| FO | RM | 4 |
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| | Check this box if no longer subject to Section 16. Form 4 or Form 5 obligations may continue. See Instruction 1(b). |
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| Check this box to indicate that a |
|-------------------------------------------|
| transaction was made pursuant to a |
| contract, instruction or written plan for |
| the purchase or sale of equity |
| securities of the issuer that is |

| UNITED STATES | SECURITIES AI | ND EXCHANGE | COMMISSION |
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| | | | |

Washington, D.C. 20549

STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP

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

| OMB APPROVAL | | | | | | |
|--------------------------|-----|--|--|--|--|--|
| OMB Number: 3235-0287 | | | | | | |
| Estimated average burden | | | | | | |
| hours per response: | 0.5 | | | | | |

| | tisfy the affirmative tions of Rule 10b5-1(| .c). | | | | |
|-------------------------------------|---------------------------------------------|---------------------------------|----------------------------------------------------------------------------------------------|-------------------|-----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Name and Add <u>Cavanaugh</u> | ress of Reporting F <u>Robert N</u> | [°] erson [*] | 2. Issuer Name and Ticker or Trading Symbol <u>Accolade</u> , <u>Inc.</u> [ACCD] | (Check | ationship of Reporting Pe (all applicable) Director | 10% Owner |
| (Last) C/O ACCOLA | t) (First) (Middle) ACCOLADE, INC. | | 3. Date of Earliest Transaction (Month/Day/Year) 01/10/2025 | V | Officer (give title below) Preside | Other (specify below) nt |
| (Street) SEATTLE | WA | 98101 | 4. If Amendment, Date of Original Filed (Month/Day/Year) | 6. Indiv Line) | vidual or Joint/Group Fili Form filed by One Re Form filed by More th | eporting Person |
| (City) | (State) | (Zip) | | | Person | , and the second s |

Table I - Non-Derivative Securities Acquired, Disposed of, or Beneficially Owned

| 1. Title of Security (Instr. 3) | 2. Transaction Date (Month/Day/Year) | 2A. Deemed Execution Date, if any (Month/Day/Year) | | | 4. Securities Acquired (A) or Disposed Of (D) (Instr. 3, 4 and 5) | | | 5. Amount of Securities Beneficially Owned Following Reported | 6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4) | 7. Nature of Indirect Beneficial Ownership (Instr. 4) |
|---------------------------------|--------------------------------------------|-------------------------------------------------------------|-------------------------|---|-------------------------------------------------------------------------|---------------|---------------------------|---------------------------------------------------------------------------|-------------------------------------------------------------------|-------------------------------------------------------------------|
| | | Code | | v | Amount | (A) or (D) | Price | Transaction(s) (Instr. 3 and 4) | | (1150.4) |
| Common Stock | 01/10/2025 | | М | | 710 | Α | \$0 ⁽¹⁾ | 215,021 | D | |
| Common Stock | 01/13/2025 | | S ⁽²⁾ | | 256 | D | \$6.879 | 214,765 | D | |

Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned

(e.g., puts, calls, warrants, options, convertible securities)

| 1. Title of Derivative Security (Instr. 3) | 2. Conversion or Exercise Price of Derivative Security | 3. Transaction Date (Month/Day/Year) | 3A. Deemed Execution Date, if any (Month/Day/Year) | 4. Transa Code (8) | | of Deriv Secu Acqu (A) or Dispo of (D) | erivative (Month/Day/Year) scurities cardined) or sposed (D) str. 3, 4 | | and Amount of Securities Underlying Derivative Security (Instr. 3 and 4) | | | Owned | 10. Ownership Form: Direct (D) or Indirect (I) (Instr. 4) | 11. Nature of Indirect Beneficial Ownership (Instr. 4) | |
|-----------------------------------------------------|-----------------------------------------------------------------------|--------------------------------------------|-------------------------------------------------------------|------------------------------|---|----------------------------------------------------------|-------------------------------------------------------------------------------------------|---------------------|-----------------------------------------------------------------------------------------|-----------------|----------------------------------------|-------|--------------------------------------------------------------------------|--------------------------------------------------------------------|--|
| | | | | Code | v | (A) | (D) | Date Exercisable | Expiration Date | Title | Amount or Number of Shares | | | | |
| Restricted Stock Units | (3) | 01/10/2025 | | М | | | 710 | (4) | (4) | Common Stock | 710 | (3) | 3,554 | 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. Each RSU represents the contingent right to receive one share of the Issuer's common stock.

4. The shares subject to this RSU shall vest at a rate of one-third of the total number of shares on the one-year anniversary of June 10, 2022 (the "June 2022 RSU Vesting Commencement Date") and 1/36th of the total number of shares each monthly anniversary of the June 2022 RSU 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 three-year anniversary of the June 2022 RSU Vesting Commencement Date.

| /s/ Richard Eskew, Attorney- | 0 |
|------------------------------|----------|
| in-Fact | <u>u</u> |

01/14/2025

** 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.