

Abstract

Specifics of Anglo-Saxon and Continental corporate governance

This thesis deals with the comparison of Anglo-Saxon and Continental approaches to corporate governance. Although the title of this thesis might evoke that the main theme of this thesis is a comparison of two different models of corporate governance, the basis for this work is the opposite. The author aims to make use of the comparison of selected corporate governance issues in the various legal systems of both the Anglo-Saxon and Continental models of corporate governance to find out how significantly the current Anglo-Saxon and Continental model of corporate governance differs, whether there is a convergence or divergence between these two models and whether it makes sense to divide legal systems' approaches to corporate governance on the basis of these two models or not anymore.

The thesis is divided into five (5) chapters, where the first chapter is a brief introduction to corporate governance issues followed by chapters dedicated to selected issues of corporate governance in joint-stock companies after. These four (4) main issues explored in the thesis are: the internal organization of the administrative bodies of joint-stock companies, the independence and objectivity of the corporation's administrative bodies, the liability of members of the administrative bodies of joint-stock companies and the remuneration of members of the administrative bodies of joint-stock companies.

The first chapter is purely analytical, summarizing the knowledge of the scientific literature devoted to this topic. The following chapters addressing the issues of corporate governance are based on the analysis of the question raised and the subsequent comparison of the main issues in the selected Anglo-Saxon and Continental legal systems. In the case of the Anglo-Saxon model, it is always the legal system of the United States of America and the United Kingdom of Great Britain and Northern Ireland; in the case of the continental model, it is always the legal system of Germany and the Czech Republic, in selected chapters supplemented by the legal system Italy or France.

The summary of the findings of the analysis of selected systems and the author's answer to the scientific questions set out in introduction to this work are summarized in the conclusion of this thesis.