

## ***Zakat* Institutions and Management: A Comparison of *Zakat* Models, Types, and Arrangements in Middle Eastern Countries and Indonesia**

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### **ABSTRACT**

This research aims to dissect and comparatively analyze the institutional models and management of *Zakat* in Middle Eastern countries—especially Saudi Arabia, the United Arab Emirates (UAE), Kuwait, Qatar, and Egypt—alongside Indonesia. It employs a descriptive qualitative method through a juridical-comparative approach. The study identifies three dominant typologies in global *Zakat* governance for 2025: a Fiscal-Mandatory Integration Model in Saudi Arabia, where *Zakat* is fully integrated into the state tax system under ZATCA, achieving high compliance through automated e-invoicing; a Digital-Regulatory Model in the UAE and Qatar, which centralizes management via a national platform powered by AI and blockchain to transparently handle crypto and investment assets; and a Pluralistic-Coordinated Model in Indonesia and Egypt, which preserves community and institutional autonomy while coordinating through unified national data systems such as "One *Zakat* Data" to prevent overlapping distribution. Crucially, technology has transitioned from an auxiliary tool to the core of *Zakat* management, effectively minimizing information asymmetry between donors (*muzaki*) and recipients (*mustahik*). The integration of national data with AI scoring in the UAE, along with automated payroll deductions in Indonesia and Saudi Arabia, illustrates how *Zakat* has evolved into an efficient, transparent, and accountable mechanism for poverty alleviation. This study concludes that despite differing regulatory approaches—from mandatory to voluntary—a global convergence is emerging toward professional, transparent, and technology-driven *Zakat* management. It highlights the need for policymakers to synchronize data across institutions and standardize digital asset calculations, thereby optimizing *Zakat's* potential as a future driver of public welfare.

**Keywords:** *Zakat* institution, *Zakat* management, middle east, indonesia, 2025 regulations, digital economy, fiscal integration.

### **INTRODUCTION**

Entering 2025, the global sharia economic landscape is undergoing a fundamental transformation driven by the integration of financial technology and the repositioning of Islamic philanthropic instruments as a pillar of macroeconomic stability (Al-Mubarak et al., 2021; Menne et al., 2022; Zarkasi & Hariyanto, 2024). *Zakat*, as one of the pillars of Islam that has a transcendental and socio-economic dimension, is no longer managed in a traditional-charitable manner but has been transformed into an integral part of the Sustainable Development Goals (SDGs) in various Muslim countries (Ahmed Shaikh & Ghafar Ismail, 2017; Arwani et al., 2025; Gunawan & Rusydiana, 2023; Sa'adah & Hasanah, 2021). In the global context, *Zakat* is seen as a preventive solution amid post-pandemic economic uncertainty and geopolitical turmoil that affect the purchasing power of vulnerable people. As noted in the *Islamic Social Finance Report 2025*, the effectiveness of *Zakat* as an instrument for poverty alleviation depends heavily on the strength of institutional architecture, governance transparency, and regulatory support that can adapt to the dynamics of the digital economy (World Bank & IDB, 2025). The difference in approach between countries in the Middle East,

which tends to be centralistic, and Indonesia, which is pluralistic, provides a broad spectrum of studies on how sharia values are implemented in modern public policy.

The massive digital transformation in 2025 has given birth to new challenges as well as opportunities in *Zakat* management, especially related to the emergence of digital assets such as cryptocurrencies, non-fungible tokens (NFTs), and investment portfolios based on blockchain technology. *Zakat* institutions are currently required to have technical competence equivalent to conventional financial institutions to ensure the accuracy of the calculation of *nishab* and *haul* on assets that have high volatility. In several developed countries such as the United Arab Emirates (UAE) and Saudi Arabia, the use of artificial intelligence (AI) to perform *mustahik* scoring and the automation of collection through electronic invoices have become an operational standard. This shift marks the end of the era of manual-based *Zakat* management and the beginning of the era of *Zakat*-Tech, which prioritizes efficiency, accountability, and real-time traceability of funds. According to Hassan and Lewis (2023), the convergence between sharia compliance and technological innovation is the main key to increasing *muzaki* (*Zakat* payers') trust in this era of highly open information transparency.

In the Middle East region, especially the countries that are members of the Gulf Cooperation Council (GCC), the institutional model of *Zakat* shows a very strong tendency to formalize under the control of state authorities. Saudi Arabia, through the *Zakat*, Tax and Customs Authority (ZATCA), has integrated *Zakat* into the national fiscal system, making it a mandatory obligation backed by the country's legal force (ZATCA, 2025). This approach is in stark contrast to neighboring countries such as Kuwait and Qatar which, despite having state institutions, still maintain a voluntary nature in the collection of *Zakat* for individuals but impose specific regulations for the corporate sector. The dynamics in the Middle East reflect how *Zakat* is used not only for domestic social assistance but also as an instrument of humanitarian diplomacy through the distribution of aid to conflict and disaster areas globally. This can be seen from the role of Kuwait *Zakat* House, which consistently synergizes *Zakat* funds with the United Nations international assistance program (Kuwait *Zakat* House, 2025).

On the other hand, Indonesia, as a country with the largest Muslim population in the world, offers a unique *Zakat* management model through a dual system. In contrast to the centralistic model in the Middle East, Indonesia allows broad community participation through the *Amil Zakat* Institute (LAZ) managed by mass organizations and foundations, under the supervision of the National *Amil Zakat* Agency (BAZNAS) as the state coordinator. Indonesian regulations through Law No. 23 of 2011 and the update of the BAZNAS Roadmap 2025–2030 seek to synergize this diversity into a single data infrastructure to avoid overlapping fund disbursements (BAZNAS RI, 2025). Indonesia's vast geographical challenges and diverse sociodemographic conditions demand decentralized but digitally connected *Zakat* management. Indonesia's success in implementing *Zakat* as a reduction in taxable income and optimizing professional *Zakat* in the ASN and SOE sectors is an interesting reference for other countries on how religious instruments can synergize with national economic policies without losing the spirit of partnership with civil society (Sulaeman & Adnan, 2024).

Despite significant progress, disparities in the arrangement and collection mechanisms between the Middle East and Indonesia still leave crucial room for academic debate, especially regarding the effectiveness of mandatory (legally mandatory) and voluntary systems. In addition, the regulation regarding the types of *mal Zakat* on contemporary assets still lacks

uniform international standardization, which often confuses *muzaki* who have cross-border assets. Therefore, this study aims to conduct a detailed comparative analysis of the institutional models, types of assets, and regulatory mechanisms of *Zakat* management in Saudi Arabia, Kuwait, UAE, Qatar, Egypt, and Indonesia in 2025. By identifying best practices and governance typologies across these regions, this research seeks to provide strategic insights and actionable recommendations to strengthen the effectiveness, transparency, and inclusiveness of *Zakat* systems globally. The findings of this study are expected to benefit policymakers, *Zakat* institutions, and Islamic economic stakeholders by offering a framework for harmonizing regulations, enhancing digital integration, and maximizing the socio-economic impact of *Zakat* as a sustainable instrument for poverty alleviation and social welfare.

## METHOD

This research was conducted using a descriptive qualitative method that aims to provide an in-depth picture of the reality of *Zakat* management in the field in 2025. The approach used is a comparative study, where researchers do not only collect data from one country, but compare *Zakat* management policies and practices in Saudi Arabia, the United Arab Emirates (UAE), Kuwait, Qatar, Egypt, and Indonesia. The selection of these countries is carried out deliberately (purposive) because each country represents a different system; Starting from a system that is integrated with state taxes to a system that is managed in a mutual cooperation by the community. This is strengthened by the view of Sulaeman & Adnan (2024) who stated that cross-country comparisons are very important to find the best pattern in managing the people's funds in the midst of the rapid development of digital technology.

The data collection process is carried out through document studies or literature research, where researchers rely on official sources published by the government and *Zakat* institutions of each country until the period of 2025. The main data is taken from the latest laws and regulations, such as the UAE Federal Law No. 4 of 2025 concerning the National *Zakat* Platform, the Amendment to the 2025 Saudi Arabia ZATCA Regulation, and the BAZNAS Indonesia Roadmap 2025-2030 (BAZNAS RI, 2025; ZATCA, 2025). In addition to legal documents, the researchers also used data from the annual reports of international financial institutions and the latest Islamic economic journals to ensure that the information analyzed included current phenomena, such as the use of artificial intelligence (AI) in calculating *Zakat* of digital assets or cryptocurrencies.

After all the data is collected, the next step is to conduct an in-depth content analysis. The researcher divided the data into several large groups, namely the organizational structure of the institution, how to collect funds, the method of distribution to people in need, and the legal rules that bind them. The data is then juxtaposed with each other to see where the similarities lie and what are the striking differences between the countries. This analysis technique follows the comparative logic described in the World Bank & IDB report (2025), where each policy is evaluated based on its effectiveness in reaching the poor. The final result of this analysis is a synthesis that summarizes the advantages of each model, so that it can be a valuable input for the improvement of the *Zakat* management system in the future.

## RESULT AND DISCUSSION

### Overview of *Zakat* Institutions in Middle Eastern Countries and Indonesia

*Zakat* institutions and management in Middle Eastern countries (Saudi Arabia, United Arab Emirates, Kuwait, Qatar, and Egypt) and Indonesia by 2025 show a strong convergence towards digital governance (e-governance), although each country maintains a different regulatory model according to their political and economic ideologies. In general, this ecosystem is divided into a centralized mandatory-fiscal model, a digital-regulatory model, and a dual coordination model. Here is a detailed description of the model comparison, its types, and settings:

### **1. State and Fiscal Integration Model (Mandatory): Saudi Arabia**

In Saudi Arabia, *Zakat* institutions reach the highest point of integration with the state financial system through ZATCA (*Zakat*, Tax and Customs Authority). Based on the ZATCA 2025 Regulation, *Zakat* is managed as a mandatory instrument for all Saudi citizens and business entities owned by Saudi/GCC citizens. The management uses the Fatoora system (electronic invoice) which automatically calculates *Zakat* obligations of 2.5% based on digital financial statements. The latest arrangement in 2025 places an emphasis on Real Estate *Zakat* for ongoing development projects, where *Zakat* is collected based on the market value of the asset to fund national social security centrally (ZATCA, 2025; World Bank & IDB, 2025).

### **2. Centralistic Digital Authority Model: United Arab Emirates (UAE) and Qatar**

The UAE is leading the digital transformation through the ratification of Federal Law No. 4 of 2025 regarding the National *Zakat* Platform. Institutions in the UAE are centralized on a single digital platform managed by the federal *Zakat* Fund, which serves as both a regulator and a collector. *Zakat* management here is very progressive by including Digital Asset *Zakat* (Crypto and global investments) which is calculated using AI algorithms to overcome market volatility. In Qatar, the *Zakat* Affairs Department under the Ministry of Awqaf promotes a strategic voluntary model with a focus on human capital. The arrangement in Qatar in 2025 strongly prioritizes accountability through a blockchain system to track the distribution of *Zakat* for medical assistance and higher education (UAE Ministry of Justice, 2025; Qatar Ministry of Awqaf, 2025).

### **3. Hybrid Model and Religious Autonomy: Kuwait and Egypt**

The model in Kuwait and Egypt highlights the role of autonomous institutions that have very strong religious legitimacy in the eyes of the public. Kuwait *Zakat* House (Baituz Zakah) functions autonomously under the supervision of the Minister of Islamic Affairs, with special rules (Law No. 46/2006) that require public companies to deposit 1% of profits for *Zakat* or social contributions. Meanwhile, in Egypt, the institution of *Zakat* is dominated by Bait al-*Zakat* wa al-Sadaqat which is directly under the supervision of the Grand Imam of Al-Azhar (based on Law No. 123/2014). Management in these two countries in 2025 focuses on massive social projects and international humanitarian assistance, making it the most active *Zakat* management model in global social diplomacy (Kuwait *Zakat* House, 2025; Al-Azhar Report, 2025).

### **4. Dual-System Coordination Model: Indonesia**

Indonesia implements the most unique *Zakat* management model by involving the role of the state (BAZNAS) and civil society (LAZ). Based on Law No. 23 of 2011, the institution of *Zakat* is decentralized but coordinated nationally. By 2025, Indonesia will successfully implement the One *Zakat* Data (SIMBA) system that synchronizes muzaki and mustahik data at all levels of institutions. The most prominent types of *Zakat* are Income *Zakat* collected

through an automatic payroll deduction mechanism for civil servants and formal sector employees, as well as the development of productive *Zakat* through microeconomic empowerment that is integrated with national poverty data (BAZNAS RI, 2025; Sulaeman & Adnan, 2024).

**Table 1. Summary of Institutional Comparison Analysis By Country**

Country	Institutional Model	Nature of Levy	Key Regulations	Focus Management
Saudi Arabia	Tax Integration (ZATCA)	Mandates	<i>Zakat</i> By laws 2025	National Social Security
UEA	Platform Digital Federal	Volunteer/Regulated	Federal Law 4/2025	AI & Asset Digital (Crypto)
Kuwait	Autonomy ( <i>Zakat</i> House)	Hybrid Corporation	(1% Law No. 46 of 2006	Global & Local Assistance
Qatar	Ministry Departments	Volunteer	National Vision 2030	Education & Medical
Egypt	Al-Azhar & Nasser Bank	Volunteer	Law No. 123 of 2014	Social Mega-Projects
Indonesia	Dual-System (BAZNAS-LAZ)	Volunteer/Payroll	Law No. 23 of 2011	Economic Empowerment

Source: Compiled from regulatory documents and institutional reports from ZATCA (2025), UAE Ministry of Justice (2025), Kuwait *Zakat* House (2025), Qatar Ministry of Awqaf (2025), Al-Azhar Report (2025), and BAZNAS RI (2025)

### 1. Saudi Arabia: Mandatory Fiscal Integration Model

- a. The Institutional Model of Saudi Arabia applies the Centralistic-Mandatory model. The management of *Zakat* is fully carried out by the state through ZATCA (*Zakat*, Tax and Customs Authority). Since the merger of *Zakat* and tax authorities, *Zakat* has been managed professionally like a state fiscal instrument but with strict sharia compliance.
- b. Types and Mechanisms of Assembly
  - Nature: Mandatory for Saudi and GCC citizens, as well as the companies they own.
  - Mechanism: Using the Fatoora system (e-invoicing). By 2025, the collection will be integrated in real-time with the company's digital financial statements. ZATCA also tightens the collection of *Zakat* on investment assets and off-plan sales property projects.
- c. The mechanism of distributing *Zakat* funds is managed in a special account that is separate from taxes. ZATCA distributes the funds directly to the Ministry of Human Resources and Social Development for social security programs to help the poor and vulnerable groups.
- d. Regulation
  - ZATCA 2025 Regulation Amendment: Focus on harmonizing *Zakat* calculations for the real estate sector and digital economy.
  - Saudi Vision 2030: Placing *Zakat* as the main pillar of national social security.

### 2. United Arab Emirates (UAE): Digital-Regulatory Model

- a. The UAE Institutional Model uses a Centralistic-Digital model. Management is carried out by the federal *Zakat* Fund (Shunduq al-*Zakat*). The year 2025 will be a turning point where this institution transforms into the control center of the national digital platform.
- b. Types and Mechanisms of Assembly
  - Nature: Voluntary, however its collection is strictly regulated by the state.
  - Mechanism: Based on Federal Law No. 4 of 2025, all collections are carried out through the National *Zakat* Platform. This platform uses AI-*Zakat* Calculator which is able to calculate *Zakat* on crypto assets, global stocks, and gold automatically.
- c. Distribution Mechanism Using the AI system Mustahik Scoring. Recipient data is integrated with national identity authorities and health insurance to ensure targeted assistance. Distribution is carried out non-cash through a special digital wallet.
- d. Regulation
  - Federal Law No. 4 of 2025: The latest regulation prohibits non-governmental institutions from collecting *Zakat* digitally without a license from national platforms to prevent fraud and illegal funding.

### 3. Kuwait: Hybrid Autonomous Model

- a. The Kuwait Institutional Model applies a Hybrid-Autonomous model. It is managed by Kuwait *Zakat* House (Baituz Zakah), a government agency that has extensive administrative and financial autonomy, led by a council of sharia and economic experts.
- b. Types and Mechanisms of Assembly
  - Properties: Mixed. It is mandatory for listed companies of 1% of net profit according to Law 46/2006, and voluntary for individuals..
  - Mechanism: Through an integrated mobile app, branch offices spread across residential areas, as well as automatic deduction on certain stock dividends for registered muzaki.
- c. Distribution Mechanism Has Local and International Reach. Domestically, focus on housing and health assistance. Abroad, Kuwait *Zakat* House in 2025 strengthens partnerships with international agencies such as UNHCR to distribute *Zakat* to refugees in conflict areas.
- d. Regulation
  - Law No. 46 of 2006: Obligation to contribute company profits.
  - ISO 2025 Standard: Implementation of international quality management in the accountability of *Zakat* fund distribution.

### 4. Qatar: Strategic & High-Net-Worth Philanthropy Model (Advanced)

- a. The institutional model is government-led voluntary. The management of *Zakat* in Qatar is carried out centrally by the *Zakat* Affairs Department (formerly Qatar *Zakat* Fund) which is under the auspices of the Ministry of Awqaf and Islamic Affairs. This institution functions as an official state facilitator for muzaki (*Zakat* payers) without any legal coercion.
- b. Types and Mechanisms of Assembly
  - Voluntary: There are no legal obligations for individuals or companies, but the state provides a very massive payment infrastructure.

- Mechanism: Corporate *Zakat* Audit: Qatar expands free audit services for large companies to calculate their *Zakat* obligations based on annual financial statements.
  - Digital Seamless Payment: The use of the "*Zakat* Qatar" application which is integrated with the national banking system and SMS payments through local operators (Ooredoo & Vodafone).
  - Private Consulting Services: *Zakat* expert visits to homes or offices are available for High-Net-Worth individuals to calculate their global assets.
- c. Distribution Mechanism
- Education & Medical Focus: By 2025, Qatar prioritizes the distribution of tuition assistance for underprivileged foreign students at Education City and medical assistance for chronic diseases at Hamad Medical Corporation.
  - Validation System: Using data integration with the Ministry of Social Affairs to ensure there is no overlap of assistance.
- d. Regulation
- Emiri Decree No. 45 of 2005: Establishes the structure of the Department of *Zakat* Affairs.
  - Qatar National Vision 2030: Directing *Zakat* as an instrument to support social welfare and human development at the local level.

## 5. Egypt: Pluralistic Model & Autonomous Institutions

- a. The institutional model is pluralistic/hybrid (decentralized & diverse). In contrast to the centralized Gulf states, Egypt has two main pillars that are state-supported but have very strong autonomy:
1. Nasser Social Bank: The first institution to officially administer *Zakat* under the Ministry of Social Solidarity.
  2. Bait al-*Zakat* wa al-Sadaqat al-Misri (Egyptian *Zakat* and Charity House): Directly under the supervision of the Grand Imam of Al-Azhar, which has become very dominant since 2014.
- b. Types and Mechanisms of Assembly
- Massive Voluntary: *Zakat* is voluntary, but Egypt has the highest level of public participation in the region due to the religiosity factor of Al-Azhar.
  - Mechanism: Omnichannel Collection: *Zakat* withdrawals are made through thousands of Nasser Social Bank branches, ATM machines, Al-Azhar portals, to retail payment networks such as Fawry.
  - Professional *Zakat*: Many state and private institutions facilitate voluntary salary deductions from employees to be deposited into Al-Azhar *Zakat* House.
- c. Mekanisme Penyaluran
- Strategic Projects (Mega-Projects): In addition to monthly assistance (cash transfers) to millions of poor families, Al-Azhar *Zakat* House in 2025 focuses on housing development for the underprivileged and the provision of clean water in remote villages.
  - Health Services: Distribution of large amounts of *Zakat* funds to support the operation of national cancer and heart disease hospitals.
- d. Regulation

- Law No. 66 of 1971: Legal basis for the establishment of Nasser Social Bank to manage *Zakat*.
- Law No. 123 of 2014: A special law establishing Bait al-*Zakat* wa al-Sadaqat under the supervision of the Grand Imam of Al-Azhar, which gives Al-Azhar broad authority to raise and distribute funds independently of the ministry's bureaucracy.

## 6. Indonesia: Coordinated Dual-System Model

- a. The Indonesian Institutional Model applies the Coordinated Decentralization (Dual-System) model. It consists of BAZNAS (National Amil *Zakat* Agency) as the state coordinator and LAZ (Amil *Zakat* Institution) established by community organizations.
- b. Macam dan Mekanisme Penghimpunan
  - Nature: Voluntary in general, but semi-mandatory for ASN through presidential instructions related to salary deduction (payroll deduction).
  - Mechanism: Digital Omnichannel. The collection is carried out through QRIS, an e-commerce platform, banking application, and the BAZNAS portal which by 2025 will be connected to the One *Zakat* Data system.
- c. The Distribution Mechanism Focuses on Productive Economic Empowerment. In addition to consumptive assistance, Indonesia excels in programs such as ZMart (mustajik stalls), educational scholarships, and healthy houses. The distribution is based on Regsosek (Socio-Economic Registration) data to ensure accuracy.
- d. Regulation
  - Law No. 23 of 2011 concerning *Zakat* Management.
  - BAZNAS Roadmap 2025-2030: Focus on standardizing national digital reporting and strengthening digital offices in all regions.

## Comparative Analysis of *Zakat* Governance

The first very striking comparison lies in who holds the main authority or control in the management of *Zakat*. On the one hand, Saudi Arabia applies a very strict model where *Zakat* is considered part of the country's fiscal obligations managed by ZATCA (*Zakat*, Tax and Customs Authority). In this system, *Zakat* is mandatory for citizens and local companies, so that its collection has very strong legal certainty like taxes (Al-Saudi ZATCA, 2025). This condition is very different from Indonesia which adopts a dual-system coordination model. In Indonesia, the government through BAZNAS acts as a coordinator, but the state still provides a large space for the community to establish the Amil *Zakat* Institute (LAZ). This Indonesian model is considered more democratic and inclusive because it combines the power of government regulation with the spirit of mutual cooperation of civil society (BAZNAS RI, 2025; Sulaeman & Adnan, 2024). Meanwhile, countries such as Kuwait and Egypt are in the middle by relying on autonomous institutions such as Kuwait *Zakat* House or Al-Azhar which have administrative independence but are still fully supported by state legitimacy (Kuwait *Zakat* House, 2025).

In terms of technology utilization, there will be extraordinary competition for innovation in 2025 to create the most transparent and efficient system. The United Arab Emirates (UAE) and Qatar are leading the way in the use of high-level technologies such as Artificial Intelligence (AI) and Blockchain. The UAE, through its national platform, uses AI

algorithms to automatically calculate *Zakat* on digital assets such as crypto, as well as accurately scans poverty data to determine who is most eligible to receive assistance (UAE Ministry of Justice, 2025). On the other hand, Indonesia is more focused on ease of access for the wider community (retail) through a digital omnichannel system. By using QRIS, banking applications, and marketplaces, Indonesia has succeeded in attracting millions of small-scale *Zakat* payers supported by the SIMBA (Satu Data *Zakat*) system to ensure that all incoming funds are recorded in real-time and transparently (BAZNAS RI, 2025). This difference shows that while Middle Eastern countries focus on infrastructure sophistication for large assets, Indonesia focuses on digitalization to reach people to remote villages (World Bank & IDB, 2025).

A very basic difference can be seen in the paradigm or final goal of distributing funds. Saudi Arabia and Egypt tend to use *Zakat* funds as a social safety net instrument or direct cash assistance to meet the basic needs of the poor such as food and daily health (Nasser Social Bank, 2025). However, Indonesia and Qatar have different visions, namely focusing on productive empowerment. Qatar directs its *Zakat* to build "human capital" through higher education scholarships and advanced medical facilities (Qatar Ministry of Awqaf, 2025). Indonesia has excellent programs such as the provision of business capital (productive *Zakat*) which aims to turn aid recipients (*mustahik*) into economically independent people, and even later become *Zakat* payers (*muzaki*). In addition, Kuwait highlights its international role by channeling most of its *Zakat* funds to global humanitarian assistance and cross-border refugees, making *Zakat* a tool for peace diplomacy (Kuwait *Zakat* House, 2025). Overall, this comparison shows that despite the different methods, all these countries are heading towards one common goal by 2025: to make *Zakat* a modern solution to poverty through data transparency and management professionalism (Hassan & Lewis, 2023).

## CONCLUSION

In 2025, *zakat* management has undergone a radical transformation into a sophisticated macroeconomic instrument, driven by digital technologies like AI for *mustahik* scoring in the UAE and blockchain for aid tracking in Qatar, alongside recognition of *zakat* on complex assets such as cryptocurrencies across sample countries. Saudi Arabia leads with a Fiscal-Mandatory Integration Model via ZATCA, fully embedding *zakat* in taxation for enforced compliance and social security, while the UAE and Qatar pioneer a voluntary Digital-Regulatory Model on unified platforms; in contrast, Indonesia and Egypt employ a Dual-System Model leveraging state-community collaboration, exemplified by Indonesia's "One Data *Zakat*" (SIMBA) initiative to harmonize institutions and curb distribution overlaps. These institutional differences shape collection and distribution efficiency, blending state regulation, religious legitimacy, and tech sophistication. For future research, scholars should explore standardized cross-border digital protocols and international *zakat* regulations to support *muzaki* with multi-jurisdictional assets, potentially through comparative simulations of hybrid models blending Indonesia's inclusivity with Middle Eastern fiscal rigor.

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