FORM 4

obligations may continue. See Instruction 1(b).

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

| lashington, | D.C. | 20549 |
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STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP Check this box if no longer subject to Section 16. Form 4 or Form 5

| OMB APPF | ROVAL | | | | | | | | |
|--------------------------|-----------|--|--|--|--|--|--|--|--|
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Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934 or Section 30(h) of the Investment Company Act of 1940

| I | nd Address of I RAJEE | Reporting Person* | | | | | | | ACCE | | Symbol | | | heck all a | nip of Report oplicable) ector | ing Per | son(s) to Iss 10% Ov | | |
|---|---|--|--|----------------------------|----------------|---|-------|--|----------------------------------|-----------|---|---|---|---|---|---------------------------------------|--|--|--|
| (Last) | (Last) (First) (Middle) C/O ACCOLADE, INC. | | | | | 3. Date of Earliest Transaction (Month/Day/Year) 05/16/2024 | | | | | | | | | X Officer (give title below) Other (sp below) Chief Executive Officer | | | | |
| (Street) SEATTL | E W | Ά | 98101 | | 4. lf | f Amen | ndmen | t, Date | of Origir | al File | ed (Month/E | Day/Year) | | 6. Individual or Joint/Group Filing (Check Applicable Line) X Form filed by One Reporting Person Form filed by More than One Reporting Person | | | | | |
| (City) | (Si | | (Zip) | | | Rule 10b5-1(c) Transaction Indication Check this box to indicate that a transaction was made pursuant to a contract, instruction or written plan the satisfy the affirmative defense conditions of Rule 10b5-1(c). See Instruction 10. | | | | | | | | | | | that is intende | ed to | |
| 1. Title of Security (Instr. 3) | | 2. Transaction Date (Month/Day/Year) | | 2A. Deemed Execution Date, | | 3. Transaction Code (Instr. | | 4. Securities Acquired (A) Disposed Of (D) (Instr. 3, 4 | | ed (A) or | 5. Amount of Securities Beneficially Owned Following | | 6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4) | | 7. Nature of Indirect Beneficial Ownership | | | | |
| | | | | | | | Code | v | Amount | (A) o | r Price | | rted action(s) 3 and 4) | | | (Instr. 4) | | | |
| Common Stock | | | | 05/16 | 05/16/2024 | | | | M | | 933 | A | (1) | 7 | 749,252 | | D | | |
| Common Stock | | | 05/17 | 05/17/2024 | | | | S ⁽²⁾ | | 376 | D | \$7.2 | 73 7 | 18,876 | | D | | | |
| Common Stock | | | | | | | | | | | | | | (| 51,619 | 1,619 | | By Avanti Holdings, LLC ⁽³⁾ | |
| | | Т | able II - | | | | | | | | osed of convert | | | y Owne | d | | | | |
| 1. Title of Derivative Security (Instr. 3) | 2. Conversion or Exercise Price of Derivative Security | 3. Transaction Date (Month/Day/Year) | 3A. Deen Executio if any (Month/D | n Date, | Date, Transact | | | | 6. Date Expirati (Month/ | on Dat | | 7. Title a Amount Securitie Underlyi Derivativ (Instr. 3 a | of s ng e Security | 8. Price Derivati Security (Instr. 5) | e derivativ | re es ally g d tion(s) | 10. Ownership Form: Direct (D) or Indirect (I) (Instr. 4) | 11. Nature of Indirect Beneficial Ownership (Instr. 4) | |
| | | | | | Code | v | (A) | (D) | Date Exercisa | | Expiration Date | Title | Amount or Number of Shares | | | | | | |
| Restricted Stock Units | (4) | 05/16/2024 | | | М | | | 933 | (5) | | (5) | Common | 933 | (4) | 12,12 | 27 | D | | |

Explanation of Responses:

- 1. Each Restricted Stock Unit ("RSU") converted into one share of the Issuer's common stock.
- 2. The sale reported on this Form 4 represents shares sold by the Reporting Person to cover tax withholding obligations in connection with the vesting and settlement of RSUs. The sale was to satisfy tax withholding obligations to be funded by a "mandatory sell to cover" transaction and does not represent a discretionary transaction by the Reporting Person.
- 3. The Reporting Person is a partner of Avanti Holdings, LLC and has voting and investment power with respect to the securities held by Avanti Holdings, LLC.
- 4. Each RSU represents a contingent right to receive one share of the Issuer's Common Stock.
- 5. The shares subject to this RSU shall vest at a rate of twenty-five percent of the total number of shares on the one-year anniversary of June 16, 2021 (the "June 2021 Vesting Commencement Date") and 1/48th of the total number of shares each monthly anniversary of the June 2021 Vesting Commencement Date thereafter for so long as the Reporting Person provides continuous service to the Issuer, such that the total number of shares shall be fully vested on the four-year anniversary of the June 2021 Vesting Commencement Date.

/s/ Richard Eskew, Attorney-

05/20/2024

in-Fact

** Signature of Reporting Person

Date

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

- * If the form is filed by more than one reporting person, see Instruction 4 (b)(v).
- ** Intentional misstatements or omissions of facts constitute Federal Criminal Violations See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, see Instruction 6 for procedure.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB Number.