

## **Comparative study of monitoring the manager's performance of joint stock companies by the institutions outside the company in the law of Iran and England**

**Mohsen GHANI** (PhD student of privacy law, law school of Tehran Center University)

### **Abstract**

The method of monitoring the manager's performance of joint stock companies in Iran's domestic law as well as France is in-company. Monitoring from outside of the company is an alien concept in Iran's domestic law except cooperatives that ministry of cooperatives monitors them. In contrast, In the British law system two methods of monitoring were predicted because monitoring assignment to shareholders failed to prevent managers' abuse. on one hand, monitoring of inside of the company and on the other hand monitoring from outside of the company, that happened by several government agencies such as ministry of trade and industry and the organization of the securities and these institutions are responsible for monitoring of corporate affairs and legislature tried to give them wide discretion including jurisdiction, in order to doing their assigned duties better. This paper attempts to analyze the developments of the company's inspection firm in the legal system of Iran and the United Kingdom.

### **Keywords:**

commercial companies' inspection, monitoring of inside of the company, monitoring of outside of the company, regulatory institutions.