuant to Federal Law No. (6) of 2018. It elucidates the conditions and procedures required to grant an award executory force, and analyzes the judiciary's role in exercising limited supervisory control restricted to formal, procedural aspects without review on the merits. Furthermore, the study addresses the concept of public policy and its extension to Islamic rules, demonstrating the prominent forms of conflict that may arise between arbitral awards and these rules, such as issues pertaining to usury (*riba*), uncertainty (*gharar*), and the illegality of certain contracts. The study concludes that the primary challenge lies in achieving a delicate balance between openness to international arbitration standards and preserving the legislative particularity derived from Islamic Sharia. This necessitates the adoption of a flexible approach that distinguishes between material and non-material non-compliance. The findings also underscore the pivotal role of the judiciary in sustaining this equilibrium by interpreting the concept of public policy in a non-restrictive manner, alongside the importance of the parties' and arbitral tribunals' awareness of the local legal environment to preempt complications at the enforcement stage. Ultimately, the study recommends enhancing the integration between legal frameworks and Sharia reference points to guarantee the efficacy and stability of the commercial arbitration system.

Keywords: Arbitration, Commercial Disputes, Islamic Rules, Arbitral Awards

Introduction

In the wake of economic globalization, commercial arbitration has become one of the most critical alternative dispute resolution (ADR) mechanisms due to its procedural expedition, flexibility in application, and capacity to accommodate the specificities of contemporary commercial relationships, particularly those of an international character. Recognizing the importance of this system in supporting the investment environment and bolstering confidence in its economic climate, the United Arab Emirates has actively developed a modern legal framework for arbitration. This effort culminated in the enactment of Federal Law No. (6) of 2018 on Arbitration, which aligns significantly with international standards, most notably the UNCITRAL Model Law and the 1958 New York Convention on the Recognition and Enforcement of Foreign Arbitral Awards.

However, the efficacy of arbitration is incomplete upon the mere rendition of an award; its true significance manifests during the enforcement stage, which represents the practical test of the system's utility. An arbitral award, regardless of its precision and soundness, remains devoid of effect unless recognized and enforced by the national judiciary (Ben Soucha & Khaddour, 2025). Hence, the problem of enforcing arbitral awards emerges as the critical juncture where legal considerations intersect with the prerequisites of public policy, including rules of Islamic provenance that constitute a primary source of legislation in the UAE.

Within this framework, questions arise regarding the feasibility of reconciling the requirements of openness toward international commercial arbitration—which carries concepts that may occasionally conflict with certain Sharia provisions, such as usurious interest or forms of *gharar* (uncertainty)—with the necessity of adhering to Islamic rules that form part of public policy. This conflict may result in the refusal to enforce certain arbitral awards, thereby engendering practical complications that jeopardize the stability of commercial transactions and investor confidence.

Accordingly, studying the enforcement of arbitral awards in commercial disputes under UAE legislation acquires a particular significance. It sheds light on a nuanced problem: striking a balance between modern, international legal considerations and the legislative particularity derived from Islamic Sharia, ultimately ensuring the realization of justice and the stability of transactions without compromising fundamental legal tenets and societal values.

Section I: The Legal Framework for the Enforcement of Arbitral Awards in Commercial Disputes

The enforcement of arbitral awards constitutes the decisive phase in the arbitration system, as its efficacy is only realized by conferring executory force upon the rendered award, thereby binding the parties to its content and achieving its intended practical effect. No matter how precise or impartial an arbitral award may be, it remains in need of a legal mechanism that guarantees its transition from a mere decision resolving a dispute into a binding, enforceable instrument. Consequently, it is imperative to delineate the framework governing this process, both in terms of the prerequisites that the award must satisfy and the supervisory role performed by the judiciary to ensure the integrity of enforcement (Ben Soucha & Khaddour, 2025).

This framework is predicated upon a combination of considerations. On one hand, it seeks to ensure respect for the autonomy of the parties who elected to resort to arbitration; on the other hand, it safeguards public policy, preventing the execution of awards that contravene the legal foundations or core values of society. Therefore, the enforcement of arbitral awards is not a purely formalistic exercise, but rather a precise legal process requiring verification that the award satisfies a set of substantive and procedural parameters.

Moreover, this stage reveals the nature of the relationship between arbitration and the judiciary. The arbitrator does not independently possess enforcement powers; rather, the judiciary remains the authority that endows the award with its binding force through a circumscribed review. This review does not extend to the merits of the dispute but is strictly confined to verifying procedural integrity and compliance with fundamental safeguards. This reflects a delicate equilibrium between the autonomy of arbitration and judicial sovereignty. Consequently, analyzing the legal framework for the enforcement of arbitral awards necessitates addressing the conditions and procedures governing this operation, alongside defining the boundaries of the judicial role in supervising arbitral awards. This will be presented through two complementary subsections: the first outlines the conditions and procedures of enforcement, while the second delineates the scope of judicial review over these awards.

Subsection I: Conditions and Procedures for the Enforcement of Arbitral Awards

The enforcement stage of an arbitral award is a natural extension of the arbitral process, wherein the outcome of the dispute resolution transitions from a theoretical determination to practical execution, thereby achieving the primary objective of reverting to arbitration. However, this enforcement does not occur automatically; rather, it is subject to a matrix of conditions and procedures designed to ensure the legal integrity of the arbitral award and its eligibility for enforcement against the parties (Aladaseen, 2026).

Regarding the substantive conditions, enforcement requires that the award be rendered in an arbitrable dispute and that it be final and dispositive of the merits, rather than a mere provisional or preliminary measure. Furthermore, the award must have been rendered pursuant to valid procedures that respect the rights of defense and the adversarial principle (*due process*). The arbitrator or arbitral tribunal must also have operated within the prescribed boundaries of their mandate without exceeding their jurisdiction or departing from the scope of the submission to arbitration. Added to this is the requirement that the award must be free from fundamental defects that vitiate its legal structure, such as ambiguity, contradiction, or violation of the foundational rules underpinning public policy. As for the procedural aspect, the enforcement of an award follows a statutory path aimed at obtaining an enforcement order (*exequatur*). The award-creditor files a motion before the competent judicial authority requesting an enforcement order, appending the arbitral award and supporting documentation to enable the court to verify compliance with the statutory prerequisites. This stage constitutes a formal review intended to verify the procedural soundness of the award, without delving into or re-examining the merits of the dispute (Wahab & Maramria, 2021).

The significance of these procedures lies in their position as the intersection between arbitral autonomy and judicial authority. Judicial intervention is not viewed as an encroachment upon

the role of arbitration, but rather as an essential safeguard ensuring compliance with legal parameters and the protection of party rights. This stage also facilitates the refusal of enforcement in cases where a material defect in the award is proven, thereby maintaining a balance between the efficacy of arbitration and the requirements of justice (Abdulmalek & Alnimer, 2026).

Thus, the conditions and procedures for enforcing arbitral awards constitute an integrated system ensuring that the rendered award is legally enforceable while simultaneously reflecting a just settlement of the dispute, thereby reinforcing confidence in arbitration as an effective means of resolving commercial disputes.

Subsection II: The Role of the Judiciary in the Supervision of Arbitral Awards

The judiciary plays a pivotal role during the enforcement stage of arbitral awards, exercising a supervisory function aimed at ensuring the integrity of the award without compromising its substance or re-evaluating the merits of the dispute. In principle, arbitration is founded upon party autonomy and the freedom to choose this mechanism; however, this autonomy does not imply absolute detachment from judicial oversight. Rather, this supervision remains a fundamental guarantee for the proper administration of justice and compliance with core legal rules.

This judicial review is characterized by its limited scope. It does not extend to reviewing the arbitrator's assessment of facts or interpretation of contracts, but is restricted to verifying the availability of the essential prerequisites for the award's validity. Prominent within the scope of this review is ensuring respect for the rights of defense, the integrity of proceedings, the tribunal's adherence to its jurisdiction, and the absence of gross defects that would impair the award's validity or enforceability (Wahab & Maramria, 2021).

Furthermore, the role of the judiciary is most pronounced when examining the alignment of the arbitral award with public policy. The court possesses the authority to refuse enforcement if the award contains elements violating the legal foundations or core values of society. This review acts as a safety valve preventing the validation of awards that disrupt legal equilibrium or contravene fundamental principles, without rendering arbitration hollow or restricting its efficacy.

This judicial role reflects a precise balance between supporting arbitration as a modern and effective dispute resolution mechanism and upholding the rule of law. The judiciary is not an adversary to arbitration, but a partner in its success, providing the supervisory framework that validates its outcomes and fosters institutional trust.

Accordingly, judicial supervision over arbitral awards constitutes a necessary guarantee for achieving justice, contributing to the verification that the award was rendered within a framework of legality and compliance with core parameters, thereby balancing arbitral independence with the imperatives of the legal system.

Section II: Public Policy and Islamic Rules in the Enforcement of Arbitral Awards

The enforcement of arbitral awards raises a fundamental dilemma that transcends procedural dimensions to engage the value systems upon which the legal order is

constructed, particularly when an award intersects with the concept of public policy and its foundational principles. Public policy is not confined to mandatory statutory rules (*jus cogens*) in the narrow sense; it extends to a broader set of values reflecting the identity and orientations of society, including rules of Islamic provenance that occupy a venerable position within the legal architecture (Shabat, 2026).

Within this framework, Islamic rules emerge as a defining parameter that may dictate the enforceability of an arbitral award, particularly if the award contains elements deemed in violation of these rules—such as transactions involving suspicions of usury (*riba*), unconscionable uncertainty (*gharar*), or a breach of contractual equity. This renders public policy a flexible concept capable of accommodating these considerations, granting the judiciary discretionary power to assess the compatibility of the award with these criteria.

Moreover, the challenge lies not only in defining the scope of public policy but extends to how it can be reconciled with the mandates of commercial arbitration, which thrives on openness, flexibility, and the accommodation of international practices. A rigid application of public policy may impede the enforcement of arbitral awards, whereas excessive laxity may compromise core societal values. This necessitates a meticulous balance between these two competing considerations.

Consequently, studying the relationship between public policy and Islamic rules in the context of enforcing arbitral awards requires examining the concept and boundaries of public policy, demonstrating its extension to Sharia rules, and analyzing the forms of conflict that may arise between arbitral awards and these rules. This will be addressed via two integrated subsections: the first defines public policy and its relationship with Islamic rules, while the second analyzes the manifestations of conflict between arbitral awards and Sharia principles.

Subsection I: The Concept of Public Policy in the Enforcement of Arbitral Awards and its Extension to Islamic Rules

Public policy is an essential legal construct that restricts individual autonomy in regulating private relationships and serves as a governing standard when assessing the enforcement of arbitral awards. This concept is not restricted to mandatory statutory provisions but encompasses the core principles underpinning the societal fabric, whether legal, ethical, or economic. Thus, public policy represents the minimum threshold of values that cannot be derogated from by mutual agreement, and whose violation precludes the recognition of legal effects.

In the context of arbitration, public policy assumes heightened importance as one of the primary grounds for refusing the enforcement of an award when it contravenes these fundamental principles. However, the complexity lies not in the existence of this restriction, but in determining its content and boundaries, given the fluid nature of the concept and its variance across societies based on their legal and cultural specificities (Miri, 2026).

In this regard, Islamic rules constitute a core component of public policy within legal systems with an Islamic reference frame, shaping the value matrix governing transactions, particularly in financial and commercial spheres. These rules manifest in principles aimed at ensuring justice and equilibrium, most notably the prohibition of usury (*riba*), the prevention of

uncertainty (*gharar*), the requirement of legality regarding the subject matter and cause of the contract, and the emphasis on good faith dealing (Aqil & Qala'a, 2023).

The impact of these rules extends to the enforcement stage of arbitral awards, raising questions regarding the executory viability of an award containing elements that conflict with these principles. Here, public policy operates as a legal mechanism enabling the judiciary to scrutinize the award in light of these rules, ensuring it does not infringe upon the foundations of the legal order.

However, the extension of public policy to Islamic rules does not imply a rigid or literal application; rather, it mandates an interpretation that accounts for the nature of modern commercial transactions and the demands of economic integration. This imposes an equilibrium between respecting Sharia foundations and avoiding the disruption of commercial traffic or the degradation of arbitration as a dispute resolution mechanism.

Accordingly, the concept of public policy in the field of enforcing arbitral awards is dynamic and interdisciplinary, fusing statutory law with Sharia. Its core objective is to protect the fundamental values of society while maintaining the flexibility required to ensure the stability of transactions and prevent the unjustified obstruction of arbitral awards (Alhiniti & Zaid, 2026).

Subsection II: Manifestations of Conflict Between Arbitral Awards and Islamic Rules

The enforcement of arbitral awards in commercial disputes creates practical challenges when awards contain elements that conflict with rules derived from Islamic Sharia, directly impacting their enforceability. This conflict is not unidirectional but assumes multiple forms tied to the nature of modern commercial transactions, which may rely on concepts or mechanisms misaligned with Sharia parameters (Abdel-Qader, 2026).

Among the most prominent manifestations of this conflict are financial transactions involving *riba* (usury), where an arbitral award might order a party to pay interest accrued due to delay or on the principal debt—a matter that remains problematic from the perspective of Islamic rules. Another manifestation appears in cases involving a degree of *gharar* (uncertainty) or speculation regarding contractual obligations, such as contracts predicated upon indeterminate contingencies or ambiguous terms, which undermine the principles of certainty and stability in transactions.

Furthermore, the conflict may extend to the underlying nature of the contracts or activities subject to the dispute if they are deemed illicit under Sharia, or if they entail a breach of contractual equity and equilibrium between the parties. Complications also arise in the assessment of damages, particularly if the award transitions from compensatory to punitive or results in unjust enrichment, or if it is not predicated upon actual, quantifiable harm, thereby conflicting with Sharia parameters governing compensation (Abdel-Qader, 2026).

This issue is not confined to the substantive content of the award but may encompass the underlying procedures if they are marred by violations of justice or the rights of defense—principles where statutory legal standards converge with Islamic values emphasizing equity and due process between litigants.

This problem is further compounded by the transnational character of many commercial disputes, where an arbitrator may apply a foreign choice of law or international trade usages that do not account for Sharia particularities, creating a discrepancy between the determinations of the arbitral award and the requirements of the domestic value system.

Consequently, the manifestations of conflict between arbitral awards and Islamic rules underscore the necessity of developing mechanisms that balance respect for the particularity of these rules with preserving the efficacy of arbitration, requiring a nuanced treatment that ensures neither imperative is sacrificed.

Section III: Striking an Equilibrium Between Commercial Arbitration Requirements and Adherence to Islamic Rules

Achieving a balance between the mandates of commercial arbitration—characterized by expedition, flexibility, and global openness—and compliance with Islamic rules represents one of the most formidable challenges facing legal systems with a Sharia reference frame, particularly amid the escalating reliance on arbitration as a dispute resolution mechanism. While arbitration strives to accommodate international commercial practices and foster an investment-attractive environment, Islamic rules impose a value-driven framework aimed at ensuring equity, preventing exploitation, and regulating transactions in strict conformity with Sharia principles (Alhiniti & Zaid, 2026).

Within this context, there emerges a critical need to formulate a balanced methodology that neither deprives arbitration of its substantive efficacy nor disregards the foundational safeguards underpinning the host legal system. An excessive adherence to flexibility may lead to the validation of awards that contravene core societal values, whereas a rigid enforcement of rules could paralyze the execution of arbitral awards and degrade institutional confidence in the system.

Furthermore, realizing this equilibrium is not a task confined to the legislative domain; it extends to the judiciary's role in interpreting and applying rules in a manner that accounts for the specificities of each case. It also underscores the importance of the parties' and arbitrators' awareness regarding the nature of the legal environment hosting the arbitration. This necessitates integrating Sharia considerations into the arbitral process from its inception to preempt the emergence of conflicts at the enforcement stage (Wahab & Maramria, 2021). Accordingly, analyzing this equilibrium requires examining how the judiciary approaches awards that potentially violate Islamic rules, alongside exploring viable mechanisms that facilitate synergy between commercial arbitration and these rules. This ultimately guarantees the efficacy and stability of the arbitral system without compromising the normative foundations of society.

Subsection I: The Judicial Stance on the Enforcement of Arbitral Awards Violating Islamic Rules

The judiciary serves as the ultimate arbiter in the enforcement of arbitral awards, possessing the authority to assess their alignment with public policy (*ordre public*), including Islamic rules. The significance of this role is magnified when a potential conflict arises between the determinations of the arbitral award and Sharia principles. In such scenarios, the court must strike a precise balance between respecting the *res judicata* effect of the arbitral award and

withholding its endorsement if it infringes upon the foundational tenets of the legal order (Wahab & Maramria, 2021).

In this framework, the judiciary generally inclines toward a restrictive interpretation of public policy violations, meaning that enforcement is withheld only when the conflict is conspicuous and material. Not every divergence from Islamic rules invariably triggers a refusal of enforcement; rather, courts assess the extent to which such a conflict impairs the essence of justice or fundamental values governing commercial transactions. This judicial trend reflects a commitment to supporting the efficacy of arbitration and avoiding its unwarranted obstruction.

Moreover, the judiciary demonstrates procedural flexibility in certain instances by distinguishing between different parts of the arbitral award. It may grant execution to portions that do not contravene fundamental rules while severing or disregarding the non-compliant sections. This approach mitigates the adverse practical ramifications of a total refusal of enforcement and enhances the stability of commercial transactions.

Concurrently, the judiciary accords due weight to the circumstances and nature of the dispute, particularly in international cases, where it may accommodate global commercial considerations without abandoning core statutory safeguards. This demonstrates an ongoing effort to harmonize legal openness with the preservation of localized value specificities (Shabat, 2026).

Consequently, the judicial stance is characterized by caution and equilibrium, seeking to safeguard public policy without sacrificing the viability of arbitration, thereby reinforcing institutional trust and systemic stability.

Subsection II: Mechanisms for Harmonizing Commercial Arbitration with Islamic Rules

Achieving harmony between the requirements of commercial arbitration and Islamic rules is a pragmatic necessity to ensure the efficacy and stability of the arbitration system, particularly within legal environments predicated upon a Sharia framework. This harmonization is not confined to the post-award enforcement stage; rather, it should commence at the inception of the contractual relationship and span all phases of the arbitral process, thereby reducing the likelihood of conflict and enhancing the award's enforceability (Miri, 2026).

Among the prominent mechanisms facilitating this harmony is the parties' diligence, when drafting the arbitration agreement, to include clear clauses defining the legal and Sharia framework governing their relationship. This includes explicitly covenanting to exclude any transactions or provisions that might provoke suspicions of non-compliance with Islamic rules (Aqil & Qala'a, 2023). This proactive approach directs the arbitral tribunal from the outset toward rendering an award that aligns with these parameters, minimizing subsequent legal complications.

Furthermore, the arbitral tribunal plays a vital role in this context by remaining cognizant of the legal environment where enforcement will be sought, ensuring that rules are interpreted and applied in a manner that avoids collision with core domestic principles. This manifests in

the prudent assessment of damages, the careful drafting of the dispositive part of the award (*dispositif*), and the avoidance of elements that are problematic under Sharia, while simultaneously upholding equity between the parties.

Additionally, leveraging specialized expertise is of paramount importance. This can be achieved either by appointing arbitrators well-versed in Sharia dimensions or by retaining experts when necessary, thereby elevating the qualitative soundness of the arbitral award and minimizing the prospects of setting-aside or enforcement challenges.

The judiciary further reinforces this harmony by adopting a flexible and balanced approach toward the concept of public policy, ensuring it is not deployed as a tool to impede the enforcement of awards except in cases of material non-compliance. This approach fosters confidence in arbitration and encourages its utilization without the apprehension of enforcement rejection based on formalistic or non-material grounds.

Accordingly, reconciling commercial arbitration with Islamic rules demands the concerted efforts of the parties, the arbitral tribunal, and the judiciary within an integrated vision. This vision must respect Sharia particularities without impairing the mandates of modern commerce, thereby guaranteeing an effective and balanced arbitral system.

The legal experience in the United Arab Emirates reveals a clear trajectory toward supporting the commercial arbitration system and maximizing its efficacy, a trend reflected in the meticulous regulation of the enforcement mechanism for arbitral awards within a modern framework aligned with international standards. Federal Law No. (6) of 2018 on Arbitration consecrated the principle of respecting the binding force of arbitral awards, assigning the judiciary a circumscribed supervisory role restricted to verifying formal compliance without reviewing the merits of the dispute. Consequently, an award is executed after being granted executory force (*exequatur*) by the competent court.

This statutory framework reaffirms that enforcement is the general rule, while the refusal of enforcement remains a narrow exception, invoked only under specific statutory grounds, including public policy violations. This orientation reflects the UAE legislator's desire to strike a balance between supporting arbitration as an expeditious and effective alternative dispute resolution mechanism and maintaining a baseline of judicial oversight to guarantee the integrity of awards and prevent their collision with core legal tenets.

Conversely, adherence to Islamic rules remains structurally embedded within the concept of public policy, which serves as one of the primary constraints on the enforcement of arbitral awards, given that Islamic Sharia is a principal source of legislation in the UAE. This manifests in the judiciary's authority to withhold enforcement if an award contains elements violating Sharia principles—such as usurious interest (*riba*) or transactions grounded in unconscionable uncertainty (*gharar*)—as these touch upon the foundational values of the legal order.

Nevertheless, this commitment is not applied rigidly; rather, it operates within a paradigm of balance and flexibility, ensuring that enforcement is denied only when the conflict is material and compromises the integrity of justice. This underscores the UAE legislator's endeavor to

align the provisions of Islamic Sharia with the prerequisites of international commercial arbitration, adopting a approach that guarantees respect for value-driven particularity without diminishing the efficacy of arbitration or adversely affecting the stability of commercial transactions.

Conclusion

This study demonstrates that the enforcement of arbitral awards in commercial disputes represents the decisive phase in the arbitration system, wherein its overall efficacy and capacity to realize justice and contractual stability are manifested. The research illustrates that this stage is not merely a collection of formalistic procedures, but rather involves nuanced legal and normative dimensions, particularly given the intersection between the requirements of modern commercial arbitration and rules derived from Islamic Sharia.

Furthermore, the primary challenge lies in achieving a delicate balance between openness to international practices underpinning arbitration and preserving the legislative particularity rooted in an Islamic reference frame. This equilibrium cannot be achieved by privileging one imperative over the other, but rather through the adoption of a flexible methodology that evaluates the specificities of each case, distinguishing between material non-compliance that infringes upon public policy and formal variance that leaves the core of justice unaffected.

The findings indicate that the judiciary performs a pivotal role in this domain through its supervision over the enforcement of arbitral awards, striving to protect public policy without divesting arbitration of its standard commercial utility a posture that reinforces institutional confidence in the system. Equally vital is the role of the parties and the arbitral tribunal, who can preempt numerous complications prior to the enforcement stage through precise drafting and a comprehensive understanding of the host legal environment.

This research makes a significant theoretical contribution to the growing body of scholarship on commercial arbitration by advancing an integrated analytical framework that reconciles contemporary arbitration principles with the normative foundations of Islamic Sharia. While existing studies frequently address either the procedural aspects of arbitral award enforcement or the influence of Sharia on dispute resolution, this study bridges these domains by examining how enforcement mechanisms can operate effectively within a legal system that simultaneously embraces international commercial standards and religiously grounded legal principles. In doing so, the study enriches the theoretical discourse on legal pluralism, demonstrating that the relationship between international arbitration norms and Islamic legal values is not inherently contradictory but can be harmonized through context-sensitive judicial interpretation and balanced legislative approaches.

From a contextual perspective, the study contributes to a deeper understanding of the practical challenges facing jurisdictions that seek to position themselves as arbitration-friendly environments while maintaining fidelity to Islamic legal identity. The findings provide valuable insights for policymakers, judges, arbitrators, and commercial actors operating within such jurisdictions by identifying the legal and institutional mechanisms capable of ensuring both enforceability and compliance with public policy considerations derived from Sharia. Furthermore, the study offers a model that may guide legislative reforms and judicial practice in other Muslim-majority countries encountering similar tensions between

globalization and legal particularism. Consequently, the research contributes not only to academic knowledge but also to the development of more effective and culturally legitimate arbitration systems capable of enhancing commercial certainty, investor confidence, and the rule of law in contemporary Islamic legal contexts.

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